



# Caritas Village Project Draft Environmental Impact Report

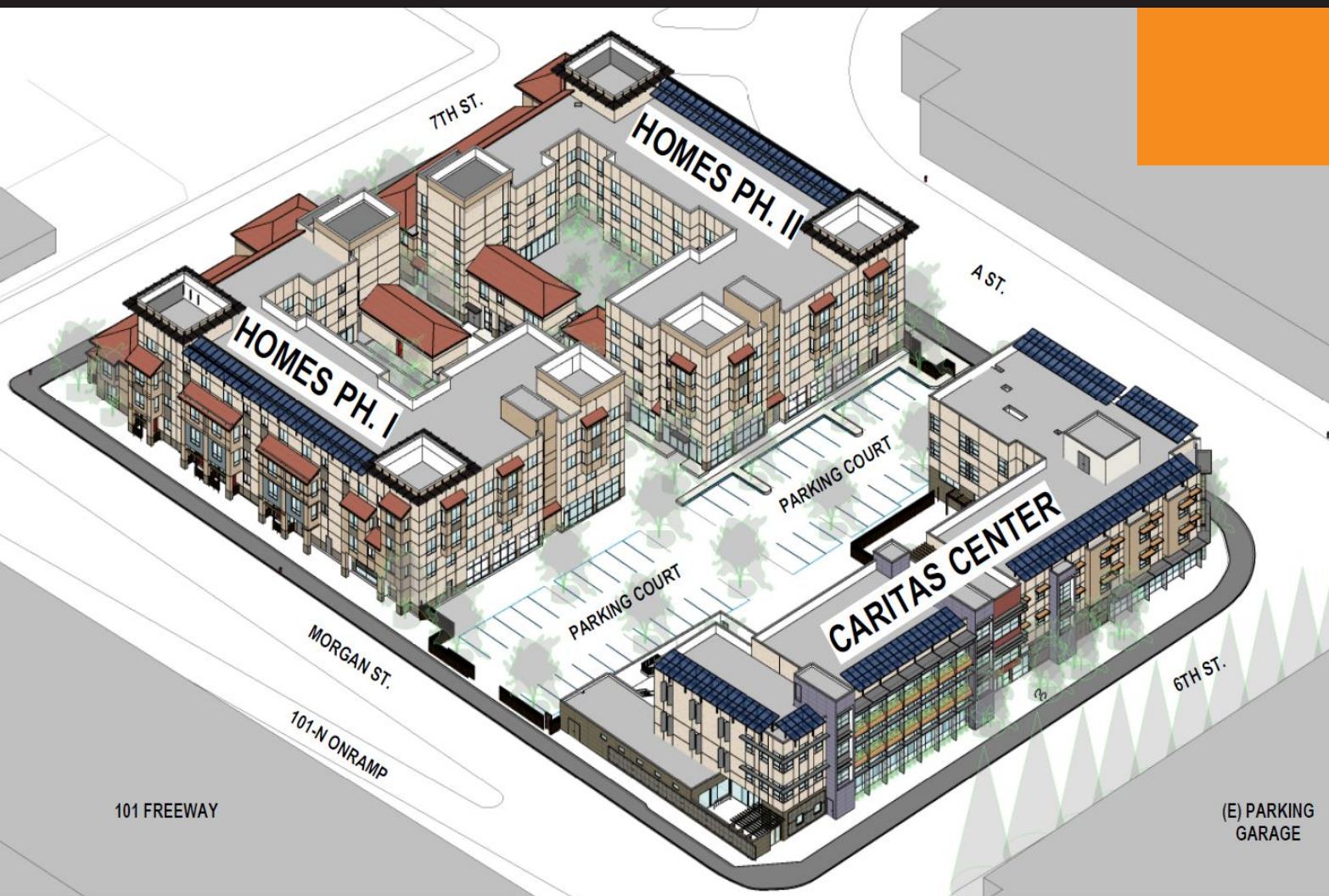
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**Prepared for:**

City of Santa Rosa  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, California 95404

**Prepared by:**

Stantec Consulting Services Inc.  
7502 N. Colonial, Suite 101  
Fresno, California 93711



(E) PARKING  
GARAGE



## EXECUTIVE SUMMARY

### ES.1 PROJECT LOCATION

The Caritas Village Project (project) is located at 431, 437, 439, 465 A Street, and 506, 512, 516, 520, 600, 608, and 612 Morgan Street in the City of Santa Rosa, Sonoma County. The project site is bordered by A Street, Morgan Street, 6<sup>th</sup> Street, and 7<sup>th</sup> Street. The project site is approximately 2.78 acres and comprises the following 15 Sonoma County Assessor Parcel Numbers:

|                          |                          |
|--------------------------|--------------------------|
| 010-041-001              | 010-041-014              |
| 010-041-004              | 010-041-015              |
| 010-041-005              | 010-041-016              |
| 010-041-008 (City owned) | 010-041-017              |
| 010-041-009 (City owned) | 010-041-018              |
| 010-041-010 (City owned) | 010-041-019 (City owned) |
| 010-041-011              | 010-041-020              |
| 010-041-013              |                          |

### ES.2 SUMMARY OF PROPOSED PROJECT

The project involves the construction of a full city-block of development that includes a comprehensive family and homeless support services facility (Caritas Center) to be operated by Catholic Charities of the Diocese of Santa Rosa (Catholic Charities) and an affordable housing development (Caritas Homes) to be operated by Burbank Housing Development Corporation (Burbank Housing). The Caritas Center would consolidate the existing onsite Family Support Center and Homeless Services Center into a single building that would provide emergency shelter, a navigation center, transitional housing, coordinated entry, wrap-around services, health services, and administrative offices. Caritas Homes would provide up to 126 permanent affordable housing units, plus two units for onsite managers. Other ancillary improvements include landscaping, roadway improvements, waterline improvements, and pedestrian walkways.

#### ES.2.1 Project Objectives and Approvals

##### City Objectives and Goals

The overarching goal of the proposed project is the orderly and systematic development of an integrated and sustainable residential community that is consistent with the goals and policies of the City of Santa Rosa General Plan and Downtown Station Area Specific Plan (Downtown Specific Plan) areas. A primary objective of this Downtown Specific Plan is to increase the number of residents and employees within walking distance of the existing SMART site through the intensification of land uses in the Plan Area.

##### Applicants Objectives and Goals

Catholic Charities and Burbank Housing have the following project objectives:



1. Construct new affordable housing and expanded homeless services predominately on land already owned by Catholic Charities.
2. Continue to provide homeless and family support services at their existing location because the purchase funding for these parcels require that these services be ongoing. Community Development Block Grants (CDBG) partially funded Catholic Charities' acquisition of its parcels. CDBG funding restrictions require Catholic Charities to operate a Family Support Center and Homeless Services Center *on the main part of the project site* for at least 55 years, beginning in 2015.
3. Continue to provide homeless and family support services at their existing location, because this is a known and familiar location for them. These services have been offered here since 1989, and the public is familiar with and expects these services to be offered at this location. Preserving homeless services at this location is of particular importance to maintain participant enrollment and for continuity of services, and ease of use by Catholic Charities' clients.
4. Since many of the service recipients and potential tenants do not own vehicles, construct the expanded center and housing within walking distance of the SMART Train Station and Transit Mall so clients and tenants have easy access to transportation to public services and jobs.
5. Provide onsite support services for residents of Caritas Homes.
6. Help as many people as practicable by developing the project site to the highest residential density allowed by the City's General Plan.
7. Develop transit and pedestrian-oriented affordable rental housing in downtown Santa Rosa within 0.25 mile of the SMART Train Station in Railroad Square and within 0.30 mile of Bus Route 1. Bus Route 1 is one of only two city routes that picks up passengers in 15-minute increments.
8. Reduce vehicle miles traveled by siting affordable rental housing at sites that can be developed with high densities near public transportation to reduce greenhouse gas emissions. This allows Burbank Housing to pursue state affordable housing and sustainable communities funding through the state's innovative cap-and-trade program. Qualifying sites for the program are rare in Sonoma County.

## Approvals

The following permits and approvals are required:

- General Plan Amendment
- Specific Plan Amendment – extend Courthouse Square Sub-Area
- Specific Plan Amendment – specify 80-foot diameter roundabouts at 6<sup>th</sup> and A Street and 7<sup>th</sup> and A Street intersections
- Rezoning of all parcels to Transit Village-Mixed Use (TV-M) zoning district
- Parcel Map creating three parcels
- Conditional use permit (CUP) to authorize emergency shelter and transitional housing
- Density bonus with three concessions
  - Removing development standard requiring 6-foot building step back for levels above the third floor
  - Remove the restriction of parking provided within 20 feet of the frontage
  - Remove the requirement for 80 percent of the street frontage to be located on the property line
- Parking reduction for Caritas Homes
- Housing allocation plan building height concession





- Design review
- Sign permit
- Right-of-way abandonment
- Tree removal permit
- Landmark alteration permit(s)
- Request for Reserve A allotments

### Responsible and Trustee Agencies

Under the California Environmental Quality Act (CEQA), a responsible agency is a public agency, other than the lead agency, that has responsibility to carry out or approve a project (Public Resource Code [PRC] Section 21069). A trustee agency is a state agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California (PRC Section 21070).

The following agencies may serve as responsible and/or trustee agencies:

- California Department of Transportation, District 4
- California State Office of Historic Preservation
- State Water Resources Control Board
- Regional Water Quality Control Board #1
- Bay Area Air Quality Management (BAAQMD)

## ES.3 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

The following are potential areas of controversy over the project.

- Demolition of historic structures
- Calls for service for police, fire and emergency services
- Biohazardous waste

Table ES-1, Executive Summary of Impacts and Mitigation Measures, summarizes the detailed discussion contained in Section 3, Environmental Impact Analysis, of this draft environmental impact report (Draft EIR).

## ES.4 DISAGREEMENT AMONG EXPERTS

This Draft EIR contains substantial evidence to support the conclusions presented herein. It is possible that there will be disagreement among various parties regarding these conclusions, although the City of Santa Rosa is not aware of any disputed conclusions at the time of this writing. Both the CEQA Guidelines and case law clearly provide the standards for treating disagreement among experts. Where evidence and opinions conflict on an issue concerning the environment, and the lead agency knows of these controversies in advance, the EIR must acknowledge the controversies, summarize the conflicting opinions of the experts, and include sufficient information to allow the public and decision-makers to make an informed judgment about the environmental consequences of the proposed project.



## ES.5 ALTERNATIVES TO THE PROPOSED PROJECT

The project alternatives and their potential impacts are discussed in Section 5, Alternatives Analysis, of this Draft EIR. As authorized under CEQA, the alternatives are discussed in less detail than the project. The no project alternative reflects a reasonably foreseeable view of the project site's future use.

### No Project Alternative (Alternative 1)

CEQA Guidelines Section 15126.6(e)(1) requires that the no project alternative be described and analyzed, "to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project." The no project analysis is required to discuss, "the existing conditions at the time the Notice of Preparation is published . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (Section 15126.6(e)(2)).

The no project alternative assumes that no additional development would occur on the project site.

This alternative would continue to use the existing structures on the project site to provide family and homeless support services. Catholic Charities has undertaken adaptive reuse of all the structures on this block for decades. The old hospital was repurposed and serves as the Family Service Center. Single-family homes along Morgan Street were repurposed to serve as the Navigation Center. Currently, an 2,554-square-foot single-family home serves as the Navigation Center for an average of 200 daily visits (325 max) and 1,090 clients per year.

While the no project alternative would avoid the significant and unavoidable impact to a historical resource as defined in §15064.5, it would not meet a majority of project objectives, including increasing services to homeless individuals and providing new, affordable permanent housing, some of which would be for people who have been or are at risk of homelessness.

### Site Redesign – Two Buildings/Reduced Footprint/Higher Density (Alternative 2)

The site redesign alternative would construct two separate buildings for Caritas Center and Caritas Homes. Construction adjacent to Morgan Street would be eliminated by reducing the Caritas Center footprint adjacent to Morgan Street and 6th Street and constructing a higher density single building for Caritas Homes along A Street. The acreage for each component would be approximately 0.75 acre. For analytical purposes, it was assumed that this alternative would provide approximately 75 percent of the square footage/housing units requested by the proposed project. Surface parking may be reduced or eliminated to allow the two building footprints to be conformed to the reduced footprint. Each of the buildings would be taller than the proposed project. Caritas Homes would be a minimum of four stories in height above the ground-level podium parking. Caritas Center would be four stories in height. This alternative would eliminate the demolition of structures adjacent to Morgan Street including the historic four-plex at 608 Morgan and the historic single-family home at 520 Morgan. The structures at 516 and 520 Morgan may continue to be used for transitional housing with constraints placed on the term of occupancy due to cancer risk impacts from air pollutants under long-term occupancy conditions. Other structures on Morgan may also to be used as site facilities such as offices or meeting space, but potential long-term occupancy would not be permitted due to the cancer risk from air pollutants. The site redesign alternative would reduce the significant and unavoidable impact to historical resources.



### **Partial Preservation (Alternative 3)**

The partial preservation alternative would involve the demolition of all structures on the project site except for the historic single-family home at 520 Morgan and the single-family home at 512 Morgan. 520 and 512 Morgan would be relocated to two vacant lots, 501 A Street (relocation site for 520 Morgan) and 507 A Street (relocation site for 512 Morgan) that have been used for a garden in the past and are under Catholic Charities' ownership. 507 A Street would be used as a residence, and 501 A Street would be used as administrative offices by Catholic Charities' staff. The partial preservation alternative would reduce the significant and unavoidable impact to historic resources by eliminating the demolition of the historic single-family home at 520 Morgan Street; however, the historic four-plex at 608 Morgan would still be demolished.

## **ES.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Table ES-1, Executive Summary of Impacts and Mitigation Measures, summarizes the potential environmental effects of the proposed project, the recommended mitigation measures, if applicable, and the level of significance after mitigation. Per CEQA Section 15093, should the project be approved as proposed, any impact noted in the summary as "significant" after mitigation would require the adoption of a statement of overriding considerations. As shown in Table ES-1, development of the proposed project would result in significant and unavoidable impacts. Therefore, a statement of overriding considerations would be required.

Additionally, CEQA requires public agencies to establish a mitigation monitoring and reporting program for the purpose of ensuring compliance with those mitigation measures identified in an EIR and/or adopted as conditions of approval in order to mitigate or avoid significant environmental impacts identified in an EIR. A mitigation monitoring and reporting program, incorporating the mitigation measures set forth in this document, will be adopted at the time of certification of the Final EIR.



Table ES-1 Executive Summary of Impacts and Mitigation Measures

| Impacts  | Mitigation Measures  | Level of Significance After Mitigation |
|--|--|--|
| <b>Section 3.1 – Aesthetics</b>  |  |  |
| <b>Impact AES-1</b> The proposed project would not conflict with applicable zoning and other regulations governing scenic quality. | No mitigation is necessary.  | Less Than Significant Impact.          |
| <b>Section 3.2 – Air Quality</b>   |  |  |
| <b>Impact AQ-1</b> The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.     | <p><b>MM AQ-1: Implement Construction Best Management Practices.</b> The applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by the BAAQMD to reduce fugitive dust emissions. Emission reduction measures will include, at a minimum, the following measures. Additional measures may be identified by the BAAQMD or contractor as appropriate:</p> <ul style="list-style-type: none"> <li>a) all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered two times per day;</li> <li>b) all haul trucks transporting soil, sand, or other loose material offsite will be covered;</li> <li>c) all visible mud or dirt track-out onto adjacent public roads will be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited;</li> <li>d) all vehicle speeds on unpaved roads will be limited to 15 miles per hour (mph);</li> <li>e) all roadways, driveways, and sidewalks to be paved will be completed as soon as possible. Building pads will be laid as soon as possible after grading unless seeding or soil binders are used; and</li> <li>f) idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of CCR). Clear signage shall be provided for construction workers at all access points.</li> <li>g) all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.</li> </ul> | Less Than Significant Impact           |



| Impacts   | Mitigation Measures  | Level of Significance After Mitigation |
|---|--|--|
|   | <p>h) a publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person will respond and take corrective action within 48 hours. The BAAQMD phone number will also be visible to ensure compliance with applicable regulations.</p> <p>i) substitute electrified equipment for diesel- and gasoline-powered equipment where practical.</p> <p><b>MM AQ-2: Minimize Exhaust Emissions.</b> Exhaust emissions shall be minimized during construction activities with the use of off-road equipment engines that meet or exceed CARB's Tier 3 or Tier 4 engine emissions standards for large (greater than 120 horsepower [hp]) off-road equipment. At a minimum, all welding rigs, dozers, and graders shall be certified as compliant with the Tier 4 engine emissions standards as provided in CCR, Title 13, section 2423(b)(1)(B). Engines can achieve these standards through the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, or other options as they become available.</p> |  |
| <p><b>Impact AQ-2</b> The proposed project could potentially result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).</p> | <p>None required.</p>  | <p>Less Than Significant Impact</p>    |
| <p><b>Impact AQ-3</b> The proposed project would not expose sensitive receptors to substantial pollutant concentrations.</p>  | <p>Implement MM AQ-1 and MM AQ-2.</p> <p><b>MM- AQ-3: MERV Filtration System Rating.</b> The applicant shall require that a MERV filter rating of 13 be used for the indoor air filtration system within both the Caritas Center and Caritas Home facilities.</p>  | <p>Less Than Significant Impact</p>    |



| Impacts  | Mitigation Measures  | Level of Significance After Mitigation |
|--|--|--|
| <b>Section 3.3 - Biological Resources</b>  |  |  |
| <b>Impact BIO-1</b> The proposed project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. | <p><b>MM BIO-1: Avoid Disturbance of Nesting Birds.</b> If project activities occur during the nesting season for native birds (February 1 to August 31), the following measures shall be implemented to avoid or minimize the potential for adverse impacts on nesting migratory birds and raptors:</p> <p>A pre-construction nesting bird survey for species protected by the MBTA and California Fish and Game Code will be conducted by a qualified biologist within a 250-foot radius of proposed construction activities for passerines and a 500-foot radius for raptors no more than 2 weeks prior to the start of construction activities.</p> <p>If an active nest is found, the qualified biologist will establish an appropriate no-work buffer around the nest, unless a smaller buffer zone is approved by CDFW. Construction within the no-work buffer may resume once it is determined by a qualified biologist that the young have left the nest. If a lapse in construction activities of 7 days or more occurs during the nesting season, an additional nesting bird survey is recommended to ensure that no nests were established in the area while construction activities were on hold.</p> | Less Than Significant Impact           |
| <b>Impact BIO-2</b> The proposed project would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.  | <b>MM BIO-2: Tree Replanting.</b> Removed trees will be mitigated through replanting, following all terms and conditions included in the City's tree ordinance permit.   | Less Than Significant Impact           |
| <b>Section 3.4 - Cultural Resources</b>  |  |  |
| <b>Impact CUL-1</b> The proposed project would cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.   | <b>MM CUL-1: Salvage Report.</b> A Salvage Report shall be prepared prior to the demolition of the relevant structure(s). This report shall identify character-defining features of each of the individual buildings, as well as the broader St. Rose Historic Preservation District. Based upon these identification efforts, noteworthy materials, and architectural features at 520 and/or 608 Morgan Streets shall be identified for potential salvage and reuse throughout the district or, if agreed upon by relevant City staff, other historic preservation districts within the City that have comparable architectural character, historical significance, and period of construction where reuse would not be deemed inappropriate. The Salvage Report shall be prepared by an architectural historian or historic architect that meets the Secretary of the Interior's Standards and Guidelines for Professional   | Significant and Unavoidable Impact     |





| Impacts | Mitigation Measures  | Level of Significance After Mitigation |
|---------|--|--|
|         | <p>Qualifications. Local preservation groups and the City shall be consulted in the preparation of the Salvage Report and all relevant plans.</p> <p><b>MM CUL-2: Public Report Documentation.</b> The buildings at 520 and 608 Morgan Streets shall be documented prior to commencement of any work associated with the project. This documentation will be consistent with the Historic American Building Survey (HABS) documentation Level II, although will not require submittal to the Library of Congress. The HABS-like documentation shall include large format photographs and a written history of the properties, including historical contexts related to the St. Rose Historic Preservation District. Materials shall be prepared by an architectural historian, historic architect, or historian that meets the Secretary of the Interior's Professional Qualifications. Produced materials shall be submitted to local repositories, which should include the City of Santa Rosa Public Library and the Museum of Sonoma County. While public documentation is instrumental in understanding and cataloguing alterations to historical resources, it should be noted that Section II.C-Demolition in the Design Guidelines specifically states that public documentation is not sufficient as a stand-alone mitigation measure.</p> <p><b>MM CUL-3: Interpretive Materials.</b> At least three sets of interpretive materials related to the history of the property as well as the broader St. Rose Historic Preservation Historic District shall be produced and installed. The exact medium of the interpretive materials will not be specified so as not to inhibit creativity, although typical efforts include panels, signage, museum exhibits, or interactive landscape elements, such as play elements or site furnishings.</p> <p>Interpretive materials shall be located adjacent to, and accessible from, the public right-of-way, and in the vicinity of the following: 1) the Catholic Charities entrance area; 2) the homes entrance area; and 3) the entrance near the parking lot. The specific historical themes reflected at each specific location should reflect on the development of the St. Rose Historic District and associated historic contexts and themes. Interpretive materials shall feature physical elements that reflect the character-defining features of the historic district, including materials, architectural forms, details, and other unifying elements. Proposed interpretive material designs, including narratives, will be presented to the Santa Rosa Cultural Heritage Board for comment and approval prior to installation.</p> <p><b>MM CUL-4: Compatible Design.</b> The developer of the project shall work with a historic architect or architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards to ensure that the proposed project meets the relevant requirements of the City of Santa</p> |  |



| Impacts  | Mitigation Measures   | Level of Significance After Mitigation |
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|  | Rosa Design Guidelines, particularly under Section 2.4: Historic Districts within the Downtown Area and Station Area and Section 4.7: Historic Properties and Districts-III.G-new Construction. A presentation will be made to the Santa Rosa Cultural Heritage Board that outlines the finalized project design and its compatibility with the surrounding historic district; this will be subject to Cultural Heritage Board comments and approval  |  |
| <p><b>Impact CUL-2</b> The proposed project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.</p> | <p><b>MM CUL-5: Cultural Resource Awareness Training.</b> Prior to the initiation of the project, a cultural resources training shall be provided to supervisors, the contract foreman, construction crew members, and any additional key construction personnel. A qualified archaeologist shall administer the training. The purpose of the training is to increase awareness and knowledge of cultural resources and appropriate protocols in the event of an inadvertent discovery. The training shall include a discussion of the procedures for stopping work and notification of key City personnel if an inadvertent discovery of cultural resources occurs during project construction. If human remains are discovered, the appropriate protocols shall also be discussed. Upon completion of the training, participants shall be able to define cultural resources, describe the policies and procedures for identifying and protecting cultural resources, know how to locate and receive assistance from the qualified archaeologist and coordinate with other sources, and describe steps to be taken when cultural resources are encountered during project implementation. All new construction personnel added after construction commences shall receive the same training and orientation before working onsite. If Native American monitors are used, it shall be necessary for tribal representatives to also participate in the training.</p> <p><b>MM CUL-6: Construction Monitoring.</b> If evidence of any prehistoric or historic-era subsurface archaeological features or deposits are discovered during excavation or other earth-moving activities, the qualified archaeologist shall assess the significance of the find(s) and determine the appropriate treatment. Appropriate treatment may include recordation and/or additional excavation. A monitoring report shall be completed by the archaeological monitor at the end of construction. This report shall include a brief summary of the pre-construction cultural resource awareness training and the results of monitoring. The monitoring report shall be kept on file with the City.</p> <p><b>MM CUL-7: Unanticipated Discovery of Cultural Resources.</b> If prehistoric or historic-era cultural resources are encountered during the course of grading or construction, all ground-disturbing activities within 50</p> | Less Than Significant Impact           |



| Impacts   | Mitigation Measures  | Level of Significance After Mitigation |
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|   | <p>feet of the find shall cease. The qualified archaeologist shall evaluate the significance of the resources and recommend appropriate treatment measures. Per CEQA Guidelines Section 15126.4(b)(3)(A), project redesign and preservation in place shall be the preferred means to avoid impacts to significant archaeological sites. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with the City, which may include data recovery or other appropriate measures. The City shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. Archaeological materials recovered during any investigation shall be curated at an accredited curatorial facility. The qualified archaeologist shall prepare a report documenting evaluation and additional treatment of the resource. A copy of the report shall be provided to the City and to the NWIC. Construction shall recommence based on direction of the qualified archaeologist.</p>   |  |
| <p><b>Impact CUL-3</b> The proposed project could potentially disturb any human remains, including those interred outside of formal cemeteries.</p> | <p><b>MM CUL-8: Procedures for Human Burials Encountered During Construction.</b> If ground-disturbing activities uncover previously unknown human remains, Section 7050.5 of HSC applies, and the following procedures shall be followed:</p> <ul style="list-style-type: none"> <li>• There shall be no further excavation or disturbance of the area where the human remains were found or within 100 feet of the find until the Sonoma County Coroner and the appropriate City of Santa Rosa representative are contacted. Duly authorized representatives of the Coroner and the City shall be permitted onto the project site and shall take all actions consistent with Health and Safety Code Section 7050.5 and Government Code Sections 27460, et seq. Excavation or disturbance of the area where the human remains were found and an area within 100 feet of the find shall not be permitted to re-commence until the Coroner determines that the remains are not subject to the provisions of law concerning investigation of the circumstances, manner, and cause of any death.</li> <li>• If the Coroner determines the remains are Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the “most likely descendant” (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work for</li> </ul> | <p>Less Than Significant Impact</p>    |



| Impacts   | Mitigation Measures   | Level of Significance After Mitigation |
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|   | means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the MLD's recommendations, the owner or the MLD may request mediation by NAHC. |  |
| <b>Section 3.5 - Greenhouse Gases</b>   |   |  |
| <b>Impact GHG-1</b> The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.   | No mitigation is necessary.   | Less Than Significant Impact           |
| <b>Impact GHG-2</b> The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.  | No mitigation is necessary.   | Less Than Significant Impact           |
| <b>Section 3.6 - Land Use and Planning</b>  |   |  |
| <b>Impact LU-1</b> The proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.   | No mitigation is necessary.   | Less Than Significant Impact.          |
| <b>Section 3.7 - Noise</b>  |   |  |
| <b>Impact NOI-1</b> The proposed project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <p><b>MM NOI-1: Construction Hours.</b> Construction activities shall be limited to the hours of 7:00 AM and 7:00 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays, with no noise generating construction on Sundays or holidays.</p> <p><b>MM NOI-2: Construction Activity.</b> Implementation of the following multi-part mitigation plan is required to reduce the potential construction period noise impacts.</p>        | Less Than Significant Impact.          |



| Impacts  | Mitigation Measures  | Level of Significance After Mitigation |
|--|--|--|
|  | <ul style="list-style-type: none"> <li>• Use a comprehensive program of noise prevention through planning and mitigation and consider noise impacts as a crucial factor in project approval.</li> <li>• Construct noise barriers such as temporary walls or piles of excavated material between noisy activities and noise-sensitive receivers.</li> <li>• Site equipment on the construction lot as far away from noise-sensitive sites as possible.</li> <li>• Construct walled enclosures around especially noisy activities or clusters of noisy equipment. For example, shields can be used around pavement breakers, and loaded vinyl curtains can be draped under elevated structures.</li> <li>• Combine noisy operations to occur in the same time period. The total noise level produced shall not be significantly greater than the level produced if the operations were performed separately.</li> <li>• Avoid nighttime activities. Sensitivity to noise increases during the nighttime hours in residential neighborhoods.</li> <li>• Use rammed aggregate piers instead of pile driving to reinforce soils for the upper 20 feet of the project site to avoid impacts associated with pile driving .</li> <li>• Use specially quieted equipment, such as quieted and enclosed air compressors or mufflers, on all engines.</li> <li>• Select quieter demolition methods where possible. For example, sawing bridge decks into sections that can be loaded onto trucks results in lower cumulative noise levels than impact demolition by pavement breakers.</li> <li>• Post a construction site notice that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City.</li> </ul> |  |
| <b>Impact NOI-2</b> The proposed project would not result in the generation of excessive | No mitigation is necessary.  | Less Than Significant Impact.          |



| Impacts  | Mitigation Measures   | Level of Significance After Mitigation |
|--|---|--|
| groundborne vibration or groundborne noise levels.   |   |  |
| <b>Section 3.8 - Transportation</b>  |   |  |
| <p><b>Impact TRANS-1</b> The proposed project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.</p> | <p><b>MM TRANS-1: Construction Traffic Management Plan.</b> A traffic management plan shall be submitted to the City for review and approval prior to the issuance for construction activities of any construction permits. The traffic management plan shall be prepared in accordance with both the California's Manual on Uniform Traffic Control Devices and Work Area Traffic Control Handbook. The traffic management plan shall route trucks into the sites avoiding 7<sup>th</sup> Street, A Street north of 7<sup>th</sup> Street, and Morgan Street north of 7<sup>th</sup> Street as much as possible. Avoiding these streets keeps construction traffic removed from the sensitive single-family homes along Morgan and A streets. The traffic management plan shall also include strategies for minimizing impacts to traffic, effectively managing traffic flow and reducing the number of trips accessing the project site during the peak hours of 7 AM to 9 AM and 4 PM to 6 PM These strategies shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Temporary traffic control plan that addresses traffic safety and control through the work zone;</li> <li>• Directing construction traffic with a flagger;</li> <li>• Placing temporary signage, lighting, and traffic control devices if required, including but not limited to appropriate signage along access routes to indicate the presences of heavy vehicles and construction traffic;</li> <li>• Require parking within designated areas on the project site and prohibit parking along the shoulders of adjacent roadways.</li> <li>• Provide for emergency vehicle movement through the project site at all times during construction and operation.</li> <li>• Provide approved offsite parking for workers with shuttle services to transport them onsite when and if onsite parking becomes restricted or unfeasible.</li> <li>• Facilitate materials delivery during off-peak traffic hours and comply with regulations governing oversized loads.</li> <li>• Encourage vanpool and carpool for construction employees commuting to the project site.</li> </ul> | Less Than Significant Impact.          |





| Impacts   | Mitigation Measures                         | Level of Significance After Mitigation |
|---|---|--|
| <b>Impact TRANS-2</b> The proposed project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).   | No mitigation is necessary.                 | Less Than Significant Impact.          |
| <b>Impact TRANS-3</b> The proposed project would not result in inadequate emergency access.   | No mitigation is necessary.                 | Less than significant impact           |
| <b>Impact TRANS-4</b> The proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?   | No mitigation is necessary.                 | Less than significant impact           |
| <b>Section 3.9 – Tribal Cultural Resources</b>  |   |  |
| <b>Impact TRI-1</b> The project would not cause a substantial adverse change in the significance of a tribal cultural resource a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, local register of historical resources as defined in PRC section 5020.1(k), or by the lead agency pursuant to criteria set forth in PRC section 5024.1(c). | Implement MM CUL-3, MM CUL-4, and MM CUL-5. | Less Than Significant Impact.          |
| <b>Section 3.10 - Energy</b>  |   |  |
| <b>Impact EN-1</b> The proposed project would not result in a potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?  | No mitigation is necessary.                 | Less Than Significant Impact.          |
| <b>Impact EN-2</b> Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?   | No mitigation is necessary.                 | Less Than Significant Impact.          |



| Impacts  | Mitigation Measures   | Level of Significance After Mitigation |
|--|---|--|
| <b>Section 3.11 – Hazards and Hazardous Materials</b>  |   |  |
| <p><b>Impact HAZ-1</b> The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p> | <p><b>MM HAZ-1: Removal of Biohazardous and Medical Waste.</b> Prior to construction, the applicant shall retain a certified biohazardous waste contractor to inspect the project site and determine if biohazardous and medical waste are present. If present, the certified contractor would remediate the project site in accordance with the California Department of Public Health regulations and Cal/OSHA worker safety requirements. The certified contractor would dispose of all biohazardous and medical waste at a certified medical waste processing facility in accordance with the California Medical Waste Management Act to ensure that these materials are not released into the environment.</p> <p><b>MM HAZ-2: Removal of Asbestos Containing Materials and/or Lead Based Paint.</b> A comprehensive survey for the presence of asbestos-containing material and lead-based paint shall be conducted at the project site prior to any demolition activities. Demolition of buildings containing asbestos materials or lead based paint must be achieved in accordance with state and federal regulations, including the EPA's Asbestos National Emissions Standards for Hazardous Air Pollutants, Cal/OSHA's Construction Lead Standard (8 CCR 1432.1), and California Department of Toxic Substances Control and EPA requirements for disposal of hazardous waste. Disposal of any asbestos-containing materials or lead-based paint found on the site shall be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work and in accordance with the appropriate state and federal standards to ensure that these materials are not released into the air in the project vicinity.</p> <p><b>MM HAZ-3: Install Sharps Kiosk Station.</b> The applicant shall obtain a Home-Generated Sharps Consolidation Point permit from Sonoma County to install a Sharps Kiosk at the project site. The kiosk shall be placed onsite in an area that is accessible to visitors and residents. The applicant shall retain a biohazardous waste contractor to collect the hazardous materials from the kiosk weekly and transport them to a certified medical waste processing facility for disposal in accordance with the California Medical Waste Management Act.</p> <p><b>MM HAZ-4: Install Environmental Design Features.</b> The applicant must install environmental design features at the project site to reduce illicit behaviors such as loitering, trespassing, littering and garbage, disposal of sharps, and bathroom incivility. The design features must include additional lighting, camera surveillance, provision of proper disposal containers, or other design features approved by the City.</p> | <p>Less Than Significant Impact.</p>   |



| Impacts   | Mitigation Measures                                   | Level of Significance After Mitigation |
|---|---|--|
| <b>Impact HAZ-2</b> The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. | Implement MM HAZ-1, MM HAZ-2, MM HAZ-3, and MM-HAZ 4. | Less Than Significant Impact.          |
| <b>Impact HAZ-3</b> The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.                                 | No mitigation is necessary.                           | Less Than Significant Impact.          |
| <b>Section 3.12 – Public Services</b>   |   |  |
| <b>Impact PS-1</b> The proposed project would not require the construction of new or physically altered fire protection or police protection facilities, which could cause significant environmental impacts.                                   | No mitigation is necessary.                           | Less than significant impact           |



## ES.7 REVIEW OF THE DRAFT EIR

The Draft EIR will be available for public review for the statutory 45-day review period and will circulate until December 30, 2019. The document will be available for public review at the locations listed below. In addition, the Draft EIR is available electronically on the City of Santa Rosa's project webpage:

<https://srcity.org/2910/Caritas-Village>.

City of Santa Rosa  
Planning & Economic Development  
City Hall  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95404  
Hours:  
Monday–Friday 8:30 AM–4:30 PM  
Closed alternating Fridays and holidays (call to verify hours)

Santa Rosa Public Library  
211 E Street  
Santa Rosa, CA 95404  
Hours:  
Monday – 10:00 AM–9:00 PM  
Tuesday – 10:00 AM–6:00 PM  
Wednesday – 10:00 AM–9:00 PM  
Thursday–Saturday – 10:00 AM–6:00 PM  
Sunday – 2:00 PM–6:00 PM

Agencies, organizations, and interested parties will have the opportunity to comment on this Draft EIR during the 45-day public review period. The City of Santa Rosa encourages the electronic submission of comments. Please indicate a contact person for your agency or organization and send your comments to: [KToomians@srcity.org](mailto:KToomians@srcity.org). Please include Caritas Village in the subject line.

Written comments on this Draft EIR should be addressed to:

City of Santa Rosa  
Attention: Kristinae Toomians, Senior Planner  
Planning & Economic Development  
City Hall  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95404  
Phone: (707) 543-4692  
FAX: (707) 543-3269



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## ACRONYMS AND ABBREVIATIONS

|                    |   |
|--------------------|---|
| µg/m <sup>3</sup>  | micrograms per liter  |
| AB                 | Assembly Bill   |
| ABAG               | Association of Bay Area Governments   |
| ACC                | Advanced Clean Cars   |
| ADT                | average daily trips   |
| AEP                | Association of Environmental Professionals                                      |
| AES                | Aesthetics  |
| AICUZ              | Air Installation Compatible Land Use Zone                                       |
| Air Basin          | San Francisco Bay Area Air Basin  |
| AMI                | average median income   |
| AQ                 | Air Quality   |
| AQP                | air quality plan  |
| AWSC               | all-way stop control  |
| BAAQMD             | Bay Area Air Quality Management   |
| BIO                | Biological Resources  |
| BMP                | best management practices   |
| Burbank Housing    | Burbank Housing Development Corporation   |
| Business Plan Act  | California Hazardous Materials Release Response Plans and Inventory Law of 1985 |
| CAA                | Clean Air Act   |
| CAAQS              | California Ambient Air Quality Standards  |
| CAFÉ               | Corporate Average Fuel Economy  |
| Cal/EPA            | California Environmental Protection Agency                                      |
| CalEEMod           | California Emissions Estimator Model  |
| CALGreen           | California Green Building Standards Code  |
| Cal/OSHA           | California Occupational Safety and Health Administration                        |
| Caltrans           | California Department of Transportation   |
| CAP                | Climate Action Plan   |
| CAPCOA             | California Air Pollution Control Offices Association                            |
| CARB               | California Air Resources Board  |
| Catholic Charities | Catholic Chairities of the Diocese of Santa Rosa                                |
| CCAA               | California Clean Air Act  |
| CCR                | California Code of Regulations  |
| C&D                | construction and demolition   |
| CDBG               | Community Development Block Grant   |
| CDFW               | California Department of Fish and Wildlife                                      |
| CDMG               | California Division of Mines and Geology  |
| CEC                | California Energy Commission  |
| CEQA               | California Environmental Quality Act  |



|                        |  |
|------------------------|--|
| CFR                    | Code of Federal Regulations  |
| CH <sub>4</sub>        | Methane  |
| CHB                    | Cultural Heritage Board  |
| City                   | City of Santa Rosa   |
| CN                     | Neighborhood Commercial  |
| CNDDDB                 | California Natural Diversity Database                                  |
| CNEL                   | Community Noise Equivalent Level                                       |
| CNPS                   | California Native Plant Society  |
| CO                     | carbon monoxide  |
| CO <sub>2</sub>        | carbon dioxide   |
| CPTED                  | crime prevention through environmental design                          |
| CPUC                   | California Public Utilities Commission                                 |
| CR                     | Cultural and Historical Resources                                      |
| CRHR                   | California Register of Historic Resources                              |
| CUP                    | Conditional Use Permit   |
| dB                     | decibels   |
| dB(A)                  | A-weighted decibels  |
| dB(C)                  | C-weighted decibels  |
| Delay                  | average vehicle delay  |
| Design Guidelines      | Santa Rosa Design Guidelines   |
| District               | Santa Rosa City School District  |
| Downtown Specific Plan | Downtown Station Area Specific Plan                                    |
| DPM                    | diesel particulate matter  |
| DSASP                  | Downtown Station Area Specific Plan                                    |
| DTSC                   | California Department of Toxic Substances Control                      |
| DU                     | dwelling unit  |
| E                      | equivalent impact to the proposed project                              |
| EIR                    | environmental impact report  |
| Emp                    | employee   |
| EN                     | Energy   |
| EO                     | executive order  |
| EPA                    | U.S. Environmental Protection Agency                                   |
| ESCI                   | Emergency Services Consultation International                          |
| EV                     | electric vehicle   |
| Farmland               | Prime Farmland, Unique Farmland, or Farmland of Statewide Significance |
| FERC                   | Federal Energy Regulatory Commission                                   |
| FR                     | Federal Register   |
| FTA                    | Federal Transit Administration   |
| G                      | greater impact than the proposed project                               |
| General Plan           | City of Santa Rosa 2035 General Plan                                   |
| GHG                    | greenhouse gas   |
| GPA                    | General Plan Amendment   |





|                     |   |
|---------------------|---|
| -H                  | Historic Combining District                               |
| HABS                | Historic American Buildings Survey                        |
| HAP                 | hazardous air pollutant                                   |
| HAZ                 | Hazards and Hazardous Materials                           |
| HCM                 | Highway Capacity Manual                                   |
| HCP                 | Habitat Conservation Plan                                 |
| hp                  | Horsepower  |
| HRA                 | Health Risk Assessment                                    |
| HVAC                | heating, ventilation, air conditioning                    |
| Hz                  | Hertz   |
| in/sec              | inches per second   |
| IS                  | initial study   |
| ITE                 | Institute of Transportation Engineers                     |
| KBTU                | 100-British Thermal Units                                 |
| KOP                 | Key Observation Point                                     |
| kW                  | kilowatt  |
| kWh                 | kilowatt hours  |
| L                   | less impact than proposed project                         |
| lbs/day             | pounds per day  |
| lbs/year            | pounds per year   |
| L <sub>dn</sub>     | day-night sound level                                     |
| LED                 | light-emitting diode                                      |
| LEED                | Leadership in Energy and Environmental Design             |
| L <sub>eq</sub>     | equivalent sound level                                    |
| L <sub>max</sub>    | maximum sound level                                       |
| L <sub>min</sub>    | minimum sound level                                       |
| LTS                 | less than significant impact                              |
| LTS/M               | Less than significant impact with mitigation incorporated |
| LU                  | Land Use and Planning                                     |
| L <sub>xx</sub>     | percentage exceeded sound level                           |
| LOS                 | level of service  |
| MBTA                | Migratory Bird Treaty Act                                 |
| MEI                 | maximally exposed individual                              |
| MERV                | minimum efficiency reporting value                        |
| mg/m <sup>3</sup>   | milligrams per liter                                      |
| MLD                 | Most Likely Descendant                                    |
| MM                  | mitigation measure  |
| MMTCO <sub>2e</sub> | million metric tons of carbon dioxide equivalent          |
| mph                 | miles per hour  |
| MPO                 | Metropolitan Planning Office                              |
| MTCO <sub>2e</sub>  | metric tons of carbon dioxide equivalent                  |
| MTC                 | Metropolitan Transportation Commission                    |



|                      |   |
|----------------------|---|
| MUTCD                | Manual on Uniform Traffic Control Devices                             |
| N <sub>2</sub> O     | Nitrous Oxide   |
| NAAQS                | National Ambient Air Quality Standards                                |
| NAHC                 | Native American Heritage Commission                                   |
| NCCP                 | Natural Community Conservation Plan                                   |
| NESHAP               | national emissions standards for hazardous air pollutants             |
| NFPA                 | National Fire Protection Association                                  |
| NHTSA                | National Highway Traffic Safety Administration                        |
| NI                   | no impact   |
| NO <sub>2</sub>      | nitrogen dioxide  |
| NOA                  | naturally occurring asbestos  |
| NOC                  | Notice of Completion  |
| NOI                  | Noise and Vibration   |
| NOP                  | Notice of Preparation   |
| NO <sub>x</sub>      | nitrogen oxides   |
| NPO                  | nonprofit organization  |
| NRHP                 | National Register of Historic Places                                  |
| NWIC                 | Northwest Information Center  |
| O <sub>3</sub>       | Ozone   |
| OEHHA                | Office of Environmental Health Hazard Assessment                      |
| OITC                 | Outside-Inside Transmission Class                                     |
| OPR                  | Governor's Office of Planning and Research                            |
| PDA                  | Priority Development Area   |
| PG&E                 | Pacific Gas & Electric  |
| PM <sub>2.5</sub>    | particulate matter less than 2.5 microns in aerodynamic diameter      |
| PM <sub>10</sub>     | particulate matter between 2.5 and 10 microns in aerodynamic diameter |
| ppb                  | parts per billion   |
| ppm                  | parts per million   |
| PPV or Peak Velocity | peak particle velocity  |
| PRC                  | California Public Resources Code                                      |
| project              | Caritas Village Project   |
| PS                   | Public Services   |
| PV                   | photovoltaic  |
| R-3                  | multi-family residential  |
| RCNM                 | Federal Highway Association Roadway Construction Noise Model          |
| RCPA                 | Regional Climate Protection Authority                                 |
| RCRA                 | Resource Conservation and Recovery Act                                |
| ROG                  | reactive organic gases  |
| RTP                  | Regional Transportation Plan  |
| RWQCB                | Regional Water Quality Control Board                                  |
| -SA                  | Station Area Combining District                                       |
| SB                   | Senate Bill   |



|                    |   |
|--------------------|---|
| SCS                | Sustainable Communities Strategy  |
| SCTA               | Sonoma County Transportation Authority  |
| SIP                | State Implementation Plan   |
| SMART              | Sonoma-Marin Area Rail Transit  |
| SO <sub>2</sub>    | sulfur dioxide  |
| SP                 | service population  |
| SR BIG             | Santa Rosa Build It Green   |
| SRFD               | Santa Rosa Fire Department  |
| SRO                | single-room occupants   |
| SRPD               | Santa Rosa Police Department  |
| Standards          | <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> |
| Stantec            | Stantec Consulting Environmental Services Inc.  |
| STC                | Sound Transmission Class  |
| SU                 | significant and unavoidable impact  |
| SUSMP              | Standard Urban Storm Water Mitigation Plan  |
| SWPPP              | Stormwater Pollution Prevention Plan  |
| TACs               | toxic air contaminants  |
| TBD                | To be determined after permitting with BAAQMD   |
| TAFH               | time away from home factor  |
| TOG                | total organic gases   |
| TPY                | tons per year   |
| TRANS              | Transportation  |
| TRIB               | Tribal Cultural Resources   |
| TRP                | Transitional Residency Program  |
| TV-M               | transit village mixed use   |
| TWSC               | two-way stop control  |
| USFWS              | United States Fish and Wildlife Service   |
| UWMP               | Urban Water Management Plan   |
| VMT                | vehicle miles traveled  |
| Warren-Alquist Act | Warren-Alquist Energy Resources Conservation and Development Act                      |



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## GLOSSARY

For ease of reference and clarity, the following project glossary of key terms used throughout this document is included below.

|  |  |
|--|--|
| <b>Annual Homeless Survey</b>                    | These are volunteers who come to the site once a year to help with the county-wide homeless survey.  |
| <b>Caritas Center</b>                            | This is where homeless services are provided. Caritas Center includes the Nightingale Program, Family Support Center, Navigation Center, a medical service - doctor's office, administrative staff, and other services to support people experiencing homelessness.  |
| <b>Caritas Homes</b>                             | This is affordable housing. It includes two managers who will live on the site.  |
| <b>Caritas Village</b>                           | Caritas Village is comprised of Caritas Homes and Caritas Center.  |
| <b>Coordinated Entry Program</b>                 | The Coordinated Entry Program provides centralized waiting list, light case management, and community referrals for families and individuals on a waiting list until housing, shelter, or housing intervention becomes available. Clients access the Coordinated Entry System by calling or visiting the drop-in locations at the Navigation Center or the Family Support Center. These clients typically arrive by car and a typical assessment is about an hour long.  |
| <b>Emergency Shelter - Nightingale Program</b>   | This is where homeless individuals recover when they are discharged from the hospital. On average, people stay 29 days. Typically, a taxi brings them to the Nightingale Program. These people receive assistance taking medications and other layperson care, as well as daily help from physical therapists, who come from off-site to provide physical therapy. Departing clients are typically transported off site via car and they may leave the project site two or three times per week to receive off-site care. These clients do not have cars.  |
| <b>Emergency Shelter - Family Support Center</b> | This an emergency shelter where families stay. On average, families stay here for four to six months. Catholic Charities' staff estimate that 20% of these families have a car.  |
| <b>Emergency Shelter - Navigation Center</b>     | This is a day facility, open five days per week, where homeless individuals can obtain dignity services, such as showers, using a phone, doing laundry, checking mail, etc. Many people use the Navigation Center several times per week. Catholic Charities estimates that 10% of the Navigation Center clients have cars and will park in the parking lot behind the proposed Caritas Center. It is important to note that, on average, a Navigation Center client is only on the site for two hours per day. The proposed Navigation Center does not include any overnight accommodations. In past years, the Navigation Center was previously called the "Day Center." |



|   |  |
|---|--|
| <b>Housing Navigator</b>  | A Housing Navigator helps homeless individuals and/or families find housing. Housing Navigators complete participant-centered assessments, create individualized case plans, facilitate mutual goal setting, with the purpose of navigating housing resources/services to secure housing.      |
| <b>Housing Locator</b>  | A Housing Locator works with owners, landlords, and property managers within Sonoma County to identify housing opportunities.  |
| <b>Housing Stabilization, Case Managers</b>                           | A Housing provides housing-focused stabilization services to transition individuals and/or families from experiencing homelessness to housing.   |
| <b>Medical Service - Doctor's Office</b>                              | This is a doctor's office helping mostly on-site with some off-site clients.   |
| <b>Onsite Coordinator</b>   | An Onsite Coordinator provides operational support, staff supervision, and facility oversight for an emergency shelter for persons experiencing homelessness. The Site Coordinator also helps people transition from shelters into housing.  |
| <b>Participant Advocate</b>   | The Participant Advocate (PA) is responsible for providing operational support and oversight at an emergency shelter location during an assigned shift that may include day, night and/or swing. The Participant Advocate ensures that all interactions with participants are housing focused. |
| <b>Program Aide</b>   | The Program Aide facilitates the safe operation of on-site, day-to-day shelter operations, typically during graveyard hours- 12am-8am.   |
| <b>Service Groups</b>   | These are groups that volunteer on the site.   |
| <b>Thank you events</b>   | These are thank you events to thank volunteers and others. There are two per year with up to 150 people per event.   |
| <b>Transitional Living Space/Transitional Residency Program (TRP)</b> | This is where formerly homeless individuals reside onsite and volunteer in the Navigation Center. We estimate 10% of these volunteers have a car. The Transitional Residency Program is informally called the "TRP."   |
| <b>Volunteers</b>   | These are individual volunteers who come to the site to help.  |



## 1.0 INTRODUCTION

### 1.1 THE ENVIRONMENTAL REVIEW PROCESS

The California Environmental Quality Act (CEQA) requires public agencies to identify, disclose, and consider the potential environmental impacts of proposed discretionary actions that lead agencies are considering for approval. A project that may have a significant impact on the environment cannot be approved unless the lead agency makes the approval contingent upon the implementation of mitigation measures that would reduce or avoid that impact to the extent feasible. When a project may have significant environmental impacts, the lead agency must prepare an environmental impact report (EIR) before it considers whether to approve the project.

The City of Santa Rosa (City), as the lead agency for the proposed project, has prepared this Draft EIR for public review and comment. As discussed below, the Draft EIR will be available for review and comment by public agencies and the general public for a period of 45 days. Prior to considering the proposed project, the City will prepare a Final EIR that includes the Draft EIR, the comments received on the Draft EIR, written responses to those comments, a list of the commenters, and any revisions being made to the Draft EIR in response to the comments. The Final EIR will be considered by the City's discretionary bodies when taking action on the proposed project.

#### 1.1.1 Purpose and Authority

This Draft EIR has been prepared pursuant to the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.). CEQA requires that State and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects (California Public Resources Code [PRC] 21000 et seq.).

According to CEQA Guidelines Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental impact. The purpose of this Draft EIR is to analyze the potential environmental impacts of the proposed project, to indicate ways to reduce or avoid potential environmental impacts associated with the proposed project, and to identify alternatives to the project that reduce or avoid significant environmental impacts. CEQA requires that each public agency mitigate or avoid the significant environmental effects of projects it approves or implements whenever feasible.

An EIR is an informational document used in state, regional, and local planning and decision-making processes to meet the requirements of CEQA. The purpose of the EIR is not to recommend approval or denial of a project. However, the City's decision whether to approve or to deny the project must take into consideration the information provided by the EIR. A public agency may approve a project even if it would result in significant and unavoidable environmental impacts, provided the agency adopts a statement of overriding considerations.

The Draft EIR must disclose the following: the proposed project's environmental effects, including those that cannot be avoided; the proposed project's growth inducing effects; the project-related effects found not to be significant; and cumulative impacts.



### 1.1.2 Type of Environmental Impact Report

In accordance with CEQA Guidelines Section 15161, this document is a project EIR that examines the environmental impacts of a specific project. This type of EIR focuses on the changes in the environment that would result from a specific project. In accordance with CEQA Guidelines Section 15161, a project EIR must examine the environmental effects of all phases of the project, including construction and operation. Additional resource-specific studies, such as air quality, biological resources, cultural resources, historic resources, noise, and traffic, as well as others, have been prepared for this Draft EIR to provide detailed information about the proposed project's potential impacts on the environment. The mitigation measures identified in this Draft EIR are sufficiently detailed to ensure that they would be effectively carried out to reduce the proposed project's impacts.

### 1.1.3 Lead Agency Determination

The City is designated as the lead agency for the proposed project. CEQA Guidelines Section 15367 defines the lead agency as, "...the public agency, which has the principal responsibility for carrying out or approving a project." Other public agencies may use this document in their decision making or permit processes (e.g., Department of Water Resources, Bay Area Air Quality Management District [BAAQMD], California Department of Transportation [Caltrans], etc.).

This Draft EIR was prepared by the City with technical assistance provided by Stantec Consulting Services Inc. (Stantec), an environmental consultant. Prior to public review, this Draft EIR was extensively reviewed and evaluated by the City staff and, as such, the Draft EIR reflects the independent judgment and analysis of the City, as required by CEQA. Lists of organizations and persons consulted and the report preparation personnel are provided in Section 8 of this Draft EIR.

### 1.1.4 Project of Statewide, Regional, or Areawide Environmental Significance

CEQA Guidelines Section 15206 identifies the types of projects considered to be of statewide, regional, or areawide significance. When a project is classified as such, its Draft EIR shall be submitted to the State Clearinghouse of the Governor's Office of Planning and Research (OPR), as well as the appropriate metropolitan area council of government.

The proposed project meets the following criteria defining projects of statewide, regional, or areawide significance:

- The proposed project would require a general plan amendment (GPA) and an EIR is being prepared.

The Draft EIR will be submitted to OPR and the Association of Bay Area Governments (ABAG).

## 1.2 SCOPE OF THE DRAFT EIR

Pursuant to CEQA and the CEQA Guidelines, a lead agency shall focus an EIR discussion on potentially significant environmental effects and may limit discussion on other effects to brief explanations about why they are not significant (PRC Section 21002.1, CEQA Guidelines Section 15128). A determination of which impacts would be potentially significant was made for this project based on review of the information presented in the initial study (IS) prepared for the project and comments received as part of the public scoping process (Appendix A), as well as additional research and analysis of relevant project





data obtained during preparation of this Draft EIR. This Draft EIR addresses the potential environmental effects of the proposed project. The City distributed a Notice of Preparation (NOP) of a Draft EIR for the proposed project beginning on January 24, 2019. The NOP was distributed for a 30-day comment period that ended on February 22, 2019. The comments on the NOP were considered in the preparation of this Draft EIR. The scope of this Draft EIR includes the potential environmental impacts identified in the NOP and issues raised by agencies and the public in response to the NOP.

The City has determined that the project has the potential to result in significant environmental impacts on the following resources, which are addressed in detail in this Draft EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural and Historical Resources
- Greenhouse Gas (GHGs) Emissions and Climate Change
- Land Use
- Noise and Vibration
- Transportation
- Tribal Cultural Resources
- Energy
- Hazards and Hazardous Materials
- Public Services

Please refer to Section 1.2.2, Environmental Issues Determined Not to Be Significant, for a list of environmental issues determined to be not significant.

Table 1-1 lists the comment letters received during the project scoping period.

**Table 1-1: NOP Comment Letters**

| Affiliation                      | Signatory        | Date              |
|----------------------------------|------------------|-------------------|
| <b>Private Parties – Written</b> |                  |                   |
| Interested Individual            | Greg Dabel       | January 28, 2019  |
| Interested Individual            | Elizabeth Wright | February 6, 2019  |
| Interested Individual            | Erin Morris      | February 5, 2019  |
| Interested Individual            | Erin Morris      | February 6, 2019  |
| Tomaras & Ogas, LLP              | Brenda Tomaras   | February 6, 2019  |
| Interested Individual            | Virginia Hopkins | February 7, 2019  |
| Interested Individual            | Denise Hill      | February 9, 2019  |
| Interested Individual            | Dee Richardson   | February 10, 2019 |



| Affiliation                                | Signatory        | Date             |
|--|------------------|------------------|
| <b>Private Parties – Oral <sup>1</sup></b> |                  |                  |
| Interested Individual                      | Elizabeth Wright | February 6, 2019 |
| Interested Individual                      | Dennis Gennett   | February 6, 2019 |
| Interested Individual                      | Karen Schneider  | February 6, 2019 |
| Interested Individual                      | Stan Dow         | February 6, 2019 |
| Interested Individual                      | Dale Godfrey     | February 6, 2019 |
| Interested Individual                      | Marta Koehne     | February 6, 2019 |
| Interested Individual                      | Denise Hill      | February 6, 2019 |
| Interested Individual                      | Elizabeth Clark  | February 6, 2019 |
| Interested Individual                      | Carol Johnson    | February 6, 2019 |
| Interested Individual                      | Adam Reed        | February 6, 2019 |
| Interested Individual                      | Cindy Torin      | February 6, 2019 |
| Interested Individual                      | Sandy _____      | February 6, 2019 |
| Interested Individual                      | Allen Thomas     | February 6, 2019 |
| Interested Individual                      | Ben Lopez        | February 6, 2019 |
| Interested Individual                      | Bev Roberts      | February 6, 2019 |
| Interested Individual                      | Carol Vellutini  | February 6, 2019 |
| Interested Individual                      | Sher Ennis       | February 6, 2019 |
| Interested Individual                      | Mike Lonahugh    | February 6, 2019 |
| Interested Individual                      | Heidi            | February 6, 2019 |
| Interested Individual                      | Joe Lilienthal   | February 6, 2019 |
| Interested Individual                      | Gene Wright      | February 6, 2019 |
| Interested Individual                      | Chris Rogers     | February 6, 2019 |

Notes:

1. Oral comments taken at the Scoping Meeting held on February 6, 2019

### 1.2.1 Location and Overview

The project is located in the City of Santa Rosa in Sonoma County, California. Specifically, the project site is located at 431, 437, 439, and 465 A Street and 506, 512, 516 520, 600, 608, and 612 Morgan Street in the City of Santa Rosa. The project site is bordered by: A Street, Morgan Street, 6<sup>th</sup> Street, and 7<sup>th</sup> Street.



The project site is approximately 2.78 acres, comprising the following 15 Sonoma County Assessor Parcel Numbers:

|                          |                          |
|--------------------------|--------------------------|
| 010-041-001              | 010-041-014              |
| 010-041-004              | 010-041-015              |
| 010-041-005              | 010-041-016              |
| 010-041-008 (City owned) | 010-041-017              |
| 010-041-009 (City owned) | 010-041-018              |
| 010-041-010 (City owned) | 010-041-019 (City owned) |
| 010-041-011              | 010-041-020              |
| 010-041-013              |                          |

The Caritas Village Project (project) involves the construction of a full city-block of development that combines a comprehensive family and homeless support services facility (Caritas Center) to be operated by Catholic Charities of the Diocese of Santa Rosa (Catholic Charities), and an affordable housing development with up to 126 permanent affordable housing units, plus two units for onsite managers (Caritas Homes) to be operated by Burbank Housing Development Corporation (Burbank Housing). Section 2, Project Description, includes more detailed information about the project.

## 1.2.2 Environmental Issues Determined Not to Be Significant

Pursuant to CEQA, the discussion of the potential effects on the physical environment is focused on those impacts that may be significant or potentially significant. CEQA allows a lead agency to limit the details of discussion of the environmental effects that are not considered potentially significant (PRC Section 21100, CEQA Guidelines Sections 15126.2[a] and 15128). CEQA requires that the discussion of any significant effects on the environment be limited to substantial or potentially substantial adverse changes in physical conditions that exist within the affected area, as defined in PRC Section 21060.5 (Statutory definition of “environment”). Effects dismissed in an analysis as clearly insignificant and unlikely to occur need not be discussed further in the Draft EIR unless the lead agency subsequently receives information inconsistent with the finding (CEQA Guidelines Section 15143).

Based on a review of the project information provided in the NOP (Appendix A) and comments received as part of the public scoping process (Appendix A) as well as additional research and analysis of relevant project data obtained during preparation of this Draft EIR, the following were identified as resources that would not experience any significant environmental impacts from the project. Accordingly, these resources are not addressed further in this Draft EIR but are identified below. A brief explanation as to why impacts to each resource are not anticipated, as required by CEQA is provided in Section 7, Effects Found Not to Be Significant.

- Agriculture and forestry resources
- Geology and soils
- Hydrology and water quality
- Mineral resources
- Population and housing
- Recreation
- Utilities and service systems



- Wildfires

In addition, certain subjects within various topical areas were determined not to be significant. Other potentially significant issues are analyzed within these topical areas; however, the following issues are not analyzed, but a brief explanation as to why impacts are less than significant as required by CEQA is provided in Section 7, Effects Found Not to Be Significant. Would the project:

- Have a substantial adverse effect on a scenic vista? (Section 3.1, Aesthetics)
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? (Section 3.1, Aesthetics)
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Section 3.1 Aesthetics)
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Section 3.2, Air Quality).
- Substantial adverse effect on any riparian habitat or sensitive natural community? (Section 3.3, Biological Resources)
- Substantial adverse effect on state or federally protected wetlands? (Section 3.3, Biological Resources)
- Conflict with Habitat Conservation Plan or Natural Community Plan? (Section 3.3, Biological Resources)
- Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Section 3.11, Hazards and Hazardous Materials)
- For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (Section 3.11, Hazards and Hazardous Materials)
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Section 3.11, Hazards and Hazardous Materials)
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? (Section 3.11, Hazards and Hazardous Materials)
- Physically divide an established community? (Section 3.6, Land Use and Planning)
- Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Section 3.6, Land Use and Planning)
- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project



expose people residing or working in the project area to excessive noise levels? (Section 3.7, Noise and Vibration)

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (schools, parks, other public facilities), need for new or physically altered governmental facilities (schools, parks, other public facilities), the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services. (Section 3.12, Public Services)
- Substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Section 3.8, Transportation)
- Result in inadequate emergency access? (Section 3.8, Transportation)

### 1.3 ORGANIZATION OF THE DRAFT EIR

This Draft EIR is arranged into the following sections, which contain the contents of an EIR as required by CEQA Guidelines Sections 15120 through 15132.

**Section ES: Executive Summary.** The Executive Summary provides a summary of the proposed project and the project alternatives, including a summary of project impacts, recommended mitigation measures, and the level of significance after mitigation for each environmental issue.

**Section 1: Introduction.** The Introduction provides an overview of the proposed project and the CEQA process and describes the purpose, scope, and components of this Draft EIR.

**Section 2: Project Description.** The Project Description provides a detailed description of the proposed project, including the location and project characteristics. The intended uses of this Draft EIR, project background, project objectives, and required project approvals are also addressed.

**Section 3: Environmental Impact Analysis.** The Environmental Impact Analysis analyzes the environmental effects of the proposed project. Impacts are organized into major environmental topic areas. Each topic area includes a description of the regulatory setting, environmental setting, significance criteria, project impacts, mitigation measures, and level of significance after mitigation. This section also addresses the cumulative impacts for each resource. The specific environmental topic areas that are addressed in Section 3 include the following:

- Section 3.1: Aesthetics
- Section 3.2: Air Quality
- Section 3.3: Biological Resources
- Section 3.4: Cultural and Historical Resources
- Section 3.5: Greenhouse Gas Emissions and Climate Change
- Section 3.6: Land Use and Planning
- Section 3.7: Noise and Vibration
- Section 3.8: Transportation
- Section 3.9: Tribal Cultural Resources



- Section 3.10: Energy
- Section 3.11: Hazards and Hazardous Materials
- Section 3.12: Public Services

**Section 4: Cumulative Effects.** Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. A cumulative impact consists of an impact created because of the combination of the project evaluated in the EIR together with other reasonably foreseeable projects causing related impact.

**Section 5: Alternatives to the Proposed Project.** Describes and compares the proposed project alternatives to the proposed project.

**Section 6: Other CEQA Considerations.** The Other CEQA Considerations section provides a summary of significant environmental effects, including unavoidable, irreversible, and growth-inducing impacts.

**Section 7: Effects Found Not to Be Significant.** This section provides a summary of project impacts that have been determined, through preparation of the NOP, to result in less than significant or no impact.

**Section 8: List of Preparers and Organizations Consulted.** The List of Preparers and Organizations Consulted section provides a list of the organizations and persons consulted, and the various individuals who contributed to the preparation of this Draft EIR. This section also includes a listing of the lead agency personnel and technical consultants used to prepare this Draft EIR.

**Section 9: References.** This section provides a listing of the technical studies and other documents used to prepare this Draft EIR.

**Appendices.** The appendices contain the NOP (including comments) and technical studies prepared to support the analyses and conclusions in this Draft EIR.

## 1.4 DOCUMENTS INCORPORATED BY REFERENCE

As permitted by CEQA Guidelines Section 15150, this Draft EIR references several technical studies, analyses, and previously certified environmental documents. Information from the documents, which has been incorporated by reference, is briefly summarized in the appropriate section(s). The relationship between the incorporated part of the referenced document and the Draft EIR is also described. The documents and other sources utilized in the preparation of this Draft EIR include but are not limited to the following.

- City of Santa Rosa General Plan 2035
- City of Santa Rosa General Plan 2035 EIR
- City of Santa Rosa Downtown Station Area Specific Plan (Downtown Specific Plan)
- City of Santa Rosa Downtown Station Area Specific Plan EIR
- City of Santa Rosa Municipal Code
- City of Santa Rosa Northern Downtown Pedestrian Linkages Study



## 1.5 PREVIOUSLY PREPARED ENVIRONMENTAL DOCUMENTS

- Tree Mitigation and Preservation Report (Horticulture Associates 2018)
- Historical Evaluation of buildings at 437 A Street, 305 and 306 7<sup>th</sup>, and 612 Morgan Street (Brunzell Historical 2016)
- Historical Evaluation of buildings at 608 and 608½ Morgan Street (Brunzell Historical 2016)
- Historical Evaluation of Santa Rosa General Hospital, 516 Morgan Street, and 600 Morgan Street (Brunzell Historical 2016)
- Historical Evaluation of building at 520 Morgan Street (Brunzell Historical 2016)
- Environmental Assessment – The Block 7<sup>th</sup> & A Street (AEM 2015)

## 1.6 DOCUMENTS PREPARED FOR THE PROPOSED PROJECT

The following technical studies and analyses were prepared for the proposed project:

- Air Quality and Greenhouse Gas Modeling Assumptions and Results
- Health Risk Assessment
- Biological Resources Memorandum
- Arborist Addendum to Tree Mitigation and Preservation Report
- Archaeological Survey Report
- Historic Resources Report
- Traffic Impact Analysis
- Noise Modeling

## 1.7 REVIEW OF THE DRAFT EIR

CEQA does not require formal hearings at any stage of the environmental review process (CEQA Guidelines Section 15202[a]). However, it does encourage, “wide public involvement, formal and informal, in order to receive and evaluate public reactions to environmental issues” (CEQA Guidelines Section 15201). The City distributed an NOP of a Draft EIR for the project beginning on January 24, 2019. The NOP was distributed for a 30-day comment period that ended on February 22, 2019. The comments on the NOP were considered in the preparation of this Draft EIR. Appendix A contains the written comments received on the NOP.

The City of Santa Rosa has filed a Notice of Completion (NOC) with OPR to begin the public review period (PRC, Section 21161). Concurrent with the NOC, this Draft EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as to all parties requesting a copy of the Draft EIR in accordance with PRS section 21092(b)(3). During the public review period, the Draft EIR, including the technical appendices, is available for review at City of Santa Rosa, Planning & Economic Development, Room 3, City Hall (100 Santa Rosa Avenue, Santa Rosa, CA); the Central Santa Rosa Library at 211 E Street, Santa Rosa, CA; and online at <https://srcity.org/2910/Caritas-Village>.

Agencies, organizations, and interested parties have the opportunity to comment on this Draft EIR during the 45-day public review period. The City of Santa Rosa encourages the electronic submission of comments. Please indicate a contact person for your agency or organization and send your comments to: [KToomians@srcity.org](mailto:KToomians@srcity.org). Please include Caritas Village Draft EIR in the subject line.



Written comments on this Draft EIR should be addressed to:

City of Santa Rosa  
Attention: Kristinae Toomians, Senior Planner  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95404  
Phone: (707) 543-4692 | FAX: (707) 543-3269

Upon completion of the public review period, written responses to all environmental issues raised will be prepared and made available for review by the commenting agencies at least 10 days prior to any public hearing on the proposed project at which the certification of the Final EIR will be considered. Comments received and the responses to comments will be included as part of the record for consideration by decision-makers for the proposed project.

### 1.7.1 Effectively Commenting on an EIR

Readers are invited to review and comment on the adequacy and completeness of this Draft EIR in describing the potential impacts of the proposed project, the level of severity of each impact, the mitigation measures being proposed to reduce or avoid those impacts, and the project alternatives being considered. The most effective comments are those that focus on the adequacy and completeness of the environmental analysis and that are supported by factual evidence. Comments that focus on whether the proposed project should be approved or denied are not comments on the adequacy of this Draft EIR.

### 1.7.2 Final EIR

After the end of the review period, the City will review the comments received, prepare written responses to those comments, make any related revisions to the Draft EIR, and publish the Final EIR, which will include the Draft EIR, comments on the Draft EIR, responses to comments and any revisions to the Draft EIR.

The Final EIR will be considered by the City's Planning Commission and City Council when taking action on the proposed project. If the proposed project is approved, CEQA requires the City to adopt findings describing how each of the significant impacts identified in the EIR is being mitigated. The findings are required to describe the reasons why significant unavoidable impacts, if any, cannot be mitigated; in this case, all significant effects of the project would be mitigated to less-than-significant levels by the adoption of feasible mitigation measures except for impacts to historical resources. The findings will also describe the project alternatives analyzed in the EIR and explain whether or not any alternative or portion of an alternative has been adopted. Because the proposed project has significant and unavoidable impacts, the City is required to adopt a statement of overriding considerations describing the benefits of the proposed project that outweigh its environmental impacts. Finally, the City will adopt a mitigation monitoring and reporting plan that describes how it will ensure the mitigation measures being required of the proposed project will be carried out.





## 2.0 PROJECT DESCRIPTION

### 2.1 PROJECT OVERVIEW

The project involves the construction of a full city block of development that includes a comprehensive family and homeless support services facility (Caritas Center) to be operated by Catholic Charities, and an affordable housing development (Caritas Homes) to be operated by Burbank Housing. The Caritas Center would consolidate the existing onsite Family Support Center and Navigation Center into a single building that would provide emergency shelter, a navigation center, transitional housing, coordinated entry, wrap-around services, health services, and administrative offices. Caritas Homes would provide up to 126 permanent affordable housing units plus two units for onsite managers. Other ancillary improvements would include landscaping, roadway improvements, water line improvements, and pedestrian walkways. The project requires the following entitlements: general plan amendment, Downtown Specific Plan amendments, rezoning, parcel map, conditional use permit (CUP), housing allocation plan concession, density bonus (with concessions and waivers), parking reduction, landmark alteration permit(s), design review, tree removal permit, and a request for “reserve A allotments.” Allotments for residential units are handled under City of Santa Rosa Municipal Code 21-03.070 requirements for allotments. “Reserve A” refers to the 50 percent of new allotments that become available in any calendar year. Reserve A allotments may be reserved for and may only be allotted to accessory dwelling units, units in mixed use projects, qualifying units and units that are affordable to very-low- or low-income households. The project intends to request a total of 128 Reserve A allotments in two different calendar years.

#### 2.1.1 Project Location

The project is located within the City of Santa Rosa in Sonoma County, California (See Figure 2-1). Specifically, the project site is located at 431, 437, 439, 465 A Street and 506, 512, 516, 520, 600, 608, and 612 Morgan Street in the City of Santa Rosa (See Figure 2-2). The project site is bordered by A Street, Morgan Street, 6<sup>th</sup> Street, and 7<sup>th</sup> Street. The project site is approximately 2.78 acres and comprises the following 15 Sonoma County Assessor Parcel Numbers:

|                          |                          |
|--------------------------|--------------------------|
| 010-041-001              | 010-041-014              |
| 010-041-004              | 010-041-015              |
| 010-041-005              | 010-041-016              |
| 010-041-008 (City owned) | 010-041-017              |
| 010-041-009 (City owned) | 010-041-018              |
| 010-041-010 (City owned) | 010-041-019 (City owned) |
| 010-041-011              | 010-041-020              |
| 010-041-013              |                          |

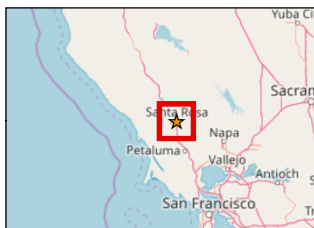
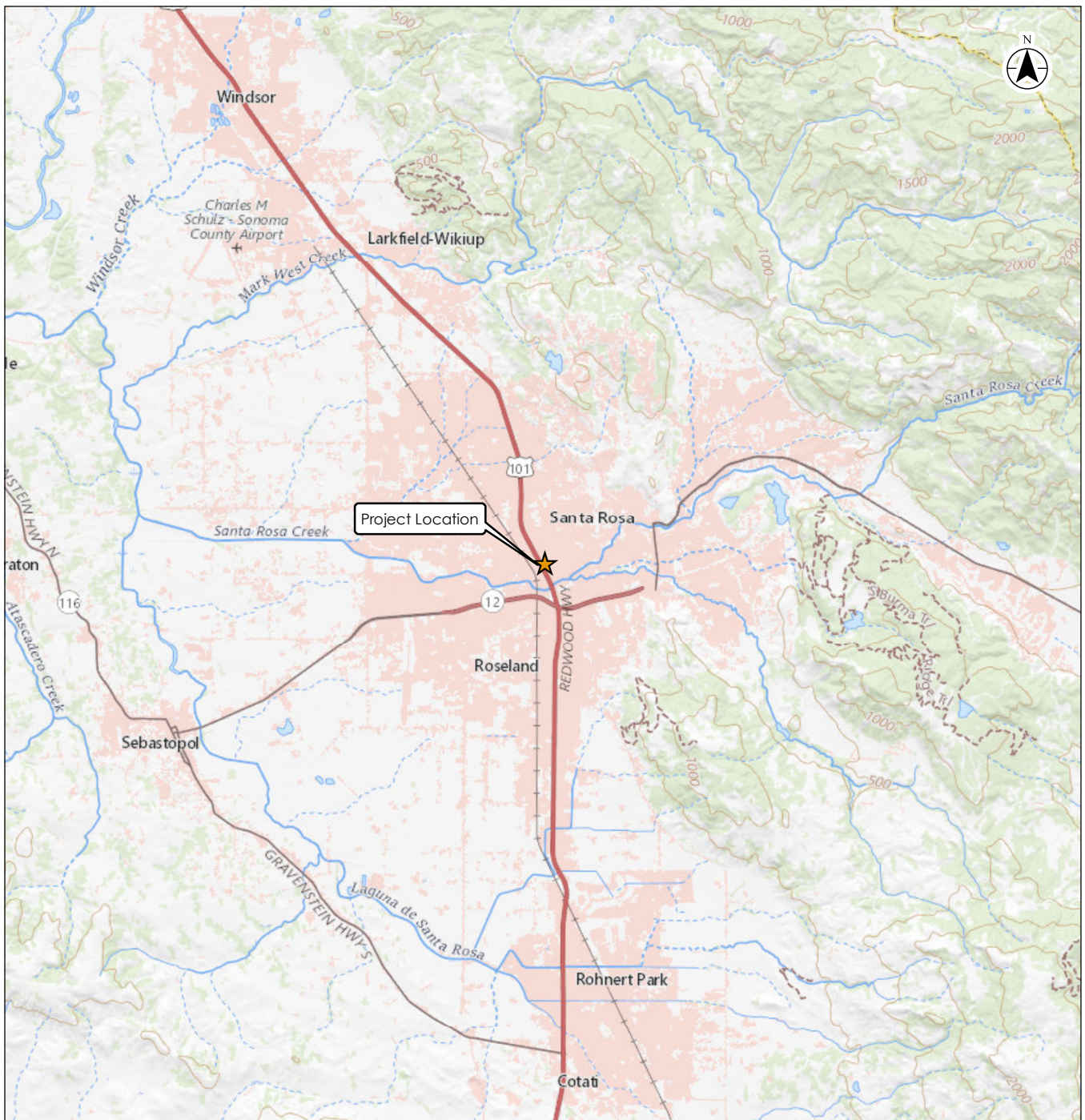
#### 2.1.2 General Plan and Zoning

Table 2-1 provides a summary of the current and proposed General Plan land use and zoning designations.



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#### Legend

★ Project Location

0 1 2 Miles  
1:150,000 (at original document size of 8.5x11)



Project Location  
T.07N, R.08W Section 23  
USGS 7.5-minute Quadrangle  
Santa Rosa

Client/Project  
City of Santa Rosa  
Caritas Village Project  
Environmental Impact Report

Figure No.

2-1

Title

Regional Location Map

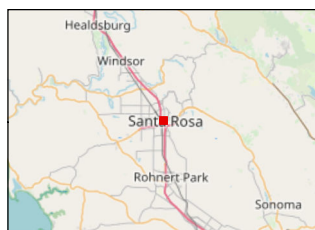
- Notes**
1. Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
  2. Service Layer Credits: © OpenStreetMap (and)

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#### Legend

Project Site

0 150 300  
Feet  
1:3,780 (at original document size of 8.5x11)



Project Location  
T.07N, R.08W Section 23  
USGS 7.5-minute Quadrangle  
Santa Rosa

Client/Project  
City of Santa Rosa  
Caritas Village Project  
Environmental Impact Report

Figure No.  
**2-2**

Title  
**Local Vicinity Map**

**Notes**  
1. Coordinate System: NAD 1983 StatePlane California II  
FPS 0402 Feet  
2. Service Layer Credits: © OpenStreetMap (and)

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**Table 2-1: General Plan and Zoning**

| Item          | Current   | Proposed  |
|---------------|---|---|
| General Plan  | Medium Density Residential (Morgan Street and A Street parcels)<br>Retail and Business Services (A Street parcels)          | Transit Village Mixed Use   |
| Specific Plan | Courthouse Square Sub-Area of the Specific Plan (A Street parcels)<br>Historic Residential Sub-Area (Morgan Street parcels) | All parcels would be in the Courthouse Square Sub-Area and the applicants have requested 80-foot diameter roundabouts at 6 <sup>th</sup> and A Street and 7 <sup>th</sup> and A Street intersections. |
| Zoning        | Residential R-3-10-H (along Morgan Street)<br>Commercial Neighborhood CN-H-SA (along A Street)                              | Transit Village Mixed (TV-M)<br>*There is no change to the existing "H" overlay.  |

## General Plan

The City of Santa Rosa's 2035 General Plan (General Plan) designates the parcels along A Street as Retail/Medium Residential and parcels along Morgan Street as Medium Residential. The General Plan defines these land uses as the following:

### Medium Density

Housing densities from 8.0 to 18.0 units per gross acre. This designation permits a range of housing types, including single family attached and multifamily developments, and is intended for specific areas where higher density is appropriate. New single-family detached housing is not permitted except in historic preservation districts and historic neighborhoods where single family detached units are allowed.

### Retail and Business Services

The General Plan allows retail and service enterprises, offices, and restaurants. 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, are allowed. Large grocery stores are expressly permitted in community shopping centers and in the downtown area only and may be considered on other commercial sites with a CUP.

The General Plan amendment will change the project site's land use designation to Transit Village Mixed Use to include at least 40 housing units per gross acre (City 2009). The General Plan defines this land use as follows:

"This classification is intended to accommodate a well-integrated mix of higher intensity residential, 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. Housing densities shall be a minimum of 40 units per acre; there is no maximum density requirement for this designation."

The project site is also part of the Downtown Specific Plan. Portions of the project site along Morgan Street and "A" Street are located within the Downtown Specific Plan's Historic Residential Sub-Area and Courthouse Square Sub-Area, respectively. The project would extend the Courthouse Square Sub-Area by one-half block to encompass the project site via a Downtown Specific Plan Amendment. The



Courthouse Square Sub-Area is, “envisioned to be developed into a vibrant mixed-use area with new housing added to the existing office and retail uses.” Density within this sub-region is limited by a maximum height limit of four stories (City 2007a). The project does not include any retail uses.

## Zoning

The Santa Rosa City Code identifies the parcels along Morgan Street as a zoning designation of Multi-Family Residential (R-3) and the parcels along A Street as Neighborhood Commercial (CN) (City 2018). The project would rezone the project site as TV-M to allow for the proposed multi-family dwelling units on the upper stories of proposed buildings. The proposed emergency shelter and transitional housing would require a Minor CUP under the City’s Resilient City Ordinance (City Code section 20-16.060).

### 2.1.3 Density Bonus

The project includes a density bonus under GC Section 65915 and Santa Rosa City Code Section 20-31.-030(A), which allows up to a 35 percent density bonus pursuant to state law. Phase One of the onsite affordable housing (Caritas Homes) will have 30 units at 20% area median income (AMI), 15 units at 50% AMI, and 18 units at 60% AMI. This means that 71% of the Phase One units will be “very low income” and 28% of the Phase One units will be “low income.” Under the City code, the applicants are eligible for a total of three incentives or concessions:

**Table 2-2: Concessions Being Requested**

| Concession No. | Source   | Requirement  | Project   |
|----------------|--|--|---|
| 1              | Specific Plan pages 5-9  | Shop Front Street Type: Buildings shall step back a minimum of 6 feet above the third floor.             | The façades for Caritas Homes and Caritas Village are flat and do not step back on the third or any other floor. The requested concession is to: (1) allow a ground-level residential building for Caritas Homes and ground-level service uses for Caritas Center, instead of shop front street type; and (2) avoid the requirement that the façade be stepped back at least 6 feet above the third floor.  |
| 2              | Specific Plan pages 5-10 and City Code § 20-28.060, subd. (E)(1)(e)(b) | Shop Front Street Type: At the ground floor, no parking shall be allowed within 20 feet of the frontage. | The project does not meet this standard. The requested concession is to: (1) allow a ground-level residential building for Caritas Homes and ground-level service uses for Caritas Center, instead of shop front street type; and (2) allow ground-level parking closer than 20 feet from the street frontage. Caritas Center has a parking lot that is only 7 feet from the Morgan Street frontage and nine feet from the A Street frontage. The residential and |





| Concession No. | Source               | Requirement   | Project   |
|----------------|----------------------|---|---|
|                |                      |   | service uses will activate the street level.  |
| 3              | Table 2-15, note (1) | Building Placement: At least 80% of the street frontage must be located on the property line. | The proposed project does not meet this standard because of PG&E's Public Utility Easement requirements. The requested concession is to: (1) allow a ground-level residential building for Caritas Homes and ground-level service uses for Caritas Center, instead of shop front street type; and (2) allow less than 80 percent of the frontage to be on the property line. The project is setback 3 feet from the property line along A Street, 7 feet along 6th Street, and 7 feet along Morgan Street and 7th Street, as PG&E requires for a public utility easement. |

Phase Two of Caritas Homes will also be 100% affordable, but the levels of affordability have not been determined yet.

## 2.1.4 Housing Allocation Plan Concession

Santa Rosa City Code Section 21-02.050(B) allows for a concession when an applicant is building more than 70 units and constructs affordable housing on a project site. The applicants are building affordable units on the project site and have requested a concession for height under the City's Housing Allocation Ordinance.

## 2.1.5 Existing Site Conditions

The project site is in a highly developed area and currently has structures on most of the Morgan Street parcels. Most of these structures used to be dwelling units; however, one was converted to the Navigation Center (600 Morgan Street) approximately 28 years ago; two are vacant (the four-plex at 608 Morgan Street is not habitable); two are used as transitional housing (516 and 520 Morgan Street); and, one was used as a private residence but is no longer occupied (512 Morgan Street). There are currently 154 residents on the project site, consisting of 138 emergency shelter residents, 12 Transitional Residency Program (TRP) participants, and 4 private individuals. Table 2-3 summarizes the existing uses shown on Figure 2-3.

**Table 2-3: Existing Site Uses**

| Parcel | Assessor Parcel Number | Street Address | Existing Use          | # of residents          |
|--------|------------------------|----------------|-----------------------|-------------------------|
| 1      | 010-041-020            | 465 A Street   | Family Support Center | 138 temporary residents |
| 2      | 010-041-004            | 439 A Street   | parking lot           | 0                       |
| 3      | 010-041-005            | 437 A Street   | parking lot           | 0                       |



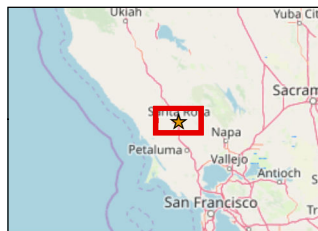
**Project Description**

| Parcel | Assessor Parcel Number | Street Address                                  | Existing Use                             | # of residents        |
|--------|------------------------|---|--|-----------------------|
| 4      | 010-041-019            | 431 A Street                                    | vacant lot                               | 0                     |
| 5      | 010-041-008            | 307 6 <sup>th</sup> Street                      | vacant lot                               | 0                     |
| 6      | 010-041-009            | 498 Washington Street                           | public street                            | 0                     |
| 7      | 010-041-010            | 500 Washington Street                           | vacant lot                               | 0                     |
| 8      | 010-041-011            | 506 Morgan Street                               | Catholic Charities office                |                       |
| 9      | 010-041-017            | 512 Morgan Street                               | family home                              | 0                     |
| 10     | 010-041-018            | 0 Morgan Street<br>Interior lot, not an address | vacant lot                               | 0                     |
| 11     | 010-041-013            | 516 Morgan Street                               | Catholic Charities transitional housing  | 6 temporary residents |
| 12     | 010-041-014            | 520 Morgan Street                               | Catholic Charities transitional housing  | 6 temporary residents |
| 13     | 010-041-015            | 600 Morgan Street                               | homeless services/<br>drop-in day center | 0                     |
| 14     | 010-041-016            | 608 and 608 ½ Morgan Street                     | Vacant 4-plex and vacant lot             | 0                     |
| 15     | 010-041-001            | 612 Morgan Street                               | vacant lot                               | 0                     |

**Note:**

At the time of the issuance of the Notice of Preparation, 512 Morgan Street was being used as a private family residence with four residents. Catholic Charities has since purchased the property and it is currently vacant.





#### Notes

1. Coordinate System: NAD 1983 StatePlane California II  
FPS 0402 Feet
2. Service Layer Credits: © OpenStreetMap (and)

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Project Location  
T.07N. R.08W Section 23  
USGS 7.5-minute Quadrangle  
Santa Rosa

Client/Project  
City of Santa Rosa  
Caritas Village Project  
Environmental Impact Report

Figure No.

**2-3**

Title

**Existing Uses**

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### 2.1.6 Surrounding Land Uses

The project site is surrounded by the following land uses:

- North: Residential neighborhood consisting of one- and two-story, detached residential buildings and a vacant lot along 7th Street.
- East: A three-story parking garage along A Street that is estimated to be 28 feet high.
- South: Three-level concrete parking garage for the downtown mall that is estimated to be 28 feet high.
- West: Highway 101, an on-ramp to Highway 101, and a sound-wall along Morgan Street.

### 2.1.7 Existing Operations

Catholic Charities currently operates several family and homeless support services out of the project location. A summary of each activity is provided below.

#### **Emergency Shelter – Family Support Center**

The Emergency Shelter – Family Support Center operates out of the former Santa Rosa General Hospital at 465 A Street. The Emergency Shelter – Family Support Center has been in operation since 1989. This facility is approximately 16,532 square feet. The facility includes a 138-bed emergency shelter for families experiencing homelessness and acts as the base of operations for the entire Shelter and Housing Department for Catholic Charities. Coordinated entry services for families, and housing navigation/stabilization/location services for families are offered out of this facility. In addition, the facility provides office space for some Catholic Charities administrative services (e.g., purchasing, facilities, payroll, etc.) for Catholic Charities Shelter and Housing.

There are approximately 46 employees on the site who work in or out of the Emergency Shelter – Family Support Center. These employees work as Program Managers (Housing Navigators, Housing Locators, Housing Stabilization Case Managers), administrative staff, maintenance workers, and cooks. There are 18 Case Managers who typically come and go from the site an average of three times per day. There are 21 Housing Locators, Stabilization, and Navigation staff that leave the site an average of 2.5 times per day. The maintenance workers and cooks are typically onsite for the duration of their shifts.

The Family Support Center is currently managed with 24-hour staffing 7 days a week to ensure safety and security for all participants. Participant advocates work in two shifts: 8 AM to 4 PM and 4 PM to 12 AM. Program aides also work the 12 AM to 8 AM shift. An onsite coordinator is responsible for supervising staff and reports to a Catholic Charities shelter staff manager. Additionally, each family is assigned a Case Manager who helps the family with their housing goals as well as any behavioral issues. Case Managers help with housing location, landlord negotiations, financial assistance, and referrals.

The Emergency Shelter – Family Support Center has 138 beds and is currently full. Families currently reside in the Center and stay in the Center for a period of between 4 and 6 months.





## Annual Homeless Survey

The Emergency Shelter – Family Support Center is the base of operation for the “Annual Sonoma County Point-in-Time Count.” This activity has 150 volunteers convene on the project site to receive homeless survey assignments. The volunteers are then dispersed throughout the county to conduct comprehensive counts of the local homeless populations to measure the prevalence of homelessness in the Sonoma County region.

## Emergency Shelter – Navigation Center

The Navigation Center operates out of the 2,554 square-foot home at 600 Morgan Street. This facility was converted from a private residence to a Navigation Center in 1991 and has been in continuous operation since this conversion. The facility is a daytime drop-in service center and does not offer overnight accommodations. The Navigation Center is primarily for single adults living on the streets. Individuals may take showers, do laundry, get mail and messages, and use the phone. The Navigation Center is the hub for Catholic Charities’ engagement efforts to link individuals to long-term, safer housing solutions. The Navigation Center serves an average of 200 people per day. Demand for services has been greater in 2019 compared to 2018. Many of the same people use the Navigation Center several times a week.

## Transitional Residency Program (TRP)

Catholic Charities operates its TRP out of two structures located at 516 Morgan (910 square feet) and 520 Morgan (1,146 square feet) Street. Each of those homes has six beds and accommodates a total of 12 individuals. The length of stay for the TRP is limited to 8 months. The TRP has been in operation since 1992.

## Coordinated Intake Program

The existing Coordinated Intake Program provides centralized waiting list, light case management, and community referrals for families on a waiting list until housing, shelter, or housing intervention becomes available. Clients access the Coordinated Intake Program by calling or visiting the drop-in locations at the Navigation Center or the Family Support Center.

## Catholic Charities Office

The 1,027 square-foot home at 506 Morgan Street is currently used by Catholic Charities as an office for five employees. These staff members work as coordinated entry case managers. The office hours for this location are 8:30 AM to 5:00 PM, 7 days a week.

## 512 Morgan Street

At the time of the public review of the Notice of Preparation, the 1,203 square-foot home at 512 Morgan Street was used as private single-family residence. Since then, Catholic Charities purchased this property in May of 2019, and the home is now unoccupied.

## Existing Clients Served

There are two types of clients served onsite. The first are residential clients. Residential clients include families staying in the Family Support Center or participants in the TRP. These clients live onsite until



more permanent housing is procured. The second is daily clients, who are only onsite during the day. Tables 2-4 and 2-5 provide a summary of the clients served by the above existing facilities on the project site.

**Table 2-4: Existing Onsite Residents**

| Clients - Residents  | Baseline   | Description   |
|--|------------|---|
| Family Support Center  | 138        | This an emergency shelter where families stay. On average, families stay here for four to six months. An estimated 20 percent of these families have a car. |
| Transitional Living Space/Transitional Residency Program (TRP) | 12         | This is where formerly homeless individuals reside on site and volunteer in the Navigation Center. An estimated 10 percent of these volunteers have a car.  |
| <b>Clients – Residents</b>                                     | <b>150</b> |   |

The Notice of Preparation, included as Appendix A of this EIR, previously disclosed that there were 120 existing residents on the project site. That estimate has been revised to account for more of the beds being occupied in the Emergency Shelter within the Family Support Center.

**Table 2-5: Existing Day Clients Served**

| Clients - Daily (no. residents) | Baseline                   |   |
|---------------------------------|----------------------------|---|
| Navigation Center               | 200 average<br>325 maximum | This is a day facility open five days per week where homeless individuals can obtain dignity services, such as showers, using a phone, doing laundry, checking mail, etc. Many people use the Navigation Center several times per week.   |
| Coordinated Intake Program      | 12                         | Provides centralized waiting list, light case management, and community referrals for families on a waiting list until housing, shelter, or housing intervention becomes available. Clients access the Coordinated Intake Program by calling or visiting the drop-in locations at the Navigation Center or the Family Support Center. |
| <b>Clients – Daily</b>          | <b>212</b>                 |   |



## Existing Staffing

Table 2-6 provides a summary of existing staffing onsite.

**Table 2-6: Existing Staffing**

| Existing Use          | Existing Employees |          |          |
|-----------------------|--------------------|----------|----------|
|                       | Day                | Swing    | Night    |
| Family Support Center | 4                  | 1        | 1        |
| Navigation Center     | 15                 | 0        | 0        |
| Other                 | 46                 | 0        | 0        |
| <b>Total Staffing</b> | <b>65</b>          | <b>1</b> | <b>1</b> |

## Good Neighbor Practices

As part of acceptance into the program, each participant signs a program agreement that outlines expected behaviors, prohibited activities, and responsibilities, including good neighbor rules that are enforced by Catholic Charities staff to ensure that participants are not loitering in the neighborhood (both during daytime and after nighttime program operation hours). Catholic Charities maintains 24-hour onsite staffing, maintains a 24-hour phone line, and holds quarterly outreach meetings with the St. Rose Neighborhood residents, business leaders, and the public. Catholic Charities strives to respond to neighborhood concerns in a way that respects the needs of the neighborhood, programs, and program participants.

### 2.1.8 Caritas Center

The Caritas Center would centralize Catholic Charities' services and programs currently located on the site by consolidating them into a single comprehensive homeless support services facility totaling approximately 46,587 square feet<sup>1</sup> and three stories in height (See Figure 2-4). Caritas Center would offer a range of services, including:

- **Emergency Shelter** (up to 45,885 square feet): The emergency shelter would include emergency housing for families (typically limited to occupancy of 6 months or less) and a Navigation Center to deliver homeless services as follows:
  - The increased emergency housing would expand shelter for homeless families with children in their care and would include a residential lobby, up to 50 private family residence rooms, two living/kitchenette areas, a communal dining/multipurpose meeting room, a commercial kitchen, bathrooms, laundry, and children's play areas.
  - The Navigation Center (approximately 3,487 square feet) would increase in physical size and would not increase its maximum daily clients, or 325 per day. The project proposes to relocate the Navigation Center and continue to provide a central location for homeless outreach and initial delivery of homeless services, including a dedicated reception/lobby, offices for the Coordinated

<sup>1</sup> This number includes 990 square feet of miscellaneous vertical circulation (stair towers, elevators) that was excluded from the floor area calculations by program area, which is why this number is 990 square feet higher than the sum of the program areas' square footages.





- Entry and Homeless Outreach Services Team, client mail facilities, lockers, showers, laundry, and bathrooms.
- Relocated wraparound services (approximately 2,253 square feet) would be provided with reception for the provision of case management, resource connection, housing counseling, classes and training, and would include a lobby, private and shared staff offices, meeting rooms, a staff lounge, bathrooms, and chapel facilities.
  - The Nightingale Shelter would be added to the site as part of the emergency shelter. It would offer a recuperative care program for the homeless people being discharged from local hospitals. Although a medical care provider would provide these services, the services are the same as what a family member would offer if the patient had a home. The Nightingale Shelter is affiliated with the Nightingale Program. The Nightingale Program is a program to help people who need very minor assistance with medications, mobility, and similar items. The Nightingale Shelter would not be open to the public. The Nightingale Shelter is an extension of Catholic Charities Nightingale Medical Respite Program, which is a regional program providing temporary housing, care, and services for homeless individuals being discharged from local hospitals or who otherwise need a safe place to recuperate from illness or injury. Catholic Charities has partnered with Sonoma County, Kaiser Permanente, Santa Rosa Memorial Health, and Sutter Santa Rosa Regional Hospital to transform the way that Sonoma County's three largest hospitals treat homeless people, because medical services and the Nightingale Clinic, emergency shelter, and Navigation Center will be onsite.
  - Administrative offices/meeting space (approximately 8,840 square feet) would be provided for leadership staff of onsite programs as well as some agency administrative staff.
  - Medical Services – Doctor's Office (approximately 2,389 square feet): The emergency shelter would add a doctor's office to provide outpatient physical and mental health services to children and adults. The clinic's primary patient population would be adults experiencing homelessness who are also receiving other services through Caritas Center. Based on a similar operation at the Brookwood Campus in Santa Rosa, the doctor's office would serve up to 90 patients per day with two-thirds of the patients coming from onsite and one-third offsite. Of the one-third coming from offsite, approximately 6 will arrive by car.
  - **Transitional Residency Program (TRP)<sup>2</sup>** (approximately 2,099 square feet): The project would include transitional housing integrated with other social services and counseling programs to assist in the transition to self-sufficiency. The transitional housing units would expand to allow for up to 20 participants in Catholic Charities' Transitional Residency Program, through which participants would develop work experience and increase social skills by assisting with Navigation Center operational duties, such as greeter, receptionist, and administrative and technical support with showers and laundry.

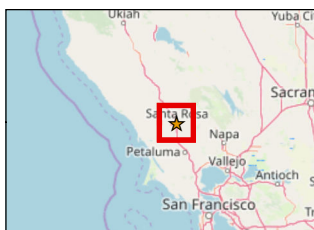
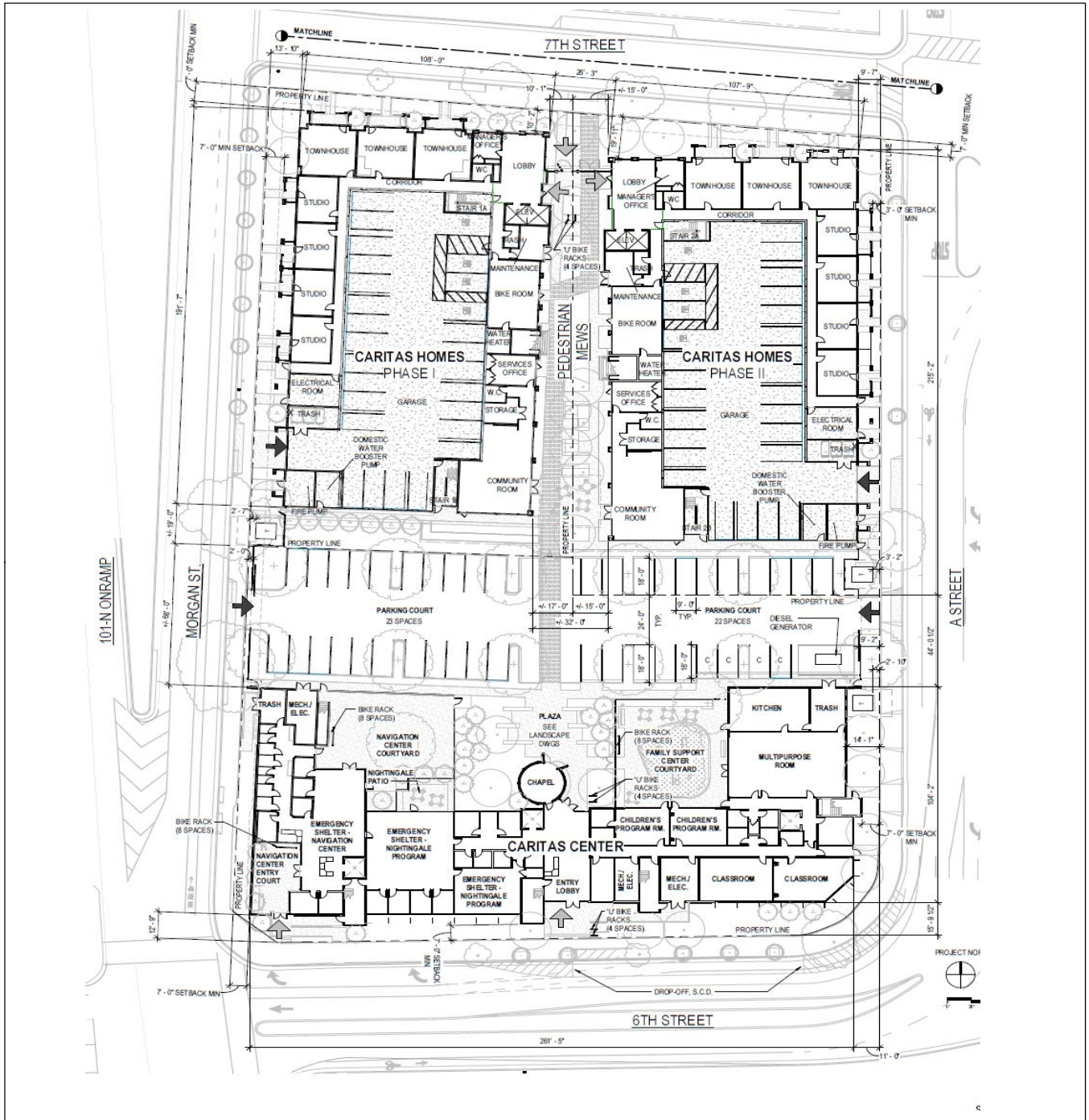
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<sup>2</sup> This use falls within the term "transitional housing" as the City Code defines it.



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- Notes**
1. Coordinate System: NAD 1983 StatePlane California II  
FPS 0402 Feet
  2. Service Layer Credits: © OpenStreetMap (and)

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Project Location  
T.07N, R.08W Section 23  
USGS 7.5-minute Quadrangle  
Santa Rosa

Client/Project  
City of Santa Rosa  
Caritas Village Project  
Environmental Impact Report

Figure No.  
**2-4**

Title

**Conceptual Site Layout**

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## Design Concept

The Caritas Center includes a progression of private walled gardens, allowing privacy for user groups, and offering off-street sheltered spaces for gathering. Wooden trellis elements, as well as metal armature and raised planter boxes, provide vertical garden opportunities. There is a clear hierarchy between the lobby entries (at the middle of 6<sup>th</sup> and 7<sup>th</sup> streets) and the intimately scaled apartment patios (lining 7<sup>th</sup>, A, and Morgan streets).

## Hours of Operation

The hours of operation at the Caritas Center would remain the same as the existing Family Support Center, with 24-hour staffing 7 days a week. Participant Advocates would work in two shifts: 8 AM to 4 PM and 4 PM to 12 AM. Program Aides would also work the 12 AM to 8 AM shift. An onsite coordinator would be responsible for supervising staff and would report to Catholic Charities' Shelter Staff Manager. Additionally, each family would be assigned a Case Manager who would help the family with their housing goals as well as any behavioral issues. Additional staffing would include participant advocates, outreach workers, and intake staff.

## Population

Catholic Charities would expand its emergency family housing, with 50 family units accommodating up to four people per unit (200 residents) on the project site as part of the Caritas Center; accommodate 40 Nightingale Program participants; and expand the Transitional Residency Program from 12 to 20 participants. The total population of Caritas Center would be 260 residents. There are currently 150 residents on the project site, consisting of 138 emergency shelter residents, and 12 Transitional Residency Program participants. Caritas Center would increase the number of residents by 110 people (not including the new housing units provided by Caritas Homes).

## Employees and Clients

As compared to the existing services and facilities, the proposed Caritas Center would generate an additional 65 new employees, accommodate 106 additional residents, and 65 daily clients, on an annual basis.

**Table 2-7: Caritas Center Employees and Clients Served Annually**

| Sites                 | Currently Onsite | Proposed with Project | Change | Description   | Notes                       |
|-----------------------|------------------|-----------------------|--------|---|-----------------------------|
| <b>Residents</b>      |                  |                       |        |   |                             |
| Family Support Center | 138              | 200                   | +62    | This an emergency shelter where families stay. On average, families stay here for 4 to 6 months. We estimate that 20% of these families have a car. | 50 rooms; 4 people per room |



| Sites  | Currently Onsite   | Proposed with Project | Change                        | Description  | Notes                                |
|--|--------------------|-----------------------|-------------------------------|--|--------------------------------------|
| Emergency Shelter - Nightingale Program                        | 0                  | 40                    | +40                           | This is where homeless individuals recover when they are discharged from the hospital. On average, people stay 29 days. Typically, a taxi brings them to the Nightingale Program. They receive assistance taking medications and other lay-person care. Departing clients are typically transported offsite via car. These clients do not have cars. |                                      |
| Transitional Living Space/Transitional Residency Program (TRP) | 12                 | 20                    | +8                            | This is where formerly homeless individuals reside onsite and volunteer in the Navigation Center. We estimate that 10% of these volunteers have a car.   | These are volunteers, not employees. |
| <b>Residents Total</b>   | <b>150</b>         | <b>260</b>            | <b>+110</b>                   |  |                                      |
| <b>Employees – Overall</b>                                     |                    |                       |                               |  |                                      |
| Family Support Center  | 6                  | 11                    | +5                            |  |                                      |
| Medical Service - Doctor's Office                              | 0                  | 16                    | +16                           | This is the maximum number of employees on site at one time for this use.  |                                      |
| Navigation Center  | 15                 | 23                    | +8                            |  |                                      |
| Emergency Shelter - Nightingale                                | 0                  | 6                     | +6                            |  |                                      |
| Other employees  | 46                 | 76                    | +30                           |  |                                      |
| <b>Employees – Overall Total</b>                               | <b>67</b>          | <b>132</b>            | <b>+65</b>                    |  |                                      |
| <b>Daily Clients (no residents)</b>                            |                    |                       |                               |  |                                      |
| Navigation Center  | 200 avg<br>325 max | 200 avg<br>325 max    | 200 avg<br>No change from max | This is a day facility, open 5 days per week, where homeless individuals can obtain dignity services such as showers, using a phone, doing laundry, checking mail, etc. Many people use the Navigation Center several times per week.  |                                      |



| Sites                                | Currently Onsite | Proposed with Project | Change       | Description   | Notes  |
|--------------------------------------|------------------|-----------------------|--------------|---|--|
| Coordinated Entry Program            | 12               | 68                    | +56          | Provides centralized waiting list, light case management, and community referrals for families on a waiting list until housing, shelter, or housing intervention becomes available. Clients access the Coordinated Entry System by calling or visiting the drop-in locations at the Navigation Center or the Family Support Center. |  |
| Medical Service – Doctor's Office    | 0                | 90                    | +90*         | This is a doctor's office helping clients.  | Based on a similar office on Brookwood Avenue, this doctor's office expected to see 90 patients per day. Of the 90 daily patients, sixty (60) will already be onsite, twenty-four (24) will walk or will take public transportation from offsite locations. The applicants estimate that six (6) will arrive by car. |
| <b>Total Average Clients – Daily</b> | <b>212</b>       | <b>402</b>            | <b>+190*</b> |   |  |

Note:

\* The Medical Service-Doctor's Office use will not result in 90 new trips per day. This is because sixty (60) of the patients will already be on the site, as residents of Caritas Homes or as clients of Caritas Center. Of the remaining thirty (30) patients, twenty-four (24) will use public transportation or walk, and only six (6) will arrive by private car. These estimates are based on what actually occurs at a similar clinic on Brookwood Avenue.

## 2.1.9 Caritas Homes

There are currently no permanent affordable housing units located on the project site. Caritas Homes would provide up to 126 new units of permanent affordable rental housing in two residential structures, plus two units reserved for onsite managers for a total of 128 units (See Figure 2-4). These two residential structures would mostly be built on top of ground-level podium parking for the equivalent of four-story buildings except along 7<sup>th</sup> Street. Three of the four sides of the residential structures would have active uses on the ground floor and at the shared plaza, or mews. Other common amenities would include outward facing lobbies and community rooms. Along 7<sup>th</sup> Street, the Caritas Homes structures would be three-story apartments. Along Morgan and A Streets, the buildings would have ground-floor residential units facing onto the street to conceal the internal parking garages. All ground floor units look directly onto the street that they face. Exterior doors, patios, and windows directly address the public sidewalk. Each phase of the residential construction would be composed of a building providing 64 units, totaling 61,246 square feet for a total of 128 units (126 rental units and two manager units). The residential units would be a mix of studio, one-bedroom, and two-bedroom apartments. Approximately



half of these units would target people who have experienced homelessness or who are at risk of homelessness.

## Design Concept

Caritas Homes would be podium-style construction, where a portion of the ground level would be vehicle parking with up to three stories of residential construction above the single-story parking podium. The ground floor residential units along Morgan and A Streets would conceal the internal parking garages. The 7<sup>th</sup> Street frontage would be limited to two stories. The plaza, or mews, between the two residential structures would be pedestrian friendly with shared amenities lining both sides and would include landscaping features. The Morgan and A Street frontages would similarly be pedestrian friendly with ground-level units and patios along most of their façades. There would be additional open space in the form of landscaped courtyards on top of the garage.

## Population

Burbank Housing has occupancy standards and lease agreements that comply with its various funding sources as well as state and local laws. Occupancy standards include minimum and maximum number of residents based upon unit size. Table 2-8 provides a summary of the occupancy guidelines.

**Table 2-8: Burbank Housing Standard Occupancy Guidelines**

| Unit Type   | Minimum Occupancy [Person(s)] | Maximum Occupancy [Person(s)] |
|-------------|-------------------------------|-------------------------------|
| Studio      | 1                             | 2                             |
| One bedroom | 1                             | 3                             |
| Two bedroom | 2                             | 5                             |

Source: Burbank Housing, personal communication, May 17, 2019

Burbank Housing uses its Standard Occupancy Guidelines unless the funding source has a more restrictive one. In those situations, the more restrictive standard would apply. The standard lease agreement for Burbank Housing units includes a section that lists all approved tenants, adults, and minors. Households that violate the agreement are subject to a 180-day notice to terminate occupancy.

Based on experience with other similar developments and the Standard Occupancy Guidelines, Caritas Homes would provide housing for up to 362 new residents. Table 2-9 provides a summary of the estimated residents by unit type.

**Table 2-9: Caritas Homes – Maximum Number of Occupants Calculation**

| Type        | Phase 1 | Phase 2 | Total | Minimum Number of Occupants per Unit | Maximum Number of Occupants per Unit | Mid-point Number | Crossroads Actual Number of Occupants per Unit | Number To Be Used for Caritas | Total Occupants |
|-------------|---------|---------|-------|--------------------------------------|--------------------------------------|------------------|--|-------------------------------|-----------------|
| Studios     | 31      | 31      | 62    | 1                                    | 2                                    | 1                | N/A  | 2                             | 124             |
| One-bedroom | 23      | 23      | 46    | 1                                    | 3                                    | 2                | 2.27   | 3                             | 138             |
| Two-bedroom | 10      | 10      | 20    | 2                                    | 5                                    | 3.5              | 2.74   | 5                             | 100             |





| Type                        | Phase 1 | Phase 2 | Total | Minimum Number of Occupants per Unit | Maximum Number of Occupants per Unit | Mid-point Number | Crossroads Actual Number of Occupants per Unit | Number To Be Used for Caritas | Total Occupants |
|-----------------------------|---------|---------|-------|--------------------------------------|--------------------------------------|------------------|--|-------------------------------|-----------------|
| Total                       | 64      | 64      | 128   |                                      |                                      |                  |  |                               | 362             |
| Average occupancy per unit= |         |         |       |                                      |                                      |                  |  |                               | 2.8             |

Source: Burbank Housing, Response to RFI #3 and attachments thereto

### 2.1.10 512 and 520 Morgan Street

The project would include demolition of all structures on the Morgan Street parcels including the structures on 512 and 520 Morgan Street. The structure on 512 Morgan Street was a private family home that has since been purchased by Catholic Charities and is unoccupied, and the structure on 520 Morgan is currently used by Catholic Charities for TRP residents.

### 2.1.11 Tree Removal and Landscaping

Horticulture Associates inventoried 66 trees on the project site in September 2018. A total of 55 trees are proposed for removal, however only 40 of those trees would require a Tree Removal Permit. Figure 2-5 shows the tree preservation and removal plan prepared by Horticulture Associates. The landscaping plan for the project was updated on July 22, 2019, to include the removal of selected street trees required for aerial fire apparatus access. Landscaping for the project would be required to comply with the City's Water Efficient Landscape Policy.

### Caritas Center

The Caritas Center would include small and large/medium trees fronting the building on Morgan, 6<sup>th</sup>, and A streets. Four outdoor courtyards would be provided. Landscaping would include plantings, vegetated stormwater planting, landscape walls, and enhanced pavement.

### Caritas Homes

The Phase 1 and 2 buildings would be separated by a central plaza area that runs through the middle of the project site from the Caritas Center to mid-block 7<sup>th</sup> Street. Landscaping for this plaza area would include pavers for stormwater infiltration, native plant stormwater swales, and shade trees. These landscaping features would provide pedestrian-friendly frontages throughout the project site. Additionally, the open spaces in the permanent housing section of the project site would have planters to manage stormwater. Finally, street frontage and setback areas would have flower plantings and sidewalk shade trees.

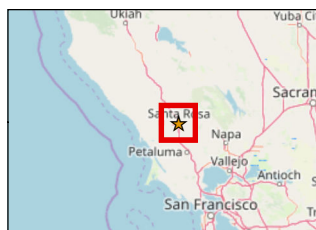
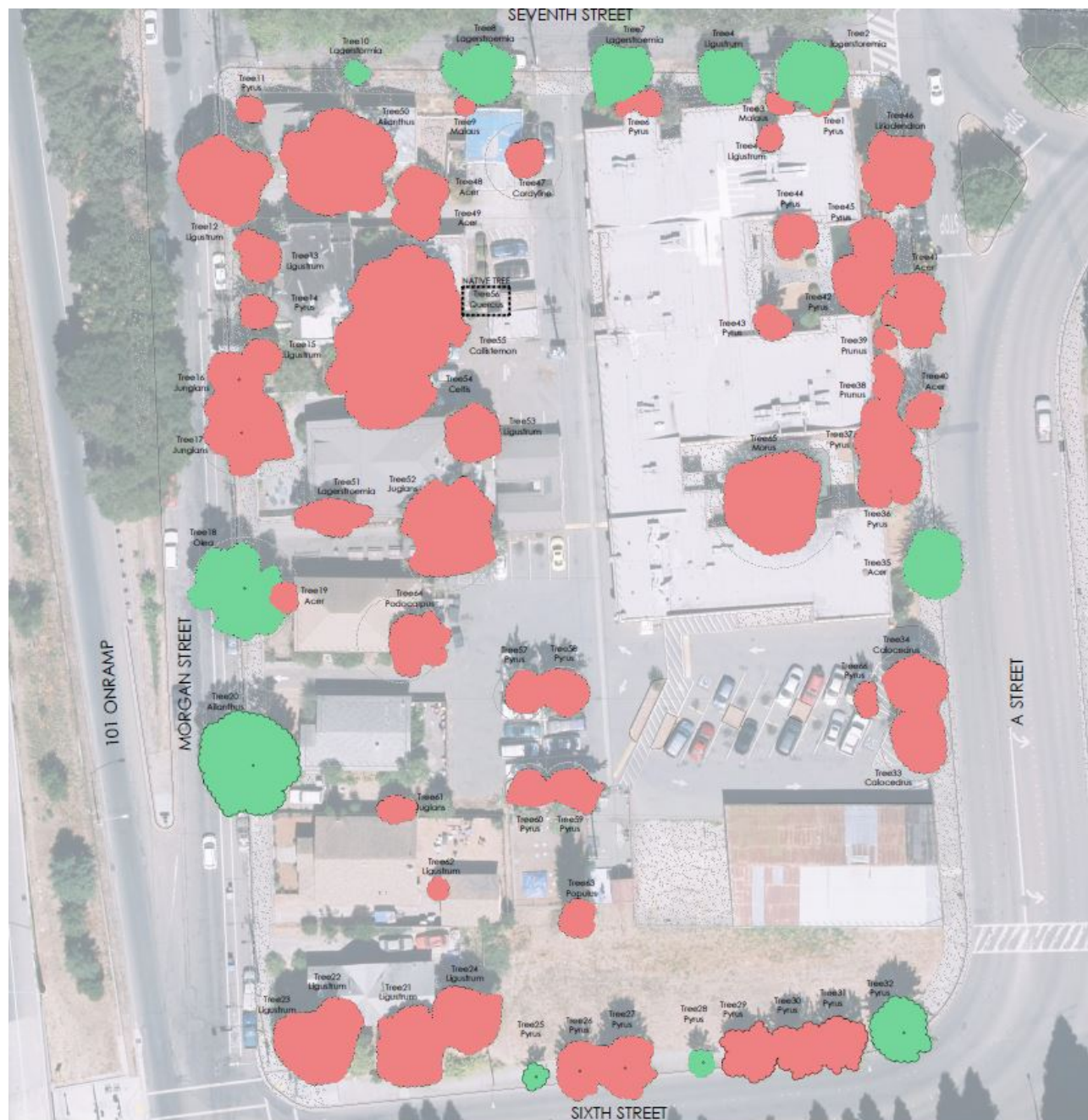
### Offsite Improvements

The project would require improvements to existing utilities as described below in Section 2.1.15, Utilities, and roadway improvements. (see Section 3.8, Transportation).



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## TREE PRESERVATION AND REMOVAL



TREE TO BE PRESERVED



TREE TO BE REMOVED, FOR CONSTRUCTION  
OR PER FIRE DEPARTMENT REQUIREMENTS

— Tree number from Project Arborist Report Sept. 9th 2014

Tree26  
Pyrus

## Notes

- Notes**
1. Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
  2. Service Layer Credits: © OpenStreetMap (and)

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Project Location  
T.07N, R.08W Section 23  
USGS 7.5-minute Quadrangle  
Santa Rosa

Client/Project  
City of Santa Rosa  
Caritas Village Project  
Environmental Impact Report

Figure No.

## Title

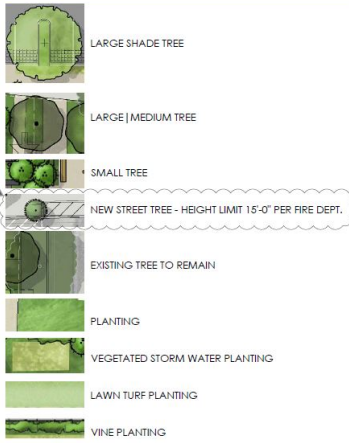
# Tree Removal and Preservation Plan

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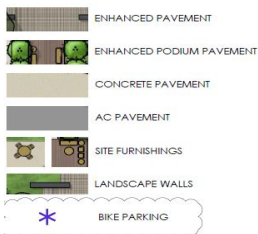




## PLANTING LEGEND



## PAVEMENT & SITE LEGEND



## CARITAS CENTER SITE LEGEND

- 13 NAVIGATION CENTER ENTRY COURTYARD
- 14 NAVIGATION CENTER COURTYARD
- 15 FAMILY SUPPORT CENTER COURTYARD
- 16 PLAY STRUCTURE (2-12 AGE RANGE)
- 17 PLAZA
- 18 NIGHTINGALE PATIO
- 19 PROPERTY LINE
- 20 DROP OFF

## CARITAS HOMES SITE LEGEND

- 1 COVERED GATHERING AREA
- 2 GATHERING AREA UNDER TREE CANOPY
- 3 COMMUNAL LAWN AREA
- 4 PET RELIEF AREA
- 5 STAIRS TO PODIUM LEVEL TERRACE
- 6 RAISED PODIUM PLANTERS
- 7 PODIUM SEATING AREAS
- 8 MEWS TRELLIS AND GATE
- 9 TENANT PORCH AND ENTRY
- 10 TENANT VEGETABLE GARDEN PLANTER
- 11 GARAGE ENTRY
- 12 LOADING ZONES
- 13 PROPERTY LINE



Project Location  
T.07N, R.08W Section 23  
USGS 7.5-minute Quadrangle  
Santa Rosa

Client/Project  
City of Santa Rosa  
Caritas Village Project  
Environmental Impact Report

Figure No.

2-6

Title

Landscaping Plan

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## 2.1.12 Vehicular Access

### Caritas Center

Pedestrian access to the Navigation Center would be through a gated courtyard at the western corner of 6<sup>th</sup> Street. Pedestrian access to all other functions in the building would be through the main lobby located at the middle of the building facing south onto 6<sup>th</sup> Street. The project would include making the northern edge of 6<sup>th</sup> Street, immediately in front of Caritas Center, a loading zone. Other vehicular access would be from A Street or Morgan Street, with surface parking lots immediately north of the building. Visitors arriving from the parking lot could use the rear entrance of the main lobby, which faces north at the center of the building.

### Caritas Homes

Pedestrian access to Caritas Homes Phases 1 and 2 would be directed through the pedestrian gate at the mews centered on 7<sup>th</sup> Street. From that secure access point, visitors would enter the building through the adjacent lobbies into either building. Vehicular access would be through the parking garages accessed from Morgan Street (Phase 1) or A Street (Phase 2).

### 7<sup>th</sup> Street Temporary Closure

As detailed in Section 2.2.1, Schedule, and Section 2.2.2, 7<sup>th</sup> Street would require a temporary closure of 2 to 4 years during construction to allow for staging.

### Roundabouts/7<sup>th</sup> Street Permanent Partial Closure

The Downtown Specific Plan includes the provision of roundabouts at the intersections of 7<sup>th</sup> Street and A Street and 6<sup>th</sup> Street and A Street. The Downtown Specific Plan does not include specific standards for the diameter of the roundabouts; however, the City's Northern Downtown Pedestrian Linkages Study Final Report (City 2006) includes a 110-foot diameter roundabout. As shown by the red dashed line in Figure 2-7, at 110-feet, the proposed roundabouts would impact the project site, and as such, the proposed project includes the modification of the Downtown Specific Plan to include the roundabouts at a specified 80-foot diameter. The reduced diameter roundabouts would not impact the project site.

The Northern Downtown Pedestrian Linkage had envisioned full closure of 7<sup>th</sup> Street south of A Street to the alley-way to create a pedestrian plaza; however, the City had concerns with potential maintenance issues associated with a large plaza area created by the full closure, and as such, 7<sup>th</sup> Street would be changed to a one-way road to provide additional pedestrian space, but it would not create a large area that could become a potential nuisance. The A Street and 7<sup>th</sup> Street roundabout could also accommodate two-way traffic if the City opted to maintain two-way traffic. The A Street and 6<sup>th</sup> Street Roundabout would be maintained for two-way traffic.

Reducing the diameter of the roundabouts to 80 feet would allow all truck traffic to access the Downtown Plaza (see Figure 2-8), but they would not be able to make a left-turn onto A Street from 6<sup>th</sup> Street or access the roundabout on A Street and 7<sup>th</sup> Street. This truck access limitation would be consistent with the pedestrian goals of the Downtown Specific Plan. Fire trucks, the largest of the City-owned vehicles, would be able to access both 80-foot roundabouts (see Figure 2-9). The above roundabout concepts



have all included converting 7<sup>th</sup> Street to a one-way road to avoid full closure of that roadway, but the roundabout concepts would also work with a two-way road at 7<sup>th</sup> Street.

### 2.1.13 Parking

#### Caritas Center

Table 3-4 of the City's Zoning Ordinance sets forth the parking requirements for Caritas Center. For emergency shelters, Table 3-4 of the City's Zoning Ordinance requires one parking space for every ten beds plus one parking space per staff person on duty for the emergency shelter use. The emergency shelter would have up to 200 beds, which would require 20 parking spaces. There would be three emergency shelter staff members onsite at any time, which would require three additional parking spaces. The Transitional Living Space would have up to 20 beds, which would require two more spaces. Thus, the total parking requirement for the residential portion of Caritas Center would be 25 parking spaces. However, the proposed Caritas Center would have 45 parking spaces, including five compact spaces and two accessible spaces. In addition, 18 minimum bicycle parking spaces would also be provided. No long-term or overnight parking for passenger vehicles, recreational vehicles, or campers would be allowed in the surface parking lot.

Table 3-4 of the City's Zoning Ordinance states that there is no parking requirement for nonresidential uses in the Downtown Specific Plan; therefore, there is no parking requirement for the nonresidential portion of Caritas Center.

#### Caritas Homes

Podium-style parking on the ground floor of each Caritas Homes building would provide 27 parking spaces per building for a total of 54 spaces, which is a ratio of 0.42 space per dwelling unit. The applicants have requested a parking reduction under Santa Rosa City Code section 20-36.050.C.1 to allow Caritas Homes to have 54 parking spaces. Table 3-4 of the City Code requires one reserved space per unit.

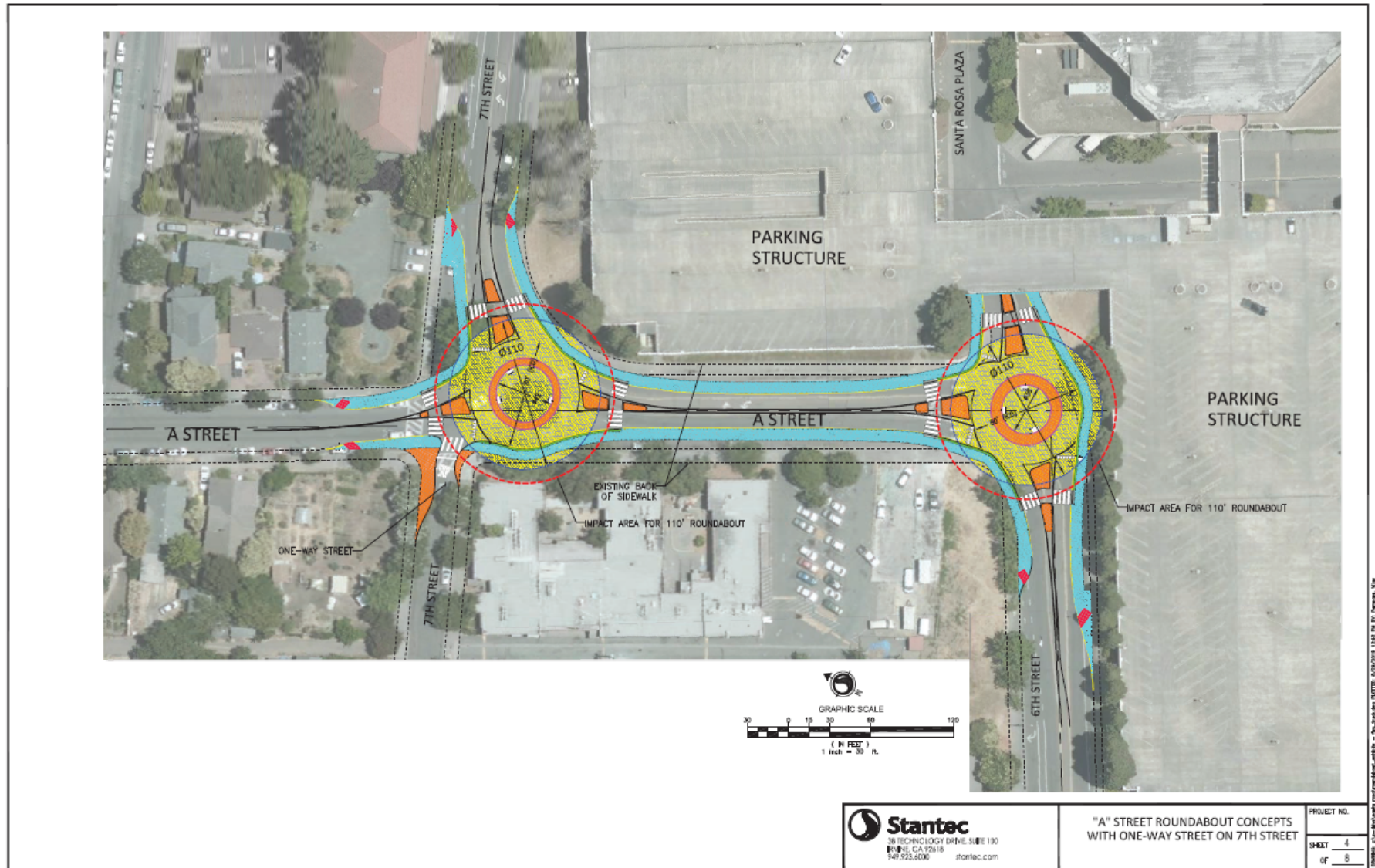
Caritas Homes will have 128 units and 54 parking spaces, which is 0.42 space per unit. This ratio is consistent with a similar housing project, Burbank Housing's Hendley Circle community at Aston Avenue and Hendley Street in Santa Rosa that opened in the early 1990s to house homeless and at-risk persons with disabilities. Hendley Circle is 1.04 acres and contains seven buildings with a community room/office of 1,599 square feet and six residential buildings totaling 9,856 square feet. The community consists of 26 single-room occupants and one two-bedroom manager's unit that serves a similar population as what is proposed for Caritas Homes. In the Hendley Circle development, the actual vehicle ratio falls within the statutory limit of 0.3 parking space per unit for this type of housing. Given the project site's location in downtown Santa Rosa, Caritas Homes' residents would enjoy a larger variety of public transportation opportunities and many amenities that are easily accessible for pedestrians. The nearest small grocery store (Varejão Santa Rosa) is located within 0.5 mile of the project site, a larger grocery store (Grocery Outlet Bargain Market) is just over a mile away. Thus, the proposed 0.42 space per unit at Caritas Homes is adequate for onsite residential parking and exceeds the parking need for similar uses with a similar resident population.

Table 2-10 provides a summary of the parking requirements and the number of spaces proposed by the project.





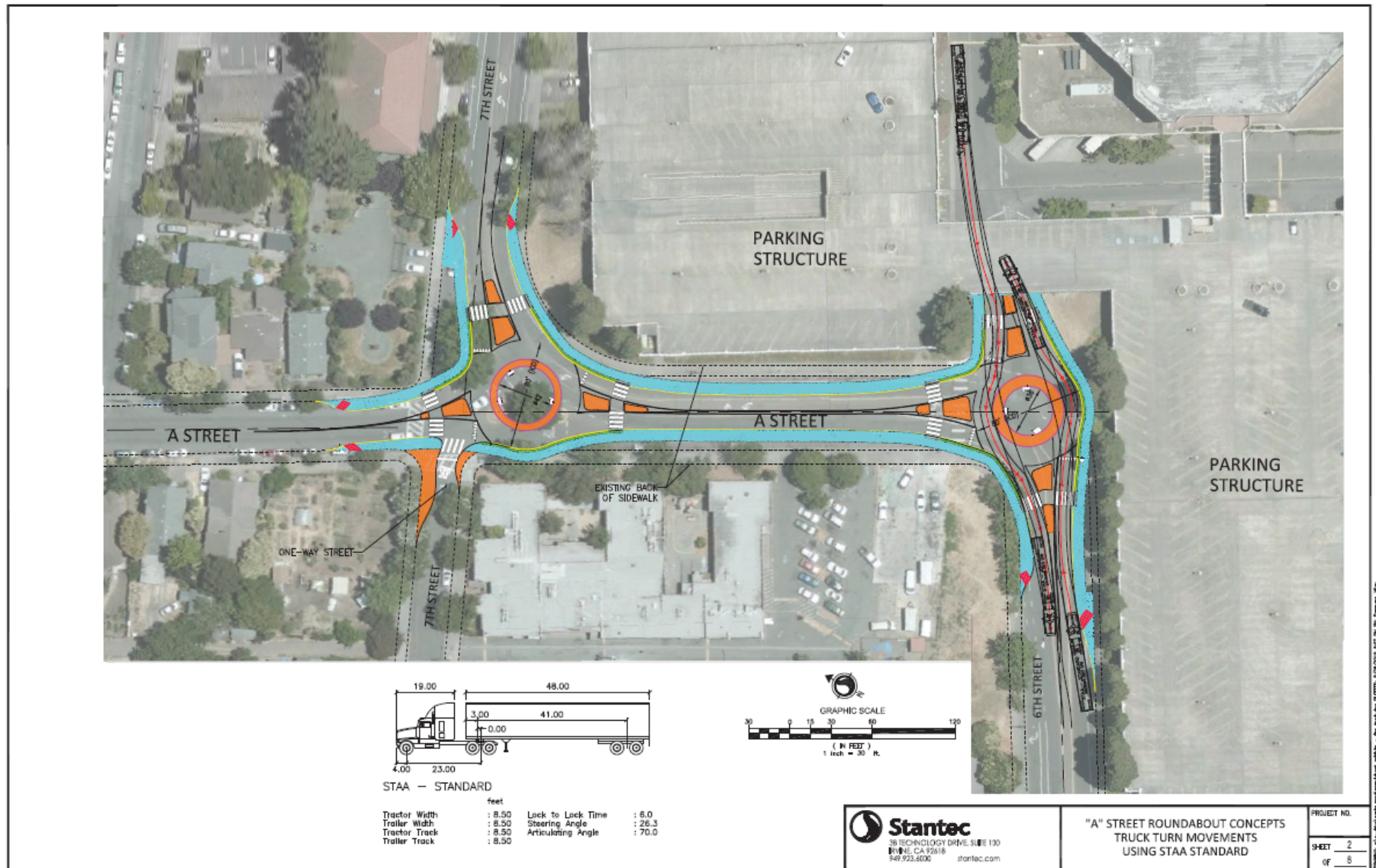
Figure 2-7: A Street 80-foot Roundabout Concepts with One-Way Street on 7<sup>th</sup> Street



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Figure 2-8: A Street 80-foot Roundabout Concepts with One-Way Street on 7<sup>th</sup> Street – Truck Access

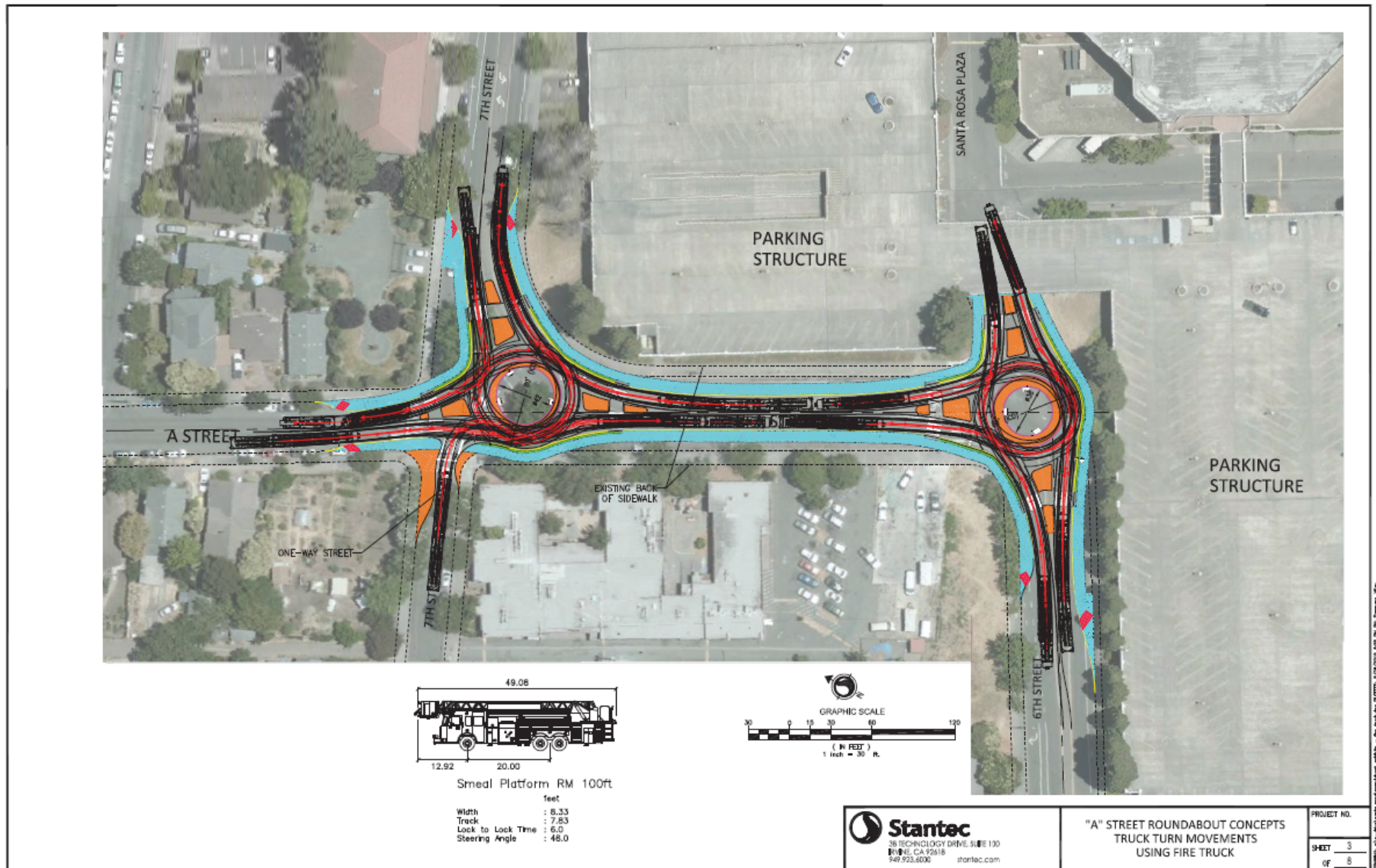


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Figure 2-9: A Street 80-foot Roundabout Concepts with One-Way Street on 7<sup>th</sup> Street – Fire Truck Access



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**Table 2-10: Caritas Village Parking Requirements**

| Land Use Type       | Zoning Code  | Number of Parking Spaces Required per City Zoning Code | Number of Parking Spaces Provided | Compliant with Regulation?                |
|---------------------|--|--|-----------------------------------|---|
| Emergency Shelter   | One space for every ten beds provided plus one space for each staff person on duty | 25   | 45                                | Yes                                       |
| Nonresidential Uses | None required within Downtown Specific Plan  | 0  | 0                                 | Yes                                       |
| Caritas Homes       | Studio/one-bedroom unit – one space per unit                                       | 108  | 54                                | No (project includes a parking reduction) |
|                     | Two or more bedroom – two spaces per unit  | 20   |                                   | No (project includes a parking reduction) |

### 2.1.14 Aesthetics and Design

The project would be designed to be compatible with the surrounding land uses. Materials most likely to be used are a combination of stucco, cement panels, ceramic tiles, metal panels, and wood. Cement board lapped siding in combination with stucco may be used along the residential edge of 7<sup>th</sup> Street. All street frontages of Caritas Homes (Morgan, 7<sup>th</sup>, and A streets) are lined with covered residential patios facing the streets. Street-facing patios would include wood details on the railings and exposed beams and rafters in their roofs so that dwelling units are compatible with nearby residential buildings. The design and architectural elements for each street are discussed below.

#### A Street

Approximately one-half of the length of the A Street frontage is lined with housing. Proposed housing along this street would be punctuated by living room bays looking out into the public realm for community visibility, and building heights would generally be three to four stories (stepping down at the northeast corner of the intersection with 7<sup>th</sup> Street to avoid detracting from the nearby historical residential neighborhood, which is part of the St. Rose Historic District). Ground-floor units would be framed with small private patios. The southern one-half of the A Street frontage will accommodate a gated entry to the Caritas Center parking lot and structure.

#### Morgan Street

The project would include trees along the east side of Morgan Street, and the building height would be between two and four stories. Similar to A Street, the four-story residential building would have bay windows to support a variety of scales. The building height would decrease to two stories near the intersection with 7<sup>th</sup> Street to be compatible with the adjacent residential neighborhood. The exterior of the



building would be a combination of stucco, cement board panels and siding, wood soffits below bay windows, and wood siding.

### **6<sup>th</sup> Street**

This three-story primary façade of the Caritas Center would be divided into eastern and western sections, flanking the primary lobby entrance at the center. Glare at night would be reduced by projecting shading devices. The western wing would have expansive windows lined with shading devices and would be fronted by raised exterior planters. The eastern section of the façade would have exterior materials of stucco and cement panels, with bays and operable windows providing a more residential scale. The Navigation Center entrance would be located along the western edge of 6<sup>th</sup> Street.

### **7<sup>th</sup> Street**

The residential units along 7<sup>th</sup> Street would be two stories and would have individual patios to be compatible with the adjacent residential neighborhood. Additionally, the buildings would have pitched roofs, patios, and smaller window proportions so the project reflects the smaller scale of the adjacent neighborhood. At the corner of A Street and at the mid-block opening, the building would step up to three stories. Lobbies for both Caritas Homes buildings access the mid-block mews and frame the pedestrian entrance to the residences.

## **2.1.15 Alternative Transportation**

The project site would be served by CityBus Routes 1, 2B, and 10, with multiple bus stops 0.1, 0.2, and 0.25 mile from the project site. Routes 1 and 2 operate on a 15-minute schedule and Route 10 operates on a 10-minute schedule. The project site is also located within 0.25 mile of the Sonoma-Marin Area Rail Transit (SMART) Station in Railroad Square and 0.30 mile from the Second Street Transit Mall (City 2018). The Caritas Center would provide a minimum of 18 bicycle parking spaces, while the Caritas Homes would provide an interior bicycle room for up to 128 long-term bicycle spaces and four outdoor bicycle parking spaces.

## **2.1.16 Sustainability**

The project would be transit-oriented because of its proximity to the SMART Station and the Transit Mall, with minimal reliance on vehicles and individual vehicle ownership. The project would also include ample space and equipment for secured bicycle parking.

Caritas Homes and Caritas Center intend to provide onsite energy generation using photovoltaic solar panels; however, the size and quantity would be dependent upon available funding opportunities. The project would be built to comply with Title 24 standards to be “solar-ready” with appropriate roof strength and installed conduit. Indoor air quality strategies would be a focused portion of the sustainability approach. The site design and mechanical systems would ensure healthy indoor air quality within all homes and would limit exposure to noise and toxic air contaminants from the adjacent freeway. Individual units and living spaces would be provided with mechanically filtered fresh air, with active filtration of fine particles, and would be fitted with zero- or low-VOC finish materials. Similarly, units near freeway noise sources would have augmented exterior wall assemblies and windows with high Sound Transmission Class ratings to ensure a comfortable living environment.





### 2.1.17 Utilities

The City currently provides water, sewer, and utility service to the project site and would continue to do so.

#### Water Supply

The project site is currently served by two 12-inch waterlines located at A Street and 6<sup>th</sup> Street, a 4-inch waterline located at Morgan Street, and a 6-inch waterline located at 7<sup>th</sup> Street. The 4-inch water line on Morgan Street would be abandoned, and a new 8-inch water line would be installed.

#### Stormwater

The project site is currently served by 15-inch storm drains located at A Street and 15-inch, 18-inch, and 21-inch storm drains on 6<sup>th</sup> Street. The project would create 2-acres of new impervious surface. The project would include a new 18-inch public storm drain on Morgan Street which would be designed in accordance with the City's storm drain standards.

#### Wastewater

The project site is currently served by a 6-inch and 15-inch sewer line located on A Street, a 6-inch sewer line on Morgan Street, and an 8-inch sewer line located at 7<sup>th</sup> Street. No improvements are anticipated for the sewer lines. The 6-inch line along Morgan Street would be abandoned as part of this project.

#### Electricity

The project site receives electrical service from Pacific Gas & Electric. Current usage for the existing facilities on the site are 187,479 kilowatt hours (kWh) of electricity per year and 7,410 therms of natural gas per year. Section 3.10, Energy, contains detailed information on the project's energy usage.

### 2.1.18 Emergency Generator

The project includes one diesel-powered emergency generator for Caritas Center. The generator would be located in the southeast corner of the parking lot for Caritas Center. The unit output shall be a minimum of 300 kilowatts (kW). The generator will be under scheduled maintenance per National Fire Protection Association (NFPA) requirements and have a fuel capacity sufficient to run for 48 continuous hours. The maximum annual operation is 50 hours per year under current BAAQMD permits. The exact manufacturer is unknown at this time, but the generator model will be 2019 or later, which would correspond to a Tier 4 Final Engine, with the lowest emissions of oxides of nitrogen and particulate matter. The generator's height would not exceed 78 inches.

## 2.2 PROJECT CONSTRUCTION

### 2.2.1 Schedule

The Caritas Village would be built in three phases: Caritas Homes Phase 1 (on Morgan Street), Caritas Center, and Caritas Homes Phase 2 (on A Street). Tables 2-11 through 2-13 show the anticipated schedule based on the assumption that the construction would begin in 2020. For Caritas Homes, the



construction schedule is the same for each phase, but sequential. Caritas Homes Phase 1 and Phase 2 are identical except for the start date. It is anticipated that ancillary improvements would occur concurrently with the construction of the facilities. Any additional construction equipment for the improvements is accounted for in each construction phase.

**Table 2-11: Caritas Homes Phase 1 Construction Schedule**

| Task                  | Start Date | End Date  | Workdays |
|-----------------------|------------|-----------|----------|
| Demolition            | 3/23/2020  | 4/14/2020 | 20       |
| Site Preparation      | 4/15/2020  | 4/20/2020 | 5        |
| Grading               | 4/21/2020  | 5/1/2020  | 10       |
| Building Construction | 5/2/2020   | 3/1/2021  | 260      |
| Paving                | 3/2/2021   | 3/12/2021 | 10       |
| Architectural Coating | 3/13/2021  | 3/24/2021 | 10       |

**Table 2-12: Caritas Center Construction Schedule**

| Task                  | Start Date | End Date  | Workdays |
|-----------------------|------------|-----------|----------|
| Demolition            | 5/18/2020  | 6/9/2020  | 20       |
| Site Preparation      | 6/10/2020  | 6/20/2020 | 10       |
| Grading               | 6/21/2020  | 7/2/2020  | 10       |
| Building Construction | 7/3/2020   | 7/22/2021 | 330      |
| Paving                | 7/23/2021  | 8/12/2021 | 18       |
| Architectural Coating | 8/13/2021  | 9/2/2021  | 18       |

**Table 2-13: Caritas Homes Phase 2 Construction Schedule**

| Task                  | Start Date | End Date  | Workdays |
|-----------------------|------------|-----------|----------|
| Demolition            | 2/1/2022   | 2/23/2022 | 20       |
| Site Preparation      | 2/24/2022  | 3/1/2022  | 5        |
| Grading               | 3/2/2022   | 3/12/2022 | 10       |
| Building Construction | 3/13/2022  | 1/10/2023 | 260      |
| Paving                | 1/11/2023  | 1/21/2023 | 10       |
| Architectural Coating | 1/22/2023  | 2/2/2023  | 10       |

Project construction and grading activities would be consistent with the City's Municipal Code and the project would be conditioned to limit construction hours to between 7 AM and 7 PM, Monday through Friday, and between 9 AM and 5 PM on Saturday. Project construction and grading activities would not occur on Sundays or federal holidays.

### 2.2.2 Access and Staging

Workers would access the project site from city streets and Highway 101. Materials would typically be stored onsite in the future parking lot areas. However, flooring and photovoltaic panels may be stored offsite.



The construction work is anticipated to occur as far as the centerlines of A, 6<sup>th</sup>, and 7<sup>th</sup> streets and as close as 5 feet from the west curb along Morgan Street (both along the larger block and the two lots northeast of the larger block). Furthermore, improvements are being proposed in the road right-of-way within these three streets as described below.

- A Street: Preserve existing sidewalks and tree wells. Eliminate existing driveway curb cuts and create two new driveway entries. Create new sanitary sewer and water laterals.
- 6<sup>th</sup> Street: Street would be restriped to reflect the loading zone in front of Caritas Center and minor curb adjustments.
- Morgan Street: Preserve existing sidewalks and tree wells. Eliminate existing driveway curb cuts and create two new driveway entries. Create new water main and lateral, new manhole, and new storm drain.
- 7<sup>th</sup> Street: Preserve existing sidewalks and tree wells. Eliminate existing driveway curb cuts. Create new sanitary sewer lateral connections.
- 7<sup>th</sup> Street: To provide room for staging, 7<sup>th</sup> Street would be subject to a 2- to 4-year closure during construction.

### 2.2.3 Construction Equipment and Workers

Construction equipment anticipated onsite is listed in Table 2-14. No pile driving is proposed. Rammed aggregate piers would be used to reinforce the soils onsite for all the structures. Construction workers for each housing phase and Caritas Center would fluctuate between 25 and 100 workers per day, with an average of 50 workers per day.

**Table 2-14: Proposed Construction Equipment**

| Phase Name            | Off-Road Equipment Type   |
|-----------------------|---------------------------|
| Demolition            | Concrete/industrial saws  |
|                       | Excavators                |
|                       | Rubber tired dozers       |
|                       | Tractors/loaders/backhoes |
| Site Preparation      | Graders                   |
|                       | Tractors/loaders/backhoes |
| Grading               | Excavators                |
|                       | Concrete/industrial saws  |
|                       | Graders                   |
|                       | Rubber tired dozers       |
|                       | Tractors/loaders/backhoes |
| Building Construction | Cranes                    |
|                       | Forklifts                 |
|                       | Tractors/loaders/backhoes |
| Paving                | Cement and mortar mixers  |



| Phase Name                       | Off-Road Equipment Type   |
|----------------------------------|---------------------------|
|                                  | Paving equipment          |
|                                  | Pavers                    |
|                                  | Rollers                   |
|                                  | Tractors/loaders/backhoes |
| Architectural Coating (Painting) | Air compressors           |

## 2.2.4 Grading and Demolition

The project would create approximately 2 acres of new or reconstructed impervious surface. Pervious surfaces would include landscape planters and vegetated stormwater planting. Soil would be exported to construct the at-grade entrances, ground-floor parking, and foundations of buildings. However, the amount of earthwork (cut/fill) would ultimately depend on the geotechnical engineer's assessment of the underlying soils, their recommendations for over-excavation/re-compaction, and the structural engineers' recommendations for the structural section and footings beneath the buildings. It is anticipated that the upper 3 feet of material would be over-excavated and re-compacted, then approximately 12,000 cubic yards of material would be moved. If the upper 1-foot of material is exported, then this would equate to approximately 4,000 cubic yards of material. This estimate does not include depth of disturbances for excavation, grading, and foundations. Soil fill is not anticipated unless it is needed to mitigate existing soil that the geotechnical engineer deems unsuitable for construction.

## 2.2.5 Lighting and Security

All project site areas other than front yard setbacks would be secured with gates and provide limited access. The parking lot at Caritas Center would have rolling gates that would be open during business hours, but then closed in the evenings and on the weekends. The courtyards at Caritas Homes would be secured with fence, and the gates would have keyed access control. Front lobbies for all of the three buildings would have controlled access either through a key card or by staff.

A lighting plan has been prepared for the proposed project. All exterior lighting would be night-sky-friendly and directed downwards to reduce spillover onto adjacent land uses. During construction, security lighting would be the same for all phases. From commencement through foundation, video with remote monitoring and live audio capability would be installed. A security guard would be employed from start of construction through substantial completion for nights, weekends, and holidays.

The project would incorporate Crime Prevention Through Environmental Design (CPTED) concepts to reduce illicit behaviors associated with the homeless population such as loitering, trespassing, littering and garbage, and bathroom incivility. These CPTED design concepts include but are not limited to light-emitting diode (LED) light to reduce glare and shadows, attractive screens to maintain privacy and deter graffiti, landscape rocks to deter long-term standing or resting, locked dumpsters to discourage unwanted "recycling" activity, and landscape trimming to provide increased line-of-site and natural surveillance. Each project proponent would also provide onsite security personnel and video surveillance systems to monitor the exterior and interior of their properties.



## 2.3 PROJECT OBJECTIVES AND REQUIRED PROJECT APPROVALS

### 2.3.1 Objectives

#### City Objectives and Goals

The overarching goal of the proposed project is the orderly and systematic development of an integrated and sustainable residential community that is consistent with the goals and policies of the City of Santa Rosa General Plan and Downtown Specific Plan. A primary objective of this Specific Plan is to increase the number of residents and employees within walking distance of the proposed SMART site through the intensification of land uses in the Plan Area.

#### Applicants Objectives and Goals

Catholic Charities and Burbank Housing have the following project objectives:

1. Construct new affordable housing and expanded homeless services predominately on land already owned by Catholic Charities.
2. Continue to provide homeless and family support services at their existing location because the purchase funding for these parcels requires these services to be on-going.
3. Continue to provide homeless and family support services at their existing location because this is a known and familiar location for them. These services have been offered here since 1989, and the public is familiar with and expects these services to be offered at this location. Preserving homeless services at this location is of particular importance to maintain participant enrollment and for continuity of services, and ease of use by Catholic Charities' clients.
4. Since many of the service recipients and potential tenants do not own vehicles, construct the expanded Center and housing within walking distance of the SMART Train Station and Transit Mall so clients and tenants have easy access to transportation to public services and jobs.
5. Provide onsite support services for residents of Caritas Homes.
6. Help as many people as practicable by developing the project site to the highest residential density allowed by the City's General Plan.
7. Develop transit and pedestrian-oriented affordable rental housing in downtown Santa Rosa within 0.25 mile of the SMART Train Station in Railroad Square and within 0.30 mile of Bus Route 1. Bus Route 1 is one of only two city routes that picks up passengers in 15-minute increments.
8. Reduce vehicle miles traveled by siting affordable rental housing at sites that can be developed with high densities near public transportation to reduce greenhouse gas emissions.

### 2.3.2 Approvals

The project requires the following approvals from the City:

- General Plan Amendment
- Specific Plan Amendment – extend Courthouse Square Sub-Area



**Project Description**

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- Specific Plan Amendment – specify 80-foot diameter roundabouts at 6<sup>th</sup> and A Street and 7<sup>th</sup> and A Street intersections
- Rezoning of all parcels to TV-M zoning district
- Parcel Map creating three parcels
- CUP to authorize emergency shelter and transitional housing
- Density Bonus with three concessions:
  1. Removing development standard requiring 6-foot building step back for levels above the third floor
  2. Remove the restriction of parking provided within 20 feet of the frontage
  3. Remove the requirement for 80 percent of the street frontage to be located on the property line
- Parking Reduction for Caritas Homes
- Housing Allocation Plan building height concession
- Design review
- Sign Permit
- Right-of-Way Abandonment
- Tree Removal Permit
- Landmark Alteration Permit(s)
- Request for Reserve A Allotments



## 3.0 ENVIRONMENTAL IMPACT ANALYSIS

### Approach to Environmental Analysis

In accordance with CEQA Guidelines Section 15126.2, this Draft EIR identifies and focuses on the significant direct and indirect environmental effects of the proposed project, giving due consideration to both its short- and long-term effects. Short-term effects are generally those associated with construction of the proposed project, while long-term effects are generally those associated with operation of project components. As described in Section 1.0, Introduction, this analysis focuses on a limited number of environmental resource topics as other topics were addressed in the analysis that accompanied the NOP (Appendix A). However, based on community feedback received at the scoping meeting held on February 6, 2019, the additional resource areas of hazards and public services were evaluated further in the Draft EIR. Sections 3.1 through 3.12 of this Draft EIR contain discussions of the potential environmental impacts related to the construction and operation of the proposed project.

### Environmental Topics

The potential environmental effects associated with the implementation of the proposed project are evaluated in the following environmental resource areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural and Historical Resources
- Greenhouse Gas Emissions and Climate Change
- Land Use and Planning
- Noise and Vibration
- Transportation
- Tribal Cultural Resources
- Energy
- Hazards and Hazardous Materials
- Public Services

### Organization of Issue Areas

Each environmental issue section contains the following components:

**Regulatory Setting** presents the laws, regulations, plans, and policies that are relevant to each issue area. Regulations originating from the federal, state, and/or local levels are each discussed as appropriate.

**Environmental Setting** presents the existing environmental conditions on the project site and within the surrounding area as appropriate, in accordance with CEQA Guidelines Section 15125. The extent of the environmental setting area evaluated (the project study area) differs among resources, depending on the locations where impacts would be expected. For example, air quality impacts are assessed for the air



basin (macro-scale), as well as the site vicinity (micro-scale), whereas aesthetic impacts are assessed for the project vicinity only.

In determining the level of significance of environmental impacts associated with the proposed project, the analysis in this Draft EIR assumes that the proposed project would comply with relevant federal and state laws and regulations, and City of Santa Rosa General Plan policies, ordinances, and other adopted City documents, unless otherwise noted. Therefore, such mandatory policies, ordinances, and standards are not identified as mitigation measures, but rather are discussed as part of the “regulatory setting” governing the proposed project.

**Thresholds of Significance** identifies the thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic, in accordance with CEQA Guidelines Sections 15126, 15126.2, and 15143. The thresholds of significance used in this Draft EIR are based on the checklist presented in Appendix G of the CEQA Guidelines; best available data; and regulatory standards of federal, state, and local agencies.

**Project Impacts** identify the level of each environmental impact by comparing the effects of the proposed project to the environmental setting. Key methods and assumptions used to frame and conduct the impact analysis, as well as issues or potential impacts not discussed further (i.e., such issues for which the project would have no impact), are also described.

Project impacts are organized numerically in each subsection (e.g., Impact AES-1, Impact AES-2, Impact AES-3). A bold-font environmental impact statement precedes the discussion of each impact while its level of significance succeeds the discussion of each impact. The discussion that follows the impact summary includes the substantial evidence supporting the impact significance conclusion.

**Mitigation Measures** describe any feasible measures that could avoid, minimize, rectify, reduce, or compensate for significant adverse impacts, with measures having to be fully enforceable through incorporation into the project (PRC Section 21081.6[b]). Mitigation measures are not required for environmental impacts that are found to be less than significant. Where feasible mitigation for a significant environmental impact is available, it is described following the impact. Where sufficient feasible mitigation is not available to reduce environmental impacts to a less than significant level, or where the lead agency lacks the authority to ensure that the mitigation is implemented when needed, the impacts are identified as significant and unavoidable.

**Level of Significance After Mitigation** describes the level of impact significance remaining after mitigation measures are implemented.

**Cumulative Impacts** describes two or more individual impacts that, when considered together, are significant or that compound or increase other significant environmental impacts. Cumulative impacts can result from individually minor, but collectively significant projects taking place over time (State CEQA Guidelines Section 15355). The incremental impact of a project, although less than significant on its own, may be cumulatively considerable when viewed in the cumulative context of other closely related past, present, and reasonably foreseeable future projects. A cumulatively considerable contribution to a cumulative impact is considered cumulatively significant.





## Level of Significance

Determining the severity of project impacts is fundamental to achieving the objectives of CEQA. CEQA Guidelines Section 15091 requires that decision makers mitigate, to the maximum extent feasible, the significant impacts identified in the Final EIR. If the EIR identifies any significant unmitigated impacts, CEQA Guidelines Section 15093 requires decision-makers to adopt a statement of overriding considerations that explains why the benefits of the project outweigh the adverse environmental consequences identified in the EIR.

The level of significance for each impact examined in this Draft EIR is determined by considering the predicted magnitude of the impact against the applicable threshold. Thresholds were developed using criteria from the CEQA Guidelines and Appendix G Checklist; federal, state, and local regulatory schemes; regional and local plans and ordinances; accepted practice; consultation with recognized experts; and other professional opinions.

## Format Used for Impact Analysis and Mitigation Measures

The format adopted in this Draft EIR to present the evaluation of environmental impacts is described and illustrated below.

### Summary Heading of Impact

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|                      |   |
|----------------------|---|
| <b>Impact AIR-1:</b> | <b>An impact summary heading appears immediately preceding the impact description (Summary Heading of Impact in this example). The impact abbreviation identifies the section of the report (AIR for Air Quality in this example) and the sequential order of the impact (1 in this example) within that section. To the right of the impact number is the impact statement, which identifies the potential impact.</b> |
|----------------------|---|

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### Impact Analysis

A narrative analysis follows the impact statement.

### Level of Significance Before Mitigation

This section identifies the level of significance of the impact before any mitigation is proposed.

### Mitigation Measures

In some cases, following the impact discussion, reference is made to federal and state regulations and agency policies that would fully or partially mitigate the impact. In addition, policies and programs from applicable local land use plans that partially or fully mitigate the impact may be cited.

Project-specific mitigation measures, beyond those contained in other documents, are set off with a summary heading and described using the format presented below:

|                  |   |
|------------------|---|
| <b>MM AIR-1:</b> | <b>Project-specific mitigation is identified that would reduce the impact to the lowest degree feasible. The mitigation number links the particular mitigation to the impact with which it is associated (AIR-1 in this example);</b> |
|------------------|---|

### Level of Significance After Mitigation

This section identifies the resulting level of significance of the impact following mitigation. Abbreviations used in the mitigation measure numbering are shown in Table 3-1.



**Table 3-1: Environmental Issue Abbreviations**

| Code  | Environmental Issue                         |
|-------|---|
| AES   | Aesthetics                                  |
| AQ    | Air Quality                                 |
| BIO   | Biological Resources                        |
| CR    | Cultural and Historical Resources           |
| EN    | Energy                                      |
| GHG   | Greenhouse Gas Emissions and Climate Change |
| HAZ   | Hazards and Hazardous Materials             |
| LU    | Land Use and Planning                       |
| NOI   | Noise and Vibration                         |
| PS    | Public Services                             |
| TRANS | Transportation                              |
| TRIB  | Tribal Cultural Resources                   |

**Level of Significance After Mitigation**

Less Than Significant Impact with Mitigation.



## 3.1 AESTHETICS

This section describes the existing aesthetic setting and potential effects to visual resources at the project site and its surroundings from project implementation. The descriptions and analyses in this section are based on a review of applicable policies contained in Santa Rosa's 2035 General Plan and City Code, a site reconnaissance survey, visual simulations prepared by Stantec, and the project description.

### 3.1.1 Environmental Setting

#### Regional Visual Character

The proposed project is in central Sonoma County in the City of Santa Rosa. The City of Santa Rosa is situated on the Santa Rosa Plain and bounded by the foothills of the Sonoma Mountains 10 miles to the east and Laguna de Santa Rosa 7 miles to the west. Santa Rosa's visual environment is characterized by its wide range of existing land uses including industrial, residential, commercial, office, civic, recreation, and agricultural uses. The downtown area serves as the City's core and is a highly urbanized area. As such, it has a different visual setting and character than less urbanized industrial and agricultural areas outside of the downtown core. The downtown area contains several local attractions such as Courthouse Square, Santa Rosa Plaza shopping mall, federal and state government buildings, and the Railroad Square Historic District. In addition, the downtown area contains the City's downtown business area, historically residential neighborhoods, community and cultural facilities, and other mixed uses.

The project site is in the western part of downtown and is located within the Downtown Specific Plan. Specifically, the project site is within the Downtown Specific Plan's Courthouse Square Sub-Area and the Historic Residential Sub-Area. The Courthouse Square Sub-Area is the "town center" of Santa Rosa and is the focal point of downtown. It primarily consists of a mix of retail and office uses with scattered parking throughout. This area is envisioned to be developed into a mixed-use area with new housing added to the existing office and retail uses (City 2007a). Most of the buildings in the Courthouse Square Sub-Area are one- to three-story structures with no setback from the right-of-way to create a continuous street facade (City 2007b). North of the Courthouse Square Sub-Area is the Historic Residential Sub-Area. The Historic Residential Sub-Area consists of four historic preservation districts; the project site is within the St. Rose Historic District. Uses within the Historic Residential District Sub-Area consist of single-family homes built throughout the last century, along with scattered uses such as schools and parks. The Downtown Specific Plan aims to maintain and enhance the existing residential character of this Sub-Area (City 2007a).

Like the rest of downtown, the project site is in a highly urbanized area that is characterized in visual terms by a variety of uses. Mature landscaping and trees are planted throughout the area, and overhead utilities obstruct possible view corridors (City 2007b). Most views are partially to fully obstructed by structures and vegetation within the downtown area.

#### Project Site Visual Character

The 2.78-acre project site is located east of Highway 101 in the St. Rose Historic District. The project site encompasses a full-city block bordered by 7<sup>th</sup> Street to the north, A Street to the east, 6<sup>th</sup> Street to the south, and Morgan Street to the west. The project site is developed with one- and two-story residential and public facility buildings approximately 15 to 25 feet tall and a surface parking lot (Figure 2-2).



The area immediately surrounding the project site consists of a mix of residential, commercial, and office uses, interspersed with utility and transportation infrastructure, including distribution lines, freeway, freeway on-ramps, and the three-level Santa Rosa Plaza parking garage. Mature vegetation is present throughout the streetscape. Buildings adjacent to the project site range in scale and height. Residential dwelling units are typically one- to two-stories tall with heights ranging between approximately 15 and 25 feet. Commercial uses and parking facilities are up to three stories tall and range from 28 to 44 feet in height. Local attractions near the project include the St. Rose School, a local landmark now used for professional offices, and the Sonoma County Historic Museum. These buildings are 44 feet and 41 feet in height, respectively.

On November 26, 2018, Stantec visual resource specialists conducted a site visit to document the existing conditions within and surrounding the project site. Stantec collected photographs of views toward the project site from 16 publicly accessible locations to inform the preliminary selection of viewpoints. From the set of preliminary viewpoints photographed, Stantec and the City of Santa Rosa identified four views to use as Key Observation Points (KOPs) for the basis of evaluating changes to the existing aesthetic environment at the project site with the proposed project. The four KOPs are representative of one or more viewer types and/or interests in the project area, particularly residents in the St. Rose neighborhood, visitors to downtown Santa Rosa, and travelers along nearby roadways. The locations of the four KOPs are shown in Figure 3.1-1. Photographs showing existing conditions of the project site from each KOP are included as Figures 3.1-2, 3.1-4, 3.1-6 and 3.1-8 and described in the following paragraphs.

#### KOP 1: View Looking South/Southeast from Morgan Street

Figure 3.1-2 depicts the view of the project site from KOP 1, which is within 200 feet of the northwest corner of the project site. This viewpoint is representative of views from the Morgan Street corridor, which is mostly single-family residential in scale with architecture that is indicative of the historic district on the edge of downtown. While such buildings contribute to the existing visual character along Morgan Street, they are partially obscured by features that are typical of the area's broader character: utility lines, parked vehicles, and street trees. These features appear at a scale and density typical of an urban setting, and partially obstruct the portion of the project site visible in this view, which contains a vacant two-story residence.

#### KOP 2: View Looking South/Southwest from A Street and 8<sup>th</sup> Street

Figure 3.1-4 depicts the view of the project site from KOP 2, which is approximately 300 feet from the northeast corner of the project site. This viewpoint is representative of views from the southeast portion of the St. Rose neighborhood, which is mostly residential in character with some office uses. The view from KOP 2 is of the historic/residential district adjacent to the west edge of downtown with the same urban characteristics visible from KOP 1, including mature vegetation. The mature vegetation and parked vehicles obscure the portion of the project site visible in this view, which is developed with the single-story family support center building.

#### KOP 3: View Looking North from A Street and 6<sup>th</sup> Street

Figure 3.1-6 depicts the view of the project site from KOP 3, which is less than 100 feet from the southwest corner of the project site. This viewpoint is representative of travelers driving on A Street along the periphery of the Santa Rosa Plaza shopping mall at a point where their view is oriented toward the St.



Rose neighborhood. The view from KOP 3 is of mostly commercial uses and parking facilities, such as the three-level parking garage associated with the Santa Rosa Plaza shopping mall and the surface parking lot on the project site. Utility infrastructure and mature vegetation including street trees are also visible in this view. In the background of this view the St. Rose School is visible and limits long-distance views. Additionally, the Sonoma County Historic Museum is around the corner from this location. The mix of urban uses is typical of the Courthouse Square Sub-Area and contributes to this view's existing visual character.

#### KOP 4: View Looking North/Northeast from Morgan Street and 5<sup>th</sup> Street

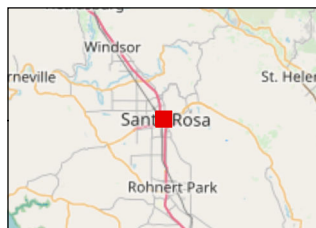
Figure 3.1-8 depicts the view of the project site from KOP 4, which is within 400 feet of the southeast corner of the project site. This viewpoint is representative of travelers on the Morgan Street corridor that may be driving toward the Highway 101 on-ramp (potentially coming from the Railroad Square Historic District) or Santa Rosa Plaza shopping mall. The view from KOP 4 is mostly of the commercial and residential uses adjacent to the Highway 101 corridor, with the same urban characteristics and mature vegetation visible in previously described views. The urban features and mature vegetation contribute clutter to views and reduce visibility of the project site; however, these are typical characteristics of a developed urban environment.



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#### Legend

- KOP Location
- Project Site

0 100 200 Feet  
1:3,000 (at original document size of 8.5x11)



Project Location  
T.07N, R.08W Section 23  
USGS 7.5-minute Quadrangle  
Santa Rosa

Client/Project  
City of Santa Rosa  
Caritas Village Project  
EIR

Figure No.  
**3.1-1**

Title

#### Key Observation Point Locations

- Notes**
1. Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
  2. Service Layer Credits: © OpenStreetMap (and)

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View to the south-southeast from Morgan Street. The northwest corner of the project site is visible in the center of the view at the intersection of Morgan Street and 7th Street, within 200 feet.

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View from KOP 1 with the proposed project simulated. The proposed two-story townhomes and the four-story Caritas Homes building are visible in this view.

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View to the south-southwest at the corner of A Street and 8th Street. The northeast corner of the project site is visible in the right-center of this view at the corner of A Street and 7th Street, approximately 300 feet away.

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View from KOP 2 with the proposed project simulated. The proposed Caritas Homes building would be visible in this view.

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View to the north at the corner of A Street and 6th Street. The project site is visible in the left side of this view along A Street, less than 100 feet away.

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View from KOP 3 with the proposed project simulated. The four-story Caritas Homes building is visible in the north portion of the project site. The three-story Caritas Center building is visible in the south portion of the project site.

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View to the north-northeast at the corner of Morgan Street and 5th Street. The project site is visible in the right-center of the view at the corner of Morgan Street and 6th Street, within 400 feet.

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View from KOP 4 with the proposed project simulated. The three-story Caritas Center is visible at the corner of Morgan Street and 6th Street. The four-story Caritas Homes building is visible behind Caritas Center on Morgan Street.

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### 3.1.2 Regulatory Setting

#### Local

##### City of Santa Rosa 2035 General Plan

The following lists goals and policies from the City of Santa Rosa 2035 General Plan pertaining to aesthetics that are applicable to the proposed project.

##### *Urban Design Element*

**Goal UD-A.** Preserve and enhance Santa Rosa's scenic character including its natural waterways, hillsides, and distinctive districts.

- **Policy UD-A-2.** Strengthen and emphasize community focal points, visual landmarks, and features that contribute to the identity of Santa Rosa using design concepts and standards implemented through the Zoning Code, Design Guidelines, Preservation District plans, Scenic Roads policies, the Downtown Specific Plan, and the Citywide Creek Master Plan. Examples of landmarks and community focal points are Old Courthouse Square, DeTurk Round Barn, Railroad Square water tower, St. Rose School, Hotel La Rose, Santa Rosa Creek, Luther Burbank Home and Gardens, and views to the hills.
- **Policy UD-A-5.** Require superior site and architectural design of new development projects to improve visual quality in the City.

**Goal UD-B.** Preserve and strengthen downtown as a vital and attractive place.

- **Policy UD-B-4.** Respect and relate the scale and character of development at the edges of downtown to the surrounding Preservation Districts.
- **Policy UD-B-5.** Promote street life in the downtown through attractive building designs with street-level activity and façade windows, public art, trees, fountains, and other landscaping elements that are pedestrian friendly. Discourage blank parking garage or office block frontage. Implement this policy through development review and the City's Capital Improvement and Downtown Programs.
- **Policy UD-B-6.** Require design review for all new structures and alterations to existing structures within downtown.

##### Santa Rosa City Code *Title 20, Zoning*

The Santa Rosa City Code implements the goals and policies of the General Plan 2035 by classifying and regulating the uses of land and structures within the City. The following provisions of the Zoning Code help minimize the visual impacts of new development projects in Santa Rosa.

##### *Section 20-52.030, Design Review*

This section of the Zoning Code establishes procedures for the City's review of the design aspects of proposed development in compliance with the adopted Santa Rosa Design Guidelines (Design



Guidelines). Proposed development requiring a building permit or resulting in exterior physical changes to existing structures are subject to the City's design review process. The design review authority charged with reviewing proposed development projects varies depending on the scale of the project. The Director of Planning and Economic Development reviews minor improvement projects that are not within a historic district or visually sensitive location. The Zoning Administrator reviews development projects with up to 10,000 square feet of total floor area that are not located within a historic district. Development projects with 10,000 square feet or more of total floor area that are not located within a historic district or projects with 5,000 square feet or more that are located within a historic district are reviewed by the Design Review Board. The designated design review authority reviews project features such as building design, landscaping, site planning, and signage. The criteria for design review are as follows:

- The design and layout of the proposed development is of superior quality and is consistent with the General Plan, any applicable specific plan, applicable Zoning Code standards and requirements, the City's Design Guidelines, architectural criteria for special areas, and other applicable City requirements (e.g., City policy statements and development plans);
- The design is appropriate for the use and location of the proposed development and achieves the goals, review criteria and findings for approval as set forth in the framework of Design Review (Design Guidelines, Introduction, Subsection C);
- The design and layout of the proposed development will not interfere with the use and enjoyment of neighboring existing or future developments;
- The architectural design of the proposed development is compatible with the character of the surrounding neighborhood;
- The design of the proposed development will provide a desirable environment for its occupants, visiting public, and its neighbors through the appropriate use of materials, texture, and color and would remain aesthetically appealing and be appropriately maintained;
- The proposed development will not be detrimental to public health, safety, or welfare or materially injurious to the properties or improvements in the vicinity; and
- The proposed project has been reviewed in compliance with CEQA.

### Santa Rosa Design Guidelines

The Design Guidelines, adopted in 2002, implement the design objectives of the Urban Design element of the General Plan 2035 and serve as the primary authority for design issues when used in conjunction with applicable City regulations. The Design Guidelines are organized into four sections: Neighborhood Design; Core Area; Residential, Commercial and Industrial beyond the Core Area; and Special Design Considerations. Each section includes goals and guidelines that provide direction to designers as well as establish criteria that City staff, boards and commissions, and City Council use to evaluate project proposals.

The design guidelines for the City's Core Area would apply to the proposed project. The overarching goal of the Core Area design guidelines is to encourage diverse uses that mutually reinforce each other to create a 24-hour pedestrian-friendly city center that exhibits "Superior Design" (City 2005). The City is committed to ensuring that all new development and redevelopment is designed in such a way to



revitalize the Downtown Area and Downtown Station Area. Therefore, the Core Area design guidelines include a set of goals to ensure that the design of new buildings are compatible with the architectural style and character of adjacent buildings and historic districts in terms of height, scale, materials, and massing (City 2005).

### 3.1.3 Environmental Impacts

This section analyzes the project's potential to result in significant aesthetic impacts. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid that impact.

#### Methodology for Analysis

Analysis of the project's visual impacts is based on an evaluation of the changes to the existing visual resources that would result from development of the proposed project. In determining the extent and implications of the visual changes, consideration was given to the following:

- The existing visual quality of the affected environment;
- Specific changes in the visual character and quality of the affected environment;
- The extent to which the affected environment contains places or features that provide unique visual experiences or that have been designated in plans and policies for protection or special consideration; and
- The sensitivity of viewers and their activities and the extent to which these activities are related to the aesthetic qualities affected by the project.

The inventory of viewpoints included three components: (1) identification and photo-documentation of viewing areas and viewpoints (field work was completed November 2018 by Stantec), (2) evaluation of visual sensitivity of viewpoints, and (3) an evaluation of the proposed project's visibility from the final KOPs. The final four KOPs were selected in concert with the City. Assessments of existing visual conditions were made based on professional judgment that took into consideration the following conditions: visual quality, viewer groups and viewer sensitivity, and visual character.

During the photography site visit, Stantec collected photographs using a high-resolution, full-frame, 35 millimeter digital single-lens-reflex camera with a fixed 50-millimeter lens. A 50-millimeter focal length is widely accepted as an industry standard for approximating the field of vision of the human eye. That is, a photograph of a landscape shot with a full-frame camera with a 50-millimeter lens generally replicates what a person would see in a single frame of view.

Following the site visit, Stantec visualization specialists used the photographs to prepare visual simulations of the proposed project from each KOP. The visual simulations provide clear before-and-after impacts of the location, scale, and visual appearance of the features affected and associated with the proposed project. The simulations were developed using a three-dimensional computer model of the proposed project that was provided to Stantec by Pyatok Architects in November 2018. Pyatok Architects developed the three-dimensional computer model using a combination of AutoCAD files and Autodesk's Revit Architecture Suite. Design data—consisting of engineering drawings, elevations, site and topographical contour plans, concept diagrams, and reference pictures—were used as a platform from which the computer model was created.



Stantec visualization specialists then developed a simulated perspective (camera view) to match the location of each KOP, as well as the bearing and focal length of each photograph. Stantec used digital elevation model data as the land base upon which existing elements in each view (e.g., buildings, vegetation, infrastructure) were modeled based on aerial imagery. They placed the project model and existing elements into the digital elevation model and then adjusted the camera and target location, focal length, and camera roll to align all modeled elements with the corresponding elements in the photograph within which the model was placed. Photo-realistic images of mature landscape plantings were also incorporated into the simulation to represent the preliminary landscape plan for the proposed project. Visualization specialists reviewed simulations for photo-realistic quality and consistency with the preliminary site plans and landscape plans.

### Thresholds of Significance

The significance criteria used to identify aesthetic impacts is from Appendix G of the CEQA Guidelines (2019). The proposed project would cause a significant impact on aesthetic resources if it would do the following:

- In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The following questions were determined to have no impact or a less than significant impact during the NOP scoping process. These issues are summarized in Section 7.0, Effects Found Not to Be Significant, and are not discussed further in this section.

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?
- Create a new source of substantial light or glare that would adversely affect day- or nighttime views in the area?

### Evaluation of Visual Impacts

As discussed in Section 2.0, Project Description, the proposed project would result in the redevelopment of the project site with construction of the proposed Caritas Homes and the Caritas Center. The Caritas Homes would consist of two four-story buildings, with a maximum height of 60 feet. The Caritas Center would consist of a three-story family support and homeless services center, which would be approximately 51 feet in height.

The visual impacts summarized in this section are based in part on comparing the “before” and “after” visual conditions portrayed in the visual simulations and assessing the degree of visual change for the proposed project. The visual simulations of each KOP illustrate the location, scale, and conceptual appearance of the proposed project as seen from KOP-1 through KOP-4. The visual simulations are included as Figures 3.1-3, 3.1-5, 3.1-7, and 3.1-9.



*KOP 1: View Looking South/Southeast from Morgan Street with the Proposed Project*

As shown in Figure 3.1-3, the proposed project would replace the existing one- to two-story structures onsite with comparatively taller ones. The proposed project would alter existing views with the introduction of taller structures. However, this change would not be substantial as the proposed project would include two-story townhomes along 7<sup>th</sup> Street to provide a transition between the existing and proposed taller structures and would reflect the scale of the adjacent residential structures that are one- to two-stories tall. Additionally, the townhomes would be designed to incorporate porches, small front yards, stoops, pitched roofs, and similar window proportions so there would be consistency between the aesthetic character of the project and the adjacent neighborhood.

*KOP 2: View Looking South/Southwest from A Street and 8<sup>th</sup> Street with the Proposed Project*

As shown in Figure 3.1-5, the proposed project would replace the existing one- to two-story structures onsite with comparatively taller ones. The introduction of taller structures at the project site would alter existing views, but not substantially because most of the proposed Caritas Homes building would be obscured by the existing vegetation. The proposed project would also design the Caritas Homes building so that it is three stories tall at the corner of A Street and 7<sup>th</sup> Street to reflect the scale of the adjacent structures.

*KOP 3: View Looking North from A Street and 6<sup>th</sup> Street with the Proposed Project*

As shown in Figure 3.1-7, the proposed project would replace the existing one- to two-story structures onsite with comparatively taller ones. The introduction of these two buildings would alter existing views and become the tallest structures in this view. The visual effects of this, while noticeable, would not be substantial. As is evident in this view, taller structures are not uncommon near the project site because there is an existing three-story parking structure, approximately 44 feet tall on the east side of A Street, and the St. Rose professional office building north of the project site that is approximately 44 feet tall. The construction of the proposed buildings would contribute to the mix of commercial, office, and parking uses that define the view's existing visual character. Additionally, the proposed project would be consistent with the intent of the Courthouse Square Sub-Area, which is envisioned as a mixed-use area with new housing added to the existing office and retail uses (City 2007a).

*KOP 4: View Looking North/Northeast from Morgan Street and 5<sup>th</sup> Street with the Proposed Project*

As shown in Figure 3.1-9, the proposed project would replace the existing one- and two-story structures onsite with the three-story Caritas Center building. The proposed project would alter existing views with introduction of a taller building. However, land uses south of the project site primarily consist of commercial, retail, and parking uses, and viewers traveling northbound along the Morgan Street corridor are most likely travelling from these areas and habituated to structures of larger scale. Therefore, the scale and character of the proposed project would reflect the scale of the uses located south of the project site.



### 3.1.4 Project Impact Analysis and Mitigation Measures

#### Conflict with Applicable Zoning/Regulations Governing Scenic Quality

---

|                     |   |
|---------------------|---|
| <b>Impact AES-1</b> | <b>The proposed project would not conflict with applicable zoning and other regulations governing scenic quality.</b> |
|---------------------|---|

---

#### Impact Analysis

The goals and policies of the General Plan Urban Design Element and the City's Design Guidelines pertaining to development in the City's Core Area (Downtown Area and Downtown Station Area) would apply to the proposed project. These goals and policies govern the visual quality and character of the built environment in the City.

The proposed project would be consistent with the goals and policies of the General Plan Urban Design Element. Specifically, the proposed project would be consistent with Goal UD-B of the Urban Design Element and its applicable policies that pertain to preserving and strengthening the downtown area as a vital and attractive place. As required by Policy UD-B-4, the project would articulate the proposed buildings to respect and relate to the scale and character of the adjacent development, including the structures within the adjacent residential neighborhood part of the St. Rose Historic Preservation District. This would be accomplished by constructing two-story townhomes along the south side of 7<sup>th</sup> Street. The townhomes would provide a visual transition between the existing buildings that are one to two stories tall and the new buildings proposed at the project site that would be four stories tall, fostering harmonious visual transitions between the proposed buildings and single-family homes with stepping down of forms, spacing, and landscaping. Furthermore, the proposed townhomes would face 7<sup>th</sup> Street and would be designed to incorporate front porches, small front yards, stoops, pitched roofs, and similar window proportions so their appearance is compatible with the existing visual character in terms of scale, height, and mass.

In addition, the proposed project would comply with Policy UD-B-5 and redevelop the existing streetscape and the underutilized parcels with construction of a high-density development with residential and support service uses that contain active uses at the ground floor and shared plazas or mews. It is expected that the proposed buildings would be constructed with a combination of stucco, cement panels, ceramic tiles, metal panels, and wood materials. Bay windows would be placed along the façade of the buildings overlooking the surrounding area. The Caritas Homes buildings would also have ground floor residential units facing Morgan and A streets to conceal the internal podium parking from the street frontages of Morgan and A streets. The frontages of Morgan and A streets would similarly be pedestrian-friendly by providing the ground-level units with entry patios and porches. Landscaping elements such as plantings, landscape walls, and sidewalk shade trees would also be provided throughout the project site to provide a pedestrian-friendly frontage throughout the project site.

The overall project design would be consistent with the visual character of the surrounding area with regard to scale, architectural style, and use, as defined by the City's Core Area Design Guidelines. In addition, the project is subject to the City's design review process and may be subject to minor design modifications.



For each of the reasons set forth above, implementation of the proposed project would not conflict with relevant aesthetic goals, policies, and design guidelines of the City of Santa Rosa, and impacts would be less than significant.

**Level of Significance Before Mitigation**

Less Than Significant Impact.

**Mitigation Measures**

No mitigation is necessary.

**Level of Significance After Mitigation**

Less Than Significant Impact.



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## 3.2 AIR QUALITY

### 3.2.1 Environmental Setting

#### San Francisco Bay Area Air Basin

The project is in Southern Sonoma County within the San Francisco Bay Area Air Basin (Air Basin), specifically in the Cotati Valley subregion. The Air Basin encompasses some or all portions of the nine Bay Area counties. The climate of the Bay Area is heavily influenced by the high-pressure system over the eastern Pacific Ocean resulting in subsidence inversion layers that trap pollutants during summer and fall months.

#### Sonoma County Climate

The regional climate within the San Francisco Bay Area is driven by a summertime high-pressure cell centered over the northeastern Pacific Ocean that dominates the summer climate of the West Coast. The persistence of this high-pressure cell generally results in negligible precipitation during the summer, and meteorological conditions are typically stable with a steady northwesterly wind flow. This flow causes upwelling of cold ocean water from below the surface, which produces a band of cold water off the California coast. The cool and moisture-laden air approaching the coast from the Pacific Ocean is further cooled by the presence of the cold-water band, resulting in condensation and the presence of fog and stratus clouds along the Northern California coast. In the winter, the Pacific high-pressure cell weakens and shifts to the south, resulting in wind flows offshore, the absence of upwelling, and an increase in the occurrence of storms. Winter stagnation episodes are characterized by nocturnal drainage wind flows in coastal valleys. Drainage is a reversal of the usual daytime air-flow patterns; air moves from the Central Valley toward the coast and back down toward the Bay from the smaller valleys within the Air Basin.

Each year, BAAQMD summarizes data collected from the Bay Area air quality monitoring stations. The nearest air quality monitoring stations to the project are in Sebastopol, San Rafael, and Vallejo. Table 3.2-1 includes a summary of the air quality monitoring data at each station for the year 2017. The table shows the number of times each station recorded pollutant concentrations above federal and state air quality standards and the highest annual reading for each pollutant.

**Table 3.2-1: 2017 Northern Bay Area Region Air Quality Monitoring Station Data**

| Pollutant             | Air Pollutant, Averaging Time (Units)            | Sebastopol | San Rafael | Vallejo |
|-----------------------|--|------------|------------|---------|
| Ozone (ppb)           | Maximum 1-hour                                   | 87         | 88         | 105     |
|                       | California 1-hour number of days over standard   | 0          | 0          | 1       |
|                       | Maximum 8-hour                                   | 71         | 63         | 88      |
|                       | National 8-hour number of days over standard     | 1          | 0          | 2       |
|                       | California 8-hour number of days over standard   | 1          | 0          | 2       |
|                       | 3-year average                                   | 53         | 58         | 61      |
| Carbon Monoxide (ppm) | Maximum 1-hour                                   | 2.1        | 2.6        | 3.1     |
|                       | Maximum 8-hour                                   | 1.6        | 1.6        | 2.1     |
|                       | National/California number of days over standard | 0          | 0          | 0       |



| Pollutant                              | Air Pollutant, Averaging Time (Units)           | Sebastopol | San Rafael | Vallejo |
|--|---|------------|------------|---------|
| Nitrogen Dioxide (ppb)                 | Maximum 1-hour                                  | 35         | 53         | 49      |
|  | Annual average                                  | 5          | 10         | 8       |
|  | National 1-hour number of days over standard    | 0          | 0          | 0       |
|  | California 1-hour number of days over standard  | 0          | 0          | 0       |
| Sulfur Dioxide (ppb)                   | Maximum 1-hour                                  | -          | -          | 5.9     |
|  | Maximum 24-hour                                 | -          | -          | 2.1     |
|  | National 1-hour number of days over standard    | -          | -          | 0       |
|  | California 24-hour number of days over standard | -          | -          | 0       |
| PM <sub>10</sub> (µg/m <sup>3</sup> )  | Annual average                                  | -          | 17.7       | -       |
|  | Maximum 24-hour                                 | -          | 94         | -       |
|  | National 24-hour number of days over standard   | -          | 0          | -       |
|  | California 24-hour number of days over standard | -          | 2          | -       |
| PM <sub>2.5</sub> (µg/m <sup>3</sup> ) | Maximum 24-hour                                 | 81.8       | 74.7       | 101.9   |
|  | National 24-hour number of days over standard   | 4          | 8          | 9       |
|  | 3-year average                                  | 21         | 27         | 30      |
|  | Annual average                                  | 8.1        | 9.7        | 11.6    |
|  | 3-year average                                  | 6.5        | 8.2        | 9.5     |

## Notes:

µg/m<sup>3</sup> = micrograms per literPM<sub>2.5</sub> = particulate matter less than 2.5 microns in aerodynamic diameterPM<sub>10</sub> = particulate matter between 2.5 and 10 microns in aerodynamic diameter

ppb = parts per billion

ppm = parts per million

Based on the monitoring results for the region, the Santa Rosa area has exceeded the 8-hour ozone standard for California and federal standards, the California 24-hour particulate matter between 2.5 and 10 microns in aerodynamic diameter (PM<sub>10</sub>) standard, and Federal particulate matter less than 2.5 microns in aerodynamic diameter (PM<sub>2.5</sub>) standard.

### Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics. The project site currently contains sensitive receptors based on the existing onsite housing. The residential developments to the north and northeast of the project site are also sensitive receptors in the vicinity of the project. The future residents of Caritas Homes and Caritas Center would be considered sensitive receptors.



## Existing Sources of Toxic Emissions

The project is located adjacent to Highway 101, which exceeds California Air Resource Board's (CARB's) recommendations in its Air Quality Land Use Handbook for siting sensitive land uses. CARB recommends avoiding siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 or more vehicles per day, or rural roads with 50,000 or more vehicles per day. The project is also located within a Best Practices area as identified by BAAQMD in its Planning Healthy Places (BAAQMD 2016). Locating sensitive receptors in proximity to freeways may result in adverse health impacts. BAAQMD recommends the implementation of best practices in its Planning Healthy Places (BAAQMD 2016) to reduce impacts.

BAAQMD recommends evaluating the impacts of toxic sources within 1,000 feet of the project site. In addition to the mobile sources identified above, there are existing stationary sources of toxic air contaminants within the 1,000-foot buffer of the project site. Those sources include:

- A'Roma Roasters & Coffee House, Inc: Roaster
- Macy's West Stores Inc.: Generator
- EMI Santa Rosa LP: Generator

### 3.2.2 Regulatory Setting

#### Federal

The United States Environmental Protection Agency (EPA) has been charged with implementing national air quality programs. EPA air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments to the CAA made by Congress were in 1990.

#### Criteria Air Pollutants

The CAA required EPA to establish national ambient air quality standards (NAAQS). As shown in Table 3.2-2, EPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), respirable and fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and lead. The primary standards protect the public health, and the secondary standards protect public welfare. The CAA also required each state to prepare an air quality control plan, referred to as a State Implementation Plan (SIP). The federal CAA amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. EPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and whether implementation would achieve air quality goals. If EPA determines a SIP to be inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area. If an approvable SIP is not submitted or implemented within the mandated timeframe, sanctions may be applied to transportation funding and stationary air pollution sources in the air basin.



## Hazardous Air Pollutants

EPA and CARB regulate hazardous air pollutants (HAPs) and toxic air contaminants (TACs) through statutes and regulations that generally require the use of the maximum available control technology or best available control technology for TACs to limit emissions, respectively. These, in conjunction with additional rules set forth by BAAQMD, described further below, establish the regulatory framework for TACs.

EPA has programs for identifying and regulating HAPs. Title III of the CAA directed EPA to promulgate national emissions standards for hazardous air pollutants (NESHAP). The NESHAP may differ for major sources and for area sources of HAPs. Major sources are defined as stationary sources with potential to emit more than 10 tons per year (TPY) of any HAP or more than 25 TPY of any combination of HAPs; sources that emit less than 10 TPY of a single air toxic or less than 25 TPY of a combination of air toxics are considered area sources. The emissions standards are to be promulgated in two ways. First, EPA has technology-based emission standards designed to produce the maximum emission reduction achievable. These standards are generally referred to as requiring maximum available control technology for toxics. For area sources, the standards may be different, based on generally available control technology. Second, EPA also has health-risk-based emissions standards, where deemed necessary, to address risks remaining after implementation of the technology-based NESHAP.

The CAA also required EPA to issue vehicle or fuel standards containing reasonable requirements that control toxic emissions of, at a minimum, benzene and formaldehyde. Performance criteria were established to limit mobile-source emissions of toxics, including benzene, formaldehyde, and 1,3-butadiene.

## State

The California Legislature enacted the California Clean Air Act (CCAA) in 1988 to address air quality issues. CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the CCAA. California law authorizes CARB to set ambient (outdoor) air pollution standards (California Health and Safety Code [HSC] Section 39606) in consideration of public health, safety, and welfare (California Ambient Air Quality Standards [CAAQS]) (Table 3.2-2).

## Criteria Air Pollutants

CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants. In most cases, the CAAQS are more stringent than the NAAQS. Differences in the standards are generally explained by the health effects studies considered during the standard-setting process and the interpretation of the studies. In addition, the CAAQS incorporate a margin of safety to protect sensitive individuals.

CCAA requires that all local air districts in the state endeavor to achieve and maintain CAAQS by the earliest date practicable. CCAA specifies that local air districts should focus attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.



Among CARB's other responsibilities are overseeing local air district compliance with federal and state laws, approving local air quality plans, submitting SIPs to EPA, monitoring air quality, determining and updating area designations and maps, and setting emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

### Toxic Air Contaminants

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807, Chapter 1047, Statutes of 1983) and the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588, Chapter 1252, Statutes of 1987). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. Research, public participation, and scientific peer review are required before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs, including diesel particulate matter (DPM), and has adopted EPA's list of HAPs as TACs.

Once a TAC is identified, CARB adopts an airborne toxics control measure for sources that emit that particular TAC. If a safe threshold exists for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If no safe threshold exists, the source must incorporate best available control technology for toxics to minimize emissions.

CARB has adopted diesel exhaust control measures and more stringent emission standards for various on-road mobile sources of emissions, including transit buses, and off-road diesel equipment (e.g., tractors, generators). Recent milestones included the low-sulfur diesel fuel requirement and stricter emissions standards for heavy-duty diesel trucks (effective in 2007 and subsequent model years) and off-road diesel equipment (2011). Over time, replacing older vehicles would result in a vehicle fleet that produces substantially lower levels of TACs than under current conditions. Mobile-source emissions of TACs (e.g., benzene, 1,3-butadiene, DPM) in California have been reduced substantially over the last decade; such emissions will be reduced further through a progression of regulatory measures (e.g., low-emission vehicles, clean fuels, and Phase II reformulated-gasoline regulations) and control technologies. The California Air Pollution Control Offices Association (CAPCOA) Health Risk Assessments for Proposed Land Use Projects Guidance Document recommends that when siting a residential project within 500 feet of a freeway, the associated public health risk should be disclosed in a CEQA document; therefore, a health risk assessment (HRA) was prepared for the project, and the results are summarized in Section 3.2.3, Environmental Impacts.

The Hot Spots Act requires that existing facilities that emit toxic substances above a specified level prepare an inventory of toxic emissions and a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

The federal and state ambient air quality standards are listed below in Table 3.2-2, and the attainment status for the criteria pollutants are listed in Table 3.2-3.



**Table 3.2-2: California and National Ambient Air Quality Standards**

| Pollutant                     | Averaging Time          | California Standards      | National Standards            |                          |
|-------------------------------|-------------------------|---------------------------|-------------------------------|--------------------------|
|                               |                         | Concentration             | Primary                       | Secondary                |
| Ozone                         | 1 hour                  | 0.09 ppm (180 µg/m³)      | —                             | Same as primary standard |
|                               | 8 hour                  | 0.070 ppm (137 µg/m³)     | 0.070 ppm (137 µg/m³)         |                          |
| Respirable particulate matter | 24 hour                 | 50 µg/m³                  | 150 µg/m³                     | Same as primary standard |
|                               | Annual arithmetic mean  | 20 µg/m³                  | —                             |                          |
| Fine particulate matter       | 24 hour                 | —                         | 35 µg/m³                      | Same as primary standard |
|                               | Annual arithmetic mean  | 12 µg/m³                  | 12 µg/m³                      |                          |
| Carbon monoxide               | 1 hour                  | 20 ppm (23 mg/m³)         | 35 ppm (40 mg/m³)             | —                        |
|                               | 8 hour                  | 9.0 ppm (10 mg/m³)        | 9 ppm (10 mg/m³)              | —                        |
|                               | 8 hour (Lake Tahoe)     | 6 ppm (7 mg/m³)           | —                             | —                        |
| Nitrogen dioxide              | 1 hour                  | 0.18 ppm (339 µg/m³)      | 100 ppb (188 µg/m³)           | —                        |
|                               | Annual arithmetic mean  | 0.030 ppm (57 µg/m³)      | 0.053 ppm (100 µg/m³)         | Same as primary standard |
| Sulfur dioxide                | 1 hour                  | 0.25 ppm (655 µg/m³)      | 75 ppb (196 µg/m³)            | —                        |
|                               | 3 hour                  | —                         | —                             | 0.5 ppm (1,300 µg/m³)    |
|                               | 24 hour                 | 0.04 ppm (105 µg/m³)      | 0.14 ppm (for certain areas)  | —                        |
|                               | Annual arithmetic mean  | —                         | 0.030 ppm (for certain areas) | —                        |
| Lead                          | 30-day average          | 1.5 µg/m³                 | —                             | —                        |
|                               | Calendar quarter        | —                         | 1.5 µg/m³                     | Same as Primary Standard |
|                               | Rolling 3-month average | —                         | 0.15 µg/m³                    |                          |
| Visibility-reducing particles | 8 hour                  | See Footnote <sup>1</sup> | No National Standards         |                          |
| Sulfates                      | 24 hour                 | 25 µg/m³                  |                               |                          |
| Hydrogen sulfide              | 1 hour                  | 0.03 ppm (42 µg/m³)       |                               |                          |
| Vinyl chloride                | 24 hour                 | 0.01 ppm (26 µg/m³)       |                               |                          |

## Notes:

1. In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

µg/m<sup>3</sup> = micrograms per liter

mg/m<sup>3</sup> = milligrams per cubic meter

Source: CARB 2016



**Table 3.2-3: San Francisco Bay Area Air Basin Designations for State and National Ambient Air Quality**

| Criteria Pollutants           | State Designation | National Designation    |
|-------------------------------|-------------------|-------------------------|
| Ozone                         | Non-attainment    | Non-attainment          |
| Carbon monoxide               | Attainment        | Attainment              |
| PM <sub>10</sub>              | Non-attainment    | Unclassified            |
| PM <sub>2.5</sub>             | Non-attainment    | Non-attainment          |
| Carbon monoxide               | Attainment        | Unclassified/attainment |
| Nitrogen dioxide              | Attainment        | Unclassified/attainment |
| Sulfur dioxide                | Attainment        | Attainment              |
| Sulfates                      | Attainment        | —                       |
| Lead                          | Attainment        | Unclassified/attainment |
| Hydrogen sulfide              | Unclassified      | —                       |
| Visibility reducing particles | Unclassified      | —                       |

Notes:

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in aerodynamic diameter

PM<sub>10</sub> = particulate matter between 2.5 and 10 microns in aerodynamic diameter

Source: CARB 2017

As summarized in Table 3.2-3, the Air Basin is designated as nonattainment for state ozone, PM<sub>2.5</sub>, and PM<sub>10</sub> standards, as well as national ozone and PM<sub>2.5</sub> standards.

## Regional

### Bay Area Air Quality Management District

BAAQMD is the public agency that regulates stationary sources of air pollution in the nine counties that comprise the San Francisco Bay Area: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, southwestern Solano, and southern Sonoma. BAAQMD attains and maintains air quality conditions in Napa County through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of BAAQMD includes the preparation of plans and programs for the attainment of NAAQS and CAAQS, adoption and enforcement of rules and regulations, and issuance of permits for stationary sources. BAAQMD also inspects stationary sources, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the CAA and CCAA.

As mentioned above, BAAQMD adopts rules and regulations. All projects are subject to BAAQMD's rules and regulations in effect at the time of construction. Specific rules applicable to project construction may include, but are not limited to:

- Regulation 2, Rule 1, General Permit Requirements: Includes criteria for issuance or denial of permits, exemptions, appeals against decisions of the Air Pollution Control Officer and BAAQMD actions on applications.



- Regulation 2, Rule 2, New Source Review: Applies to new or modified sources and contains requirements for Best Available Control Technology and emission offsets. Rule 2 implements federal New Source Review and Prevention of Significant Deterioration requirements.
- Regulation 6, Rule 1, General Requirements: Limits the quantity of particulate matter in the atmosphere by controlling emission rates, concentration, visible emissions, and opacity.
- Regulation 7, Odorous Substances: Regulation 7 places general limitations on odorous substances and specific emission limitations on certain odorous compounds. A person (or facility) must meet all limitations of this regulation but meeting such limitations shall not exempt such person from any other requirements of BAAQMD, state, or national law. The limitations of this regulation shall not be applicable until BAAQMD receives odor complaints from 10 or more complainants within a 90-day period alleging that a person has caused odors perceived at or beyond the property line of such person and deemed to be objectionable by the complainants in the normal course of their work, travel, or residence. When the limits of this regulation become effective as a result of citizen complaints described above the limits shall remain effective until such time as no citizen complaints have been received by BAAQMD for 1 year. The limits of this regulation shall become applicable again if BAAQMD receives odor complaints from five or more complainants within a 90-day period. BAAQMD staff shall investigate and track all odor complaints they receive and shall attempt to visit the site, identify the source of the objectionable odor, and assist the owner or facility in finding a way to reduce the odor.
- Regulation 8, Rule 3, Architectural Coatings: Limits the quantity of volatile organic compounds in architectural coatings supplied, sold, offered for sale, applied, solicited for application, or manufactured for use within BAAQMD.

### Toxic Air Contaminants

At the local level, air pollution control or management districts may adopt and enforce CARB control measures. Under BAAQMD Regulation 2, Rule 1, General Permit Requirements, and Regulation 2, Rule 2, New Source Review, all sources that possess the potential to emit TACs are required to obtain permits from the district. Permits may be granted to these operations if they are constructed and operated in accordance with applicable regulations including new-source-review standards and air-toxics control measures. BAAQMD limits emissions and public exposure to TACs through programs including the Community Air Risk Evaluation Program, which estimates and reports both local and regional impacts of TACs in the Bay Area. BAAQMD administers certain portions of the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly), which serves to collect data, identify specific facilities that produce localized impacts, assess health risks, notify nearby residents of risks, and reduce those significant risks to acceptable levels through 'Hot Spots' Risk Reduction Audits and Plans for specific facilities.

### Local

#### Santa Rosa General Plan

The Santa Rosa General Plan contains the following goals and policies applicable to the project:





- **Policy T-H-3:** Require new development to provide transit improvements, where a rough proportionality to demand from the project is established. Transit improvements may include:
  - Direct and paved pedestrian access to transit stops;
  - Bus turnouts and shelters; and
  - Lane width to accommodate buses.
- **Policy T-K-3:** Orient building plans to allow for easy pedestrian access from street sidewalks, transit stops, and other pedestrian facilities, in addition to access from parking lots.
- **Policy T-K-4:** Require construction of attractive pedestrian walkways and areas in new residential, commercial, office, and industrial developments. Provide landscaping or other appropriate buffers between sidewalks and heavily traveled vehicular traffic lanes as well as through and to parking lots.
- **Policy T-L-9:** Require new development to dedicate land and/or construct and install bicycle facilities for project users, where a rough proportionality to demand from the project is established.
- **Goal OSC-H:** Reduce energy use in existing and new commercial, industrial, and public structures.
- **Policy OSC-H-1:** Promote the use of site planning, solar orientation, cool roofs, and landscaping to decrease summer cooling and winter heating needs. Encourage the use of recycled content construction materials.
- **Policy OSC-H-2:** Identify opportunities for decreasing energy use through installation of energy efficient lighting, reduction of thermostat settings, and elimination of unnecessary lighting in public facilities.

### 3.2.3 Environmental Impacts

This section analyzes the project's potential to result in significant air quality impacts. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid that impact.

#### Methodology for Analysis

##### Construction

Short-term construction-related emissions of criteria air pollutants and precursors were calculated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 computer program (California Air Pollution Control Officers Association 2017). CalEEMod was used to calculate emissions from construction of the parking lot, buildings, and paved areas. Modeling was based on project-specific information (e.g., building type and size, amount of demolition, area to be paved) where available, and default values in CalEEMod that are based on the project's location, land use type, and type of construction.

The project proponent proposes to demolish the existing six structures and concrete and asphalt from the existing parking lot and foundations, respectively. Construction equipment to be used during the project construction phase would include graders, scrapers, backhoes, front-end loaders, generators, water trucks, and dump trucks. Construction would begin in as early as March 2020 with Caritas Homes and would continue with Caritas Center as early as May 2020. Phase 2 of Caritas Homes would begin construction as early as February 2022.



## Operations

Long-term operational emissions of criteria air pollutants and precursors were also calculated using CalEEMod. Consistent with the floor plan drawings for the proposed hotel rooms, modeling did not include woodstoves, fireplaces, or outdoor heating equipment. Operational emissions were estimated for the use of restaurant patio heaters, assuming heaters would be used 4 months per year. Operational activity involving area- and water-heating would be provided by natural gas. Emissions from consumer products, landscape maintenance activities, and mobile-source emissions were estimated using the applicable modules in CalEEMod. Mobile-source emissions were estimated using daily trip-rate information in the traffic impact study conducted for the project. Trip-rate estimates are based on the Traffic Study prepared for the project. The proposed land use represents the combined uses of housing and service facilities and includes trips generated by facility employees. The proposed land use is based on the function space of the project and includes trips generated by patrons and employees. Operational emissions from all sources were estimated at full buildout of the project, which is anticipated to occur in 2023.

Detailed model assumptions and inputs for these calculations can be found in Appendix B of this Draft EIR.

## Exposure to Toxic Air Contaminants

The level of health risk from exposure to construction- and operational-related TAC emissions was assessed quantitatively. The HRA is discussed in Impact AQ-4 and is provided as Appendix C to this Draft EIR.

The purpose of the HRA was to assess potential criteria pollutant and health impacts that would result from construction and operation of the project, consistent with guidelines and methodologies from the BAAQMD, CARB, California Office of Environmental Health Hazard Assessment (OEHHA), and EPA. Consistent with the methods recommended in those guidelines, the HRA evaluated the estimated excess lifetime cancer risk and PM<sub>2.5</sub> concentrations associated with diesel exhaust that would be emitted by onsite construction activities and diesel and gasoline exhaust emitted from vehicles associated with operational traffic.

## Thresholds of Significance

In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary. The analysis to assess project-level air quality impacts should be as comprehensive and rigorous as possible (BAAQMD 2017). Table 3.2-4 summarizes BAAQMD thresholds used for this analysis.



**Table 3.2-4: BAAQMD Air Quality CEQA Thresholds of Significance**

| Pollutant   | Construction-Related              | Operational-Related               |                                |
|---|-----------------------------------|-----------------------------------|--------------------------------|
|   |                                   | Average Daily Emissions (lbs/day) | Maximum Annual Emissions (TPY) |
| Criteria Air Pollutants and Precursors (regional)   | Average Daily Emissions (lbs/day) | Average Daily Emissions (lbs/day) | Maximum Annual Emissions (TPY) |
| ROG   | 54                                | 54                                | 10                             |
| NOx   | 54                                | 54                                | 10                             |
| PM <sub>10</sub>                                    | 82<br>(exhaust)                   | 82                                | 15                             |
| PM <sub>2.5</sub>                                   | 54<br>(exhaust)                   | 54                                | 10                             |
| PM <sub>10</sub> /PM <sub>2.5</sub> (fugitive dust) | Best management practices         | None                              |                                |

Notes:

lbs/day = pounds per day

NOx = nitrogen oxides

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in aerodynamic diameter

PM<sub>10</sub> = particulate matter between 2.5 and 10 microns in aerodynamic diameter

ROG = reactive organic gases

TPY = tons per year

In accordance with the CEQA Guidelines' Appendix G Environmental Checklist, the following questions were analyzed and evaluated to determine whether the project's air quality impacts are significant. Would the project:

- Conflict with or obstruct implementation of the applicable air quality plan?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area under the applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?
- Expose sensitive receptors to substantial pollutant concentrations?

Regarding a project's cumulative impacts, past, present and future development projects in the BAAQMD region contribute to adverse air quality impacts in the region on a cumulative basis. Air pollution is largely a cumulative impact by its nature. No single project is sufficient in its overall emission, in isolation, to result in nonattainment of ambient air quality standards. A project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. The BAAQMD significance thresholds are intended to analyze whether a project's contribution to the cumulative impact is considerable. Therefore, if a project exceeds the identified significance thresholds, its emissions would also be considered cumulatively considerable, resulting in a significant adverse air quality impact to the region's existing air quality conditions and additional analysis to assess cumulative impacts is unnecessary (BAAQMD 2017).

Regarding the HRA analysis, the BAAQMD has established a maximum threshold for land use projects that have the potential to expose sensitive receptors (including residential areas) or the general public to substantial levels of toxic air contaminants. The BAAQMD thresholds of significance for toxic air contaminants for single sources are: 1) probability of contracting cancer for the maximally exposed individual (MEI) exceeds 10 in one million; or 2) ground-level concentrations of noncarcinogenic toxic air



contaminants would result in a Hazard Index greater than 1 for the MEI. The BAAQMD thresholds of significance under cumulative conditions (all sources) are: 1) a cancer risk level greater than 100 in a million; 2) a non-cancer risk (chronic or acute) hazard index greater than 10.0; or 3) annual average PM<sub>2.5</sub> of greater than 0.8 micrograms per cubic meter.

The following issues were determined to have no impact or a less than significant impact during the NOP Scoping. These issues are summarized in Section 7, Effects Found Not to Be Significant, and are not discussed further in this section.

- Create objectionable odors affecting a substantial number of people?

## Project Impact Analysis and Mitigation Measures

### Air Quality Plan

|                    |  |
|--------------------|--|
| <b>Impact AQ-1</b> | <b>The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.</b> |
|--------------------|--|

### Impact Analysis

The BAAQMD 2017 Clean Air Plan is the regional air quality plan (AQP) for the Air Basin. It identifies strategies to bring regional emissions into compliance with federal and state air quality standards. The BAAQMD Guidance provides three criteria for determining if a plan-level project is consistent with the current AQP control measures. However, the BAAQMD does not provide a threshold of significance for project-level consistency analysis. Therefore, the following criteria will be used for determining a project's consistency with the AQP.

- Criterion 1: Does the project support the primary goals of the AQP?
- Criterion 2: Does the project include applicable control measures from the AQP?
- Criterion 3: Does the project disrupt or hinder implementation of any AQP control measures?

#### Criterion 1

The primary goals of the 2017 Clean Air Plan, the current AQP, are to:

- Protect public health through the attainment air quality standards and
- Protect the climate.

As discussed in impact discussions AQ-2 and AQ-3, the project would not significantly contribute to cumulative nonattainment pollutant violations, expose sensitive receptors to substantial pollutant concentrations, or create or enhance disparities among Bay Area communities in cancer health risk from TACs after implementation of mitigation measure AQ-1, which would require all construction contractors to implement the basic construction mitigation measures recommended by the BAAQMD to reduce fugitive dust emissions; mitigation measure AQ-2, which would require Tier 4 emission standards for much of the off road construction equipment; and mitigation measure AQ-3, which would require minimum efficiency reporting value (MERV) filter rating of 13 filters be installed in the buildings. Therefore, the project is consistent with criterion 1 with incorporation of mitigation measures AQ-1, AQ-2, and AQ-3 because it would reduce criteria air pollutants and protect public health through the use of cleaner equipment and the protection of sensitive receptors from TACs.



Regarding climate protection, the proposed project's GHG emissions were determined to be less than significant and the project was consistent with applicable greenhouse gas reduction plans adopted to protect the climate (See Section 3.5, Greenhouse Gas Emissions and Climate Change). Accordingly, the project would be consistent with criterion 1 for climate protection.

## Criterion 2

The 2017 Clean Air Plan contains 85 control measures aimed at reducing air and climate pollutants in the Bay Area. For purposes of consistency with climate planning efforts at the state level, the control strategy in the Clean Air Plan is based upon the same economic sector framework used by the CARB for its Climate Change Scoping Plans. The sectors are as follows:

- Stationary sources
- Transportation
- Energy
- Buildings
- Agriculture
- Natural and working lands
- Waste management
- Water
- Super GHG pollutants

Of the 85 measures aimed at reducing air and climate pollutants, only the transportation control measure TR2 Trip Reduction Program would apply to any future land use at the project site that has more than 50 employees. In addition, the applicant would be required to conform to the energy efficiency requirements of the California Building Standards Code, also known as Title 24.

As presented in Tables 3.2-5, 3.2-6, and 3.2-7, the pollutants of concern include reactive organic gas (ROG), nitrogen oxides (NO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. The BAAQMD Criteria Air Pollutant Significance thresholds were used to determine the project's potential impacts during construction and operations.

## Construction Emissions

The project's "unmitigated" construction emissions shown in Table 3.2-5 were less than the BAAQMD's regional thresholds of significance and do not require mitigation; however, the potential health risks to the existing onsite and adjacent residents (discussed in Impact AQ-3) required the incorporation of cleaner construction equipment. The mitigated construction emissions are shown in Table 3.2-6. In summary, the project would comply with all applicable rules and regulations, and the project would not impede attainment because its emissions fall below the BAAQMD regional significance thresholds for both construction and operations of the project.

**Table 3.2-5: Annual Unmitigated Construction Emissions**

| Year                                | Units                      | ROG         | NO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
|-------------------------------------|----------------------------|-------------|-----------------|------------------|-------------------|
| 2020                                | Total emissions (TPY)      | 0.40        | 3.82            | 0.19             | 0.17              |
| 2020                                | Total emissions (lbs/year) | 808.8       | 7,643           | 373.6            | 348.4             |
| <b>2020 Average Daily Emissions</b> | <b>lbs/day</b>             | <b>3.37</b> | <b>31.85</b>    | <b>1.56</b>      | <b>1.45</b>       |



| Year  | Units                      | ROG          | NOx          | PM <sub>10</sub> | PM <sub>2.5</sub> |
|---|----------------------------|--------------|--------------|------------------|-------------------|
| 2021  | Total emissions (TPY)      | 0.95         | 2.18         | 0.10             | 0.10              |
| 2021  | Total emissions (lbs/year) | 1,892        | 4,364        | 208.6            | 195.6             |
| <b>2021 Average Daily Emissions</b>                 | <b>lbs/day</b>             | <b>9.01</b>  | <b>20.78</b> | <b>0.99</b>      | <b>0.93</b>       |
| 2022  | Total emissions (TPY)      | 0.13         | 1.23         | 0.05             | 0.05              |
| 2022  | Total Emissions (lbs/year) | 265.4        | 2,468        | 107.2            | 99                |
| <b>2022 Average Daily Emissions</b>                 | <b>lbs/day</b>             | <b>0.96</b>  | <b>8.94</b>  | <b>0.39</b>      | <b>0.36</b>       |
| 2023  | Total Emissions (TPY)      | 0.44         | 0.07         | 0.00             | 0.00              |
| 2023  | Total Emissions (lbs/year) | 885.6        | 134.8        | 5.98             | 5.58              |
| <b>2023 Average Daily Emissions</b>                 | <b>lbs/day</b>             | <b>31.63</b> | <b>4.81</b>  | <b>0.21</b>      | <b>0.20</b>       |
| BAAQMD Significance Threshold                       | lbs/day                    | 54           | 54           | 82               | 54                |
| <b>Does Any Year Exceed Significance Threshold?</b> |                            | <b>No</b>    | <b>No</b>    | <b>No</b>        | <b>No</b>         |
| <b>Significant Impact?</b>                          |                            | <b>No</b>    | <b>No</b>    | <b>No</b>        | <b>No</b>         |

Notes:

BAAQMD = Bay Area Air Quality Management District

lbs/day = pounds per day

lbs/year = pounds per year

NOx = nitrogen oxides

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in aerodynamic diameterPM<sub>10</sub> = particulate matter between 2.5 and 10 microns in aerodynamic diameter

ROG = reactive organic gases

TPY = tons per year

Source: CalEEMod Output (Appendix B)

**Table 3.2-6: Annual Mitigated Construction Emissions**

| Year                                | Units                      | ROG         | NOx         | PM <sub>10</sub> | PM <sub>2.5</sub> |
|-------------------------------------|----------------------------|-------------|-------------|------------------|-------------------|
| 2020                                | Total emissions (TPY)      | 0.16        | 1.05        | 0.02             | 0.02              |
| 2020                                | Total emissions (lbs/year) | 313.6       | 2,092.2     | 48.1             | 47.16             |
| <b>2020 Average Daily Emissions</b> | <b>lbs/day</b>             | <b>1.31</b> | <b>8.72</b> | <b>0.20</b>      | <b>0.20</b>       |
| 2021                                | Total emissions (TPY)      | 0.81        | 0.69        | 0.02             | 0.02              |
| 2021                                | Total emissions (lbs/year) | 1,627       | 1,384       | 36.46            | 35.66             |
| <b>2021 Average Daily Emissions</b> | <b>lbs/day</b>             | <b>7.75</b> | <b>6.59</b> | <b>0.17</b>      | <b>0.17</b>       |
| 2022                                | Total emissions (TPY)      | 0.07        | 0.45        | 0.01             | 0.01              |
| 2022                                | Total emissions (lbs/year) | 134.8       | 903         | 24.2             | 23                |
| <b>2022 Average Daily Emissions</b> | <b>lbs/day</b>             | <b>0.49</b> | <b>3.27</b> | <b>0.09</b>      | <b>0.08</b>       |



| Year  | Units                      | ROG          | NO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
|---|----------------------------|--------------|-----------------|------------------|-------------------|
| 2023  | Total emissions (TPY)      | 0.44         | 0.04            | 0.00             | 0.00              |
| 2023  | Total emissions (lbs/year) | 881          | 81.6            | 3.28             | 3.12              |
| <b>2023 Average Daily Emissions</b>                 | <b>lbs/day</b>             | <b>31.46</b> | <b>2.91</b>     | <b>0.12</b>      | <b>0.11</b>       |
| BAAQMD Significance Threshold                       | lbs/day                    | 54           | 54              | 82               | 54                |
| <b>Does Any Year Exceed Significance Threshold?</b> |                            | <b>No</b>    | <b>No</b>       | <b>No</b>        | <b>No</b>         |
| <b>Significant Impact?</b>                          |                            | <b>No</b>    | <b>No</b>       | <b>No</b>        | <b>No</b>         |

Notes:

BAAQMD = Bay Area Air Quality Management District

lbs/day = pounds per day

lbs/year = pounds per year

NO<sub>x</sub> = nitrogen oxides

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in aerodynamic diameter

PM<sub>10</sub> = particulate matter between 2.5 and 10 microns in aerodynamic diameter

ROG = reactive organic gases

TPY = tons per year

Source: CalEEMod Output (Appendix B)

## Operational Emissions

Annual operational emissions were determined by modelling the project emissions and the existing operational emissions at the project site and then calculating the net increase. The calculated net increase is summarized in Table 3.2-7.

**Table 3.2-7: Daily Operational Emissions**

| Emissions Source                  | lbs/day     |                 |                  |                   |
|-----------------------------------|-------------|-----------------|------------------|-------------------|
|                                   | ROG         | NO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
| Area                              | 2.34        | <0.01           | <0.01            | <0.01             |
| Energy                            | 0.06        | 0.57            | 0.04             | 0.04              |
| Mobile                            | 1.14        | 3.12            | 2.94             | 0.80              |
| <i>Winter Total</i>               | <i>3.54</i> | <i>3.69</i>     | <i>2.98</i>      | <i>0.85</i>       |
| <b>Thresholds of Significance</b> | <b>54</b>   | <b>54</b>       | <b>82</b>        | <b>54</b>         |
| <b>Significant?</b>               | <b>No</b>   | <b>No</b>       | <b>No</b>        | <b>No</b>         |

Notes:

lbs/day = pounds per day

ROG = reactive organic gases

NO<sub>x</sub> = nitrous oxides

PM<sub>10</sub> = particulate matter 10 microns or less in diameter

PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter

Source: CalEEMod Output (Appendix B)



### Criterion 3

If the approval of a project would not cause a disruption, delay, or otherwise hinder the implementation of any clean air plan control measure, it would be considered consistent with the 2017 Clean Air Plan. Examples of how a project may cause the disruption or delay of control measures include a project that precludes an extension of a transit line or bike path or proposes excessive parking beyond parking requirements. The project would not preclude extension of a transit line or bike path, propose excessive parking beyond parking requirements, or otherwise create an impediment or disruption to implementation of any AQP control measures.

### Conclusion

The project would be consistent with the criteria of the AQP with incorporation of mitigation measures AQ-1 and AQ-2. As such, with the incorporation of these mitigation measures, the project's potential construction and operational impacts would be less than significant.

### Level of Significance Before Mitigation

Potentially Significant Impact.

### Mitigation Measures

- MM AQ-1      Implement Construction Best Management Practices.** The applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by the BAAQMD to reduce fugitive dust emissions. Emission reduction measures will include, at a minimum, the following measures. Additional measures may be identified by the BAAQMD or contractor as appropriate:
- a) all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered two times per day;
  - b) all haul trucks transporting soil, sand, or other loose material offsite will be covered;
  - c) all visible mud or dirt track-out onto adjacent public roads will be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited;
  - d) all vehicle speeds on unpaved roads will be limited to 15 miles per hour (mph);
  - e) all roadways, driveways, and sidewalks to be paved will be completed as soon as possible. Building pads will be laid as soon as possible after grading unless seeding or soil binders are used; and
  - f) idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of CCR). Clear signage shall be provided for construction workers at all access points.
  - g) all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
  - h) a publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person will respond and take corrective action within 48 hours. The BAAQMD phone number will also be visible to ensure compliance with applicable regulations.





- i) substitute electrified equipment for diesel- and gasoline-powered equipment where practical.

**MM AQ-2 Minimize Exhaust Emissions.** Exhaust emissions shall be minimized during construction activities with the use of off-road equipment engines that meet or exceed CARB's Tier 3 or Tier 4 engine emissions standards for large (greater than 120 horsepower [hp]) off-road equipment. At a minimum, all welding rigs, dozers, and graders shall be certified as compliant with the Tier 4 engine emissions standards as provided in CCR, Title 13, section 2423(b)(1)(B). Engines can achieve these standards through the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, or other options as they become available.

#### Level of Significance After Mitigation

Less Than Significant Impact.

#### Criteria Pollutants

|                    |  |
|--------------------|--|
| <b>Impact AQ-2</b> | <b>The proposed project could potentially result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).</b> |
|--------------------|--|

#### Impact Analysis

In developing thresholds of significance for air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Project construction and operational impacts are assessed separately below.

#### Construction Emissions

Emissions from construction-related activities are generally short-term but may still cause adverse air quality impacts. The project would generate emissions from construction equipment exhaust, worker travel, and fugitive dust. These construction emissions include criteria air pollutants from the operation of heavy construction equipment.

As discussed in Section 2.0, Project Description, the project construction would begin in March of 2020 with full buildout completed in February 2023. Construction would include the following phases:

- Phase 1: Caritas Homes (Phase 1)
- Phase 2: Caritas Center
- Phase 3: Caritas Homes (Phase 2)

The construction schedule used in the analysis represents a "worst-case" analysis scenario since emission factors for construction equipment decrease as the analysis year increases due to improvements in technology and more stringent regulatory requirements. Therefore, construction emissions would decrease if the construction schedule moves to later years. The duration of construction



activity and associated equipment represents a reasonable approximation of the expected construction fleet as required pursuant to CEQA Guidelines 15064(f)(5).

Table 3.2-5 provides the unmitigated construction emissions estimated for the project. The construction emissions in each year are well below the recommended thresholds of significance. The project would implement mitigation measure AQ-1 as recommended by the BAAQMD to address fugitive dust impacts. Although the emissions were less than regional thresholds for criteria air pollutant the health risk assessment (discussed under impact AQ-3) determined that mitigation measure AQ-2 would be required, therefore Table 3.2-6 provides a summary of the mitigated construction emissions. Emissions from construction would be less than significant with and without mitigation incorporated.

### Operational Emissions

Operational emissions would occur over the lifetime of the project and would be from two main sources: area sources and motor vehicles, or mobile sources. It was assumed that the entire project would be operational in 2023 to provide a conservative estimate of operational emissions. If a later buildout year were used, the emissions would be lower due to cleaner vehicles from increasing regulations. Therefore, using an earlier year to consider full buildout of the project would provide a worst-case scenario of emissions. As shown in Table 3.2-7, the project operational emissions would be below the BAAQMD significance thresholds, and therefore, impacts would be considered less than significant.

### Level of Significance Before Mitigation

Less Than Significant Impact.

### Mitigation Measures

None required.

### Level of Significance After Mitigation

Less Than Significant Impact.

### Sensitive Receptors

|                    |   |
|--------------------|---|
| <b>Impact AQ-3</b> | <b>The proposed project would not expose sensitive receptors to substantial pollutant concentrations.</b> |
|--------------------|---|

### Impact Analysis

This discussion addresses whether the project would expose sensitive receptors to construction-generated fugitive dust (PM<sub>10</sub>), naturally occurring asbestos (NOA), construction-generated DPM, operational related TACs, or operational CO hotspots. According to BAAQMD, some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics. The project site is considered a sensitive receptor.

The nearest existing sensitive receptors are the residential homes located north and northeast, as close as 80 feet from the project.



## Construction Emissions *Fugitive Dust PM<sub>10</sub>*

Fugitive dust (PM<sub>10</sub>) would be generated from site grading and other earth-moving activities. Most of this fugitive dust would remain localized and would be deposited near the project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from the project site. The project would implement mitigation measure AQ-1 requiring fugitive dust control measures that are consistent with best management practices (BMPs) established by the BAAQMD, to reduce the project's construction-generated fugitive dust impacts to a less than significant level.

## *Naturally Occurring Asbestos*

Construction in areas of rock formations that contain NOA could release asbestos to the air and pose a health hazard. BAAQMD enforces CARB's air toxic control measures at sites that contain ultramafic rock. The air toxic control measures for construction, grading, quarrying and surface mining operations were signed into state law on July 22, 2002, and became effective in the Air Basin in November 2002. The purpose of this regulation is to reduce public exposure to NOA. A review of the map with areas more likely to have rock formations containing NOA in California indicates that there is no asbestos in the immediate project area (USGS 2011). Therefore, it can be reasonably concluded that the project would not expose sensitive receptors to NOA. Impacts would be less than significant.

## *Diesel Particulate Matter (DPM)*

An HRA was prepared for the project to assess potential criteria pollutant and health impacts that would result from construction and operation of the project. The HRA evaluated construction period health risk to offsite receptors and stationary and mobile source emissions and their related health risk impacts for future residents of the project. According to the BAAQMD, a project would result in a significant impact if it would individually expose sensitive receptors to TACs resulting in an increased cancer risk greater than 10.0 in 1 million, an increased non-cancer risk of greater than 1.0 on the hazard index (chronic or acute), or an annual average ambient PM<sub>2.5</sub> increase greater than 0.3 micrograms per liter (µg/m<sup>3</sup>). A significant cumulative impact would occur if the project, in combination with other projects located within a 1,000-foot radius of the project site, would expose sensitive receptors to TACs resulting in an increased cancer risk greater than 100.0 in one million, an increased non-cancer risk of greater than 10.0 on the hazard index (chronic), or an ambient PM<sub>2.5</sub> increase greater than 0.8 µg/m<sup>3</sup> on an annual average basis.

The project site is in an urban area within 500 feet from existing residential uses (the nearest residence is approximately 80 feet from the proposed project) that could be exposed to diesel emission exhaust during the construction period. To estimate the potential cancer risk associated with construction of the proposed project from equipment exhaust (including DPM), a dispersion model was used to translate an emission rate from the source location to a concentration at the receptor location of interest (i.e., a nearby residence). Dispersion modeling varies from a simpler, more conservative screening-level analysis to a more complex and refined detailed analysis. This refined assessment was conducted using CARB exposure methodology with the air dispersion modeling performed using the United States Environmental Protection Act dispersion model AERMOD. The model provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and site-specific meteorological data. In order to reduce the potential cancer risk associated with construction of the project from equipment exhaust, mitigation measure AQ-2 would be implemented. Results of the analysis are shown in Table 3.2-8 and indicate construction of the project



would not expose nearby sensitive receptors to substantial pollutant concentrations. Model input and output data used in the construction HRA are shown in Appendix C.

**Table 3.2-8: Inhalation Health Risks from Project Construction to Offsite Receptors**

|  | Carcinogenic<br>Inhalation Health<br>Risk in One Million | Chronic Inhalation<br>Hazard Index | Acute Inhalation<br>Hazard Index | Annual PM <sub>2.5</sub><br>Concentration<br>(µg/m <sup>3</sup> ) |
|--|--|------------------------------------|----------------------------------|---|
| <b>Unmitigated Impacts</b>   |  |                                    |                                  |   |
| Maximum Exposed<br>Individual Location<br>(Residential)                    | 61.23  | 0.09                               | 0.0                              | 0.33  |
| Threshold  | 10.0   | 1.0                                | 1.0                              | 0.30  |
| <b>Exceeds Threshold</b>   | <b>Yes</b>   | <b>No</b>                          | <b>No</b>                        | <b>No</b>   |
| <b>Mitigated Impacts (Implementation of Tier 4 Construction Equipment)</b> |  |                                    |                                  |   |
| Maximum Exposed<br>Individual Location<br>(Worksite)                       | 7.97   | 0.01                               | 0.0                              | 0.08  |
| Threshold  | 10.0   | 1.0                                | 1.0                              | 0.30  |
| <b>Exceeds Threshold</b>   | <b>No</b>  | <b>No</b>                          | <b>No</b>                        | <b>No</b>   |

Notes:

µg/m<sup>3</sup> = micrograms per liter

PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter

## Operational Emissions

### Carbon Monoxide Hotspots

Localized high levels of CO (CO hotspot) are associated with traffic congestion and idling or slow-moving vehicles. The BAAQMD recommends a screening analysis to determine if a project has the potential to contribute to a CO hotspot. The screening criteria identify when site-specific CO dispersion modeling is necessary. The project would result in a less than significant impact to air quality for local CO if the following screening criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans;
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

A review of the Sonoma County Comprehensive Transportation Plan indicates that the proposed project is consistent with the applicable congestion management goals. According to the Traffic Impact Study prepared for the project, the proposed project would generate approximately 119 new net trips during the AM peak hour and 125 new net trips during the PM peak hour and would not substantially increase traffic volumes on nearby roadways above 44,000 vehicles per hour. Furthermore, the adjacent roadways are



not located in an area where vertical and/or horizontal mixing, or the free movement of the air mass, is substantially limited by physical barriers such as bridge overpasses or urban or natural canyon walls. Therefore, the project would not significantly contribute to an existing or projected CO hotspot. Impacts would be less than significant.

### *Toxic Air Contaminant Emissions*

Two scenarios have the potential to expose sensitive receptors to TACs. The first is when a project includes a new or modified source of TACs and would be located near an existing or proposed sensitive receptor. The second involves a residential or other sensitive receptor development located near an existing or planned source of TACs.

For project-level analysis, BAAQMD specifies both individual and cumulative-level thresholds of significance for risks and hazards. For projects that are considered new sources of TACs or PM<sub>2.5</sub> (such as stationary sources, industrial sources, or roadway projects), it is generally appropriate to use both the project-level and cumulative-level thresholds because the project-level threshold identifies said project's individual contribution to risk, while the cumulative threshold assesses said project's cumulative contribution to risk.

### *Stationary Sources*

The stationary source analysis evaluated the risk levels from permitted sources in the project vicinity using the toxic air contaminant emissions reported to the BAAQMD by the stationary sources identified in the project vicinity. Data from the BAAQMD identified three sources of emissions that were within 1,000 feet of the project site, two of which were generators. The results of the stationary source analysis are presented in Table 3.2-9. As shown in Table 3.2-9, the highest risk would be 0.0 in one million, which would not exceed the BAAQMD cancer risk threshold of 10 in one million. The hazard index would be 0.0, which is below the threshold of 1.0. The results of the analysis also indicate that the maximum PM<sub>2.5</sub> concentration would be 0.00 µg/m<sup>3</sup>, which is also below the BAAQMD significance threshold of 0.3 µg/m<sup>3</sup>. The BAAQMD's cumulative threshold of cancer risk greater than 100.0 in one million, an increased non-cancer risk of greater than 10.0 on the hazard index (chronic), or an ambient PM<sub>2.5</sub> increase greater than 0.8 µg/m<sup>3</sup> on an annual average basis would not be exceeded.

**Table 3.2-9: Stationary Sources**

| Plant ID                              | Plant ID | Stationary Source  | Distance (feet) | Adjusted Adult Carcinogenic Risk (in one million) | PM <sub>2.5</sub> (µg/m <sup>3</sup> ) | Hazard       |
|---------------------------------------|----------|--|-----------------|---|--|--------------|
| 43                                    | 15951    | A'Roma Roasters & Coffee House, Inc.                     | 897             | 0.0   | 0.0                                    | 0.0          |
| 567                                   | 16247    | Macy's West Stores Inc, 800 SANTA ROSA PLAZA (generator) | 150             | 0.0   | 0.0                                    | 0.0          |
| 352                                   | 16230    | EMI Santa Rosa LP, 1071 SANTA ROSA PLAZA (generator)     | 827             | 0.0   | 0.0                                    | 0.0          |
| <b>Maximum Single Source Risks</b>    |          |  |                 | <b>0.0</b>  | <b>0.0</b>                             | <b>0.0</b>   |
| <b>BAAQMD Single Source Threshold</b> |          |  |                 | <b>10 in 1 million</b>                            | <b>0.30</b>                            | <b>1.000</b> |
| <b>Exceeds Threshold?</b>             |          |  |                 | <b>No</b>   | <b>No</b>                              | <b>No</b>    |
| <b>Total Risk</b>                     |          |  |                 | <b>0.0</b>  | <b>0.0</b>                             | <b>0.0</b>   |



| Plant ID                           | Plant ID | Stationary Source | Distance (feet) | Adjusted Adult Carcinogenic Risk (in one million) | PM <sub>2.5</sub> (µg/m <sup>3</sup> ) | Hazard      |
|------------------------------------|----------|-------------------|-----------------|---|--|-------------|
| <b>BAAQMD Cumulative Threshold</b> |          |                   |                 | <b>100 in 1 million</b>                           | <b>0.80</b>                            | <b>10.0</b> |
| <b>Exceeds Threshold?</b>          |          |                   |                 | <b>No</b>   | <b>No</b>                              | <b>No</b>   |

Notes:

µg/m<sup>3</sup> = micrograms per liter

PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter

TBD = To be determined after permitting with the BAAQMD

### Mobile Sources

The HRA was conducted following the OEHHA and BAAQMD Guidelines and recommendations of the CARB. The analysis consists of several steps: determine the PM<sub>10</sub> and total organic gases (TOG) emission factors, determine source emission rates, and determine concentrations at the project site; translate the PM<sub>10</sub> and TOG concentrations into health risk values; and compare the health risk values to BAAQMD thresholds to determine significance.

The BAAQMD requires that age sensitivity be included when assessing exposure to sensitive receptors for long-term exposure. The exposure assumptions are very conservative in that they assume an individual would reside at this location from birth through 70 years.

With approval of the OEHHA 2015 guidance, additional adjustments have been recommended to account for the amount of time a person spends away from their home during his or her lifetime. Following the new OEHHA guidance document recommendations, a time away from home factor (TAFH) was applied to more accurately represent the exposure a person would have over a lifetime when they are at home. The TAFH factors are provided in Table 3.2-10:

**Table 3.2-10: Time Away from Home Factors**

| Age Range                      | Fraction of Time Away from Home |
|--------------------------------|---------------------------------|
| Third Trimester, and 0-2 years | 0.15                            |
| 2-16 years                     | 0.28                            |
| 16-70 years                    | 0.27                            |

Source: OEHHA 2015

Annual traffic data obtained from Caltrans were used as an input to the model. According to Caltrans, the total annual average daily traffic along Highway 101 near the project site is 160,700. Emission factors for vehicles were determined using the CARB EMFAC2017, which includes assumptions of technological and regulatory changes that will reduce emission rates over time. The model only allows for a single emission rate for the entire 70-year health risk evaluation period. Therefore, a conservative set of emission factors from the year 2025 onward (when the project would be built and in operation) was used to represent the long-term 70-year evaluation period.

The classification of the total annual average daily traffic into 13 vehicle type categories, and the corresponding total emissions for that volume of vehicles at the average speed (5-90 mph) were used in the analysis. For the purpose of this assessment, it is assumed that the traffic volumes are constant



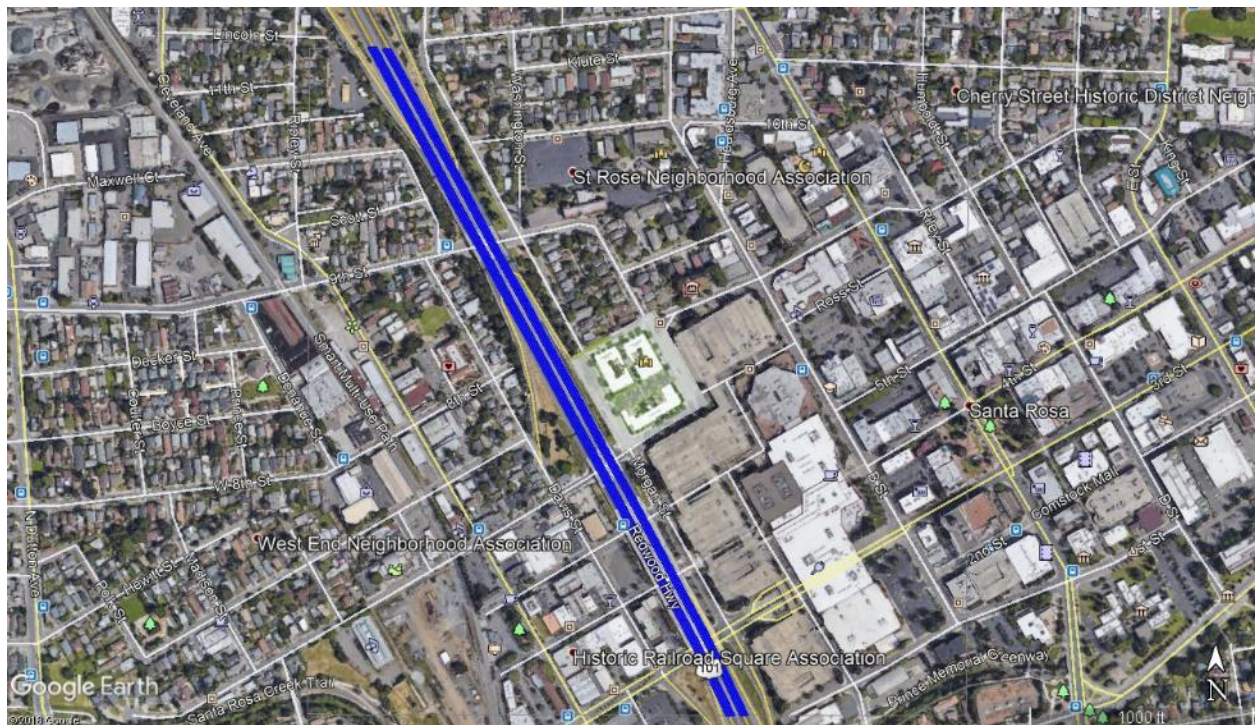
throughout the year. The PM<sub>10</sub> and TOG emission rates used in the analysis were determined based on the vehicle distribution by type according to the Caltrans traffic data for Highway 101, as shown in Tables 3 thru 8 of the HRA included as Appendix C of this EIR.

For purposes of this analysis, diesel and TOG vehicle exhaust was modeled based on a six-lane highway with 281 volume sources for each lane located along Highway 101. The sources were modeled to approximately 0.05 mile north and south adjacent to the project site in both directions. Figure 3.2-1 shows the volume sources used.

The proposed project includes an emergency generator (emergency engine). The emergency backup engine was model as a point source in the dispersion model. Since no specific stack parameters are known at this time, the parameters from other permitted engines of the same size were used to estimate emissions concentrations to onsite receptors.

Modeled receptors were placed in a grid representing the proposed residential building at the project site. Meteorological data to represent the conditions at the project site was developed by Stantec for the Santa Rosa Airport station from 2014 through 2018, since data available by CARB was out-of-date. Figure 3.2-2 shows a representation of the modeled grid.

**Figure 3.2-1: Modeled Roadway Sources**





**Figure 3.2-2: Receptor Grid**

The results of the inhalation risk analysis are shown in Table 3.2-11 and 3.2-12. Initial results indicate that vehicle exhaust concentrations on the project site would exceed the individual source significance thresholds established by the BAAQMD. Therefore, Mitigation Measure AQ-3, which includes the use of MERV filter rating of 13 and is based on data from Johns Hopkins–Bloomberg School of Public Health (Johns Hopkins 2008), would provide a removal efficiency of greater than 90 percent for PM<sub>10</sub> size particles. The mitigated scenario would not exceed the individual source significance thresholds established by the BAAQMD. It should be noted that the only regulatory approved modelling for HRAs, which was used for this project, provide concentration values at a given location with the assumption that the receptors are outside, the model cannot account for walls or windows. Therefore, the values calculated for this analysis represent a worst-case scenario, and in reality, the building would provide some protection from TAC exposure.

The project has two types of onsite house. Caritas Center is designed to house short-term residents (1- to 2-year) and Caritas Home is designed to house long-term residents. An assessment was performed for both scenarios (short-term 2-year and long-term 70-year). The results for each scenario are presented in Tables 3.2-11 and 3.2-12.



**Table 3.2-11: Inhalation Health Risks from Mobile Sources (Caritas Center, Short-Term)**

| Source                     | Carcinogenic Inhalation Health Risk | Chronic Inhalation Hazard Index | Acute Inhalation Hazard Index | PM <sub>2.5</sub> |
|----------------------------|-------------------------------------|---------------------------------|-------------------------------|-------------------|
| <b>Unmitigated Impacts</b> |                                     |                                 |                               |                   |
| Highway 101                | 14.00                               | 0.03                            | 0.03                          | 0.06              |
| Emergency Engine           | 0.0001                              | 0.001                           | 0.0                           | 0.0001            |
| Total                      | 14.00                               | 0.03                            | 0.03                          | 0.06              |
| Single Source Threshold    | 10                                  | 1.0                             | 1.0                           | 0.8               |
| Exceed? (yes/no)           | Yes                                 | No                              | No                            | No                |
| <b>Mitigated Impacts</b>   |                                     |                                 |                               |                   |
| Highway 101                | 1.4                                 | 0.03                            | 0.03                          | 0.006             |
| Emergency Engine           | 0.0001                              | 0.001                           | 0.0                           | 0.0001            |
| Total                      | 1.4                                 | 0.03                            | 0.03                          | 0.006             |
| Single Source Threshold    | 10                                  | 1.0                             | 1.0                           | 0.8               |
| Exceed? (yes/no)           | No                                  | No                              | No                            | No                |

Notes:

PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter

**Table 3.2-12: Inhalation Health Risks from Mobile Sources (Caritas Home, Long-Term)**

| Source                     | Carcinogenic Inhalation Health Risk | Chronic Inhalation Hazard Index | Acute Inhalation Hazard Index | PM <sub>2.5</sub> |
|----------------------------|-------------------------------------|---------------------------------|-------------------------------|-------------------|
| <b>Unmitigated Impacts</b> |                                     |                                 |                               |                   |
| Highway 101                | 38.63                               | 0.03                            | 0.03                          | 0.06              |
| Emergency Engine           | 0.0001                              | 0.001                           | 0.0                           | 0.0001            |
| <b>Total</b>               | 38.63                               | 0.03                            | 0.03                          | 0.06              |
| Single Source Threshold    | 10                                  | 1.0                             | 1.0                           | 0.8               |
| Exceed? (yes/no)           | Yes                                 | No                              | No                            | No                |
| <b>Mitigated Impacts</b>   |                                     |                                 |                               |                   |
| Highway 101                | 3.86                                | 0.03                            | 0.03                          | 0.06              |
| Emergency Engine           | 0.0001                              | 0.001                           | 0.0                           | 0.0001            |
| <b>Total</b>               | 3.86                                | 0.03                            | 0.03                          | 0.006             |
| Single Source Threshold    | 10                                  | 1.0                             | 1.0                           | 0.8               |
| Exceed? (yes/no)           | No                                  | No                              | No                            | No                |

Notes:

PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter



### Carcinogenic and Chronic Impacts

The results for carcinogenic and chronic impacts are shown in Tables 3.2-11 and 3.2-12. Results of the analysis indicate that the MEI inhalation unmitigated cancer risk associated with living at the proposed development for 70 years would be 38.63 in 1 million, which exceeds the BAAQMD threshold of significance. This is a potentially significant impact. Mitigation measure AQ-3 requires the use of MERV 13 filters that will provide 90 percent control. With implementation of mitigation measure AQ-3, the mitigated cancer risk would drop to 3.86 in 1 million, which is lower than the threshold of 10 in 1 million. The maximum chronic Hazard Index would be 0.03, which is below the threshold of 1.0.

The unmitigated results of the analysis are shown in Figures 3.2-3 for the short-term cancer risk and Figure 3.2-4 for the long-term cancer risk. The mitigated results are shown in Figure 3.2-5 for the short-term cancer risk and Figure 3.2-6 for the long-term cancer risk.

**Figure 3.2-3: Caritas Center Unmitigated (2-year Cancer Risk)**

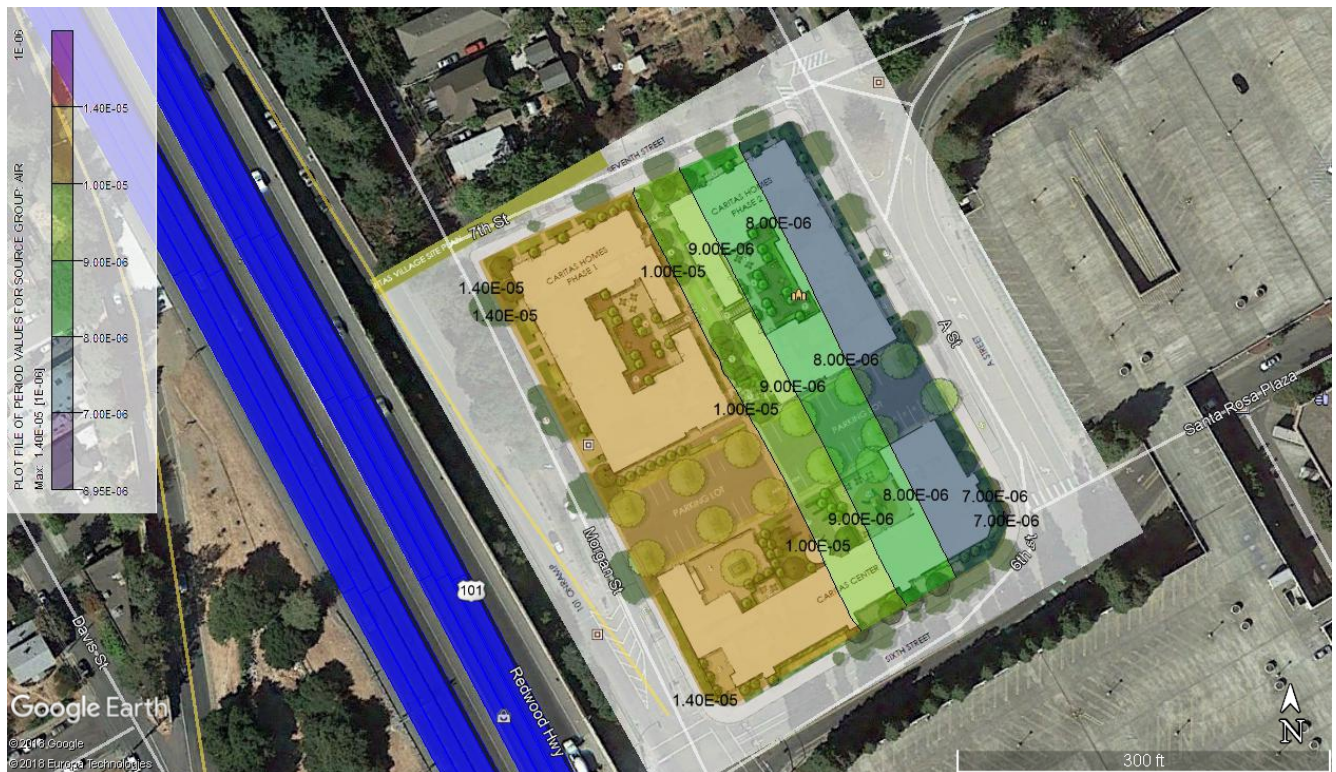




Figure 3.2-4: Caritas Homes Unmitigated (70-year Cancer Risk)

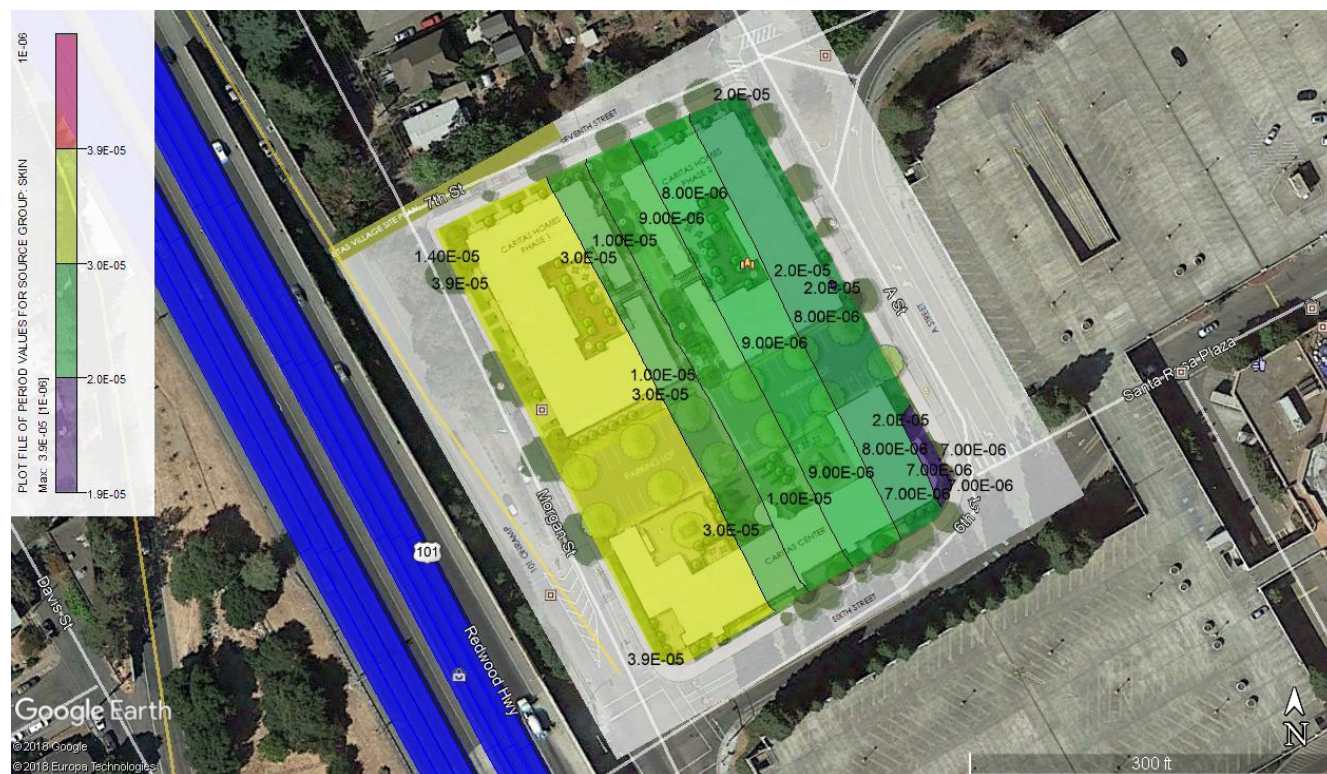
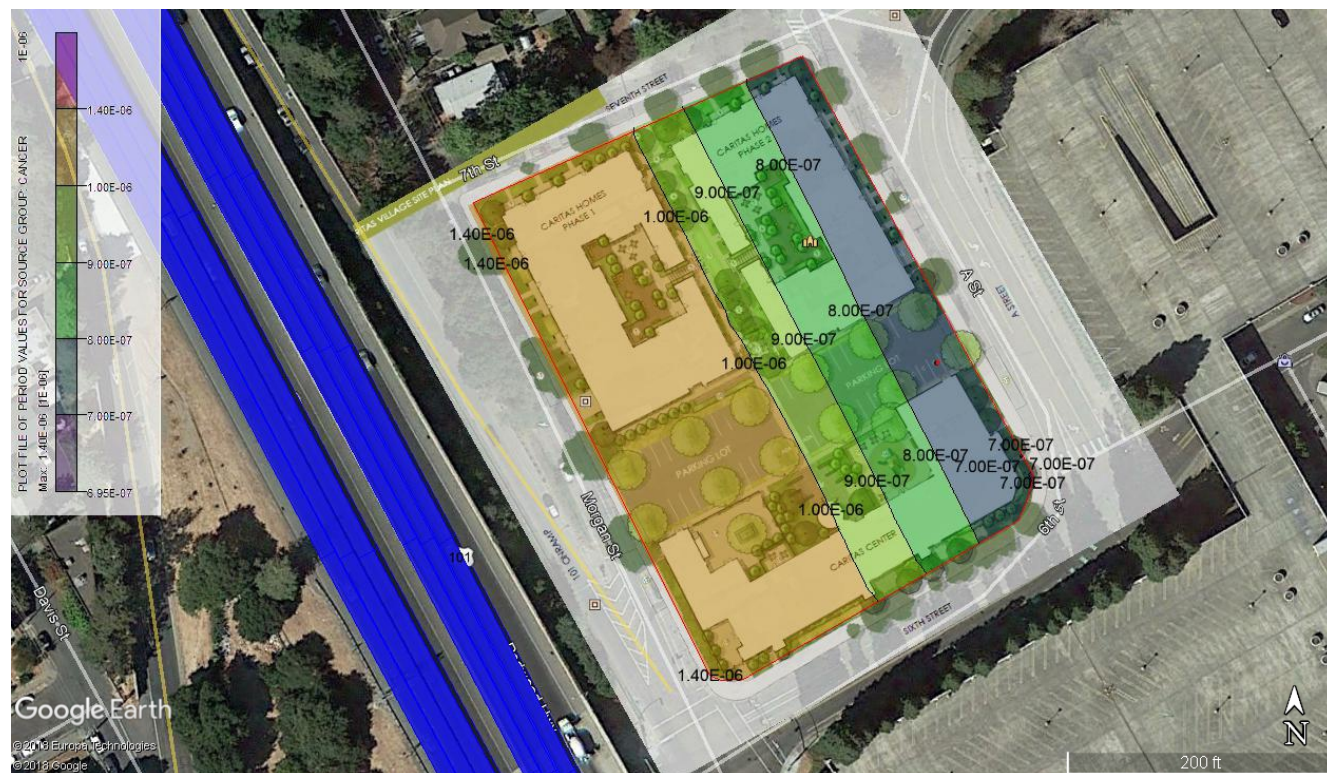
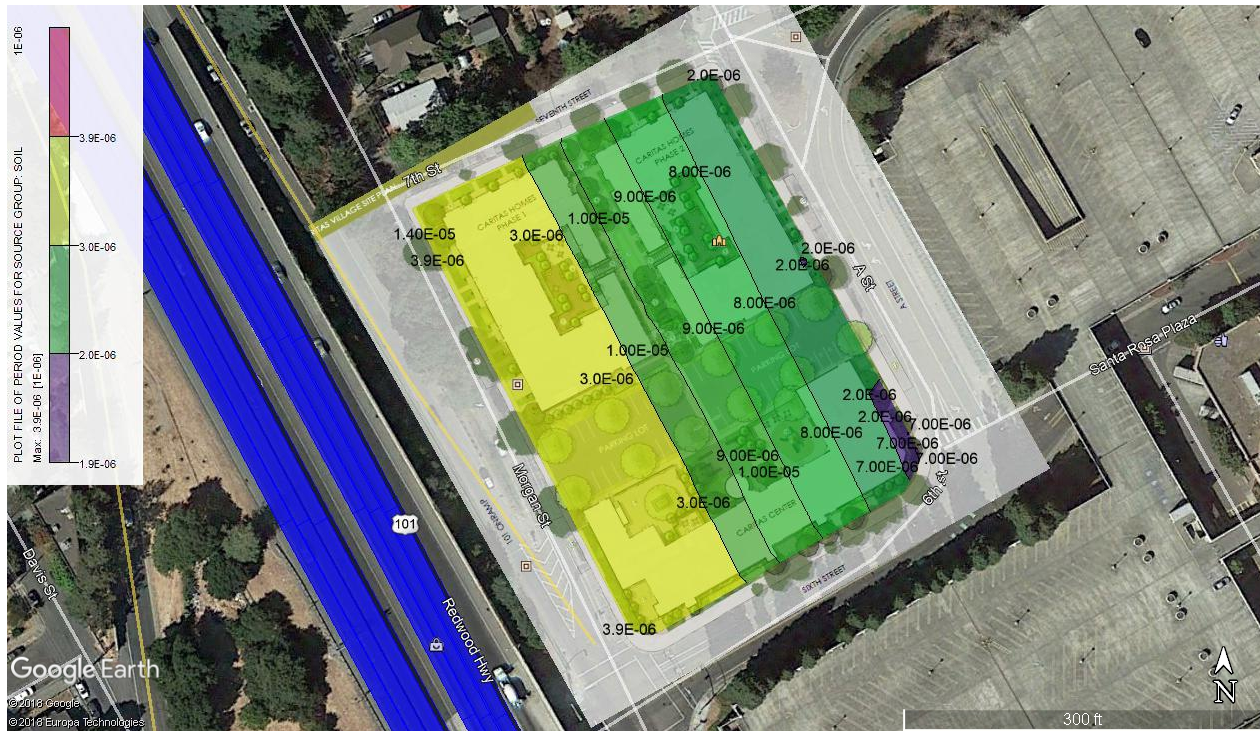


Figure 3.2-5: Caritas Center Mitigated (2-year Cancer Risk)





**Figure 3.2-6: Caritas Homes Mitigated (70-year Cancer Risk)**

### Acute Emission Impacts

The acute inhalation Hazard Index standard for non-carcinogenic contaminants is 1.0. As shown above, for future residents of the project site, the maximum acute Hazard Index would be 0.03, which is below the threshold of 1.0. Therefore, the potential for short-term acute exposure would be less than significant.

### Cumulative Risks and Hazards

The cumulative analysis sums all sources of emissions in the vicinity of the project site including stationary and mobile sources. The cumulative cancer risk, hazard index, acute index and PM<sub>2.5</sub> concentrations are shown in Table 3.2-13. Results of the cumulative analysis indicate that the proposed project would not expose future residents of the project site to significant cumulative health risks.

**Table 3.2-13: Cumulative Risk from All Sources**

| Source                               | Carcinogenic Inhalation Health Risk | Chronic Inhalation Hazard Index | Acute Inhalation Hazard Index | PM <sub>2.5</sub> |
|--------------------------------------|-------------------------------------|---------------------------------|-------------------------------|-------------------|
| A'Roma Roasters & Coffee House, Inc. | 0.0                                 | 0.0                             | 0.0                           | 0.0               |
| Macy's West Stores Inc.              | 0.0                                 | 0.0                             | 0.0                           | 0.0               |
| EMI Santa Rosa LP                    | 0.0                                 | 0.0                             | 0.0                           | 0.0               |
| Highway 101                          | 3.86                                | 0.03                            | 0.03                          | 0.006             |
| Emergency Generator                  | 0.001                               | 0.01                            | 0.0                           | 0.0               |



|                      |                    |      |      |       |
|----------------------|--------------------|------|------|-------|
| Total                | 3.86               | 0.04 | 0.03 | 0.006 |
| Cumulative Threshold | 100 in one million | 10   | 10   | 0.8   |
| Exceed? (yes/no)     | No                 | No   | No   | No    |

Notes:

PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter

## Conclusion

As shown in Tables 3.2-11 and 3.2-12, a 70-year outdoor exposure of roadway emissions, TOG and DPM and stationary source emissions at the proposed residential units on the project site would result in a maximum exposure of future residents to a risk level that would not exceed the criterion of significance for cancer health effects and the individual or cumulative level. The project is located approximately 120 feet from Highway 101. Based on data collected by Caltrans, this section of Highway 101 has 6.20 percent truck traffic. The high percentage of truck traffic increases the resulting carcinogenic inhalation health risk. However, as shown in the figures above, the cancer risk levels drop from the western edge of the property to a lower risk level on the east side of the property further away from Highway 101.

The HRA results estimate a risk will not expose future residents of the project site to substantial pollutant concentrations that may cause harmful effects. Additionally, the project would not locate residents near known existing industrial sources of toxic air contaminants. Therefore, health risk associated with the location of new sensitive receptors on the project site would not be significant.

### Level of Significance Before Mitigation

Potentially Significant

### Mitigation Measures

**MM AQ-1**      **Implement Construction Best Management Practices.**

**MM AQ -2**      **Minimize Exhaust Emissions.**

**MM- AQ -3**      **MERV Filtration System Rating.** The applicant shall require that a MERV filter rating of 13 be used for the indoor air filtration system within both the Caritas Center and Caritas Home facilities.

### Level of Significance After Mitigation

Less Than Significant Impact.



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### 3.3 BIOLOGICAL RESOURCES

This section describes the environmental and regulatory setting for biological resources. It also describes impacts on biological resources that would result from implementation of the proposed project and mitigation measures for significant impacts.

#### 3.3.1 Environmental Setting

The project site is currently disturbed and primarily covered by existing structures and pavement. The only unpaved areas are portions of land located along 6<sup>th</sup> and 7<sup>th</sup> streets that are covered by short, non-native vegetation that is periodically cut or mowed. The project site contains 66 trees, including pear, maple, crepe myrtle, apple, privet, mulberry, walnut, and a single coastal live oak. The coastal live oak is the only onsite native tree species; the remaining trees are ornamental species that were either planted or volunteered. The trees that would be removed as part of the proposed project are described in the Arborist Report Addendum (Appendix D). The project site is bounded by Highway 101 to the west, residential development to the north, and parking garages to the south and east. There are no aquatic features or wetlands present within or near the project site. The following sections describe the existing environmental setting as reported in the Biological Resources Memorandum prepared for this project (Appendix D).

The study area, which covers the entire 2.78-acre project site and includes all project components, is located in a highly disturbed urban setting that includes paved parking lots, a vacant lot, and existing buildings surrounded by residential streets. The study area lacks any form of natural habitat corridor (e.g., riparian areas along streams, rivers, or other natural features) that would allow plant or animal ingress and egress to the study area from other habitats. The two primary habitat types within the project area are barren and urban habitats, which are described further below.

##### Barren

Barren habitat occurs as paved roads, buildings, and their associated road shoulders and parking lots. Vegetation is mostly absent (i.e., less than 2 percent total vegetative cover and less than 10 percent cover of tree or shrub layer species) in these locations. Opportunistic grasses and forbs are largely devoid in the study area as landscaped wood chips blanket the ground layer throughout the majority of the landscaped project area. Generally, use of barren habitats by wildlife is limited to species accustomed to frequent anthropogenic disturbances. Rock doves (*Columba livia*) and other small passerines may forage briefly in these barren areas.

##### Urban

Urban habitat occurs as strips of street trees, landscaped lawns, and low-growing ornamental vegetation planted along the buildings throughout the study area. Dominant trees species include callery pear (*Pyrus calleryana*), glossy privet (*Ligustrum lucidum*), crepe myrtle (*Lagerstroemia indica*), and several other ornamental species. Similar to barren habitats, the only use of urban areas by wildlife is limited to species accustomed to frequent anthropogenic disturbances. Wildlife species observed within this habitat include ground squirrel (*Otospermophilus sp.*) and mourning dove (*Zenaida macroura*).



### 3.3.2 Regulatory Setting

#### Federal

The federal Endangered Species Act of 1973 serves as the guiding legislation for protecting and facilitating the recovery of threatened or endangered animal and plant species. Endangered species are defined as being, “in danger of extinction,” and threatened species are defined as, “likely to become an endangered species within the foreseeable future” (USFWS 2017). The United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service are the federal agencies responsible for managing these special-status species by preventing “take” without an incidental take permit administered by the USFWS. “Take” is defined as any action that would harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect protected species. To prevent “take,” federal agencies are required to consult with USFWS or National Marine Fisheries Service in a formal or informal setting to determine appropriate mitigation measures. If a formal consultation is initiated, a Biological Opinion will be issued to indicate if a species will be jeopardized by the proposed agency actions.

The Migratory Bird Treaty Act (MBTA) domestically implements a series of international treaties that provide for migratory bird protection. The MBTA authorizes the Secretary of the Interior to regulate the taking of migratory birds. It further provides that it is unlawful, except as permitted by regulations, “to pursue, take, or kill any migratory bird, or any part, nest or egg of any such bird...” (16 United States Code 703). As amended by U.S. Department of the Interior Solicitor’s Opinion M-37050 in December 22, 2017, and subsequently by USFWS guidance issued on April 11, 2018, the accidental or incidental take of birds resulting from an activity is not prohibited by the MBTA when the underlying purpose is not to take birds. If the purpose of the action is not to take birds, Opinion M-37050 allows both the direct take of birds and their nests and indirect or incidental take that results in the direct loss of birds, nests, or eggs (USDOJ 2017; USFWS 2018a). The current list of species protected by the MBTA can be found in the March 1, 2010, Federal Register (75 Federal Register [FR] 9281). This list includes essentially all native migratory birds (i.e., non-migratory birds [e.g., wild turkey or quails] are not included but may be otherwise protected). Permits for take of nongame migratory birds can be issued only for specific activities such as scientific collecting, rehabilitation, propagation, education, taxidermy, and protection of human health and safety and of personal property. However, active bird nests are still protected by state law (see below) as the recent federal MBTA guidance does not alter the state protection of active bird nests and eggs.

The objective of CWA, as amended, is to maintain and restore the chemical, physical, and biological integrity of the nation’s waters. Discharge of dredged or fill material into waters of the United States, including jurisdictional wetlands, is regulated under Section 404. Permits are also required to obtain water quality certifications through the state (State Water Resources Control Board or the RWQCB in California) under Section 401 of the CWA.

#### State

The 1984 California Endangered Species Act and the 1977 Native Plant Protection Act serve as the guiding legislation for protecting plant and animal species within the State. Under these Acts, California Department of Fish and Wildlife (CDFW) designates endangered, threatened, and rare species and regulates the take of these listed species. The CDFW also maintains a list of species of special concern that face local extinction. These species of special concern do not have special legal protection, but the CDFW recommends that project planning consider potential impacts to these species. Additionally,



Sections 3511, 3513, 4700, and 5050 of the California Fish and Game Code pertain to fully protected wildlife species (birds in Sections 3511 and 3513, mammals in Section 4700, and reptiles and amphibians in Section 5050) and strictly prohibit the take of these species. CDFW cannot issue a take permit for fully protected species except under narrow conditions for scientific research, the protection of livestock, or if a natural community conservation plan (NCCP) has been adopted.

Section 3503 of the California Fish and Game Code prohibits the killing of birds and the destruction of bird nests. Section 3503.5 prohibits the killing of raptors and the destruction of raptor nests. Typical violations include destruction of active bird and raptor nests as a result of tree removal and failure of nesting attempts (loss of eggs or young) as a result of disturbance of nesting pairs caused by nearby human activity. Section 3513 adopts the list of federally protected migratory birds and take provisions under the MBTA that prohibit the intentional take or possession of birds designated by the MBTA as migratory nongame birds except as allowed by federal rules and regulations pursuant to the MBTA.

Although threatened and endangered species are protected by specific federal and state statutes, Section 15380(b) of the CEQA Guidelines provides that a species not listed on the federal or state list of protected species may be considered rare or endangered if the species can be shown to meet certain specified criteria. These criteria have been modeled after definitions in the federal Endangered Species Act and the section of the California Fish and Wildlife Code dealing with rare or endangered plants and animals. CEQA Guidelines Section 15380(b) requires public agencies to undertake reviews to determine if projects would result in significant effects on species that are not listed by either the USFWS or CDFW (i.e., candidate species). Thus, CEQA provides an agency with the ability to protect a species from a project's potential impacts until the respective government agencies have an opportunity to designate the species as protected, if warranted.

## Local

The project site is located within the Pacific Gas and Electric (PG&E) Bay Area Operation and Maintenance Habitat Conservation Plan area. However, this plan only applies to PG&E maintenance activities and would not impact the proposed project.

The Santa Rosa General Plan includes the following goals and policies relevant to the proposed project:

- OSC-H-1: Preserve trees and other vegetation, including wildflowers, both as individual specimens and as parts of larger plant communities.
- OSC-H-2: Preserve and regenerate native oak trees.
- OSC-H-4: Require incorporation of native plants into landscape plans for new development where appropriate and feasible, especially in areas adjacent to open space areas or along waterways.

Santa Rosa adopted a tree ordinance on October 2, 1990, to ensure proper tree removal and preservation (City 1990). Article 2, Section 17-24 of the City's tree ordinance requires a permit to remove or alter "heritage trees", "protected trees," and "street trees" in all zoning districts as defined below:

**Heritage Tree.** The City defines a "heritage tree" as, "a tree or grove of trees so designated by a resolution of the Planning Commission and after the holding of a noticed public hearing, having a specific historical or cultural association or value due to its age, species, character, location, height and/or the circumstances of its planting or origin." Species of heritage trees include:



California bay (*Umbellularia californica*), big leaf maple (*Acer macrophyllum*), black oak (*Quercus kelloggii*), blue oak (*Quercus douglasii*), California buckeye (*Aesculus californica*), canyon oak (*Quercus chrysolepis*), douglas fir (*Pseudotsuga menziesii*), interior live oak (*Quercus wislizeni*), California live oak (*Quercus agrifolia*), madrone (*Arbutus menziesii*), Oregon white oak (*Quercus garryana*), red alder (*Alnus oregona*), redwood (*Sequoia sempervirens*), valley oak (*Quercus lobata*), and white alder (*Alnus rhombifolia*). (City 1990, Article II, Section 17-24.020: L)

**Protected Tree.** “Protected trees” are defined as, “any tree, including a heritage tree, designated to be preserved on an approved development plan or as a condition of a tentative map, a tentative parcel map, or other development approval issued by the City.” (City 1990, Article II, Section 17-24.020: M)

**Street Tree.** The City defines a “street tree” as, “any tree having a single trunk circumference greater than six and one-quarter inches or a diameter greater than two inches, a height of more than six feet, and one half or more of its trunk is within a public right-of-way or within five feet of the paved portion of a City street or a public sidewalk.” (City 1990, Article II, Section 17-24.020: O)

### 3.3.3 Environmental Impacts

This section analyzes the project’s potential to result in significant biological impacts. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid impacts.

#### Methodology for Analysis

An arborist Tree Preservation and Mitigation Report was prepared by Horticultural Associates on September 13, 2018, which provided development impact assessments for each previously inventoried species based on the proposed development plan. This Tree Preservation and Mitigation Report can be found included in Appendix E. On November 20, 2018, Stantec qualified biologist (i.e., one knowledgeable in tree identification, arboricultural practices, and survey techniques) Leticia Morris re-surveyed the Caritas Center project site to ensure consistency and accuracy with Horticultural Associates’ findings, and the parcel north of 7<sup>th</sup> Street where two historic homes are proposed to be relocated. The results of this survey were documented in the Arborist Report Addendum in Appendix E and serve as an update to the Tree Preservation and Mitigation Report.

Stantec conducted a reconnaissance-level biological survey within the entire 2.78-acre project site on November 21, 2018. The results of this assessment are documented in the Biological Resources Memorandum (Appendix D) and include a table of species observed within the project site.

In addition to the Biological Resources Memorandum (Appendix D), Stantec also evaluated the following resources to determine the potential for the project to impact biological resources:

- CDFW RareFind 5 and Biogeographic Information and Observation System California Natural Diversity Database (CNDDB) (CDFW 2018a)
- USFWS Information for Planning and Consultation (USFWS 2018a)
- The California Native Plant Society (CNPS) online Inventory of Rare and Endangered Plants (CNPS 2018)



- *Inventory of Rare and Endangered Vascular Plants of California* (CNPS 2018)
- *The Jepson Manual: Vascular Plants of California*, Second Edition (Baldwin et al. 2012)
- California Wildlife Habitat Relationships System (CDFW 2014)
- National Wetlands Inventory (USFWS 2018b)
- Aerial photographs and topographic maps of the project site and surrounding area

A list of special-status species with the potential to occur in the project site was compiled by performing a CNDDDB query for the U.S. Geological Survey quadrangle containing the project site (Santa Rosa) and the eight surrounding quadrangles (Mark West Springs, Calistoga, Kenwood, Glen Ellen, Cotati, Two Rock, Sebastopol, and Healdsburg) and reviewing species data provided by the USFWS.

As noted in the Biological Resources Memorandum (Appendix D), the study area lacks any form of a natural habitat corridor (e.g., riparian areas along streams, rivers, or other natural features) that would allow for wide ranging plants and animals from other habitats ingress and egress to the study area. Additionally, there are no aquatic features or wetlands present within or near the project site.

The following sections describe the potential for special-status species to occur within the project site.

#### Special-Status Plants

Special-status plant species are defined in accordance with the CEQA Guidelines, Section 15380 and the *Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Natural Communities* (CDFW 2018b) and include species that are:

- Federally or state-listed, or proposed for listing, as rare, threatened, or endangered (CDFW 2018c);
- Special Plant as defined by the CNDDDB (CDFW 2018c); or
- Listed by the CNPS in the online version of its Inventory of Rare and Endangered Plants of California as California Rare Plant Rank List 1 through 4 (CDFW 2018c).

The CNDDDB query returned a list of 61 special-status plant species (CDFW 2018a). The USFWS data called out one additional special-status plant species. The Biological Resources Memorandum considered the distances of mapped sensitive plant occurrences from the project site and the conditions onsite to determine that the project site does not contain suitable habitat for special-status plant species (Appendix D).

#### Special-Status Wildlife

Special-status wildlife species are defined in accordance with the CEQA Guidelines, Section 15380 and include species that are:

- Listed, proposed for listing, or candidates for listing as threatened or endangered under the federal Endangered Species Act (CDFW 2018d);
- Listed or candidates for listing as threatened or endangered under the California Endangered Species Act (CDFW 2018d);



- Designated as Species of Special Concern by the CDFW (CDFW 2018d);
- Designated as Fully Protected by the CDFW (CDFW 2018d); or
- Otherwise meet the definition of rare, threatened, or endangered, as described in the CEQA Guidelines, Section 15380.

The CNDDB search performed as part of the Biological Resources Memorandum returned a list of 25 special-status wildlife species (Appendix D). The USFWS data called out an additional three species. Based on the field survey, potential habitat for these special-status species is absent from the study area. Therefore, none of the 28 special-status wildlife species have moderate or high potential to occur in the study area.

### Thresholds of Significance

In accordance with the CEQA Guidelines' Appendix G Environmental Checklist, the following questions were analyzed and evaluated to determine whether impacts to biological resources are significant. Would the proposed project:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The following questions were determined to have no impact or a less than significant impact during the NOP Scoping. These issues are summarized in Section 7, Effects Found Not to Be Significant, and are not discussed further in this section.

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations, or by the California Department of Fish or USFWS?
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of CWA (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?





## Project Impact Analysis and Mitigation Measures

### Effect on Species

|                     |   |
|---------------------|---|
| <b>Impact BIO-1</b> | <b>The proposed project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.</b> |
|---------------------|---|

### Impact Analysis

#### *Special-Status Wildlife*

The project site consists of urban, barren, and other ruderal vegetation communities associated with highly disturbed areas, paved parking lots, a vacant lot, and existing buildings surrounded by residential streets. The study area lacks any form of natural habitat corridor (e.g., riparian areas along streams, rivers, or other natural features) that would allow for wide-ranging animals from other habitats ingress and egress to the study area. Based on the project location and surrounding communities, potential habitat for special-status species is absent from the project site. This is supported by the findings of the biological field survey on November 21, 2018, as no special-status wildlife species or suitable habitats were identified (Appendix D). Therefore, no special-status wildlife species would be expected to occur within the project site.

#### *Special-Status Plants*

As discussed above, the project site consists of highly disturbed areas, paved parking lots, a vacant lot, and existing buildings surrounded by residential streets. Based on the project location, surrounding communities, and frequent disturbances, the project site does not contain habitat suitable for special-status plants. Therefore, no special-status plant species would be expected to occur within the project site, which is supported by the finding of the biological field survey on November 21, 2018 (Appendix D).

#### *Nesting Bird Species*

Based on the field survey, trees, shrubs, and other substrates (e.g., rooftops and storage buildings) in and near the study area provide potential nesting and foraging habitat for various bird species. If construction activities (including vegetation removal and equipment noise) are scheduled during the avian breeding season (i.e., late February through September depending on the species), the proposed project could disturb nesting birds in or adjacent to the project site. Removal of nesting substrates (e.g., vegetation, rooftops, and storage buildings) to prepare the work area would directly affect nesting birds if nests are present. Other construction activities such as staging equipment/materials, grading, excavation, and pipe laying near trees could also disturb nesting birds if they are present in or near the work area. These construction-related disturbances could result in the incidental loss of fertile eggs or nestlings, and/or nest abandonment. Implementation of mitigation measure BIO-1: Avoid Disturbance of Nesting Birds would reduce potential impacts to nesting birds. With the implementation of mitigation measure BIO-1, the project would have a less than significant impact.

### Level of Significance Before Mitigation

Potentially Significant Impact.



## Mitigation Measures

**MM BIO-1: Avoid Disturbance of Nesting Birds.** If project activities occur during the nesting season for native birds (February 1 to August 31), the following measures shall be implemented to avoid or minimize the potential for adverse impacts on nesting migratory birds and raptors:

A pre-construction nesting bird survey for species protected by the MBTA and California Fish and Game Code will be conducted by a qualified biologist within a 250-foot radius of proposed construction activities for passerines and a 500-foot radius for raptors no more than 2 weeks prior to the start of construction activities.

If an active nest is found, the qualified biologist will establish an appropriate no-work buffer around the nest, unless a smaller buffer zone is approved by CDFW. Construction within the no-work buffer may resume once it is determined by a qualified biologist that the young have left the nest. If a lapse in construction activities of 7 days or more occurs during the nesting season, an additional nesting bird survey is recommended to ensure that no nests were established in the area while construction activities were on hold.

### Level of Significance After Mitigation

Impacts to special-status plant and wildlife species, and nesting bird species would be less than significant with the implementation of the mitigation measures listed above.

### Local Policies or Ordinances Protecting Biological Resources

**Impact BIO-2      The proposed project would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.**

### Impact Analysis

Based on the current project design, the project would remove up to 55 trees, and 40 of those trees are subject to the City's tree ordinance as documented in the arborist report addendum completed on November 30, 2018 (Appendix E). Removal of these trees would require the applicant to apply for a category II tree removal permit from the City (the permit category required for development projects). During the permit application process, the applicant would work with the City to determine the required compensatory mitigation: (1) For each 6 inches or fraction thereof of the diameter of a tree which was approved for removal, two trees of the same genus and species as the removed tree (or another species, if approved by the Director), each of a minimum 15-gallon container size, shall be planted on the project site, provided that an increased number of smaller size trees of the same genus and species may be planted if approved by the Director, or a fewer number of such trees of a larger size if approved by the Director; (2) For each 6 inches or fraction thereof of the diameter of a tree that was not approved for removal, four trees of the same genus and species as the removed tree (or another species, if approved by the Director), each of a minimum 15-gallon container size, shall be planted on the project site, provided that an increased number of smaller size trees of the same genus and species may be planted if approved by the Director, or a fewer number of such trees of a larger size if approved by the Director (City 1990). With the implementation of mitigation measure BIO-2, the project would have a less than significant impact.

The proposed project would not conflict with any other local policies or ordinances.



**Level of Significance Before Mitigation**

Less Than Significant Impact.

**Mitigation Measures**

**MM BIO-2: Tree Replanting.** Removed trees will be mitigated through replanting, following all terms and conditions included in the City's tree ordinance permit.

**Level of Significance After Mitigation**

Less Than Significant Impact.



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## 3.4 CULTURAL AND HISTORICAL RESOURCES

This section describes impacts on cultural resources that would result from implementation of the proposed project. Included is a summary of applicable policies and regulations related to cultural resources and review of existing conditions. It also describes impacts on cultural resources that would result from implementation of the proposed project, based on the Archaeological Survey Report prepared by Alta Archaeological Consulting on September 2, 2019 (Appendix E), and the Historical Resources Report prepared by Brunzell Historical on August 27, 2019 (Appendix F).

### 3.4.1 Environmental Setting

#### Cultural Setting

The following cultural resources discussion is modified from the Archaeological Survey Report and the Historical Resources Report (Appendices E and F, respectively) unless otherwise referenced.

##### Prehistoric and Ethnographic Context

Archaeological evidence indicates that human occupation of California began at least 12,000 years ago. Early occupants appear to have had an economy based largely on hunting with limited exchange, and social units were composed of small, mobile groups. Later, subsistence strategies focused on both hunting and processing hard seeds such as acorns. As people sought new resources, this led to the diversification of economies, population growth, expansion of territories, and the shift toward sedentism. The continued trend towards sedentism intensified the use of local resources, forcing populations to spread further and ultimately defining territorial boundaries over time.

Prior to Euro-American settlement, the Southern Pomo people occupied the project area. The Southern Pomo were hunter-gatherers that lived in rich environments. Primary village sites were occupied throughout the year, and other sites were visited to procure resources that were especially abundant or available only during certain seasons. Sites were often situated near fresh water sources and in areas where plant and animal life were diverse and abundant. Refer to Section 3.9, Tribal Cultural Resources, for additional information regarding the ethnographic setting.

##### Historic Context

##### *City of Santa Rosa*

The first known non-Native American settlers came to the Santa Rosa area in the 1830s. María Ignacia Lopez de Carrillo moved to the Rancho Cabeza de Santa Rosa with her 12 children in 1837. Carrillo was mother-in-law to General Mariano Vallejo, commander of the Mexican forces north of the Presidio of San Francisco. Her adobe was located on the south side of Santa Rosa Creek near its confluence with Matanzas Creek. The land was formally granted to her by the governor on September 30, 1841. Speculators laid out the town of Santa Rosa in 1854, much of it on land donated by the Carrillos. The new town became the county seat in 1855, solidifying its regional political importance. It was settled primarily by farmers from the southern United States, and its economy was based on agriculture. In the second half of the nineteenth century, Santa Rosa grew into a transportation hub and an economic center (LeBaron et al. 1985).



By the twentieth century, Santa Rosa was well established, with a population of about 6,000 residents. Three railroad lines were in operation, hauling agricultural products from the fields to distant markets. In 1906, the Great Earthquake destroyed much of the commercial downtown. Despite the devastation, the town continued to grow during the early twentieth century. Highway 101 was built in the 1940s, transforming the geography and economy of Santa Rosa. It brought new business to Santa Rosa but also divided the town in half. Santa Rosa suffered another significant earthquake in 1969 that, in combination with the broad trend toward urban renewal, led to significant redevelopment in the late 1960s and early 1970s. The City demolished the courthouse, plaza, and other landmarks and changed the street layout. The Santa Rosa Plaza mall was also constructed during this period. New industries began to appear in Santa Rosa, and its formerly diverse agriculture gradually shifted toward a focus on wine as grape growing accelerated (Voliva 1999:8; Stanley 2008:9).

### *Hospital Block*

Although just a few blocks from the historic Santa Rosa core and within St. Rose Parish, development at the project site (referred to as the Hospital Block) occurred slowly. By 1885, there was a lumber yard at the south end of the block, but the balance of the block remained vacant until two residences were built at the southwest corner of the block. Around the turn of the century, a handful of new buildings were constructed at the south end of the block, including a warehouse on A Street. About 1915, a second warehouse was built at 437 A Street. Despite subdivision of the remainder of the block in 1916, most of the lots remained vacant until 1919.

About 1917, Henry Shanor Gutermute purchased five lots at the corner of 7<sup>th</sup> and A streets on which he planned to develop a new hospital. After construction of the hospital, General Hospital, the remaining empty lots gradually developed for housing. About 1920, the four-unit Casa del Sol apartment building (historic four-plex) was constructed behind the hospital at 608 Washington (currently Morgan) Street. Single-family residences were built at 512 and 600 Washington (Morgan) Street in the early 1920s. The neighborhood was home to small business owners, postal clerks, printers, housewives, and nurses as well as other hospital employees. About 1940, Henry Gutermute constructed three modest houses with garages along 7<sup>th</sup> Street to use as rentals. A few years later, two houses were moved from other parts of Santa Rosa to their current parcels at 516 and 512 Washington Street. By 1950, Sanborn Maps show every parcel on the block developed.

Santa Rosa Memorial Hospital opened in 1950 and was supposed to replace General Hospital, but the old facility remained in use for three more decades despite its small size and aging facilities. Expansion of Highway 101 into a freeway in the mid-1950s began a transformation of the neighborhood by creating a barrier between Washington (Morgan) Street and the formerly integrated portion of the neighborhood to its west. Residential uses on the block began to be supplanted by institutional ones in the 1960s. In 1964, the residence at 600 Morgan Street became a rest home, later housing a variety of healthcare related services. MacMillan Properties acquired Casa del Sol to use as hospital staff apartments and storage in the 1960s and eventually purchased some of the other houses on the block, using them for storage and offices.

During 1981-1982, Santa Rosa Plaza mall and a multistory parking garage were constructed south of the Hospital Block, destroying the south end of the St. Rose Parish neighborhood and further altering the historical setting. The Hospital Block footprint was altered by the project through the widening of 6<sup>th</sup> Street. The widening resulted in demolition of the properties on the north side of 6<sup>th</sup> Street including





the warehouse at the corner of B Street, the small houses facing 6<sup>th</sup> Street, and the 1880s house at 500 Morgan Street. Three years later General Hospital closed, with the building operating as an alcohol treatment center and, in the late 1980s, a homeless shelter. Catholic Charities began operating the facility about 1990 and has used the site for homeless services, subsequently expanded operations to more buildings on the block. In 2018, 512 Morgan Street was the only single-family house on the Hospital Block still in use as a residence.

#### *Archaeological Resources in the Project Area Records Search and Literature Review*

Alta Archaeological Consulting conducted a records search within a 0.50-mile radius of the project site at the Northwest Information Center (NWIC) (File No. 18-0973; File Number 18-1122) on November 19, 2018, and December 12, 2018. As an affiliate of the State of California Office of Historic Preservation, the NWIC is the official state repository of cultural resource records and reports for the region that includes Sonoma County. The records search included a review of previous studies, records, and maps on file at the NWIC, as well as the following resources:

- California Inventory of Historic Resources (California Department of Parks and Recreation)
- California Historical Landmarks for Sonoma County (California Office of Historic Preservation)
- California Points of Historical Interest
- Directory of Properties in the Historic Property Data File (California Office of Historic Preservation)

The results of the records search indicated that 97 cultural resource studies have been performed within a 0.50-mile radius of the project site, and 468 cultural resources are present within the 0.50-mile records search radius. Of the 468 previously recorded cultural resources, 440 resources consist of historic-era buildings or structures. In addition, the NWIC records search identified three prehistoric sites (P-49-000076 [CA-SON-11], P-49-000134 [CA-SON-157], and P-49-002820) and two multicomponent sites (P-49-000801 [CA-SON-860/H] and P-49-004993 [CA-SON-2670/H]) within a 0.50-mile radius of the project site. The prehistoric and multicomponent sites are located outside of the project site boundary and would not be affected by the proposed project. The NWIC records search did not identify any previously recorded archaeological resources within the project site.

#### *Field Survey*

On December 19, 2018, Alta Archaeological Consulting conducted a field survey of the project site. The entire project site was surveyed and included the excavation of eight shovel probes to examine subsurface sediments. Shovel probes were situated within vacant lots and excavated to an average of 50 centimeters below the surface. Sediments were examined for evidence of cultural materials. The archeological field survey did not reveal prehistoric cultural materials within the project site (Alta Archaeological Consulting 2019).

### **Historical Resources in the Project Area**

The project site is located within the southernmost portion of the St. Rose Historic Preservation District, which is dominated by residences dating from the late nineteenth and early twentieth centuries. The historic district was formed around the St. Rose Catholic Church, a gothic revival structure, and its associated parish school established in 1880. In 1989, Anne Bloomfield, an architectural historian under contract with the City of Santa Rosa's Cultural Heritage Board (CHB), systematically surveyed the St.



Rose neighborhood and found it eligible as a historic district. Bloomfield produced a Department of Parks and Recreation 523 form in which she documented the neighborhood's current condition and history. She did not evaluate the resources in the neighborhood or the district as a whole for significance under the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) criteria, but her Department of Parks and Recreation form states that the neighborhood was eligible for listing as a local historic district and provided photos for each property within the district. Bloomfield also prepared a table with basic information about each building including status as a contributor or non-contributor (Table 3.4-1). In 1990, the City of Santa Rosa adopted the St. Rose Historic Preservation District as its first local historic district (Brunzell Historical 2019).

Brunzell Historical conducted historical resource evaluations of all 11 buildings located on the project site, which is bounded by Morgan, 6<sup>th</sup>, A, and 7<sup>th</sup> streets. The project site is characterized by historical-period residential and institutional buildings as well as vacant lots. Additionally, it is surrounded by structures constructed outside the period of significance. The surrounding structures include the multistory parking structures to the south and east, and Highway 101 (along with its soundwall and on-ramp) to the west.

Between 2015 and 2018, Brunzell Historical evaluated the 11 buildings for historic eligibility according to the NRHP, CRHR, and the City of Santa Rosa criteria (detailed in Section 3.4.2, Regulatory Setting). The results of the historic resource evaluations and the previous evaluation performed by Anne Bloomfield in 1989 are summarized in Table 3.4-1. The significance evaluation of each building is further described in the Historical Resources Report provided in Appendix F of this document.

**Table 3.4-1: Historic Resources Evaluation Results**

| Address  | Year Built  | Use                               | Bloomfield Survey Results                    | Historic Eligibility 2015-2018   | Extant |
|--|-------------|-----------------------------------|--|----------------------------------|--------|
| 437 A Street   | c1915       | Warehouse                         | Non-contributor/ not included in survey area | Ineligible (lacked significance) | No     |
| 465 A Street   | 1919        | Hospital, homeless shelter        | Non-contributor/ not included in survey area | Ineligible (lacked significance) | Yes    |
| 506 Morgan Street                                    | c1885       | Residence                         | Non-contributor                              | Ineligible (lacked significance) | Yes    |
| 512 Morgan Street                                    | c1920       | Residence                         | District contributor                         | Ineligible (lacked integrity)    | Yes    |
| 516 Morgan Street                                    | 1922/ 1946* | Residence, office                 | District contributor                         | Ineligible (lacked integrity)    | Yes    |
| 520 Morgan Street (Historic single-family residence) | 1903/ 1946* | Residence, office                 | District contributor                         | Eligible as district contributor | Yes    |
| 600 Morgan Street                                    | 1922        | Residence, office, support center | District contributor                         | Ineligible (lacked integrity)    | Yes    |
| 608 Morgan Street (Historic four-plex)               | c1920       | Multifamily residence             | District contributor                         | Eligible as district contributor | Yes    |
| 612 Morgan Street                                    | c1940       | Residence                         | District contributor                         | Ineligible (lacked significance) | No     |
| 304 7 <sup>th</sup> Street                           | c1940       | Residence                         | District contributor                         | Ineligible (lacked significance) | No     |



| Address                    | Year Built | Use       | Bloomfield Survey Results | Historic Eligibility 2015-2018   | Extant |
|----------------------------|------------|-----------|---------------------------|----------------------------------|--------|
| 306 7 <sup>th</sup> Street | c1940      | Residence | District contributor      | Ineligible (lacked significance) | No     |

Notes:

\*Year the building was moved to its current address.

Source: Brunzell Historical 2019

As shown in Table 3.4-1, the historical resources evaluation conducted for the proposed project by Brunzell Historical identified two historical resources within the project site. The historical resources include the single-family residence at 520 Morgan Street and the historic four-plex apartment building at 608 Morgan Street, both of which are eligible contributors to the St. Rose Historic Preservation District (Brunzell Historical 2019).

### 3.4.2 Regulatory Setting

Refer to Section 3.9, Tribal Cultural Resources, for additional federal and state regulations and local policies applicable to cultural resources.

#### Federal

##### National Historic Preservation Act

The National Historic Preservation Act, as amended, established the NRHP, which contains an inventory of the nation's significant prehistoric and historic properties. Under 36 Code of Federal Regulations (CFR) 60, a property is recommended for possible inclusion on the NRHP if it is at least 50 years old, has integrity, and meets one of the following criteria:

- It is associated with significant events in history or broad patterns of events.
- It is associated with significant people in the past.
- It embodies the distinctive characteristics of an architectural type, period, or method of construction; it is the work of a master or possesses high artistic value; or it represents a significant and distinguishable entity whose components may lack individual distinction.
- It has yielded or may yield information important in history or prehistory.

Certain types of properties usually are excluded from consideration for listing on the NRHP, but they can be considered if they meet special requirements in addition to meeting the criteria listed above. Such properties include religious sites, relocated properties, graves and cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

#### State

##### California Environmental Quality Act

Lead agencies (local governments with permit approval) are required by CEQA to carry out environmental impact analysis. Historical resources are considered part of the environment and are subject to review



under CEQA. Historical resources are defined by CEQA Guidelines (CCR Title 14, Chapter 3, 15064.5) as follows:

1. A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the CRHR (PRC 5024.1, Title 14 CCR, Section 4850 et seq.).
2. A resource included in a local register of historical resources, as defined in section 5020.1(k) of the PRC or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.

### California Register of Historic Resources

Under Section 21083.2 of CEQA, an important archaeological or historical resource is an object, artifact, structure, or site that is listed on or is eligible to be listed on the CRHR. Eligible resources are those that can be clearly shown to meet any of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic value.
4. Has yielded or may be likely to yield information that is important in prehistory or history.

Automatic listings include properties that are listed on the NRHP. In addition, Points of Historical Interest nominated from January 1998 onward are to be jointly listed as Points of Historical Interest and in the CRHR. Resources listed in a local historical register or deemed significant in a historical resources survey, as provided under PRC Section 5024.1(g), are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates that they are not. A resource that is not listed on or determined to be ineligible for listing on the CRHR, not included in a local register of historical resources, or not deemed significant in a historical resources survey may nonetheless be historically significant, as determined by the lead agency (PRC Section 21084.1 and Section 21098.1).

### California Health and Safety Code and Public Resources Code

Broad provisions for the protection of Native American cultural resources are contained in the HSC, Division 7, Part 2, Chapter 5 (Sections 8010 through 8030). Several provisions of the PRC also govern archaeological finds of human remains and associated objects. Procedures are detailed under PRC



Section 5097.98 through 5097.996 for actions to be taken whenever Native American remains are discovered.

Section 7050.5 of the HSC states that any person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor, except as provided in Section 5097.99 of the PRC. Any person removing human remains without authority of law or written permission of the person or persons having the right to control the remains under PRC Section 7100 has committed a public offense that is punishable by imprisonment. PRC Chapter 1.7, Section 5097.5/5097.9 (Stats. 1965, c. 1136, p. 2792), entitled Archaeological and Historical Sites, defines any unauthorized disturbance or removal of remains on public land as a misdemeanor.

## Local

### City of Santa Rosa 2035 General Plan

The following lists goals and policies from the City of Santa Rosa 2035 General Plan pertaining to cultural resources that are applicable to the proposed project.

#### *Historic Preservation Element*

##### **Goal HP-A. Protect Native American Heritage**

- **Policy HP-A-1.** Review proposed developments and work in conjunction with Sonoma State University's NWIC to determine whether sites contain known Native American resources or have the potential for such resources.
- **Policy HP-A-2.** Require that areas found to contain significant artifacts be examined by a qualified consulting archaeologist for recommendations concerning protection and preservation.
- **Policy HP-A-3.** If cultural resources are encountered during grading, avoid altering the materials and their context until a qualified cultural resource consultant has evaluated the situation and recorded identified cultural resources.

##### **Goal HP-B. Preserve Santa Rosa's historic structures and neighborhoods.**

- **Policy HP-B-1.** Ensure that alterations to historic buildings and their surrounding settings are compatible with the character of the structure and the neighborhood. Ensure that specific rehabilitation projects follow the Secretary of Interior's Standards for Rehabilitation to a reasonable extent, taking into consideration economic and technical feasibility.
- **Policy HP-B-2.** Preserve significant historic structures. Consider various alternatives to demolition of these structures, including the adaptive reuse of historic buildings for contemporary uses.
- **Policy HP-B-3.** Establish priorities and pursue designating new landmarks and historic preservation districts, following study by the Cultural Heritage Board, to preserve historic areas.
- **Policy HP-B-4.** Allow for the adaptive reuse of historic landmark structures for institutional, office, or limited commercial uses, incorporating improvements to minimize negative impacts on existing neighborhoods to the extent feasible.
- **Policy HP-B-5.** Update the Survey of Historic Properties Inventory of 1990, taking into consideration buildings neighborhoods, and other features of historic, architectural, or cultural significance.
- **Policy HP-B-6.** Provide historic street name signs for each designated preservation district.



- **Policy HP-B-7.** In establishing zoning designations for historic properties, consider historic uses, and establish provisions to encourage retention of the historic use and setting.
- **Policy HP-B-8.** Preserve sites that are eligible for the NRHP and pursue listing eligible sites in the Register.
- **Policy HP-B-9.** Integrate the common goals of the City's green ordinances and historic preservation objectives. Provide building owners of older and historic structures clear and cost-effective options to measurably enhance energy efficiency while maintaining the structure's historic character to the greatest degree possible.

**Goal HP-C.** Increase public participation in the historic preservation process.

- **Policy HP-C-1.** Prepare and distribute educational guides and walking tour brochures of places of historical, architectural or cultural interest in Santa Rosa, to increase public awareness of these resources.
- **Policy HP-C-2.** Hold neighborhood meetings to achieve the following:
  - Increase public awareness of preservation issues and opportunities;
  - Provide information on the historic designation process; and
  - Alert neighborhoods, when necessary, to the pending loss of significant buildings or other features.

### *Historic Preservation Ordinance*

The City officially adopted its Historic and Cultural Preservation Ordinance in 1988, establishing a Cultural Heritage Board(CHB). The CHB's duties are to make recommendations on designation of historic landmarks and preservation districts and review proposed changes to historic buildings. Santa Rosa's Municipal Code authorizes the City Council to designate historic landmarks and preservation districts. Article 17-22.030 defines a landmark as, "any site, including significant trees or other significant permanent landscaping located thereon, place, building, structure, street, street furniture, sign, work of art, natural feature or other object having a specific historical, archaeological, cultural or architectural value in the City and which has been designated a landmark by the City Council." A preservation district is defined in 17-22.060 as, "any clearly described geographic area having historical significance or representing one or more architectural periods or styles typical to the history of the City that has been designated a preservation district by the City Council."

### *City of Santa Rosa Eligibility Criteria*

Santa Rosa's local eligibility criteria for historic landmarks and preservation districts is closely modeled on the NRHP and CRHR criteria. The CHB set forth local criteria in "Processing Review Procedures for Owners of Historic Properties," which was adopted by the City Council in 2001.

The Department of Community Development staff will review the project to determine if the property in question has historical or cultural significance to Santa Rosa. The staff will apply the following criteria that are widely used by federal, state, and local jurisdictions to determine historical significance.

- **Event:** Is the property associated with an event that has made a significant contribution to Santa Rosa's history; or
- **Person:** Is the property associated with the life of a person who was significant in Santa Rosa's history; or



- **Design:** Does the property embody the distinctive characteristics of a type, period, or method of construction found in Santa Rosa before 1950; or
- **Information:** Has the property yielded, or may be likely to yield, information important in Santa Rosa's prehistory or history; and
- **Integrity:** Does the property retain enough aspects of location, design, setting, workmanship, materials, feeling, and association to convey its historic significance?

### City of Santa Rosa Design Guidelines

In 2005, the City of Santa Rosa approved the Design Guidelines, which outline a series of design policies and criteria that will inform and guide urban design and an assortment of projects in the City. Although the document covers numerous design goals and criteria that pertain to a wide variety of project types, several chapters and sections are pertinent to the project. These include the following:

#### *Section 2.4: Historic Districts within the Downtown Area and Station Area*

Goal 2.4.1: Design Buildings to be sensitive to the neighborhood with regard to scale, architectural style, use or materials, build, and historical context. This is especially important in designated historic districts

Guideline A) A particular architectural style or design is not specified; however, the scale, mass, and size of the building are often more important than the decorative details which are applied.

Guideline B) Setbacks should be carefully considered in relationship to adjacent structures.

Guideline C) Designs should be compatible with the historic building in terms of mass, materials, color, proportion, and spacing of windows and doors. Refer also to Section 4.7: Historic Properties and Districts below.

Goal 2.4.2: Design new development in and adjacent to historic preservation districts to be compatible with existing structures.

Guideline B) New development adjacent to the St. Rose and West End historic neighborhoods should be compatible in height and scale with existing structures.

#### *Section 4.7: Historic Properties and Districts*

##### I. - Goals

- a. To preserve Santa Rosa's historic heritage.
- b. To encourage maintenance and retention of historic structures and districts.
- c. To ensure that alterations to historic buildings are compatible with the character of the structure and the neighborhood.
- d. To discourage demolition of significant historic structures.
- e. To assist property owners and designers in developing plans for historic properties, to encourage compatibility of new structures in historic districts, and to have those plans approved by the City.





### III.C – Demolition

*The demolition of landmarks or contributing buildings located within Preservation Districts may be restricted by state and city law and should not be ordinarily considered unless there are unusual circumstances surrounding the proposed demolition.*

- 1) Provide Mitigation for the demolition of historical resources. *Examples of mitigation measures for the demolition of significant historic buildings include adaptive reuse, reconstruction, or relocations. Examples of mitigation measures for less significant buildings include moving a building outside a district, restoring another building in exchange for the demolition, or the least desirable option, documentation and salvage. The Cultural Heritage Board is always willing to discuss other creative solutions. Early consultation with the Board is highly recommended.*

### III.G – New Construction

- 1) Design new construction so the architectural character of the neighborhood is maintained. *Specific architectural styles are not mandated. Designs for new construction can also be contemporary.*
- 2) Design new construction to be compatible in height and proportion with adjacent structures.
- 3) Use materials and designs similar to those found throughout the neighborhood,

### III.K – Relocation

- 1) Avoid the relocation of a historic building out of a district, as this negates the integrity of the site and setting. *Moving a building into or within a district may be acceptable if it is of an appearance and architectural style for the neighborhood and its new setback matches the existing buildings in the block.*

## **3.4.3 Environmental Impacts**

This section analyzes the project's potential to result in significant cultural resources impacts. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid that impact.

### **Methodology**

The following impact analysis is based on the Archaeological Survey Report prepared for the proposed project by Alta Archaeological Consulting on February 25, 2019, and the Historic Resources Report prepared by Brunzell Historical on March 8, 2019.

The Archaeological Survey Report included a records search at the NWIC, literature review, and archaeological field survey. The records search and cultural resources survey were completed in accordance with the CEQA guidelines by the following actions: 1) identifying all cultural resources within the project site; 2) offering a significance evaluation of the identified cultural resources; 3) assessing resource vulnerability to effects that could arise from project activities; and 4) offering suggestions designed to protect resource integrity, as warranted.



The Historical Resources Report included historical resource evaluations of the 11 buildings in the project area in stages between 2015 and 2018. Brunzell Historical performed additional research through the City of Santa Rosa, Sonoma County Assessor/Recorder, Sonoma County History and Genealogy Library, Sonoma State University Library's North Bay Digital Collection, and various internet resources including ancestry.com and historicaerials.com. Intensive-level cultural resources field surveys of the project area were conducted on the following dates: October 27, 2015; April 1, 2016; and August 22, 2018. Personnel took digital photographs at various points within the project area. These included overviews and detailed photographs of all elevations of the 11 buildings, as well as interior documentation of the former hospital building. Potential historical resources were recorded per the California Office of Historic Preservation *Instructions for Recording Historical Resources* in the field.

Technical Review of the Historical Resources Report (Brunzell Historical Consulting, 2019)

The survey methods employed in the Historical Resources Report as prepared by Brunzell Historical appear sound, effective, and adequate for the purposes of identifying and evaluating historical resources in the survey area; all historic resources identified in the Historical Resources Report qualify as cultural properties per CEQA. However, the technical impacts analysis of the and proposed mitigation measures included within the Historical Resources Report appear to be inadequate in assessing project impacts on said resources and developing of mitigation measures that effectively reduce these significant impacts.

The impacts analysis and prepared mitigation measures within the Historical Resources Report are supplemented in the following sections with additional analyses and mitigation measures to address further the potential significant impacts related to the identified historic properties. These supplemental components were prepared by Stantec architectural historians who meet the Secretary of the Interior's Professional Qualifications for history and architectural history.

### Thresholds of Significance

The significance criteria used to identify cultural resources impacts is from Appendix G of the CEQA Guidelines (2019). The proposed project would cause a significant impact on cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- Disturb any human remains, including those interred outside of formal cemeteries.



## Project Impact Analysis and Mitigation Measures

### Historic Resources

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**Impact CUL-1      The proposed project would cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.**

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#### Impact Analysis

##### Direct Impacts to Historical Resources

##### *Individual Historical Resources*

The Historical Resources Report prepared for the proposed project identified two historical resources within the project site: the single-family residence at 520 Morgan Street and the historic four-plex apartment building at 608 Morgan Street, both of which are eligible contributors to the St. Rose Historic Preservation District (Brunzell Historical 2019). The existing family services center located in the former hospital was determined to not be a contributor to the St. Rose Historic Preservation District, and it was not historically eligible due to lack of significance. The single-family residence at 506 Morgan was also a noncontributor to the St. Rose Historic Preservation District and was also historically ineligible due to lack of significance. The remaining structures on the project site were considered contributors to the St. Rose Historic Preservation District but were not historically eligible due to lack of significance. The proposed project would demolish all existing structures at the project site including the structures at 608 and 520 Morgan Street.

The CEQA Guidelines state that the significance of a historical resource is materially impaired by demolition, which destroys a resource's ability to convey its significance. Therefore, the proposed demolition of the historic single-family residence at 520 Morgan Street and the historic four-plex apartment building at 608 Morgan Street would result in a significant impact. The Historical Resources Report identifies recommended preparation of a public report and interpretive materials for the historic resources in conjunction with the City and interested local parties including but not limited to Santa Rosa's CHB, local preservation groups, and any local neighborhood groups that may express interest in the historic resources. However, based upon the Design Guidelines and other City documents, the mitigation measures presented in the Historical Resources Report do not satisfy the requirements outlined for the City when addressing the potential demolition to historical resources. As such, additional mitigation measures were prepared to further address the significant and unavoidable impacts per the City's guidance. Although implementation of mitigation measures CUL-1 through CUL-4 would partially mitigate the negative impact to the historic resources these mitigation measures would not fully reduce the impact below the level of significance. As such, demolition of the two historic structures at the project site would result in a **significant and unavoidable impact** to both 520 and 608 Morgan Street.

##### *St. Rose. Historic Preservation District*

The project site is located on the southern edge of the St. Rose Historic Preservation District, which is located south of the central portion of the district and its concentration of contributing properties. Additionally, the project site is located directly north-adjacent to the main downtown core of Santa Rosa and is ultimately surrounded on three sides by large-scale buildings and structures constructed outside its period of significance: Highway 101 (including its on-ramp and soundwall); and multilevel parking structures. These large structures are incompatible with the historic district and have significantly compromised the historical setting of the project area. Furthermore, when the historic district was



evaluated in 1989, six of the seven parcels located within the project site held buildings that qualified as district contributors. In 2019, Brunzell Historical determined that only two of these buildings have sufficient significance and integrity to qualify as district contributors, as the project area lacks a sufficient concentration of contributing resources to continue to convey the significance of the historic district. The Historical Resource Report recommends redrawing the boundaries of the St. Rose Historic Preservation District to remove the subject southern portion from the broader district to fully coalesce the remaining central concentration of contributing properties. However, this would result in a substantial adverse change to the historic district and is not examined further at this time.

Additional alterations to the historic district in the immediate vicinity of the project area have also taken place over the three decades since the original survey. District contributors at 507 A Street and 411 7<sup>th</sup> Street have been demolished, and at least four new buildings have been constructed within 500 feet of the project site and within the historic district.

The proposed project involves the demolition of the historically-eligible single-family residence and the historically-eligible four-plex at 520 and 608 Morgan, respectively. Although these properties are located in the southernmost portion of the Historic District, which has suffered a loss of contributing properties and overall historical integrity since the District was first identified in 1989, they are both still considered contributing properties to the St. Rose Historic Preservation District. As such, the loss of this historical material from the demolition of these two buildings would perpetuate the loss of contributors in this particular area and overall degradation of historical integrity of the St. Rose Historic Preservation District. Therefore, the demolition of the historic single-family and four-plex would qualify as a substantial adverse change per CEQA Guideline 15064.5 (b)(2)(B), which outlines that the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources. While the demolition of these two contributors would not result in the loss of the district as a whole, the alteration to the district would result in a **substantial adverse change** to the St. Rose Historic Preservation District.

### Indirect Impacts to Historical Resources

The project site is adjacent to nine historical resources that are contributors to the St. Rose Historic Preservation District (Appendix F): one institutional building (Santa Rosa Museum) and eight single-family residences. These nine resources are located approximately 300 feet from the project site, outside of the project site boundary, and would not be impacted by the proposed project.

The Historical Resources Report addresses the potential for indirect impacts using the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, particularly the *Standards for Rehabilitation* (Standards) for analyzing the potential of the overall project on the design. As stated previously, although the evaluation and identification efforts within the Historical Resources Report are sound in approach and findings, the impacts analyses included within the report are inadequate. As presented in the Historical Resources Report, the analysis suggesting conformance with the Standards relies on the piecemealing of separate project components that does not holistically look at the entirety of the project and, respectfully, comes to an incorrect conclusion; the potential demolition of the historic single-family residence and four-plex building to allow for construction of the project would not adhere to the Standards. However, the assessment of potential indirect impacts of the project are addressed in the discussion of compatibility of the proposed project in relation to the overall setting of the St. Rose Historic Preservation District and its character-defining features.



This discussion of indirect impacts occurs primarily under Standard 9, which states, “New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property.” The analysis presented in the Historical Resources Report accounts for the historic district-facing elevations of the proposed project and the design treatments employed throughout to be both compatible, yet differentiated, within the setting of the St. Rose Historic Preservation District. These design elements outlined include the following:

- Contemporary style that will, “not mimic architectural styles and will be differentiated from the historic buildings.”
- District-facing elevations at the north end of the project site will have compatible heights of one to two stories at the street level; and taller sections of the project will be set back from the district-facing streets and placed at a distance to preserve established datum of the district.
- Common architectural forms, including hipped rooflines and regularly repeating vertical window openings, will reflect character-defining features found throughout the district and building upon compatibility.

These features of the project are also consistent with the Design Guidelines, which have clearly stated sections that address new construction within historic districts, namely Section 2.4: Historic Districts within the Downtown Area and Station Area *and* Section 4.7: Historic Properties and Districts-III.G -new Construction. However, materials included in the proposed project are not discussed as part of the Standards analysis.

According to the project design as presented in the preliminary full plan set by Pyatok Architecture + Urban Design (July 22, 2019), the district-facing elevation will feature a number of materials, namely the use of Portland cement plaster panels as the primary cladding material, wood architectural features (fencing, trellises, and other details), aluminum-framed bronze windows, and concrete barrel tile roof. Although many of these materials are contemporary, they are aesthetically similar to character-defining features found throughout the historic preservation district, particularly at the nearby Santa Rosa Museum, which features a stucco veneer throughout, as well as red tile roof and metal windows and entrances. The wood architectural features are also consistent with the single-family residences within the historic preservation district, which are typically composed in Craftsman and Queen Anne styles, all of which feature decorative wood elements. This is consistent with the Design Guidelines Districts-III.G- New Construction, 3) “Use materials and designs similar to those found throughout the neighborhood.”

Currently the existing design of the elevation facing the St. Rose Historic Preservation District is consistent with the Design Guidelines Section 4.7: Historic Properties and Districts, III.G – New Construction, which reduces the potential for indirect impacts to adjacent historic resources, as well as the broader historic preservation district. However, as the design is developed further, additional analysis related to materials and additional architectural features may be required as the project goes through the City approvals process. Any future changes to the design have the potential to result in indirect impacts.



The mitigation measures outlined below (MM CUL-1 through MM CUL-4) would minimize the direct impacts caused by the demolition of the historic single-family residence and four-plex as well as the impacts on St. Rose Historic Preservation District.

### Level of Significance Before Mitigation

Significant Impact.

### Mitigation Measures

**MM CUL-1: Salvage Report.** A Salvage Report shall be prepared prior to the demolition of the relevant structure(s). This report shall identify character-defining features of each of the individual buildings, as well as the broader St. Rose Historic Preservation District. Based upon these identification efforts, noteworthy materials, and architectural features at 520 and/or 608 Morgan Streets shall be identified for potential salvage and reuse throughout the district or, if agreed upon by relevant City staff, other historic preservation districts within the City that have comparable architectural character, historical significance, and period of construction where reuse would not be deemed inappropriate. The Salvage Report shall be prepared by an architectural historian or historic architect that meets the *Secretary of the Interior's Standards and Guidelines for Professional Qualifications*. Local preservation groups and the City shall be consulted in the preparation of the Salvage Report and all relevant plans.

**MM CUL-2: Public Report Documentation.** The buildings at 520 and 608 Morgan Streets shall be documented prior to commencement of any work associated with the project. This documentation will be consistent with the Historic American Building Survey (HABS) documentation Level II, although will not require submittal to the Library of Congress. The HABS-like documentation shall include large format photographs and a written history of the properties, including historical contexts related to the St. Rose Historic Preservation District. Materials shall be prepared by an architectural historian, historic architect, or historian that meets the *Secretary of the Interior's Professional Qualifications*. Produced materials shall be submitted to local repositories, which should include the City of Santa Rosa Public Library and the Museum of Sonoma County. While public documentation is instrumental in understanding and cataloguing alterations to historical resources, it should be noted that Section II.C-Demolition in the Design Guidelines specifically states that public documentation is not sufficient as a stand-alone mitigation measure.

**MM CUL-3: Interpretive Materials.** At least three sets of interpretive materials related to the history of the property as well as the broader St. Rose Historic Preservation Historic District shall be produced and installed. The exact medium of the interpretive materials will not be specified so as not to inhibit creativity, although typical efforts include panels, signage, or interactive landscape elements, such as play elements or site furnishings.

Interpretive materials shall be located adjacent to and accessible from the public right-of-way and in the vicinity of the following: 1) the Catholic Charities entrance area; 2) the homes entrance area; and 3) the entrance near the parking lot. The specific historical themes reflected at each specific location should reflect on the development of the St. Rose Historic District and associated historic contexts and themes. Interpretive materials shall feature physical elements that reflect the character-defining features of the historic



district, including materials, architectural forms, details, and other unifying elements. .  
Proposed interpretive material designs, including narratives, will be presented to the Santa Rosa Cultural Heritage Board for comment and approval prior to installation.

**MM CUL-4: Compatible Design.** The developer of the project shall work with a historic architect or architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards to ensure that the proposed project meets the relevant requirements of the City of Santa Rosa Design Guidelines, particularly under Section 2.4: Historic Districts within the Downtown Area and Station Area, and Section 4.7: Historic Properties and Districts-III.G-new Construction. A presentation will be made to the Santa Rosa Cultural Heritage Board that outlines the finalized project design and its compatibility with the surrounding historic district; this will be subject to Cultural Heritage Board comments and approval

#### Level of Significance After Mitigation

Significant and Unavoidable Impact.

Mitigation measures outlined above under Impact CUL-1 would reduce indirect impacts to the St. Rose Historic Preservation District but would not reduce direct impacts to a level less than significant. The demolition of the historic resources at 520 and 608 Morgan Street, both contributors to the St. Rose Historic Preservation District, would still occur. Additionally, preservation guidance developed by the City of Santa Rosa, which outlines the preference for preservation and adaptive reuse over demolition, is not consistent with the objectives of the project, namely the efficient development of new, high density affordable housing that maximizes the proposed site. Therefore, the demolition of these properties would result in a significant and unavoidable impact

#### Archaeological Resources

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|---------------------|--|
| <b>Impact CUL-2</b> | <b>The proposed project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.</b> |
|---------------------|--|

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#### Impact Analysis

The records search and literature review conducted at the NWIC did not identify any previously recorded archaeological resources pursuant Section 15064.5 within the project site. Subsurface testing conducted at the project site in conjunction with the survey did not identify any subsurface deposits of cultural resources (e.g., artifacts) within the project site. Regardless of the results of survey and subsurface testing, there are previously recorded sites near the project site, and surface conditions (e.g., pavement) limited visibility during survey. Therefore, the project could inadvertently impact unknown archaeological resources.

If an inadvertent discovery were to occur, it could result in significant impact to archaeological resources. To reduce potential impacts to previously undiscovered archaeological resources the proposed project would be required to implement mitigation measures CUL-5, CUL-6, and CUL-7. Implementation of mitigation measures CUL-5 and CUL-6 would require cultural resource awareness training and construction monitoring by a qualified archaeologist. Additionally, if an undiscovered archaeological resource is encountered, the proposed project would be required to implement mitigation measure CUL-7 which would stop all ground-disturbing activities within 50 feet of the find until it is evaluated by a qualified archaeologist and appropriately documented. Impacts related to the inadvertent discovery of





archaeological resources would be less than significant with implementation of mitigation measures CUL-5, CUL-6, and CUL-7.

### Level of Significance Before Mitigation

Potentially Significant Impact.

### Mitigation Measures

- MM CUL-5: Cultural Resource Awareness Training.** Prior to the initiation of the project, a cultural resources training shall be provided to supervisors, the contract foreman, construction crew members, and any additional key construction personnel. A qualified archaeologist shall administer the training. The purpose of the training is to increase awareness and knowledge of cultural resources and appropriate protocols in the event of an inadvertent discovery. The training shall include a discussion of the procedures for stopping work and notification of key City personnel if an inadvertent discovery of cultural resources occurs during project construction. If human remains are discovered, the appropriate protocols shall also be discussed. Upon completion of the training, participants shall be able to define cultural resources, describe the policies and procedures for identifying and protecting cultural resources, know how to locate and receive assistance from the qualified archaeologist and coordinate with other sources, and describe steps to be taken when cultural resources are encountered during project implementation. All new construction personnel added after construction commences shall receive the same training and orientation before working onsite. If Native American monitors are used, it shall be necessary for tribal representatives to also participate in the training.
- MM CUL-6: Construction Monitoring.** If evidence of any prehistoric or historic-era subsurface archaeological features or deposits are discovered during excavation or other earth-moving activities, the qualified archaeologist shall assess the significance of the find(s) and determine the appropriate treatment. Appropriate treatment may include recordation and/or additional excavation. A monitoring report shall be completed by the archaeological monitor at the end of construction. This report shall include a brief summary of the pre-construction cultural resource awareness training and the results of monitoring. The monitoring report shall be kept on file with the City.
- MM CUL-7: Unanticipated Discovery of Cultural Resources.** If prehistoric or historic-era cultural resources are encountered during the course of grading or construction, all ground-disturbing activities within 50 feet of the find shall cease. The qualified archaeologist shall evaluate the significance of the resources and recommend appropriate treatment measures. Per CEQA Guidelines Section 15126.4(b)(3)(A), project redesign and preservation in place shall be the preferred means to avoid impacts to significant archaeological sites. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with the City, which may include data recovery or other appropriate measures. The City shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. Archaeological materials recovered during any investigation shall be curated at an accredited curatorial



facility. The qualified archaeologist shall prepare a report documenting evaluation and additional treatment of the resource. A copy of the report shall be provided to the City and to the NWIC. Construction shall recommence based on direction of the qualified archaeologist.

#### Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

This will be achieved through cultural resources training that informs personnel of best appropriate cultural resource management practices, as well as construction monitoring by a qualified archaeological monitor and the implementation of unanticipated discovery protocols during ground-disturbing activities.

#### Burial Sites

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| <b>Impact CUL-3</b> | <b>The proposed project could potentially disturb any human remains, including those interred outside of formal cemeteries.</b> |
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#### Impact Analysis

There are no known human remains within the project area and no indications that the project site has been used for burial purposes in the past. Therefore, it is unlikely human remains would be encountered during project construction. However, ground disturbance and subsurface project construction activities such as excavating and grading could potentially disturb previously undiscovered human burial sites. If human remains are discovered during project construction, the proposed project would be required to implement mitigation measure CUL-8, which would require all work to stop in the immediate vicinity and within 100-foot radius of the discovered remains until the Sonoma County Coroner and the appropriate City representative are contacted. Furthermore, implementation of mitigation measure CUL-8 would ensure compliance with Section 7050.5 of HSC and PRC 5097.98. As such, impacts to previously undiscovered human from the proposed project would be less than significant with implementation of mitigation measure CUL-6.

#### Level of Significance Before Mitigation

Potentially Significant Impact.

#### Mitigation Measures

MM CUL-8: **Procedures for Human Burials Encountered During Construction.** If ground-disturbing activities uncover previously unknown human remains, Section 7050.5 of HSC applies, and the following procedures shall be followed:

- There shall be no further excavation or disturbance of the area where the human remains were found or within 100 feet of the find until the Sonoma County Coroner and the appropriate City representative are contacted. Duly authorized representatives of the Coroner and the City shall be permitted onto the project site and shall take all actions consistent with HSC Section 7050.5 and GC Sections 27460, et seq. Excavation or disturbance of the area where the human remains were found and an area within 100 feet of the find shall not be permitted to re-commence until the Coroner determines that the remains are not subject to the provisions of law concerning investigation of the circumstances, manner, and cause of any death.



- If the Coroner determines the remains are Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the “most likely descendant” (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in PRC Section 5097.98. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the MLD’s recommendations, the owner or the MLD may request mediation by NAHC.

#### **Level of Significance After Mitigation**

Less Than Significant Impact with Mitigation.

The implementation of human burial discovery protocols, which requires cessation of all construction activities and immediate communications with the Sonoma County Coroner and appropriate City staff, would reduce potentially significant impacts to a less than significant level. Additional and immediate consultation with the NAHC will occur following analysis by the Coroner in support of appropriate and sensitive treatment of the remains per PRC Section 5097.98.



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## 3.5 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

This section describes the impacts on GHG emissions that would result from implementation of the proposed project. Included is a review of existing conditions, a summary of applicable policies and regulations related to GHG emissions, and analysis of environmental impacts of the proposed project. Where applicable, mitigation measures are included for significant impacts.

### 3.5.1 Environmental Setting

#### Greenhouse Gases (GHGs)

GHGs and climate change are cumulative global issues. The CARB and EPA regulate GHG emissions within the State of California and the U.S., respectively. While the CARB has the primary regulatory responsibility within California for GHG emissions, local agencies can also adopt policies for GHG emission reduction.

Many chemical compounds in the earth's atmosphere act as GHGs, as they absorb and emit radiation within the thermal infrared range. When radiation from the sun reaches the Earth's surface, some of it is reflected back into the atmosphere as infrared radiation (heat). GHGs absorb this infrared radiation and trap the heat in the atmosphere. Over time, the amount of energy from the sun to the Earth's surface should be approximately equal to the amount of energy radiated back into space, leaving the temperature of the earth's surface roughly constant. Many gases exhibit these "greenhouse" properties. Some of them occur in nature (water vapor, carbon dioxide [CO<sub>2</sub>], methane [CH<sub>4</sub>], and nitrous oxide [N<sub>2</sub>O]), while others are exclusively human-made (like gases used for aerosols).

The principal climate change gases resulting from human activity that enter and accumulate in the atmosphere are listed below:

#### Carbon Dioxide

CO<sub>2</sub> enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and chemical reactions (e.g., the manufacture of cement). CO<sub>2</sub> is also removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle.

#### Methane

CH<sub>4</sub> is emitted during the production and transport of coal, natural gas, and oil. CH<sub>4</sub> emissions also result from livestock and agricultural practices and the decay of organic waste in municipal solid waste landfills.

#### Nitrous Oxide

N<sub>2</sub>O is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.



## Fluorinated Gases

Hydrofluorocarbons, perfluorinated chemicals, and sulfur hexafluoride are synthetic, powerful climate-change gases that are emitted from a variety of industrial processes. Fluorinated gases are often used as substitutes for ozone-depleting substances (i.e., chlorofluorocarbons, hydrochlorofluorocarbons, and halons). These gases are typically emitted in smaller quantities, but because they are potent climate-change gases, they are sometimes referred to as high global warming potential gases.

## Potential Environmental Impacts

For California, climate change in the form of warming has the potential to incur or exacerbate environmental impacts, including but not limited to changes to precipitation and runoff patterns, increased agricultural demand for water, inundation of low-lying coastal areas by sea-level rise, and increased incidents and severity of wildfire events (Moser et al. 2009). Cooling of the climate may have the opposite effect. Although certain environmental effects are widely accepted to be potential hazards to certain locations, such as rising sea level for low-lying coastal areas, it is currently infeasible to predict all environmental effects of climate change on any one location.

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city and virtually every individual on earth. A project's GHG emissions are at a micro-scale relative to global emissions but could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact.

### 3.5.2 Regulatory Setting

#### State Regulations

In the absence of federal regulations, control of GHGs is generally regulated at the state level and is typically approached by setting emission reduction targets for existing sources of GHGs, setting policies to promote renewable energy and increase energy efficiency, and developing statewide action plans.

California has adopted statewide legislation addressing various aspects of climate change and GHG emissions mitigation. Much of this legislation establishes a broad framework for the state's long-term GHG reduction and climate change adaptation program. The governor has also issued several executive orders (EOs) related to the state's evolving climate change policy. Of particular importance are the following:

Assembly Bill 32

AB 32, also known as the Global Warming Solutions Act of 2006 (codified in HSC, Division 25.5), requires CARB to establish a statewide GHG emissions cap for 2020 based on 1990 emission levels. AB 32 required CARB to adopt regulations that identify and require selected sectors or categories of emitters of GHGs to report and verify their statewide GHG emissions, and CARB is authorized to enforce compliance with the program. Under AB 32, CARB was also required to adopt a statewide GHG emissions limit equivalent to the statewide GHG emissions levels set in 1990, which must be achieved by 2020. The 2020 GHG emissions limit is 431 million metric tons of carbon dioxide equivalent (MMTCO<sub>2e</sub>).



Toward achieving the maximum technologically feasible and cost-effective GHG emission reductions, AB 32 permits the use of market-based compliance mechanisms and requires CARB to monitor compliance with and enforce any rule, regulation, order, emission limitation, emissions reduction measure, or market-based compliance mechanism that it adopts. CARB has adopted nine Early Action Measures for implementation, including:

- Ship electrification at ports,
- Reduction of high global-warming-potential gases in consumer products,
- Heavy-duty vehicle GHG emission reduction (aerodynamic efficiency),
- Reduction of perfluorocarbons from semiconductor manufacturing,
- Improved landfill gas capture, reduction of hydrofluorocarbon-134a from do-it-yourself motor vehicle servicing,
- Sulfur hexafluoride reductions from the non-electric sector, a tire inflation program, and a low-carbon fuel standard.

#### Senate Bill 32

On September 8, 2016, Senate Bill (SB) 32 was signed by Governor Brown; this bill would require the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

#### B-30-15

B-30-15 provides an interim 2030 goal with the ultimate goal of reducing emissions by 80 percent below 1990 levels by 2050. The B-30-15 interim 2030 emission reduction goal is consistent with SB 32 and represents substantial progress towards the 2050 emissions reduction goal.

#### Executive Order S-03-05

EO S-03-05 directs the state to reduce GHG emissions to 80 percent below 1990 levels by 2050.

#### Climate Change Scoping Plan

In December 2008, CARB approved the AB 32 Scoping Plan outlining the state's strategy to achieve the 2020 GHG emissions limit. The Scoping Plan estimates a reduction of 174 MMTCO<sub>2</sub>e (about 191 million U.S. tons) from the transportation, energy, agriculture, forestry, and high climate-change-potential sectors, and proposes a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce dependence on oil, diversify California's energy sources, save energy, create new jobs, and enhance public health. The Scoping Plan must be updated every 5 years to evaluate the implementation of AB 32 policies to ensure that California is on track to achieve the 2020 GHG reduction goal. The First Update to the Climate Change Scoping Plan was approved by the CARB on May 22, 2014. In 2016, the Legislature passed SB 32, which codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, the CARB approved the Second Update to the Climate Change Scoping Plan, the 2017 Climate





Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target (CARB 2018).

## Local

### Santa Rosa Climate Action Plan

The Climate Action Plan (CAP) for the City of Santa Rosa was adopted on June 5, 2012 and presents measures that would reduce local GHG emissions, meet state, regional, and local reduction targets, and streamline future environmental review of projects within the City by following CEQA Guidelines and meeting the BAAQMD expectations for a qualified GHG reduction strategy. The following goals and GHG reduction strategies from the CAP that are relevant to the proposed project are included in Table 3.5-6 under the impact analysis below (City 2012).

### Sonoma County Climate Action Plan

The Regional Climate Protection Authority (RCPA) collaborated with a countywide Staff Working Group under the direction of the RCPA Board of Directors to develop a document entitled, Climate Action 2020 Plan: A Regional Program for Sonoma County Communities. The RCPA developed Climate Action 2020 over the course of several years, with input from all local city councils, the Board of Supervisors, local government staff, expert consultants, community sustainability leaders, and hundreds of members of the public. The RCPA certified an EIR and adopted the CAP in 2016, and was subsequently litigated. The Superior Court found the EIR inadequate and the RCPA declined to appeal.

Unable to adopt the Climate Action 2020 Plan, the Sonoma County Board of Supervisors adopted the Climate Change Action Resolution in May 2018. The Resolution is intended to help create countywide consistency and clear guidance about coordinated implementation of the GHG reduction measures.

### 3.5.3 Methodology for Analysis

The proposed project would result in both short- and long-term emissions of GHGs. Construction emissions would be generated from the exhaust of equipment, the exhaust of construction hauling trips, and worker commuter trips. Long-term, operational GHG emissions would result from vehicular traffic, onsite combustion of natural gas, operation of any landscaping equipment, offsite generation of electrical power over the life of the project, the energy required to convey water to and wastewater from the project site, the emissions associated with the hauling and disposal of solid waste from the project site, and any fugitive refrigerants from air conditioning or refrigerators.

Construction and operational emissions were estimated using the CalEEMod (version 2016.3.2). CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operation of a variety of land use projects. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use.

The model was developed in collaboration with the air districts in California. Default data (emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air



districts to account for local requirements and conditions. The model is an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California. The model can be used for a variety of situations where an air quality analysis is necessary or desirable such as CEQA documents. For the proposed project, site-specific grading calculations, equipment vehicle use, and construction schedule were developed in consultation with the City. Information used in the emission modeling is documented in Section 2.0, Project Description, and Appendix B. The CalEEMod module used regulatory compliance reductions for certain existing regulatory requirements that are termed “mitigation” within the model, the mitigated output from CalEEMod is used; however, those modeling components are not considered mitigation under CEQA, but rather are treated as part of the baseline conditions.

### 3.5.4 Thresholds of Significance

#### Significance Threshold Development

Climate change is global in scope, with individual projects contributing to a cumulative impact. However, the geographic boundary for this analysis is the City of Santa Rosa.

#### CEQA Guidelines

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potentially significant environmental effects of proposed activities;
- Identify ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

CEQA Guidelines define a significant effect on the environment as, “a substantial, or potentially substantial, adverse change in the environment.” To determine if a project would have a significant impact on GHGs, the type, level, and impact of emissions generated by the project must be evaluated.

The following GHG significance thresholds are contained in Appendix G of the CEQA Guidelines. A significant impact would occur if the project would:

- (a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- (b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Addressing GHG generation impacts requires an agency to make a determination as to what constitutes a significant impact. The amendments to the CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to



apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions will have a significant impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions (14 CCR Section 15064.4(a)).

## Thresholds

A number of expert agencies throughout the state have drafted or adopted varying threshold approaches and guidelines for analyzing 2020 operational GHG emissions in CEQA documents. The different thresholds include the following: (1) compliance with a qualified GHG reduction strategy, (2) performance-based reductions, (3) numeric "bright-line" thresholds, and (4) efficiency-based thresholds.

Efficiency-based thresholds represent the rate of emission reductions needed to achieve a fair share of California's GHG emissions reduction target established under AB 32 and SB 32, EO B-30- 15, and EO S-03-05. As noted earlier:

- AB 32 is a legal mandate requiring that statewide GHG emissions be reduced to 1990 levels by 2020
- SB 32 requires statewide GHG emissions to 40 percent below 1990 levels by 2030
- B-30-15 provides an interim 2030 goal with the ultimate goal of reducing emissions by 80 percent below 1990 levels by 2050. The B-30-15 interim 2030 emission reduction goal is consistent with SB 32 and represents 'substantial progress' towards the 2050 emissions reduction goal.
- EO S-03-05 directs the state to reduce GHG emissions to 80 percent below 1990 levels by 2050.

Efficiency-based thresholds are typically calculated by dividing emissions associated with residential and commercial uses within the state by the sum of jobs and residents. The sum of jobs and residents is called the "service population," and a project's service population is defined as the people that work, study, live and congregate within the project site. Therefore, for the purposes of this analysis, the proposed project is compared to an efficiency-based significance threshold; however, for this analysis population was used instead of service population because that would provide a more conservative estimate of the efficiency metric.

### BAAQMD Thresholds of Significance

BAAQMD current CEQA Air Quality Guidelines (which are being updated) currently recommends two project-specific thresholds and one plan-level threshold. Since the project does not involve the preparation of a General Plan or Specific Plan, only the project-level thresholds are discussed further. The two project-level thresholds are a bright-line threshold of 1,100 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) and a GHG efficiency threshold of 4.6 MTCO<sub>2e</sub> per service population. The bright-line numeric threshold of 1,100 MTCO<sub>2e</sub> per year is a numeric emissions level below which a project's contribution to global climate change would be less than cumulatively considerable. For projects that are above this bright-line cutoff level, emissions from these projects would still be less than cumulatively significant if the project as a whole would result in an efficiency of 4.6 MTCO<sub>2e</sub> per service population or better for mixed-use projects. Both thresholds were developed based off the 1990 state inventory and reductions identified to meet AB 32 targets for the year 2020. The GHG efficiency threshold was derived from looking at the land use inventory sector and statewide population and employment projections for AB 32 targets as detailed below in Table 3.5-1.



**Table 3.5-1: California 2020 GHG Emissions, Population Projections and GHG Efficiency Thresholds – Land Use Inventory Sectors**

|  |                                 |
|--|---------------------------------|
| <b>Land Use Sectors Greenhouse Gas Emissions Target</b>            | 295,530,000 MTCO <sub>2</sub> e |
| <b>Population</b>  | 44,135,923                      |
| <b>Employment</b>  | 20,194,661                      |
| <b>California Service Population (Population + Employment)</b>     | 64,330,584                      |
| <b>AB 32 Goal GHG emissions (MTCO<sub>2</sub>e)/SP<sup>1</sup></b> | <b>4.6</b>                      |

Notes:

AB = Assembly Bill

GHG = greenhouse gas

MTCO<sub>2</sub>e = metric tons carbon dioxide equivalent

SP = service population

<sup>1</sup> Greenhouse gas efficiency levels were calculated using only the “land use-related” sectors of ARB’s emissions inventory.

Please refer to Appendix D for detailed calculations.

Sources: BAAQMD Proposed Thresholds of Significance, December 2009. Website:

<http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en>

## Post-2020

Given the recent legislative attention and case law regarding post-2020 goals and the scientific evidence that additional GHG reductions are needed through 2050 to stabilize CO<sub>2</sub> concentrations, the Association of Environmental Professionals’ (AEP) Climate Change Committee (2015) recommended in its Beyond 2020: The Challenges of Greenhouse Gas Reduction Planning by Local Governments in California (AEP 2016) white paper that CEQA analyses for most land use development projects can continue to rely on current thresholds for the immediate future, but that long-term projects should consider “post-2020 emissions consistent with ‘substantial progress’ along a post-2020 reduction trajectory toward meeting the 2050 target.” The Beyond 2020 white paper further recommends that the “significance determination... should be based on consistency with ‘substantial progress’ along a post-2020 trajectory.”

## Project-Specific Threshold

Efficiency-based thresholds represent the rate of emissions reductions needed to achieve a fair share of California’s GHG emissions reduction target established under AB 32, SB 32, EO B-30-15, and EO S-03-05. BAAQMD’s current recommendation if a project exceeds the bright-line threshold is to evaluate it against the efficiency-based threshold that was developed for the Bay Area regional 2020 targets. The City also has a 2020 target based off the AB 32 scoping plan.

An efficiency-based threshold approach is applied in this EIR to assess the project’s greenhouse gas impacts.

## Analysis Years

For the purposes of this analysis, project-related impacts in 2020, 2023, 2030, and 2035 are considered. Year 2020 represents the City’s GHG reduction target year. Year 2023 represents the first year of full project operation. Year 2030 is consistent with the SB 32 target established by CARB. Year 2035 represents the General Plan Buildout year.



Regarding Year 2050, studies have shown that in order to meet the 2050 targets, aggressive pursuit of technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. Because of the technological shifts required and the unknown parameters of the regulatory framework in 2050, quantitatively analyzing the proposed project's impacts further relative to the 2050 goals is speculative for purposes of CEQA (CARB 2014).

### Population

The City of Santa Rosa General Plan Housing Element includes population trends and projections for 2020, 2030, and 2040. For this analysis, these projections were used to interpolate population estimates in the City for 2023 and 2035.

### Efficiency-Based Threshold

In developing the efficiency-based threshold, the City's emission reduction goals for years 2020, 2023, 2030, and 2035 were calculated. The inventory targets were calculated based on the City's 1990 GHG emissions inventory of 1,123,053 MTCO<sub>2</sub>e. The emission reduction goals for 2020 and 2035 (25 percent and 51 percent, respectively) were established by the City in the Santa Rosa Climate Action Plan. The percentage reduction goals for 2030 are based on the SB 32 targets of 40 percent reduction below 1990 levels. Lastly, the percentage reduction was then interpolated for the year 2023.

#### 2020 Thresholds

The 2020 threshold was calculated based on the City's target of 25 percent below the 1990 inventory.

The resulting 2020 "full operation" efficiency threshold is 4.6 MTCO<sub>2</sub>e per population, which was calculated using the following equation:

$$2020 \text{ Threshold} = \frac{2020 \text{ Inventory}}{2020 \text{ Population Projections}}$$

Where:

City of Santa Rosa 2020 Inventory Goal = 25 percent below the City's 1990 GHG emissions levels, calculated as 842,290 MTCO<sub>2</sub>e

2020 Population = General Plan population projections of 184,100.

#### 2023 Threshold

The 2023 GHG inventory goal was calculated based on the 1990 inventory and a linear interpolation of the reduction goals of the City for 2020 and SB 32 for 2030. The City's 2020 emission goal is 25 percent below the 1990 emissions level, and the 2030 emissions goal is 40 percent below 1990 levels. Linear interpolation between the 2020 and 2030 goals shows a reduction goal of 29.5 percent below 1990 levels by year 2023.

The resulting 2023 "full operation" efficiency threshold is 4.2 MTCO<sub>2</sub>e per population, which was calculated using the following equation:

$$2023 \text{ Threshold} = \frac{2023 \text{ Inventory}}{2023 \text{ Population Projections}}$$



Where:

2023 Inventory Goal = 29.5 percent below the City's 1990 GHG emissions levels, calculated as 791,752 MTCO<sub>2</sub>e.

2023 Population = Interpolated from the General Plan population projections for 2020 and 2030, 189,410 MTCO<sub>2</sub>e.

#### *2030 Threshold*

The 2030 GHG inventory goal is based on the reduction goals of SB 32. The State's 2030 emissions goal is 40 percent below 1990 levels. The resulting efficiency threshold is 3.3 MTCO<sub>2</sub>e per population, which was calculated using the following equation:

$$2030 \text{ Threshold} = \frac{2030 \text{ Inventory}}{2030 \text{ Population Projections}}$$

Where:

2030 Inventory Goal = 40 percent below the City's 1990 GHG emissions levels, calculated as 673,832 MTCO<sub>2</sub>e.

2030 Population = General Plan population projections of 201,800.

#### *2035 Threshold*

The 2035 threshold was calculated based on the City's target of 51 percent below the 1990 inventory.

The resulting 2035 "full operation" efficiency threshold is 2.6 MTCO<sub>2</sub>e per population, which was calculated using the following equation:

$$2035 \text{ Threshold} = \frac{2035 \text{ Inventory}}{2035 \text{ Population Projections}}$$

Where:

2035 Inventory Goal = 51 percent below the City's 1990 GHG emissions levels, calculated as 550,296 MTCO<sub>2</sub>e

2035 Population = Interpolated from the General Plan population projections for 2030 and 2040, 211,800.

### **Project Threshold Summary**

Based on the above analysis, the project must achieve an average emissions efficiency of 4.6 MTCO<sub>2</sub>e per population in the year 2020, 4.2 MTCO<sub>2</sub>e per population in year 2023, 3.3 MTCO<sub>2</sub>e per population in year 2030, and 2.6 MTCO<sub>2</sub>e per population in year 2035. Emissions in excess of the thresholds may conflict with the trajectory of the City's and state's GHG reduction goals, and the project's cumulative contribution of long-term GHG emissions would be considered significant.

The BAAQMD does not provide specific guidance regarding construction emissions. Therefore, total construction-generated GHG emissions were conservatively amortized over the estimated life of the



development and included with operational emissions for comparison to the significance thresholds. A life of 30 years was assumed for the proposed project based on a standard 30-year project lifetime assumption developed by the South Coast Air Quality Management District (SCAQMD 2008).

GHG impacts would be considered significant if the project would:

- Conflict with a compliant GHG Reduction Plan if adopted by the lead agency;
- Exceed the project specific GHG efficiency Thresholds for 2023, 2030, and 2035; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs.

### 3.5.5 Project Impact Analysis and Mitigation Measures

This section discusses potential impacts related to GHG emissions associated with the proposed project and provides mitigation measures where necessary.

#### Generation of Greenhouse Gases

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**Impact GHG-1      The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.**

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#### Impact Analysis

##### Constructions Emission Inventory

The project would emit GHG emissions during construction from the off-road equipment, worker vehicles, and any hauling that may occur. As previously indicated, BAAQMD does not presently provide a construction-related GHG generation threshold but recommends that construction-generated GHGs be quantified and disclosed. Construction emissions would be generated from the exhaust of equipment, the exhaust of construction hauling trips, and worker commuter trips. The construction phases include site preparation, site grading, paving, building construction, and architectural coating. MTCO<sub>2e</sub> emissions during construction of the project are shown in Table 3.5-2.

**Table 3.5-2: Construction Greenhouse Gas Emissions**

| Construction Year                                 | MTCO <sub>2e</sub> |
|---|--------------------|
| 2020 – Caritas Homes (Phase 1) and Caritas Center | 574                |
| 2021 – Caritas Homes (Phase 1) and Caritas Center | 370                |
| 2022 – Caritas Homes (Phase 2)                    | 249                |
| 2023 – Caritas homes (Phase 2)                    | 15                 |
| <b>Total</b>                                      | <b>1,207</b>       |
| <b>Amortized over 30 years</b>                    | <b>40</b>          |
| BAAQMD Operational significance threshold         | 1,100 per year     |





| Construction Year | MTCO <sub>2</sub> e |
|-------------------|---------------------|
| Exceed Threshold? | No                  |

Notes:

MTCO<sub>2</sub>e = metric tons of CO<sub>2</sub> equivalent

Source: CalEEMod Output (Appendix B)

As shown in Table 3.5-2, the project's estimated maximum yearly construction emissions would be 574 MTCO<sub>2</sub>e, which is well below the BAAQMD's operational threshold of 1,100 MTCO<sub>2</sub>e per year. Some air districts (Sacramento Air Quality Management District, South Coast Air Quality Management District, and San Luis Obispo County Air Pollution Control District) recommend amortizing construction emissions over the life of the project. Commercial projects are typically amortized over a 30- to 40-year lifespan. To provide a conservative estimate, the 30-year period was used. The amortized construction emissions are expected to be 40 MTCO<sub>2</sub>e per year. Therefore, the proposed project would not have a significant GHG impact during construction.

### Operational Emission Inventory

Long-term operational GHG emissions would result from proposed project-generated vehicular traffic, onsite combustion of natural gas, operation of any landscaping equipment, offsite generation of electrical power over the life of the project, the energy required to convey water to and wastewater from the project site, the emissions associated with the hauling and disposal of solid waste from the project site, and any fugitive refrigerants from air conditioning or refrigerators.

Annual operational GHG emissions were determined by modelling the proposed project emissions and the existing operational emissions at the project site and then calculating the net increase. The net increase in operational GHG emissions by source is shown for 2023 in Table 3.5-3, for 2030 in Table 3.5-4, and for 2035 in Table 3.5-5. The total annualized project emissions in 2023 are estimated to be 1,721 MTCO<sub>2</sub>e and 1,388 MTCO<sub>2</sub>e in 2030.

As shown in Table 3.5-3 and Table 3.5-4, the project's emissions would be above the bright-line BAAQMD threshold of 1,100 MTCO<sub>2</sub>e per year. BAAQMD's current recommendation if a project exceeds the bright-line threshold is to evaluate it against the efficiency-based threshold that was developed based on the 2020 target for the region. However, because the proposed project would be constructed and operated post-2020, the 2020 BAAQMD efficiency-based threshold is not appropriate. Therefore, an efficiency-based threshold approach based off of the City's GHG inventory and reduction targets is applied in this EIR to assess the project's GHG impacts. With a service population (SP) of 622, the project would generate approximately 2.75 metric tons of CO<sub>2</sub> equivalent per service population per year (MTCO<sub>2</sub>e/SP/year) in 2023, 2.22 MTCO<sub>2</sub>e/SP/year in 2030, and 2.15 MTCO<sub>2</sub>e/SP/year in 2035. As shown in Tables 3.5-3 through 3.5-5, the estimated project emissions are below the respective efficiency thresholds for each year. Therefore, the project would have a less than significant GHG impact during operations.



**Table 3.5-3: Net Increase Operational Greenhouse Gas Emissions 2023**

| Source Category                    | MTCO <sub>2e</sub>             |
|------------------------------------|--------------------------------|
| Area                               | 2                              |
| Energy Consumption                 | 444                            |
| Mobile (Vehicle)                   | 1,138                          |
| Stationary (Emergency Generator)   | 11                             |
| Solid Waste Generation             | 19                             |
| Water Usage                        | 40                             |
| Total Operational Emissions        | 1,654                          |
| Annualized Construction Emissions  | 40                             |
| Total Project Emissions            | 1,694                          |
| Service Population                 | 614                            |
| <i>Project Emission Generation</i> | 2.76                           |
| <i>2023 Efficiency Threshold</i>   | 4.2 MTCO <sub>2e</sub> /P/year |
| Significant Impact?                | <b>No</b>                      |

Notes:

a. Includes CalEEMod "mitigation" for locational features, compliance with regulatory measure

b. Construction emissions annualized over an anticipated 30-year project lifespan.

MTCO<sub>2e</sub> = metric tons of CO<sub>2</sub> equivalent

Source: CalEEMod Output (Appendix B)

**Table 3.5-4: Operational Greenhouse Gas Emissions 2030**

| Source Category                    | MTCO <sub>2e</sub>             |
|------------------------------------|--------------------------------|
| Area                               | 10                             |
| Energy Consumption                 | 221                            |
| Mobile (Vehicle)                   | 1,020                          |
| Stationary (Emergency Generator)   | 11                             |
| Solid Waste Generation             | 44                             |
| Water Usage                        | 30                             |
| Total Operational Emissions        | 1,336                          |
| Annualized Construction Emissions  | 40                             |
| Total Project Emissions            | 1,376                          |
| Service Population                 | 614                            |
| <i>Project Emission Generation</i> | 2.24                           |
| <i>2030 Efficiency Threshold</i>   | 2.8 MTCO <sub>2e</sub> /P/year |
| Significant Impact?                | <b>No</b>                      |

Notes:

a. Includes CalEEMod "mitigation" for locational features, compliance with regulatory measure

b. Construction emissions annualized over an anticipated 30-year project lifespan.



**Table 3.5-5: Operational Greenhouse Gas Emissions 2035**

| Source Category  | MTCO <sub>2</sub> e              |
|--|----------------------------------|
| Area   | 10                               |
| Energy Consumption   | 222                              |
| Mobile (Vehicle)   | 972                              |
| Stationary (Emergency Generator)   | 11                               |
| Solid Waste Generation   | 44                               |
| Water Usage  | 30                               |
| Total Operational Emissions  | 1,289                            |
| Annualized Construction Emissions  | 40                               |
| Total Project Emissions  | 1,329                            |
| Service Population   | 614                              |
| <i>Project Emission Generation</i>   | 2.16                             |
| <i>2035 Efficiency Threshold</i>   | 2.60 MTCO <sub>2</sub> e/SP/year |
| <i>2035 Efficiency Threshold</i> 2.6 MTCO <sub>2</sub> e/SP/year Significant | <b>No</b>                        |

Notes:

a. Includes CalEEMod "mitigation" for locational features, compliance with regulatory measure

b. Construction emissions annualized over an anticipated 30-year project lifespan.

MTCO<sub>2</sub>e = metric tons of CO<sub>2</sub> equivalent

Source: CalEEMod Output (Appendix B)

### Level of Significance Before Mitigation

Less Than Significant Impact.

### Mitigation Measures

No mitigation is necessary.

### Level of Significance After Mitigation

Less Than Significant Impact.

Conflict with an Applicable Plan, Policy, or Regulation

|                     |   |
|---------------------|---|
| <b>Impact GHG-2</b> | <b>The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.</b> |
|---------------------|---|

### Impact Analysis

The following analysis assesses the project's consistency with local and regional adopted plans to reduce GHG emissions. The City adopted their CAP in 2012, which was developed to present measures to reduce local GHG emissions; meet state, regional, and local reduction targets; and streamline future environmental review. Sonoma County adopted a Regional CAP in 2016 that commits to concrete actions to further reduce countywide GHG emissions. Plan Bay Area 2040 was adopted in 2017 and is the regional Bay Area GHG planning document. Lastly, the State of California has developed the Climate Change Scoping Plan, which was updated in 2017 and outlines the strategy for achieving California's 2030 GHG target of 40 percent emissions reductions below 1990 levels. The following provides a project-specific consistency analysis with each of these local, regional, and statewide plans:



## Santa Rosa Climate Action Plan

**Table 3.5-6: Santa Rosa Climate Action Plan Consistency Analysis**

| Santa Rosa Climate Action Plan  |  | Project Consistency  |
|---|--|--|
| <b>Goal 1: Energy Efficiency and Conservation</b>   |  |  |
| Measure 1.1: Require new development to meet Tier 1 CALGreen requirements, as amended, for new nonresidential and residential development.          |  |  |
| Action 1.1.1  | Require new development to comply with the current provisions, as amended, of CALGreen, Part 11 of the California Green Building Standards Code. | Consistent. The proposed project would exceed both city and state minimum green building requirements. It would also be GreenPoint rated and is anticipated to be GreenPoint Gold rating certified.  |
| Action 1.1.3  | Require all new construction to be built with net-zero electricity use, beginning 2020.  | Consistent. The City has not begun to require this condition on new construction yet, however, the project would comply with applicable requirements set forth by the City. The project will be built to a GreenPoint-rated standard that would require enhanced energy efficiency above Title 24 standards and would be built to be solar-ready that would facilitate net-zero energy if this requirement becomes applicable. |
| Measure 1.3: Encourage existing development and require new development to utilize PG&E's Smart Meter system to facilitate energy and cost savings. |  |  |
| Action 1.3.1  | Require new construction and major remodels to install real-time energy monitors that allow building users to track their current energy use.    | Consistent. The proposed project would implement mitigation measure GHG-1, which requires the installation of smart water meters.  |
| Measure 1.4: Tree Planting and Urban  |  |  |
| Action 1.4.3  | Require new development to supply an adequate number of street trees and private trees.  | Consistent: The proposed project includes the planting of shade trees.   |
| <b>Goal 3: Parking and Land Use Management</b>  |  |  |
| Measure 3.3 Affordable Housing  |  |  |
| Action 3.3.1  | Provide affordable housing development near transit stops and centers in Santa Rosa.   | Consistent: The purpose of the proposed project is to develop transit and pedestrian-oriented affordable rental housing in downtown Santa Rosa.  |
| <b>Goal 4: Improved Transport Options</b>   |  |  |
| Measure 4.3 Car Sharing and Transportation Demand Management Programs   |  |  |
| Action 4.3.5  | Encourage new developments with more than 50 on-site employees to provide subsidized or free transit passes to employees.                        | Consistent. The proposed project would implement mitigation measure GHG-2, which includes the preparation of a transportation demand management plan that would encourage carpooling and subsidized transit passes to employees.   |



| Santa Rosa Climate Action Plan                 |  | Project Consistency  |
|--|--|--|
| <b>Goal 7: Water and Wastewater</b>            |  |  |
| Measure 7.1: Water Conservation                |  |  |
| Action 7.1.1                                   | Require new development to reduce potable water use in accordance with the Tier 1 standards of CALGreen.   | Consistent. The project will comply with the California Green Building Standards Code, which requires a 20 percent reduction in indoor water use.              |
| Action 7.1.4                                   | Encourage existing development and require new development to utilize smart water meters to facilitate water and cost savings.   | Consistent. The proposed project would implement mitigation measure GHG-1, which requires the installation of smart water meters.                              |
| <b>Goal 9: Off-road Vehicles and Equipment</b> |  |  |
| Measure 9.1: Lawn and Garden Activity          |  |  |
| Action 9.1.2                                   | Encourage new buildings to provide electrical outlets on the exterior in an accessible location to charge electric-powered lawn and garden equipment.  | Consistent. The proposed project would implement mitigation measure GHG-1, which requires exterior outlets.  |
| Measure 9.2: Construction Emissions            |  |  |
| Action 9.2.1                                   | Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes or less (as required by the California airborne toxics control measure Title 13, Section 2485 of CCR).   | Consistent: The proposed project would implement mitigation measure AQ-1, which includes specific measures to reduce idling during construction activities.    |
| Action 9.2.2                                   | Construction equipment shall be maintained in accordance with manufacturer's specifications  | Consistent: The proposed project would implement mitigation measure AQ-1, which includes specific measures for maintenance of construction equipment.          |
| Action 9.2.3                                   | Work with the project applicants to limit GHG emissions from construction equipment by selecting one of the following measures, at a minimum, as appropriate to the construction project: <ul style="list-style-type: none"> <li>Substitute electrified equipment for diesel- and gasoline- powered equipment where practical</li> <li>Use alternative fuels for construction equipment onsite, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel.</li> <li>Avoid the use of onsite generators by connecting to grid electricity or utilizing solar-powered equipment.</li> </ul> | Consistent: The proposed project would implement mitigation measure AQ-1, which includes specific measures to substitute electrical equipment where practical. |

Notes:

CALGreen = California Green Building Standards

GHG = greenhouse gas

PG&E = Pacific Gas and Electric

## Sonoma County Climate Action Plan

Sonoma County has implemented a countywide target of 25 percent GHG reduction below 1990 levels by 2020. Sonoma County has developed many goals and reduction measure to meet the GHG reduction target. The Sonoma County CAP was overturned in litigation and therefore is used for informational purposes only for this CEQA analysis. The goals and reduction measures developed to reach that goal



that are applicable to the proposed project, along with the project-specific consistency with each of the goals, are presented in Table 3.5-7.



**Table 3.5-7: Sonoma County Climate Action Plan Consistency Analysis**

|   | Sonoma County  | Project Consistency   |
|---|--|---|
| <b>Goal</b>   | <b>Building Energy</b>   |   |
| 1-S1. Title 24 Standards for Commercial and Residential Buildings [All jurisdictions] | MANDATORY: Does the project comply with local building code regarding energy efficiency?   | Project Complies. The project will comply with Title 24 building standards, which have been adopted through local building code adoption. |
| 1-S2. Lighting Efficiency and Toxics Reduction Act (AB 1109)                          | MANDATORY: Does the project comply with local building code regarding lighting efficiency?   | Project Complies. The project will comply with Title 24 building standards, which have been adopted through local building code adoption. |
| 1-L2. Outdoor Lighting  | Does the project comply with local LED outdoor lighting requirements?  | Project Complies. The project will comply with Title 24 building standards, which have been adopted through local building code adoption. |
| 1-L3. Shade Tree Planting   | Does the project comply with local shade tree planting requirements?   | Project Complies. The project complies with local shade tree planting requirements by including the planting of shade trees.              |
| <b>Goal 2: Increase Renewable Energy</b>  |  |   |
| 2-L1. Solar in New Residential Development  | Does the project comply with local requirements for rooftop solar PV on new residential development?   | Not applicable. Does not apply to Santa Rosa. The project would be constructed as “solar ready”.  |
| 2-L2. Solar in Existing Residential Buildings   | MANDATORY: Does the remodel or alteration comply with local requirements for rooftop solar PV on existing residential development?   | Not applicable: The project would be considered a New Development. The project would be constructed as “solar ready”.                     |
| 2-L3. Solar in New Non-Residential Developments                                       | MANDATORY: Does the project comply with local requirements for rooftop solar PV on new non-residential development?  | Not applicable. Does not apply to Santa Rosa. The project would be constructed as “solar ready”.  |
| 2-L4. Solar in Existing Non-Residential Buildings                                     | MANDATORY: Does the remodel or alteration project comply with local requirements for rooftop solar PV on existing non-residential development?   | Not applicable: The project would be considered a New Development. The project would be constructed as “solar ready”.                     |
| <b>Goal 3: Switch Equipment from Fossil Fuel to Electricity</b>                       |  |   |
| 3-L1 Convert to Electric Water Heating  | MANDATORY: Does the project comply with mandatory requirements adopted by the local jurisdiction?  | Not applicable. Does not apply to Santa Rosa  |
| <b>Goal 4: Reduce Travel Demand Through Focused Growth</b>                            |  |   |
| 4-L1. Mixed-Use Development in City Centers and Along Transit Corridors               | MANDATORY: Is the project consistent with the jurisdiction’s adopted policies regarding mixed use development, including policies and requirements in adopted general plans, area plans, specific plans, and zoning codes? | Not applicable. The project is not considered mixed-use.  |





|   | Sonoma County  | Project Consistency   |
|---|--|---|
| 4-L2. Increase Transit Accessibility                                      | MANDATORY: Is the project consistent with the jurisdiction's adopted policies regarding transit accessibility, including policies and requirements in adopted general plans, area plans, specific plans, and zoning codes?   | Project Complies. The bus stops within 0.25 mile of the project site. The project site is also located within 0.25 mile of the SMART Station in Railroad Square and 0.30 mile from Second Street Transit Mall   |
| 4-L4. Affordable Housing Linked to Transit                                | MANDATORY: Does the project comply with adopted policies and ordinances regarding location of affordable housing near transit corridors, transit hubs and downtown cores?  | Project Complies. The project would provide up to 126 units of permanent affordable rental housing. The bus stops within 0.25 miles of the project site. The project site is also located within 0.25 miles of the SMART Station in Railroad Square and 0.30 mile from Second Street Transit Mall |
| <b>Goal 5: Encourage a Shift Toward Low-Carbon Transportation Options</b> |  |   |
| 5-R3. Sonoma Marin Area Rail Transit                                      | MANDATORY: If project is in proximity to a SMART station of connecting pedestrian and bicycle facilities, is it consistent with any adopted requirements supportive of SMART, including policies and requirements in General Plans, Area Plans, Specific Plans, Station Area Plans, zoning codes, or infrastructure plans? | Not applicable. Does not apply to Santa Rosa  |
| 5-R4. Trip Reduction Ordinance  | MANDATORY: Does the project comply with the adopted Trip Reduction Ordinance?  | Project Complies. The Transportation Management Plan would be developed for the proposed project and would include measures to encourage carpooling and subsidized transit passes for employees.  |
| 5-R6. Reduced Cost Transit Passes   | MANDATORY: Does the project comply with any adopted reduced-cost transit pass requirements?  | Project Complies. The Transportation Management Plan would be developed for the proposed project and would include measures to encourage carpooling and subsidized transit passes for employees.  |
| 5-R7. Alternative Travel Marketing & Optimize Online Service              | MANDATORY: Does the project comply with any adopted requirements for marketing alternative transportation services?  | Project Complies. Clients are reliant on public transportation. Information for available transit will be posted onsite.  |
| 5-R8. Safe Routes to School   | MANDATORY: Is the project consistent with adopted requirements for safe routes school?   | Project Complies. The existing sidewalk infrastructure would be maintained.   |
| 5-L1. Local Transportation Demand Management Program                      | MANDATORY: Is the project consistent with adopted transportation demand management requirements for businesses with 50 or more employees?  | Not applicable. Does not apply to Santa Rosa  |
| 5-L2. Carpool – Incentives and Rideshare Measures Sharing Program         | VOLUNTARY: Does the project include voluntary carpool rideshare elements or support?   | Not applicable. Does not apply to Santa Rosa  |



|   | Sonoma County  | Project Consistency  |
|---|--|--|
| 5-L3. Guaranteed Ride Home  | MANDATORY: Does the project comply with any adopted guaranteed ride home" requirements?  | Not applicable. Does not apply to Santa Rosa   |
| 5-L4. Supporting Bicycle/Pedestrian Measures                                      | MANDATORY: Does the project comply with mandatory bike and pedestrian master plan requirements?  | Project Complies. The Caritas Center would provide up to 32 bicycle parking spaces, while the Caritas Homes would provide an interior bicycle room and 4 outdoor bicycle parking spaces. |
| 5-L5. Traffic Calming   | MANDATORY: Is the project consistent with adopted traffic calming measures?  | Project Complies. The proposed project would encourage carpooling and subsidized transit passes for employees.   |
| 5-L6. Parking Policies  | MANDATORY: Does the project comply with parking policies or ordinances adopted to reduce single-occupancy vehicle travel?  | Not applicable. Does not apply to Santa Rosa   |
| 5-L7. Supporting Parking Policy Measures  | MANDATORY: Does the project comply with any mandatory requirements for prioritized parking for hybrid/EV cars, carpools, and vanpools?                               | Project Complies. As shown in Table 2-10 of the Project Description, the project complies with as parking requirements.  |
| <b>Goal 7: Encourage a Shift Toward Low-Carbon Fuels in Vehicle and Equipment</b> |  |  |
| 7-L2 Electrify Landscaping Equipment  | MANDATORY: Does the project comply with adopted requirements for electrified landscaping equipment?  | Not applicable. Does not apply to Santa Rosa   |
| 7-L3. Electrify Construction Equipment  | MANDATORY: Does the project comply with adopted requirements for use of alternatively fueled equipment (including electrical equipment) during project construction? | Not applicable. Does not apply to Santa Rosa   |
| <b>Goal 8: Reduce Idling</b>  |  |  |
| 8-L1. Idling Ordinance  | MANDATORY: Does the project comply with the adopted idling ordinance?  | Not applicable. Does not apply to Santa Rosa   |
| 8-L2. Idling Ordinance for Construction Equipment                                 | MANDATORY: Does the project comply with the adopted idling ordinance for construction equipment.   | Not applicable. Does not apply to Santa Rosa   |
| <b>Goal 9: Increase Solid Waste Diversion</b>                                     |  |  |
| 9-R1. Waste Diversion Goal  | MANDATORY: Does the project comply with applicable countywide and/or jurisdictional ordinances concerning mandatory waste minimization and diversion requirements?   | Project Complies. The proposed project would comply with all applicable ordinances.  |
| 9-L1. Construction and Demolition Reuse and Recycling Ordinance                   | MANDATORY: Does the project include a Construction Phase Recycling Plan that meets the minimum diversion rate for C&D waste?   | Project Complies. The proposed project would comply with all applicable ordinances.  |



|   | Sonoma County   | Project Consistency   |
|---|---|---|
| <b>Goal 11: Reduce Water Consumption</b>                    |   |   |
| 11-R1. Countywide Water Conservation Support and Incentives | MANDATORY: Does the project comply with all local or regionally adopted water conservation measures?                                  | Project Complies. The proposed project would comply with all adopted conservation measures. |
| 11-L1. Senate Bill X7-7 – Water Conservation Act of 2009    | MANDATORY: Does the project comply with all local or regionally adopted water conservations to implement the requirements of SB X7-7? | Project Complies. The proposed project would comply with all adopted conservation measures. |
| 11-L2. Water Conservation for New Construction              | MANDATORY: Does the project comply with all local building standards and codes relative to water efficiency in new construction?      | Not applicable. Does not apply to Santa Rosa  |
| 11-L3. Water Conservation for Existing Buildings            | MANDATORY: Does the project comply with adopted requirements to implement water conservation upgrades in existing buildings?          | Not applicable. Does not apply to Santa Rosa  |
| <b>Goal 12: Increased Recycled Water and Greywater Use</b>  |   |   |
| 12-L1. Greywater Use  | MANDATORY: Does the project comply with adopted requirements for the use of greywater for non-potable uses?                           | Not applicable: Does not apply to the proposed project.                                     |

## Notes:

C&amp;D = construction and demolition

EV = electric vehicle

PV = photovoltaic

SB = Senate Bill

SMART = Sonoma-Marín Area Rail Transit



## Plan Bay Area

Plan Bay Area 2040 was developed as a requirement under SB 375 and includes integrated long-range transportation and land use planning strategies to reduce regional GHG emissions. Plan Bay Area presents goals and targets to reduce GHG emissions but has no mandatory provisions that would apply to the proposed project.

## California Climate Change Scoping Plan

The California State Legislature adopted AB 32 in 2006. AB 32 focuses on reducing GHGs (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, the ARB adopted the Climate Change Scoping Plan in 2008, which outlines actions recommended to obtain that goal.

**Table 3.5-8: AB 32 Scoping Plan Consistency Analysis**

| Scoping Plan Measure   | Project Consistency   |
|--|---|
| <b>Transportation</b>  |   |
| California Cap-and-Trade Program                             | Consistent. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Therefore, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. |
| California Light-Duty Vehicle Greenhouse Gas Standards       | Consistent. This measure applies to all new vehicles starting with model year 2012. Passenger vehicles model year 2012 and later associated with construction and operation of the project would be required to comply with the Pavley emissions standards. Therefore, the project would not conflict with implementation.  |
| Low Carbon Fuel Standard                                     | Consistent. The project would not conflict with implementation of this measure because motor vehicles associated with construction and operation of the project would utilize low-carbon transportation fuels as required under this measure.   |
| Medium/Heavy-Duty Vehicles                                   | Consistent. Medium- and heavy-duty vehicles associated with construction and operation of the project would be required to comply with the requirements of this regulation. Therefore, the project would not conflict with implementation of this measure.  |
| <b>Electricity and Natural Gas</b>                           |   |
| Energy Efficiency  | Consistent: The proposed project would exceed both City and state minimum green building requirements. It would also be GreenPoint rated and is anticipated to be GreenPoint Gold rating certified.   |
| Renewable Portfolio Standard/Renewable Electricity Standard. | Consistent. PG&E obtained 33 percent of its power supply from renewable sources such as solar and geothermal in 2017, and about 70 percent of the electricity it delivers is carbon-free, including nuclear and large hydroelectric facilities. In addition, the proposed project would be built as solar ready.  |



| Scoping Plan Measure                  | Project Consistency   |
|---------------------------------------|---|
| Million Solar Roofs Program           | Consistent. This measure is intended to increase solar energy generation throughout California by means of a variety of electricity providers and existing solar programs. Projects within the plan area will be able to take advantage of incentives that are in place at the time of construction. The project will meet the “solar ready” requirements of the Green Building Code Standards. |
| <b>Water</b>                          |   |
| Water                                 | Consistent. The project will comply with the California Green Building Standards Code, which requires a 20 percent reduction in indoor water use.   |
| <b>Green Building</b>                 |   |
| Green Building Strategy               | Consistent. The proposed project would exceed both city and state minimum green building requirements. It would also be GreenPoint rated and is anticipated to be GreenPoint Gold rating certified.   |
| <b>Recycling and Waste Management</b> |   |
| Recycling and Waste                   | Consistent. The project is required to achieve the recycling mandates via compliance with the CALGreen code.  |

## Notes:

CALGreen = California Green Building Standards

CEQA = California Environmental Quality Act

City = City of Santa Rosa

GHG = greenhouse gas

PG&amp;E = Pacific Gas and Electric

The Scoping Plan contains a variety of strategies to reduce the State’s emissions. As shown in Table 3.5-8, the project is consistent with the strategies applicable to the proposed project. The 2017 Scoping Plan Update strategies primarily rely on increasing the stringency of existing regulations for which the project would continue to comply with and support through the project’s design and implementation.

**Table 3.5-9: SB 32 Scoping Plan Consistency Analysis**

| 2017 Scoping Plan Measures   | Project Consistency  |
|--|--|
| SB 350 to reduce GHG emissions in the electricity section through the implementation of the 50 percent Renewable Portfolio Standard. | Consistent. PG&E obtained 33 percent of its power supply from renewable sources such as solar and geothermal in 2017, and about 70 percent of the electricity it delivers is carbon-free, including nuclear and large hydroelectric facilities. In addition, the proposed project would be built as solar ready. |
| Low-Carbon Fuel Standard Transition to cleaner/less polluting fuels that have a lower carbon footprint.                              | Consistent. The project would not conflict with implementation of this measure because motor vehicles associated with construction and operation of the project would utilize low-carbon transportation fuels as required under this measure.  |



| <b>2017 Scoping Plan Measures</b>   | <b>Project Consistency</b>  |
|---|---|
| SB 1383 Approve and implement Short-Lived Climate Pollution strategy to reduce highly potent GHGs | Consistent. The project would not include wood burning fireplaces and will only include natural gas hearths that produce very little black carbon.  |
| Post-2020 Cap-and-Trade Program   | Consistent. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Therefore, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the program's first compliance period. |

Notes:

CEQA = California Environmental Quality Act

GHG = greenhouse gas

PG&E = Pacific Gas and Electric

SB = Senate Bill

EO S-3-05 established a reduction of GHG emissions to 80 percent below 1990 levels by 2050. Regarding the proposed project consistency with EO S-3-05, it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed. Because of the technological shifts required and the unknown parameters of the regulatory framework in 2050, quantitatively analyzing the proposed project's impacts further relative to the 2050 goals is speculative for purposes of CEQA. However, it can be anticipated that operation of the project would comply with measures that are enacted to meet an 80 percent reduction below 1990 levels by 2050. The proposed project would be consistent with the California GHG Plans and would further the state's goals of reducing GHG emissions to 1990 levels by 2020, 40 percent below 1990 levels by 2030 and does not obstruct their attainment.

In addition to the Plan level consistency analysis presented in Tables 3.5-6, 3.5-7, 3.5-8, and 3.5-9, the proposed project would be subject to Title 24 energy efficiency standards. Energy-efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The proposed project would comply with the California Green Building Standards Code, which includes requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that would reduce GHG emissions. Motor vehicle emissions associated with the proposed project would be reduced through compliance with State regulations on fuel efficiency and fuel carbon content. The proposed project would not conflict with the City's CAP, the County's CAP, the regional plan, or regulations adopted by the State of California to reduce GHG emissions therefore, impacts would be less than significant.

**Level of Significance Before Mitigation**

Less Than Significant Impact.

**Mitigation Measures**

No mitigation is necessary.



**Level of Significance After Mitigation**

Less Than Significant Impact.





## 3.6 LAND USE AND PLANNING

This section describes the project site's existing land uses and the potential impacts to the project site and surrounding area with implementation of the proposed project. Descriptions and analysis in this section are based on reviewing the City of Santa Rosa General Plan 2035, General Plan 2035 Draft EIR, Santa Rosa Downtown Specific Plan, and site reconnaissance.

### 3.6.1 Environmental Setting

#### Project Setting

The 2.78-acre project site is within the west part of downtown; bordered by 7<sup>th</sup> Street to the north, A Street to the east, 6<sup>th</sup> Street to the south, and Morgan Street to the west. The project site is fully developed and consists of Catholic Charities' Homeless Services Center and Family Support Center. In addition, there are several residential dwelling units on the project site that are either vacant or owned by Catholic Charities to provide transitional housing. There is one residential dwelling unit at the project site that is used as a private residence. Development surrounding the project site mostly consists of single-family homes within the St. Rose Historic District, as well as some office and commercial uses such as the Santa Rosa Plaza shopping mall, Sonoma County Museum, and the St. Rose Church that is now used for professional offices. The project site is also located immediately east of Highway 101 and the Highway 101 on-ramp at 7<sup>th</sup> Street.

#### General Plan Land Use Designation

As discussed in Section 2.0, Project Description, the General Plan designates the parcels along A Street as Retail/Medium Residential and the parcels along Morgan Street as Medium Residential. The project would require a General Plan Amendment to change the project site's land use designation to Transit Village Mixed Use (TV-M), which allows higher intensity residential uses within one-quarter mile of a transit facility.

#### Zoning

The parcels along Morgan Street are zoned Multi-Family Residential (R-3-10-H), and the parcels along A Street are zoned Neighborhood Commercial (CN-H-SA) (City 2018). The project site is also within the Historic Combining District (-H) for the St. Rose Historic Preservation District, which is intended to recognize, preserve, and enhance the City's locally designated historic resources. In addition, the parcels along A Street are within the Station Area Combining District (-SA) for the Downtown Specific Plan. The Station Area Combining District is intended to enhance and reinforce distinctive characteristics within the Downtown Specific Plan area and create environments that are comfortable to walk in (City 2018).

The proposed project would rezone the project site to TV-M to allow for the proposed multi-family dwelling units. There would be no change to the Historic Combining District or Station Area Combining District designations. Transitional housing and emergency shelter uses are allowed in the TV-M zoning district with approval of a CUP. In addition, the proposed project would require a minor CUP under the City's Resilient City Ordinance.



## Downtown Specific Plan

The project site is within the City's Downtown Specific Plan. Specifically, the parcels along Morgan Street are within the Downtown Specific Plan's Historic Residential Sub-Area, and parcels along A Street are within the Downtown Specific Plan's Courthouse Square Sub-Area. The Courthouse Square Sub-Area is the commercial core of Santa Rosa and consists of a mix of retail and office uses with scattered parking throughout. This area is envisioned to be developed into a vibrant mixed-use area with new housing added to the existing office and retail uses. The Downtown Specific Plan encourages development of new high-density housing appropriate for a city center and continuous ground-floor retail uses to promote a pedestrian-friendly environment (City 2007a). The Historic Residential Sub-Area consists of four historic preservation districts; the project site is within the St. Rose Historic District. The Downtown Specific Plan envisions the maintenance and enhancement of the existing residential character of the Historic Residential Sub-Area. The proposed project would require a Specific Plan Amendment to include the parcels along Morgan Street within the Courthouse Square Sub-Area. The density of new development within the Courthouse Square Sub-Area is limited by a maximum height limit of four stories.

A primary objective of the Downtown Specific Plan is to increase the number of residents and employees living and working within walking distance (one-half mile) of the Downtown Transit Mall and the Downtown SMART station through intensification of both residential and nonresidential land uses in the Downtown Specific Plan area; specifically, the development of 3,409 new dwelling units, 197,500 square feet of office and institutional uses, and 296,000 square feet of retail uses within 20 years. As such, the Santa Rosa General Plan identifies the Downtown Specific Plan as a Priority Development Area (PDA) that includes the project site (City 2009). PDAs are defined as areas located within the City's Urban Growth Boundary and concentrated near transit stations and along major transit corridors. The City is in the process of amending the Downtown Specific Plan to meet the projected residential and nonresidential growth for the downtown area and to provide necessary transit supportive uses and improvements.

### 3.6.2 Regulatory Setting

#### State

##### General Plans

The land use planning and zoning authority of local jurisdictions in California is set forth in the state's planning laws. California GC Section 65300, et seq. obliges cities and counties to adopt and implement general plans. The general plan is a comprehensive, long-term, and general document that describes plans for the physical development of a city or county and of any land outside its boundaries that, in the city's or county's judgment, bears relation to its planning. The general plan addresses a broad range of topics including, at a minimum, land use, circulation, housing, conservation, open space, noise, and safety. In addressing these topics, the general plan identifies the goals, objectives, policies, principles, standards, and plan proposals that support the city's or county's vision for the area. The general plan is a long-range document that typically addresses the physical character of an area over a 20-year period. Although the general plan serves as a blueprint for future development and identifies the overall vision for the planning area, it remains general enough to allow flexibility in the approach taken to achieve the plan's goals.



## State Zoning Law

The State Zoning Law (California GC Section 65800, et seq.) establishes that zoning ordinances, which are laws that define allowable land uses within a specific district, are required to be consistent with the general plan and any applicable specific plans. When amendments to the general plan are made, corresponding changes in the zoning ordinance may be required within a reasonable time to ensure the land uses designated in the general plan would also be allowable by the zoning ordinance (GC Section 65860, sub.[c]).

## Regional

### Plan Bay Area 2040

The Metropolitan Transportation Commission (MTC) and ABAG's Plan Bay Area 2040 is the Bay Area's Regional Transportation Plan (RTP)/ Sustainable Community Strategy (SCS). Plan Bay Area 2040 was adopted jointly by MTC and ABAG on July 26, 2017. The SCS sets a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement) beyond the per capita reduction targets identified by CARB. An overarching goal of Plan Bay Area is to concentrate development in areas where there are existing services and infrastructure rather than allocate new growth to outlying areas where substantial transportation investments would be necessary to achieve the per capita passenger vehicle, vehicle miles travelled (VMT), and associated GHG emissions reductions. In addition, one of the goals of Plan Bay Area 2040 is to increase share of affordable housing in the region.

## Local

### Santa Rosa General Plan

The City of Santa Rosa General Plan provides a blueprint for growth within the City limits and sphere of influence. The Santa Rosa City Council adopted the most recent General Plan on November 3, 2009. The General Plan contains 12 topical elements: land use and livability, urban design, housing, transportation, public services and facilities, open space and conservation, growth management, youth and family, economic vitality, historic preservation, noise and safety, and art and culture. Each element establishes goals and policies to guide future land use activities and development within the General Plan boundaries. The General Plan also establishes land use designations for each parcel to guide future development.

### Santa Rosa Downtown Specific Plan

The City of Santa Rosa created the Downtown Specific Plan to address the development and redevelopment of the 647-acre area in and around the downtown area of Santa Rosa, centered around the proposed SMART rail station. The Downtown Specific Plan is intended to provide a comprehensive plan for development within the Specific Plan area including land uses with their configurations and intensity, property development regulations, and design guidelines. Circulation and infrastructure needs and improvements are also identified in the Downtown Specific Plan to support phases of development as needed. A primary objective of the Downtown Specific Plan is to increase the number of residents and employees within walking distance of the SMART Station site through the intensification of land uses in the Plan Area.



## Santa Rosa Zoning Code

The City of Santa Rosa Zoning Code provides regulation of land and structures in order to promote health, safety, and welfare of the public and to insure the orderly development of the City. Title 20, Zoning, describes where specific allowed uses, such as multifamily dwellings, emergency shelter, day center, or transitional living space, may be located.

### 3.6.3 Environmental Impacts

#### Methodology

The analysis of potential land use impacts considers the project's consistency with adopted plans and policies that regulate land use on the project site, and the project's compatibility with surrounding land uses. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions pertaining to the project site. CEQA Guidelines section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. Evaluations are made to determine whether a project is consistent with such plans. Projects are considered consistent with regulatory plans if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The intent of the consistency evaluation is to determine if noncompliance with regulatory plans would result in a significant impact. The impact analysis was based on a review of the Santa Rosa General Plan and the Downtown Specific Plan to identify planned land uses and policies applicable to the project. In addition, the Plan Bay Area was reviewed because the proposed project would serve the regional population. Existing land uses were determined from site reconnaissance and General Plan designations. The City's zoning regulations were also reviewed to determine the project's consistency with existing zoning.

#### Thresholds of Significance

In accordance with the CEQA Guidelines' Appendix G Environmental Checklist, the following question was analyzed and evaluated to determine whether the project would cause a significant impact on land use:

- Would it cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The next question was determined to have no impact during the NOP Scoping. This issue is summarized in Section 7.0, Effects Found Not to be Significant, and is not discussed further in this section.

- Would it physically divide an established community?



## Project Impact Analysis and Mitigation Measures

### Conflict with Plans, Policies, or Regulations

|                    |   |
|--------------------|---|
| <b>Impact LU-1</b> | <b>The proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.</b> |
|--------------------|---|

### Impact Analysis

The proposed project involves the construction of a comprehensive family and homeless support services facility and an affordable housing development. The proposed project would require a General Plan Amendment and Specific Plan Amendment as discussed below. The proposed project's consistency with the applicable goals and policies of the 2035 General Plan and Downtown Specific Plan were also considered.

#### General Plan Amendment

The project site is designated Retail/Medium Residential and Medium Residential by the 2035 General Plan. The City's 2035 General Plan defines these land uses as the following:

##### *Medium Density*

Medium-density is defined as housing densities from 8.0 to 18.0 units per gross acre. This designation permits a range of housing types including single family attached and multifamily developments and is intended for specific areas where higher density is appropriate. New single family detached housing is not permitted except in historic preservation districts and historic neighborhoods where single family detached units are allowed.

##### *Retail and Business Services*

Retail is defined as allowing retail and service enterprises, offices, and restaurants. 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, are allowed. Large grocery stores are expressly permitted in community shopping centers and downtown only and may be considered through a CUP process on other commercial sites.

The proposed project is seeking a General Plan Amendment to change the project site's land use designation to TV-M. The TV-M land use designation is intended to accommodate mixed-use development within approximately one-half mile of a transit facility. Housing densities must be a minimum of 40 units per acre. There is no maximum density requirement for this designation (City 2009). Therefore, the General Plan Amendment would allow for the development of the affordable housing development and nonresidential uses, including office space and the support services facility for the homeless. Approval of a General Plan Amendment would require the project to be consistent with the City's General Plan Amendment criteria. Below is a discussion of the requested General Plan Amendment's consistency with the City's General Plan Amendment criteria.

- **Logical and orderly growth:** The project site is within the City's urban limits and is currently providing homeless services. In addition, the project site is in a PDA that encourages development of affordable housing units near rail and transit services. The proposed General Plan Amendment would



thereby continue to implement logical growth patterns by allowing for high-density development within a quarter mile of a transit station. The proposed project identifies goals, principles, mandatory requirements, and design standards and guidelines. As such, the proposed project would facilitate logical and orderly growth.

- Compatibility with surrounding land uses:** The project site is surrounded by residential uses to the north, commercial and retail to the east and south, and Highway 101 to the west. The proposed project is an expansion of the current land use and would consolidate the existing onsite Family Support Center and Homeless Services Center into a single building. The project proposes residential and support services, with residential uses adjacent to the existing residential development to the north and support services adjacent to the parking garages for the retail uses to the east and south. The proposed project is laid out to provide a transition from residential to nonresidential land uses and would be compatible with the surrounding land uses.
- Consistency with goals and policies of the General Plan:** The proposed project must be consistent with the City's 2035 General Plan. Analysis of the project's consistency with the applicable goals and policies of the City's General Plan is provided in Table 3.6-1.

As such, the proposed project would be consistent with the requirements of the City's General Plan Amendment criteria and would not cause a significant environmental impact.

#### General Plan Consistency Analysis

The proposed project must be consistent with the City's 2035 General Plan. The Governor's Office of Planning and Research states that, "an action, program, or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan and not obstruct their attainment." (OPR 2005) As shown in Table 3.6-1, the proposed project would be consistent with all applicable goals and policies of the 2035 General Plan. Furthermore, Table 3.6-1 shows that the proposed project would be consistent with the applicable goals and policies of the City's Housing Element that focuses on providing affordable housing and support services for the homeless. As such, the proposed project would assist the City in achieving its housing goals by providing a new affordable housing development and a support services facility for the homeless.

**Table 3.6-1: General Plan Policy Consistency Analysis**

| Goal / Policy   | Project Consistency  |
|---|--|
| <b>Land Use and Livability</b>  |  |
| LUL-A: Foster a compact rather than a scattered development pattern to reduce travel, energy, land, and materials consumption while promoting greenhouse gas emission reductions citywide.                              | <b>Consistent.</b> The proposed project would establish a high-density residential development within walking distance of the SMART Station. This would reduce travel and energy consumption and result in GHG reduction and would be consistent with this goal. |
| LUL-C-1: Promote downtown as the center of the business, residential, social, and civic life of Santa Rosa by directing high intensity office uses, government, residential, and entertainment uses to locate downtown. | <b>Consistent.</b> The proposed project would establish a high-density residential development in the Downtown Specific Plan area and would be consistent with this policy.  |



| Goal / Policy  | Project Consistency   |
|--|---|
| LUL-E: Promote livable neighborhoods by requiring compliance with green building programs to ensure that new construction meets high standards of energy efficiency and sustainable material use. Ensure that everyday shopping, park and recreation facilities, and schools are within easy walking distance of most residents. | <b>Consistent.</b> The proposed project would exceed both City and state minimum green building requirements. It would also be GreenPoint rated and is anticipated to be certified with a LEED Gold rating.   |
| LUL-E-3: Avoid concentration of large community care facilities in any single residential neighborhood.  | <b>Consistent.</b> The project site is located between residential and commercial uses and therefore would facilitate transition from residential to commercial land uses. While the definition of large is subjective and not further defined in the General Plan, the proposed Caritas Center would be 46,587 square feet and does not include a full range of services such as medical services.   |
| LUL-F-1: Do not allow development at less than the minimum density prescribed by each residential land use classification.   | <b>Consistent.</b> Density within the Courthouse Square Sub-Area is limited by a maximum height limit of four stories. The proposed project would construct buildings ranging from two to four stories tall.  |
| LUL-F-3: Maintain a balance of various housing types in each neighborhood and ensure that new development does not result in undue concentration of a single housing type in any one neighborhood. Downtown is excepted.   | <b>Consistent.</b> The proposed project would result in affordable housing along with support services. The project site is in the Downtown Specific Plan area and is therefore exempted from this policy.  |
| LUL-L: Ensure that land uses that promote use of transit.  | <b>Consistent.</b> The proposed project would provide high-density development within walking distance of the Downtown SMART Station and would be consistent with the policy of promoting transit use.  |
| LUL-L-1: Establish land use designations and development standards which will result in a substantial number of new housing units within walking distance of the Downtown SMART station site.  | <b>Consistent.</b> The project site would be designated TV-M to allow for high-density development within walking distance of the Downtown SMART Station and would be consistent with this policy.  |
| LUL-L-2: Improve pedestrian, bicycle, and bus transit connections from surrounding areas to the Downtown SMART station site as well as between neighborhoods surrounding the SMART station site.   | <b>Consistent.</b> The project site would be served by CityBus routes 1, 2B, and 10, with bus stops within 0.25 mile of the project site. The project site is also located within 0.25 mile of the SMART Station in Railroad Square and 0.30 mile of the Second Street Transit Mall. The project area is well served by sidewalks, and pedestrian connections are available for transit stops.  |
| LUL-L-3: Create pedestrian friendly environments and provide convenient connections to the transit facility for all modes of transportation.   | <b>Consistent.</b> The proposed plaza or mews between the two residential structures would be pedestrian friendly with shared amenities lining both sides and with landscaping features. The Morgan Street and A Street frontage would similarly be pedestrian friendly with ground level units and entry porches along majority of their façades. In addition, the project area is well served by sidewalks, and pedestrian connections are available for transit stops. |
| LUL-M: Ensure new development and streetscape projects provide pedestrian and bicycle circulation improvements.  | <b>Consistent.</b> The project area is well served by sidewalks and designated bike lanes on A Street and 6 <sup>th</sup> Street.   |
| LUL-N-1: Ensure private development provides its fair share of funding for necessary improvements to public services and utilities in the plan area.   | <b>Consistent.</b> The proposed project would pay its fair share of development impact fees.  |





| Goal / Policy  | Project Consistency   |
|--|---|
| LUL-P: Enhance the Sixth/Seventh Street corridor in the northern downtown area.  | <b>Consistent.</b> The proposed project includes plazas and landscaping to provide pedestrian-friendly frontages along 6 <sup>th</sup> and 7 <sup>th</sup> streets.   |
| LUL-Q: Accommodate all modes of transportation along the Sixth/Seventh Street corridor (pedestrian, bicycle, automobile, and bus).   | <b>Consistent.</b> The proposed project includes 32 bicycle parking spaces for the Caritas Center. Caritas Homes would provide 64 long-term bicycle parking spaces for each phase (128 total) and four short-term bicycle parking spaces for visitors. The project area is also well served by public transit and bike lanes.   |
| <b>Urban Design</b>  |   |
| UD-A: Preserve and enhance Santa Rosa's scenic character, including its natural waterways, hillsides, and distinctive districts.   | <b>Consistent.</b> The project site is in the St. Rose Historic District and would be designed in accordance with the City's design review process and in compliance with the requirements of the -H overlay combining district.  |
| UD-B-2: Encourage, promote, and assist in the development of housing units within downtown for a mix of income levels and housing types including integrating housing into existing buildings as mixed use.  | <b>Consistent.</b> The proposed project would develop high-density affordable housing and support services and would be consistent with this policy.  |
| UD-B-4: Respect and relate the scale and character of development at the edges of downtown to the surrounding Preservation Districts.  | <b>Consistent.</b> The proposed project's architectural character would reflect existing structures in the neighborhood with simple massing to the south and variegated to the north so the proposed structures relate to the scale of existing structures within the St. Rose Historic Preservation District.  |
| UD-B-5: Promote street life in the downtown through attractive building designs with street level activity and façade windows, public art, trees, fountains, and other landscaping elements that are pedestrian friendly. Discourage blank parking garage or office block frontage. Implement this policy through development review and the city's Capital Improvement and Downtown Programs. | <b>Consistent.</b> The proposed project includes active uses on the ground floor that face the streets and incorporates plazas to encourage pedestrian activity. The project would include a podium parking lot that would be concealed by the ground floor residential units facing Morgan Street and A Street.  |
| UD-B-6: Require design review for all new structures and alterations to existing structures within downtown.   | <b>Consistent.</b> The proposed project is subject to the City's design review.   |
| UD-G: Design residential neighborhoods to be safe, human-scaled, and livable by addressing compact development, multi-modal connectivity, and reducing energy use.   | <b>Consistent.</b> The proposed project would be a compact high-density development, designed to be compatible with the surrounding land uses. In addition, the proposed project would be constructed to meet or exceed current energy efficiency standards as codified by the 2016 CALGreen + Tier 1 checklists for residential and nonresidential buildings. In addition, the proposed project would be built to comply with Title 24 standards to be "solar-ready" with appropriate roof strength and installed conduit. |
| <b>Housing</b>   |   |
| H-C: Expand the supply of housing available to lower-income households.  | <b>Consistent.</b> The proposed project would develop high-density affordable housing and would be consistent with this policy. The applicant would enter into an affordable housing agreement with the City.   |



| Goal / Policy  | Project Consistency   |
|--|---|
| H-C-3: Require projects requesting residential General Plan amendments to rezone for General Plan consistency  | <b>Consistent.</b> The proposed project is subject to a General Plan Amendment and would rezone the project site from Medium Density Residential/Neighborhood Commercial to TV-M.   |
| H-C-6: Facilitate higher-density and affordable housing development in Priority Development Areas (PDA), which include sites located near the rail transit corridor and on regional/arterial streets for convenient access to bus and rail transit. Implement existing PDA-specific plans—the Downtown Station Area Specific Plan and the North Santa Rosa Station Area Specific Plan—and develop new plans, such as the Roseland Specific Plan, to encourage the development of homes that have access to services and amenities.   | <b>Consistent.</b> The project site is in the Downtown Specific Plan and would be developed with high-density affordable housing.   |
| H-C-15: Encourage new affordable housing development to provide amenities for residents, such as onsite recreational facilities, children's programs (day care or after-school care), and community meeting spaces.  | <b>Consistent.</b> The proposed project is a mixed-use development that includes affordable housing, support services, and amenities for the residents.   |
| H-D: Provide housing for households with special needs.  | <b>Consistent.</b> The proposed project would include emergency shelters and programs for people with special needs.  |
| H-G: Develop energy-efficient residential units and rehabilitate existing units to reduce energy consumption.  | <b>Consistent.</b> The proposed project would exceed both City and state minimum green building requirements. It would also be GreenPoint rated and is anticipated to be certified with the LEED Gold rating.   |
| <p>H-G-1 Maximize energy efficiency in residential areas. Utilize the following techniques:</p> <ul style="list-style-type: none"> <li>• Implement CALGreen Tier 1 standards;</li> <li>• Fund energy conservation through the Housing Authority's rehabilitation loans;</li> <li>• Promote home improvement strategies for energy efficiency;</li> <li>• Promote energy efficiency improvements that are sensitive to the historic significance of the residential structure; and</li> <li>• Consider a program that would require energy efficiency improvements when a residential structure undergoes transfer of title or major renovation.</li> </ul> | <b>Consistent.</b> The proposed project would be constructed to meet or exceed current energy efficiency standards as codified by the 2016 CALGreen + Tier 1 checklists for residential and nonresidential buildings. In addition, the proposed project would be built to comply with Title 24 standards to be "solar-ready" with appropriate roof strength and installed conduit.  |
| <b>Transportation</b>  |   |
| <p>T-B-1: Require site design to focus through-traffic on regional and arterial streets. Employ the following design techniques to increase driver safety and traffic efficiency:</p> <ul style="list-style-type: none"> <li>• Reduce the number of driveways and intersections;</li> <li>• Combine driveways to serve numerous small parcels;</li> <li>• Avoid residential access;</li> <li>• Install and facilitate timing of traffic signals; and</li> <li>• Ensure continuous sidewalks.</li> </ul>  | <p><b>Consistent.</b> Vehicular access to the project site would be provided by two driveways on Morgan Street and two driveways on A Street. There would be two pedestrian entryways on 6<sup>th</sup> Street to access the Caritas Center, one on the corner of Morgan Street and 6<sup>th</sup> Street to enter the Day Services area and the other at the middle of the building facing south onto 6<sup>th</sup> Street to enter the lobby.</p> <p>The Caritas Homes would have a gated pedestrian entryway on 7<sup>th</sup> Street. The proposed project separates the vehicular and pedestrian access, thereby increasing traffic safety.</p> |



| Goal / Policy   | Project Consistency   |
|---|---|
| <p>T-D-1: Maintain a Level of Service (LOS) D or better along all major corridors. Exceptions to meeting the standard include:</p> <ul style="list-style-type: none"> <li>• Within downtown;</li> <li>• Where attainment would result in significant environmental degradation;</li> <li>• Where topography or environmental impact makes the improvement impossible; and</li> <li>• Where attainment would ensure loss of an area's unique character.</li> </ul> | <p><b>Consistent.</b> The project site is in the Downtown Specific Plan . As discussed in Section 3.8, Transportation, the proposed project would maintain LOS D or better under existing conditions and existing plus project conditions; however, under the cumulative plus project conditions LOS D would not be able to be maintained. The downtown exception to the standard is invoked so that the impact is reduced to a less than significant level. Please refer to Section 3.8, Transportation, for further discussion.</p> |
| <p>T-D-3: Require traffic studies for development projects that may have a substantial impact on the circulation system.</p>  | <p><b>Consistent.</b> The traffic study for the proposed project has been prepared by Stantec. As discussed in Section 3.8, Transportation, impacts to the circulation system would be less than significant with mitigation.</p>   |
| <p>T-H-7: Require community care facilities and senior housing projects with more than 25 units to provide accessible transportation services for the convenience of residents.</p>   | <p><b>Consistent.</b> The proposed project would provide a high-density development within walking distance of transit services that are easily accessible by clients and tenants.</p>  |
| <p>T-J-4: Provide street trees to enhance the city's livability and to provide identity to neighborhoods and districts.</p>   | <p><b>Consistent.</b> The proposed project would include a variety of trees fronting the buildings on Morgan, 6<sup>th</sup>, and A streets. Street frontages and setback areas would also have flower plantings and sidewalk shade trees.</p>  |
| <b>Public Services and Facilities</b>   |   |
| <p>PSF-A-1: Provide recreation and park facilities and services needed by various segments of the population—including specific age groups, persons with special physical requirements, and groups interested in particular activities—and make these facilities and services easily accessible and affordable to all users.</p>  | <p><b>Consistent.</b> The proposed project would include private recreational facilities to serve the future residents, such as covered gathering area, communal lawn area, pet relief area, tenant vegetable garden planter, day-use courtyard, family courtyard, play structure, chapel courtyard, and office patio.</p>  |
| <p>PSF-F: Ensure that an adequate supply of water is available to serve existing and future needs of the city.</p>  | <p><b>Consistent.</b> The 2015 UWMP calculates the City's past, current, and projected water use and water supply through 2040. According to the UWMP, the future water supply would be adequate to offset future water demands from planned development during normal, single-dry, and multi-dry years through 2040.</p>   |
| <p>PSF-G: Ensure that adequate sewer capacity is available to serve existing and future needs of the city.</p>  | <p><b>Consistent.</b> As discussed in the NOP (Appendix A), there is substantial capacity at the Wastewater Treatment Plant to serve the proposed project, and implementation of the proposed project would not exceed wastewater treatment requirements.</p>   |
| <p>PSF-I-1: Require dedication, improvement, and maintenance of stormwater flow and retention areas as a condition of approval.</p>   | <p><b>Consistent.</b> The proposed project would include a system of vegetated stormwater planting areas that will collect, treat, and convey stormwater runoff from the project site to the existing stormwater system.</p>  |
| <p>PSF-I-3: Require erosion and sedimentation control measures to maintain an operational drainage system, preserve drainage capacity, and protect water quality.</p>   | <p><b>Consistent.</b> The proposed project would include a system of vegetated stormwater planting areas to collect, treat, and convey stormwater runoff from the project site to the existing stormwater system. Stormwater runoff from roofs, pavement surface, and landscaping would flow into stormwater planting areas to be treated. The stormwater planting areas would be sized to function as stormwater treatment and flow control.</p>   |



| Goal / Policy  | Project Consistency  |
|--|--|
| PSF-I-6: Require implementation of BMPs to reduce drainage system discharge of non-point source pollutants originating from streets, parking lots, residential areas, businesses, industrial operations, and those open space areas involved with pesticide application. | <b>Consistent.</b> The Stormwater Pollution Prevention Plan would identify BMPs to ensure the reduction of pollutants during stormwater discharges.  |
| PSF-I-8: Implement the SUSMP to reduce pollutants and runoff flows from new development and significant redevelopment projects.  | <b>Consistent.</b> The proposed project would be required to follow the requirements outlined in the SUSMP Guidelines. As required by the SUSMP, the proposed project would include preparation of a stormwater mitigation plan to address post-construction water quality impacts.  |
| <b>Open Space and Conservation</b>   |  |
| OSC-H: Conserve significant vegetation and trees and plant new trees.  | <b>Consistent.</b> The proposed project would remove up to 24 trees. However, new trees would be planted on Morgan, 6 <sup>th</sup> , and A streets. Street frontages and setback areas would have flower plantings and sidewalk shade trees as well.  |
| OSC-J-1: Review all new construction projects and require dust abatement actions as contained in the CEQA Handbook of the BAAQMD.  | <b>Consistent.</b> The proposed project would implement construction dust abatement measures consistent with those outlined in the BAAQMD CEQA Handbook. Refer to Section 3.2, Air Quality, for further discussion.  |
| OSC-K: Reduce energy use in existing and new commercial, industrial, and public structures.  | <b>Consistent.</b> The proposed project would exceed both City and state minimum green building requirements. It will also be GreenPoint rated and is anticipated to be certified with the LEED Gold rating.   |
| <b>Growth Management</b>   |  |
| GM-A: Prevent urban sprawl by focusing growth within the Urban Growth Boundary.  | <b>Consistent.</b> The proposed project is an infill development on existing developed but underutilized land and would not induce development in the area beyond that which has already been planned for as part of the General Plan and the Downtown Specific Plan.  |
| <b>Historic Preservation</b>   |  |
| HP-A: Protect Native American heritage.  | <b>Consistent.</b> A record search was performed at the NWIC to determine if any known Native American resources exist in the project vicinity. In addition, mitigation measures are included to reduce impacts on cultural resources. Refer to Section 3.9, Cultural and Historical Resources, and Section 3.9, Tribal Cultural Resources, for further discussion.        |
| HP-B-2: Preserve significant historic structures. Consider the life cycle costs when evaluating the alternatives to demolition of these structures, including the adaptive reuse of historic buildings for contemporary uses.  | <b>Consistent.</b> The proposed project includes demolishing all structures on the Morgan Street parcels. Adaptive reuse was considered as part of the No Project Alternative because it has been the ongoing practice of the project site to re-use residential structures for offices, drop-in facilities, and the former hospital facility for family support services. |
| HP-B-7: In establishing zoning designations for historic properties, consider historic uses and establish provisions to encourage retention of the historic use and/or setting.  | <b>Consistent.</b> The proposed project would retain the -H overlay combining district overlay.  |



| Goal / Policy   | Project Consistency  |
|---|--|
| <b>Noise and Safety</b>   |  |
| NS-B-2: Encourage residential developers to provide buffers other than sound walls, where practical. Allow sound walls only when projected noise levels at a site exceed land use compatibility standards in Figure 12-1.   | <b>Consistent.</b> Based on the ambient noise level measurements, noise levels at the project site are expected to be 66.1 dB(A) $L_{dn}$ . Interior noise levels would comply with the requirements of the General Plan, California Building, and CalGreen code requirements with use of standard construction practices. In addition, operation of fixed-source noise would be required to comply with the maximum noise limits listed in Sections 17-16.030 and 17-16.120 of the Santa Rosa City Code. Therefore, the onsite equipment would be designed to incorporate measures such as shielding and appropriate attenuators to reduce noise levels that may affect nearby properties. Refer to Section 3.7, Noise and Vibration, for further discussion. |
| NS-B-3: Prevent new stationary and transportation noise sources from creating a nuisance in existing developed areas. Use a comprehensive program of noise prevention through planning and mitigation and consider noise impacts as a crucial factor in project approval.   | <b>Consistent.</b> The project would not substantially increase traffic noise along nearby streets. Short-term noise from construction vehicles along 6 <sup>th</sup> , A, and Morgan streets would be perceptible; however, mitigation measures NOI-1 and NOI-2 would be implemented to reduce these impacts to a less than significant level. Refer to Section 3.7, Noise and Vibration, for further discussion.   |
| NS-B-4: Require new projects in the following categories to submit an acoustical study, prepared by a qualified acoustical consultant: <ul style="list-style-type: none"> <li>All new projects proposed for areas with existing noise above 60dB(A) DNL.</li> <li>Mitigation shall be sufficient to reduce noise levels below 45 dB(A) DNL in habitable rooms and 60 dB(A) DNL in private and shared recreational facilities. Additions to existing housing units are exempt.</li> <li>All new projects that could generate noise whose impacts on other existing uses would be greater than those normally acceptable (as specified in the Land Use Compatibility Standards).</li> </ul> | <b>Consistent.</b> As discussed in Section 3.7, Noise and Vibration, the project would be built with modern construction materials to achieve interior noise levels in accordance with the requirements of the General Plan, California Building Code, and CalGreen code. In addition, the project would not substantially increase traffic along nearby streets that would exceed exterior noise levels as required by the City's General Plan. Refer to Section 3.7, Noise and Vibration, for further discussion.  |
| NS-B-9: Encourage developers to incorporate acoustical site planning into their projects. Recommended measures include: <ul style="list-style-type: none"> <li>Incorporating buffers and/or landscaped earth berms;</li> <li>Orienting windows and outdoor living areas away from unacceptable noise exposure;</li> <li>Using reduced-noise pavement (rubberized-asphalt);</li> <li>Incorporating traffic calming measures, alternative intersection designs, and lower speed limits; and</li> <li>Incorporating state-of-the-art structural sound attenuation and setbacks.</li> </ul>   | <b>Consistent.</b> The proposed project would be built with modern construction practices such as augmented exterior wall assemblies and windows with high Sound Transmission Class ratings to attenuate noise. In addition, noise attenuation features such as building setbacks, walls, and landscaping along roadways, as well as orienting outdoor living areas away from major roadways are incorporated into the project design to the extent feasible. Refer to Section 2.0, Project Description, and Section 3.7, Noise and Vibration, for further discussion.   |



| Goal / Policy  | Project Consistency  |
|--|--|
| NS-C-2 Require comprehensive geotechnical investigations prior to development approval, where applicable. Investigations shall include evaluation of landslide risk, liquefaction potential, settlement, seismically-induced landsliding, or weak and expansive soils. Evaluation and mitigation of seismic hazards, including ground shaking, liquefaction, and seismically-induced landslides, shall comply with guidelines set forth in the most recent version of the California Division of Mines and Geology (CDMG) Special Publication 117. | <b>Consistent.</b> The proposed project would require site-specific geotechnical investigations prior to development approval. |

Notes:

BAAQMD = Bay Area Air Quality Management District  
 BMPs = best management practices  
 CALGreen = California Green Building Standards  
 CEQA = California Environmental Quality Act  
 City = City of Santa Rosa  
 dB(A) = A-weighted decibels  
 DNL = average day-night sound level  
 GHG = greenhouse gas  
 -H = historic district

L<sub>dn</sub> = day-night sound level  
 LEED = Leadership in Energy and Environmental Design  
 LOS = level of service  
 NOP = Notice of Preparation  
 SMART = Sonoma-Marín Area Rail Transit  
 SUSMP = Standard Urban Stormwater Mitigation Plan  
 TV-M = Transit Village Mixed Use  
 UWMP = Urban Water Management Plan  
 Source: City of Santa Rosa 2009

### Downtown Specific Plan Consistency Analysis

The proposed project is within the Downtown Specific Plan, specifically within the Courthouse Square Sub-Area and Historic Residential Sub-Area. The applicant is requesting a Specific Plan Amendment so that the entire project site would be within the Courthouse Square Sub-Area. Approval of the Specific Plan Amendment would require the project to be consistent with the goals and policies of the Downtown Specific Plan that pertain to the Courthouse Square Sub-Area. These goals and policies build on policies already contained in the Santa Rosa General Plan, Zoning Code, and Design Guidelines. As shown in Table 3.6-2, the proposed project would be consistent with all applicable goals and policies for the Courthouse Square Sub-Area.



**Table 3.6-2: Downtown Specific Plan Policy Consistency Analysis**

| Goal/ Policy   | Project Consistency   |
|--|---|
| <b>Land Use</b>  |   |
| Goal SP-LU-1: Ensure land uses that promote use of transit.  | <b>Consistent.</b> The proposed project would provide high-density development within walking distance of the Downtown SMART Station and would be consistent with the policy of promoting transit use.  |
| Policy SP-LU-1.1: Establish appropriate land use designations and development standards that will result in a substantial number of new housing units within walking distance of the Downtown SMART Station site.  | <b>Consistent.</b> The project site would be designated as TV-M to allow for a high-density development within walking distance of the Downtown SMART Station and would be consistent with this policy.   |
| Policy SP-LU-1.3: Create pedestrian friendly environments and provide convenient connections to the transit facility for all modes of transportation.  | <b>Consistent.</b> The proposed plaza or mews between the two residential structures would be pedestrian friendly with shared amenities lining both sides and with landscaping features. The Morgan Street and A Street frontage would similarly be pedestrian friendly with ground level units and entry porches along most of their façades. In addition, the project area is well served by sidewalks, and pedestrian connections are available for transit stops.                   |
| Goal SP-LU-2 Encourage a variety of new housing development.   | <b>Consistent.</b> The project would construct two high-density residential structures with 126 units of permanent affordable rental housing, as well as two units that would be reserved for onsite managers, for a total of 128 units. The project would also construct three-story apartments along 7 <sup>th</sup> Street.  |
| Policy SP-LU-2.1: Provide a variety of housing types and densities in the Specific Plan Area   | <b>Consistent.</b> The project would construct two high-density residential structures with 126 units of permanent affordable rental housing, plus two units for onsite managers for a total of 128 units. The project would also construct three-story apartments along 7 <sup>th</sup> Street.  |
| Policy SP-LU-2.3: Utilize existing City programs and policies to encourage and facilitate development of affordable housing within the Specific Plan Area.   | <b>Consistent.</b> The proposed project would develop high-density affordable housing and would enter into an affordable housing agreement with the City.   |
| Goal SP-LU-3: Encourage new development to incorporate sustainable building principles.  | <b>Consistent.</b> The proposed project would target a LEED Gold sustainability rating and would be GreenPoint rated.   |
| Policy SP-LU-3.1: Promote site and building design that improves energy efficiency by incorporating natural cooling and passive solar heating. This may include extended eaves, window overhangs, awnings, and tree placement for natural cooling, and building and window orientation to take advantage of passive solar heating. | <b>Consistent.</b> The proposed project would incorporate window awnings and tree placement to provide natural cooling. The proposed project would be constructed to meet or exceed current energy efficiency standards as codified by the 2016 CALGreen + Tier 1 checklists for residential and nonresidential buildings. In addition, the proposed project would be built to comply with Title 24 standards to be "solar-ready" with appropriate roof strength and installed conduit. |
| Policy SP-LU-3.2: Support the use of green or sustainable building materials, including recycled content materials that are consistent with the underlying architectural style and character of the building.  | <b>Consistent.</b> The proposed project would comply with the 2016 CALGreen + Tier 1 checklists for residential and nonresidential buildings, which includes the use of sustainable building materials.   |



| Goal/ Policy   | Project Consistency  |
|--|--|
| Policy SP-LU-3.3: Encourage green site design by utilizing native trees and plants where possible, incorporating permeable paving and designing resource-efficient landscapes and gardens.   | <b>Consistent.</b> The proposed project would include a variety of trees fronting the buildings on Morgan, 6 <sup>th</sup> , and A streets. Street frontages and setback areas would have flower plantings, garden planters, vegetated stormwater plantings, landscape walls, enhanced pavement, and sidewalk shade trees as well.   |
| Policy SP-LU-3.4: Utilize the SR BIG Program/Green Build Guidelines or equivalent and comparable guidelines for commercial and multifamily development as comprehensive guides for achieving sustainable building design and building practices.             | <b>Consistent.</b> The proposed project would be constructed to meet or exceed current energy efficiency standards as codified by the 2016 CALGreen + Tier 1 checklists for residential and nonresidential buildings. In addition, the proposed project would be built to comply with Title 24 standards to be "solar-ready" with appropriate roof strength and installed conduit. Implementation of these building design features would be consistent with the SR BIG program. |
| Policy SP-LU-4.1: Maintain and extend the positive qualities of the downtown area's traditional development pattern by requiring activity-generating uses such as retail at street level throughout the Courthouse Square and the Railroad Square Sub-Areas. | <b>Consistent.</b> The proposed project would include active uses on the ground floor that would face the streets and would incorporate plazas and shared mews to encourage pedestrian activity.   |
| Policy SP-LU-4.2: Require new development to include activity generating uses such as retail at the street level along 6 <sup>th</sup> , A, and 7 <sup>th</sup> streets.   | <b>Consistent.</b> The proposed project would include active uses on the ground floor that would face the streets and would incorporate plazas and shared mews to encourage pedestrian activity.   |
| Goal SP-LU-5: Create identifiable places while seeking to preserve and enhance the character of existing neighborhoods within the Plan Area.   | <b>Consistent.</b> The proposed project's architectural character would reflect existing structures in the neighborhood with simple massing to the south and variegated massing to the north so that the proposed structures relate to the scale of existing structures within the St. Rose Historic Preservation District.  |
| Policy SP-LU-5.1: New development shall be designed to reinforce and enhance the distinctive and unique qualities of the Sub-Area it is located within.  | <b>Consistent.</b> The project would be required to comply with the City's Core Area design guidelines, which include a set of goals to ensure that the design of new buildings is compatible with the architectural style and character of adjacent buildings and historic districts in terms of height, scale, materials, and massing. The proposed project would also be subject to the City's Design Review process and may be subject to minor design modifications.        |
| Goal SP-LU-6: Encourage development projects that will improve the quality of life in the Plan Area and draw new residents into the core of Santa Rosa.  | <b>Consistent.</b> The project would involve development of a comprehensive family and homeless support services facility, and an affordable housing development.  |
| <b>Transportation</b>  |  |
| Goal SP-T-1: Ensure that new development provides adequate vehicular circulation improvements.   | <b>Consistent.</b> As discussed in Section 3.8, Transportation, the project would be required to implement mitigation measures TRANS-1 to ensure that adequate vehicle circulation is provided during construction.  |
| Goal SP-T-3: Ensure that new development and streetscape projects provide pedestrian and bicycle circulation improvements.   | <b>Consistent.</b> The project area is well served by sidewalks. There are also designated bike lanes on A and 6 <sup>th</sup> streets.  |





| Goal/ Policy   | Project Consistency  |
|--|--|
| <b>Utilities and Public Services</b>   |  |
| Policy SP-UPS-1.1: Ensure that private development provides its fair share of funding for necessary improvements to public services and utilities in the Plan Area.                                | <b>Consistent.</b> The proposed project would pay its fair share of development impact fees.   |
| Goal SP-UPS-2: Ensure that adequate water supply is available to serve existing and new development in the Plan Area.  | <b>Consistent.</b> The 2015 UWMP calculates the City's past, current, and projected water use and water supply through 2040. According to the UWMP, the future water supply would be adequate to offset future water demands from planned development during normal, single-dry, and multi-dry years through 2040.                                       |
| Policy SP-UPS-2.1: Ensure that water supply capacity and infrastructure are in place prior to occupancy of new development in the Plan Area.   | <b>Consistent.</b> The project site is currently served by two 12-inch waterlines located at A Street and 6 <sup>th</sup> Street, a 4-inch waterline located at Morgan Street, and a 6-inch waterline located at 7 <sup>th</sup> Street. The 4-inch waterline on Morgan Street would be abandoned, and a new 8-inch waterline would be installed.        |
| Policy SP-UPS-2.2: New development and streetscape landscaping shall employ water conservation and re-use measures.  | <b>Consistent.</b> The project would comply with the City's Water Efficient Landscape Policy, which would require the applicant to implement outdoor irrigation water conservation measures and practices.   |
| Policy SP-UPS-2.4: New development within the Specific Plan Area shall be required to comply with the City's Water Efficient Landscape Policy.   | <b>Consistent.</b> The project would include landscaping and irrigation systems in accordance with the requirements of the City's Water Efficient Landscape Policy.  |
| Goal SP-UPS-3: Ensure that sewer capacity is available to serve existing and new development in the Plan Area.   | <b>Consistent.</b> As discussed in the NOP (Appendix A), there is substantial capacity at the Wastewater Treatment Plant to serve the proposed project, and implementation of the proposed project would not exceed wastewater treatment requirements.   |
| Policy SP-UPS-3.1: Maintain existing levels of wastewater service and provide for new development by preserving and improving infrastructure in the Plan Area, including upgrading of trunk lines. | <b>Consistent.</b> The project site is currently served by a 6-inch and a 15-inch sewer line located on A Street, a 6-inch sewer line on Morgan Street, and an 8-inch sewer line located at 7 <sup>th</sup> Street. No improvements are anticipated for the sewer lines. The 6-inch line along Morgan Street would be abandoned as part of this project. |
| Goal SP-UPS-4: Solid waste disposal needs of existing and new development in the Plan Area should be met while providing opportunities for reduction, reuse, and recycling.                        | <b>Consistent.</b> As discussed in the NOP (Appendix A), it is not anticipated that the proposed project would generate solid waste in excess of state or local standards. The landfills located in the region would have adequate capacity to serve the project.  |
| Policy SP-UPS-4.1: Expand recycling efforts in multifamily and commercial projects in the Plan Area and continue to encourage recycling by all residents.  | <b>Consistent.</b> As discussed in the NOP (Appendix A), the proposed project would comply with all state and local waste diversion requirements including Chapter 9-12, Refuse and Sanitation, of Santa Rosa's City Code.   |
| Policy SP-UPS-4.2: New development requiring demolition of existing structures in the Plan Area should reuse and recycle materials to the greatest extent possible.                                | <b>Consistent.</b> The proposed project would be GreenPoint rated in accordance with the SR BIG program. Compliance with the SR BIG program requires at least 50 percent of construction waste to be recycled.   |
| Policy SP-UPS-5.1: New development and capital improvement projects shall reduce pollution and runoff flows impacting Santa Rosa Creek by following the City's SUSMP.                              | <b>Consistent.</b> The proposed project would be required to follow the requirements outlined in the SUSMP Guidelines. As required by the SUSMP, the proposed project would include preparation of a Stormwater Mitigation Plan to address post-construction water quality impacts.  |



| Goal/ Policy  | Project Consistency   |
|---|---|
| Policy SP-UPS-5.2: Require new development to upgrade and/or install storm drainage pipes as appropriate where needed. Improvements shall be designed to be consistent with the City's storm drain standards. | <b>Consistent.</b> The project site is currently served by 15-inch storm drains located at A Street and 15-inch, 18-inch, and 21-inch storm drains on 6 <sup>th</sup> Street. The project would include a new 18-inch public storm drain on Morgan Street. The new storm drain would be designed in accordance with the City's storm drain standards. |

Notes:

CALGreen = California Green Building Standards

City = City of Santa Rosa

LEED = Leadership in Energy and Environmental Design

NOP = Notice of Preparation

SMART = Sonoma-Marín Area Rail Transit

SR BIG = Santa Rosa Build It Green

SUSMP = Standard Urban Stormwater Mitigation Program

TV-M = Transit Village Mixed Use

UWMP = Urban Water Management Plan

## Santa Rosa Zoning Code Consistency

This impact evaluates the project's consistency with applicable portions of the City's Zoning Code. The TV-M zoning district allows multifamily dwellings as a matter of right on the upper stories of a building. Emergency shelter and transitional housing uses require approval of a CUP. Construction of the proposed project would be subject to approval of a CUP and a minor CUP in accordance with Santa Rosa's Resilient City Ordinance. The proposed project would be required to incorporate all requirements of the CUP and minor CUP during project construction and operation.

The project proposes a building height of 42 feet to the roof level, not including a parapet that is typically 5 feet high and screens mechanical equipment. In a few strategic corner locations, the parapet adorned with architectural features may rise to 53.5 feet. These heights exceed the maximum allowable height of 35 feet in the TV-M zoning district and within the Historic Combining District. Pursuant to Section 21-02.050.B of the Santa Rosa City Code, projects of 70 or more dwelling units provided on the actual physical location are entitled to receive one mandatory incentive or concession. The proposed project would qualify for this mandatory height concession and thereby be consistent with the City's Zoning Code. The proposed project would also be subject to review by the City's Cultural Heritage Board and Design Review Board. The City may impose, in connection with the site plan and design review process, reasonable conditions of approval if they are consistent with the TV-M and Historic Combining District designations. In summary, the proposed project would comply with all applicable requirements of the Santa Rosa City Zoning Code, and impacts would be less than significant.

## Plan Bay Area Consistency

As described above, one of the overarching goals of the Plan Bay Area is to concentrate development in areas where there are existing services and infrastructure rather than allocate new growth to outlying areas where substantial transportation investments would be necessary to achieve the per capita passenger vehicle, VMT, and associated GHG emissions reductions. The proposed project is in a PDA and would result in development of affordable housing near the Downtown SMART station. Therefore, the project would be consistent with the Plan Bay Area 2040's goals of providing affordable housing, encouraging the reduction of vehicle usage, and promoting non-vehicular travel to decrease GHG emissions. Impacts would be less than significant.

## Level of Significance Before Mitigation

Less Than Significant Impact.



**Mitigation Measures**

No mitigation is necessary.

**Level of Significance After Mitigation**

Less Than Significant Impact.



## 3.7 NOISE AND VIBRATION

### 3.7.1 Environmental Setting

#### Noise Fundamentals and Terminology

Noise is generally defined as unwanted sound that annoys or disturbs people and potentially causes an adverse psychological or physiological effect on human health. Because noise is an environmental pollutant that can interfere with human activities, evaluation of noise is necessary when considering the environmental impacts of a proposed project.

Sound is mechanical energy (vibration) transmitted by pressure waves over a medium such as air or water. Sound is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). In particular, the sound pressure level is the most common descriptor used to characterize the loudness of an ambient (existing) sound level. Although the decibel (dB) scale, a logarithmic scale, is used to quantify sound intensity, it does not accurately describe how sound intensity is perceived by human hearing. The perceived loudness of sound is dependent upon many factors including sound pressure level and frequency content. The human ear is not equally sensitive to all frequencies in the entire spectrum, so noise measurements are weighted more heavily for frequencies to which humans are sensitive in a process called A-weighting, written as dB(A) and referred to as A-weighted decibels. There is a strong correlation between A-weighted sound levels (expressed as dB(A)) and community response to noise. For this reason, the A-weighted sound level has become the standard tool of environmental noise assessment. Table 3.7-1 defines sound measurements and other terminology used in this report, and Table 3.7-2 summarizes typical A-weighted sound levels for different noise sources.

With respect to how humans perceive and react to changes in noise levels, a 1 dB(A) increase is imperceptible, a 3 dB(A) increase is barely perceptible, a 5 dB(A) increase is clearly noticeable, and a 10 dB(A) increase is subjectively perceived as approximately twice as loud (Egan 2007). These subjective reactions to changes in noise levels were developed based on test subjects' reactions to changes in the levels of steady-state pure tones or broadband noise and to changes in levels of a given noise source. These statistical indicators are thought to be most applicable to noise levels in the range of 50 to 70 dB(A) as this is the usual range of voice and interior noise levels. Several agencies and municipalities have developed or adopted noise level standards consistent with these and other similar studies to help prevent annoyance and to protect against the degradation of the existing noise environment.

Different types of measurements are used to characterize the time-varying nature of sound. These measurements include the equivalent sound level ( $L_{eq}$ ), the minimum and maximum sound levels ( $L_{min}$  and  $L_{max}$ , respectively), percentile-exceeded sound levels (such as  $L_{10}$ ,  $L_{20}$ ), the day-night sound level ( $L_{dn}$ ), and the community noise equivalent level (CNEL).  $L_{dn}$  and CNEL values differ by less than 1 dB. As a matter of practice,  $L_{dn}$  and CNEL values are considered equivalent and are treated as such in this assessment.

For a point source such as a stationary compressor or construction equipment, sound attenuates based on geometry at a rate of 6 dB per doubling of distance. For a line source such as free-flowing traffic on a freeway, sound attenuates at a rate of 3 dB per doubling of distance (FHWA 2011). Atmospheric conditions, including wind, temperature gradients, and humidity, can change how sound propagates over



distance and can affect the level of sound received at a given location. The degree to which the ground surface absorbs acoustical energy also affects sound propagation. Sound that travels over an acoustically absorptive surface, such as grass, attenuates at a greater rate than sound that travels over a hard surface, such as pavement. The increased attenuation is typically in the range of 1 to 2 dB per doubling of distance. Barriers, such as buildings and topography that block the line of sight between a source and receiver, also increase the attenuation of sound over distance.

**Table 3.7-1: Definition of Sound Measurement**

| Sound Measurements                            | Sample Heading   |
|---|--|
| Decibel (dB)                                  | A unitless measure of sound on a logarithmic scale, which indicates the squared ratio of sound pressure amplitude to a reference sound pressure amplitude. The reference pressure is 20 micro-pascals.   |
| A-Weighted Decibel (dB(A))                    | An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.   |
| C-Weighted Decibel (dB(C))                    | The sound pressure level in decibels as measured using the C-weighting filter network. The C-weighting is very close to an unweighted or flat response. C-weighting is only used in special cases when low-frequency noise is of particular importance. A comparison of measured A- and C-weighted level gives an indication of low frequency content. |
| Maximum Sound Level ( $L_{max}$ )             | The maximum sound level measured during the measurement period.  |
| Minimum Sound Level ( $L_{min}$ )             | The minimum sound level measured during the measurement period.  |
| Equivalent Sound Level ( $L_{eq}$ )           | The equivalent steady state sound level that in a stated period would contain the same acoustical energy.  |
| Percentile-Exceeded Sound Level ( $L_{xx}$ )  | The sound level exceeded xx % of a specific time period. L10 is the sound level exceeded 10% of the time. L90 is the sound level exceeded 90% of the time. L90 is often considered to be representative of the background noise level in a given area.   |
| Day-Night Level ( $L_{dn}$ )                  | The energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring during the period from 10:00 PM to 7:00 AM  |
| Community Noise Equivalent Level (CNEL)       | The energy average of the A-weighted sound levels occurring during a 24-hour period with 5 dB added to the A-weighted sound levels occurring during the period from 7:00 PM to 10:00 PM and 10 dB added to the A-weighted sound levels occurring during the period from 10:00 PM to 7:00 AM  |
| Peak Particle Velocity (Peak Velocity or PPV) | A measurement of ground vibration defined as the maximum speed (measured in inches per second) at which a particle in the ground is moving relative to its inactive state. PPV is usually expressed in inches per second.  |
| Frequency: Hertz (Hz)                         | The number of complete pressure fluctuations per second above and below atmospheric pressure.  |

Source: FHWA 2006



**Table 3.7-2: Typical A-Weighted Sound Levels**

| Common Outdoor Activities         | Noise Level (dB(A)) | Common Indoor Activities                       |
|-----------------------------------|---------------------|--|
| Jet flyover at 1,000 feet         | -110-               | Rock band                                      |
| Gas lawnmower at 3 feet           | -100-               |  |
| Diesel truck at 50 Feet at 50 mph | -90-                | Food blender at 3 feet                         |
| Noisy urban area, daytime         | -80-                | Garbage Disposal at 3 feet                     |
| Gas lawnmower, 100 feet           | -70-                | Vacuum Cleaner at 10 feet                      |
| Commercial area                   | -60-                | Normal Speech at 3 feet                        |
| Heavy traffic at 300 feet         | -50-                |  |
| Quiet urban daytime               | -40-                | Large business office                          |
| Quiet urban nighttime             | -30-                | Dishwasher in next room                        |
| Quiet suburban nighttime          | -20-                | Theater, large conference room<br>(Background) |
| Quiet rural nighttime             | -10-                | Library  |
|                                   | -0-                 | Bedroom at night, concert hall<br>(Background) |
|                                   |                     | Broadcast/recording studio                     |

Notes:

dB(A) = A-weighted decibel

mph = miles per hour

Source: Egan 2007

## Decibel Addition

Because decibels are logarithmic units, sound pressure levels cannot be added or subtracted through ordinary arithmetic. On the dB scale, a doubling of sound energy corresponds to a 3 dB increase. In other words, when two identical sources are each producing sound of the same loudness, their combined sound level at a given distance would be 3 dB higher than one source under the same conditions. For example, if one source produces a sound pressure level of 70 dB(A), two identical sources would combine to produce 73 dB(A). The cumulative sound level of any number of sources can be determined using decibel addition.

## Vibration Standards

Vibration is like noise in that noise involves a source, a transmission path, and a receiver. While related to noise, vibration differs from noise in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of an amplitude and frequency. A person's perception to vibration depends on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system that is vibrating.



Vibration can be measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration measures in terms of peak particle velocities in inches per second. Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of peak particle velocities. The City does not have specific policies pertaining to vibration levels. However, vibration levels associated with construction activities and proposed project operations are addressed as potential noise impacts associated with the proposed project implementation.

Human and structural response to different vibration levels is influenced by multiple factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. Table 3.7-3 notes the general threshold at which human annoyance could occur is 0.1 peak particle velocity (PPV) measured in inches per second (in/sec). Table 3.7-4 indicates the threshold for damage to structures ranges from 0.2 to 0.6 in/sec PPV.

**Table 3.7-3: Guideline Vibration Annoyance Potential Criteria**

| Human Response         | Maximum PPV (in/sec) | Transient Sources<br>Continuous/Frequent Sources |
|------------------------|----------------------|--|
| Barely perceptible     | 0.04                 | 0.01   |
| Distinctly perceptible | 0.25                 | 0.04   |
| Strongly perceptible   | 0.9                  | 0.1  |
| Severe                 | 2.0                  | 0.4  |

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

in/sec = inches per second

PPV = peak particle velocity

Source: Caltrans 2004.

**Table 3.7-4: Guideline Vibration Damage Potential Criteria**

| Structure and Condition  | Maximum PPV (in/sec) | Transient Sources<br>Continuous/Frequent Sources |
|--|----------------------|--|
| Extremely fragile historic buildings, ruins, ancient monuments | 0.12                 | 0.08   |
| Fragile buildings  | 0.2                  | 0.1  |
| Historic and some old buildings                                | 0.5                  | 0.25   |
| Older residential structures                                   | 0.5                  | 0.3  |
| New residential structures                                     | 1.0                  | 0.5  |



| Structure and Condition                | Maximum PPV (in/sec) | Transient Sources<br>Continuous/Frequent Sources |
|--|----------------------|--|
| Modern industrial/commercial buildings | 2.0                  | 0.5  |

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

in/sec = inches per second

PPV = peak particle velocity

Source: Caltrans 2004.

Operation of heavy construction equipment, particularly pile driving and other impact devices such as pavement breakers, create seismic waves that radiate along the surface of and downward into the earth. These surface waves can be felt as ground vibration. Vibration from operation of this equipment can result in effects ranging from annoyance of people to damage of structures. Varying geology and distance will result in different vibration levels containing different frequencies and displacements. In all cases, vibration amplitudes will decrease with increasing distance.

Perceptible groundborne vibration is generally limited to areas within a few hundred feet of construction activities. As seismic waves travel outward from a vibration source, they excite the particles of rock and soil through which they pass and cause them to oscillate. The actual distance that these particles move is usually only a few ten-thousandths to a few thousandths of an inch. The rate or velocity (measured in in/sec) at which these particles move is the commonly accepted descriptor of the vibration amplitude, referred to as PPV.

Table 3.7-5 summarizes typical vibration levels generated by construction equipment (FTA 2006).

**Table 3.7-5: Vibration Source Levels for Construction Equipment**

| Equipment                    | PPV at 25 Feet |
|------------------------------|----------------|
| Pile driver (impact)         | 0.644 to 1.518 |
| Pile drive (sonic/vibratory) | 0.170 to 0.734 |
| Vibratory roller             | 0.210          |
| Hoe ram                      | 0.089          |
| Large bulldozer              | 0.089          |
| Caisson drilling             | 0.089          |
| Loaded trucks                | 0.076          |
| Jackhammer                   | 0.035          |
| Small bulldozer              | 0.003          |

Notes:

PPV = peak particle velocity

Source: FTA 2006





Vibration amplitude attenuates over distance and is a complex function of how energy is imparted into the ground and the soil conditions through which the vibration is traveling. The following equation can be used to estimate the vibration level at a given distance for typical soil conditions (FTA 2006). PPVref is the reference PPV from Table 3.7-5:

$$PPV = PPV_{ref} \times (25/Distance)^{1.5}$$

## Existing Project Setting

### Sensitive Receptors

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are considered more sensitive to noise intrusion than are commercial or industrial activities. Ambient noise levels can also affect the perceived desirability or livability of a development.

As shown on Figure 3.7-1, the project sites (shown with blue pins) are surrounded by a mix of land uses including a mall to the east and south, Highway 101 to the west, single-family residential to the north, and single-family residential and museums to the northeast. The sensitive receivers (in red pins) are considered to be the existing residents at the Family Shelter at 465 A Street, the temporary residents at the transitional housing at 516 and 520 Morgan Street, the single-family home at 512 Morgan Street, the single-family homes across 7<sup>th</sup> and A streets and the Museum of Sonoma County and the Sonoma County Art Museum along 7<sup>th</sup> Street.

### Existing Ambient Noise Levels

The existing noise environment in a project area is characterized by the area's general level of development due to the high correlation between the level of development and ambient noise levels. Areas that are not urbanized are relatively quiet, while areas that are more urbanized are noisier as a result of roadway traffic, industrial activities, and other human activities.

The City is exposed to several sources of noise, including traffic on major highways, such as Highway 101 and California Route 12, and noise from railways, such as the Northwest Pacific Railroad. Traffic noise depends primarily on traffic speed (tire noise increases with speed), proportion of medium and large truck traffic (trucks generate engine, exhaust, and wind noise in addition to tire noise), and number of speed control devices, such as traffic lights (accelerating and decelerating vehicles and trucks can generate more noise).

Changes in traffic volumes can also have an impact on overall traffic noise levels. For example, it takes 25 percent more traffic volume to produce an increase of only 1 dB(A) in the ambient noise level. For roads already heavy with traffic volume, an increase in traffic numbers could even reduce noise because the heavier volumes could slow down the average speed of the vehicles. A doubling of traffic volume results in a 3 dB(A) increase in noise levels.

The loudest source of noise at the project sites is traffic noise from Highway 101 and the associated on-ramp. However, it should be noted that at this point, Highway 101 is at a substantially higher elevation than the project sites, and the freeway is shielded from the sites by a wall. The freeway roadbed is neither visible from the ground of the project site nor from the roof of the existing building on the project site.



Traffic along A, Morgan, and 6<sup>th</sup> streets is light, and traffic along 7<sup>th</sup> Street is sparse. The traffic near the project site is primarily comprised of vehicles, but also contains medium trucks, heavy trucks on the highway, motorcycles, and city buses.

Other sources of noise at the project sites include activity from the mall parking garage and residential surface parking lot, sidewalk activity, faint construction noise from a distant site, personal aircraft flyovers, and nature-based noises.

A noise survey was conducted between Tuesday, January 22 and Wednesday, January 23, 2019, to establish the existing baseline condition for the project. The survey involved securing a calibrated Larson Davis LxT sound level meter to the roof of the existing building at 465 A Street near the corner of A Street and 7<sup>th</sup> Street (within the red circle in Photo 3.7-1 and shown as the “M24” green pin in Figure 3.7-1. The microphone was extended approximately 19 feet above the street and faced out toward 7<sup>th</sup> Street.



**Photo 3.7-1:** Microphone at Long-Term Measurement Location

The unattended meter collected data continuously between Tuesday and Wednesday for a minimum of 24 hours. The highest 1-hour  $L_{eq}$  sound pressure level measured at this location during anticipated business hours (8:00 AM to 6:00 PM) was 62.9 dB(A). The resulting 24-hour day-night noise level measured at the long-term location was 63.6 dB(A) Ldn. Average 15-minute sound pressure levels measured at the 24-hour measurement location are shown in Figure 3.7-2.






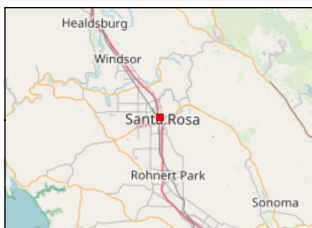
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## LEGEND

-  Project Buildings
-  Noise-Sensitive Receivers
-  Measurement Locations



- Notes
1. Coordinate System: NAD 1983 StatePlane California II  
FPS 0402 Feet
  2. Service Layer Credits: © OpenStreetMap (and)

Disclaimer: Stantec assumes no responsibility for data supplied in electronic format. The recipient accepts full responsibility for verifying the accuracy and completeness of the data. The recipient releases Stantec, its officers, employees, consultants and agents, from any and all claims arising in any way from the content or provision of the data.



Project Location  
T.07N, R.08W Section 23  
USGS 7.5-minute Quadrangle  
Santa Rosa

Client/Project  
City of Santa Rosa  
Caritas Village Project

Figure No.  
3.7-1  
Title

**DRAFT**

Measurement Locations  
and Sensitive Receivers

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Four additional spot measurements were taken during the same time period to extrapolate the 24-hour noise level to different locations and gain an understanding of sound across the full project site. The spot measurements were taken using another fully-calibrated Larson Davis LxT sound level meter. The microphone was about 5.5 feet above the sidewalk for all measurements. The locations of the measurements are shown in Figure 3.7-1 in the green pins labeled “M1”, “M2”, “M3”, and “M4”. The results of the measurements are listed below in Table 3.7-6.

**Table 3.7-6: Measured Short-Term Noise Levels**

| Measurement Location                             | Measured $L_{eq}$ , dB(A) | Estimated $L_{dn}$ , dB(A) |
|--|---------------------------|----------------------------|
| M1: Corner of 8 <sup>th</sup> and A streets      | 60.3                      | 59.8                       |
| M2: Corner of 7 <sup>th</sup> and A streets      | 62.7                      | 64.4                       |
| M3: Corner of 7 <sup>th</sup> and Morgan streets | 64.4                      | 66.1                       |
| M4: Corner of 6 <sup>th</sup> and A streets      | 64.3                      | 66.2                       |

Notes:

dB(A) = A-weighted decibels

$L_{dn}$  = day-night sound level

$L_{eq}$  = equivalent sound level

Source: Stantec 2019. Noise Measurements. See Appendix H of this EIR.

Therefore, based on the short- and long-term measurements, a 24-hour noise level of 66.1 dB(A)  $L_{dn}$  was estimated for the apartment buildings, and a 1-hour maximum noise level of 65.5 dB(A)  $L_{eq}$  was estimated for the office buildings. These existing noise levels are within the “Conditionally Acceptable” range for multifamily residential and office land uses as defined in the City’s General Plan (City 2009).

### 3.7.2 Regulatory Setting

Federal, state, and local agencies regulate different aspects of environmental noise. Generally, the federal government sets noise standards for transportation-related noise sources closely linked to interstate commerce. These include aircraft, locomotives, and trucks. No federal noise standards are directly applicable to this project. The state government sets noise standards for transportation noise sources such as automobiles, light trucks, and motorcycles. Noise sources associated with industrial, commercial, and construction activities are generally subject to local control through noise ordinances and general plan policies. Local general plans identify general principles intended to guide and influence development plans.

#### State

##### California Building Code

Part 2, Title 24 of the CCR California Noise Insulation Standards establishes minimum noise insulation standards to protect persons within new hotels, motels, dormitories, long-term care facilities, apartment houses, and dwellings other than single-family residences. Under Section 1207.11 “Exterior Sound Transmission Control”, interior noise levels attributable to exterior noise sources cannot exceed 45  $L_{dn}$  in any habitable room. Where such residences are located in an environment where exterior noise is 60  $L_{dn}$  or greater, an acoustical analysis is required to ensure interior levels do not exceed the 45  $L_{dn}$  interior standard. If the interior allowable noise levels are met by requiring that windows be kept closed, the

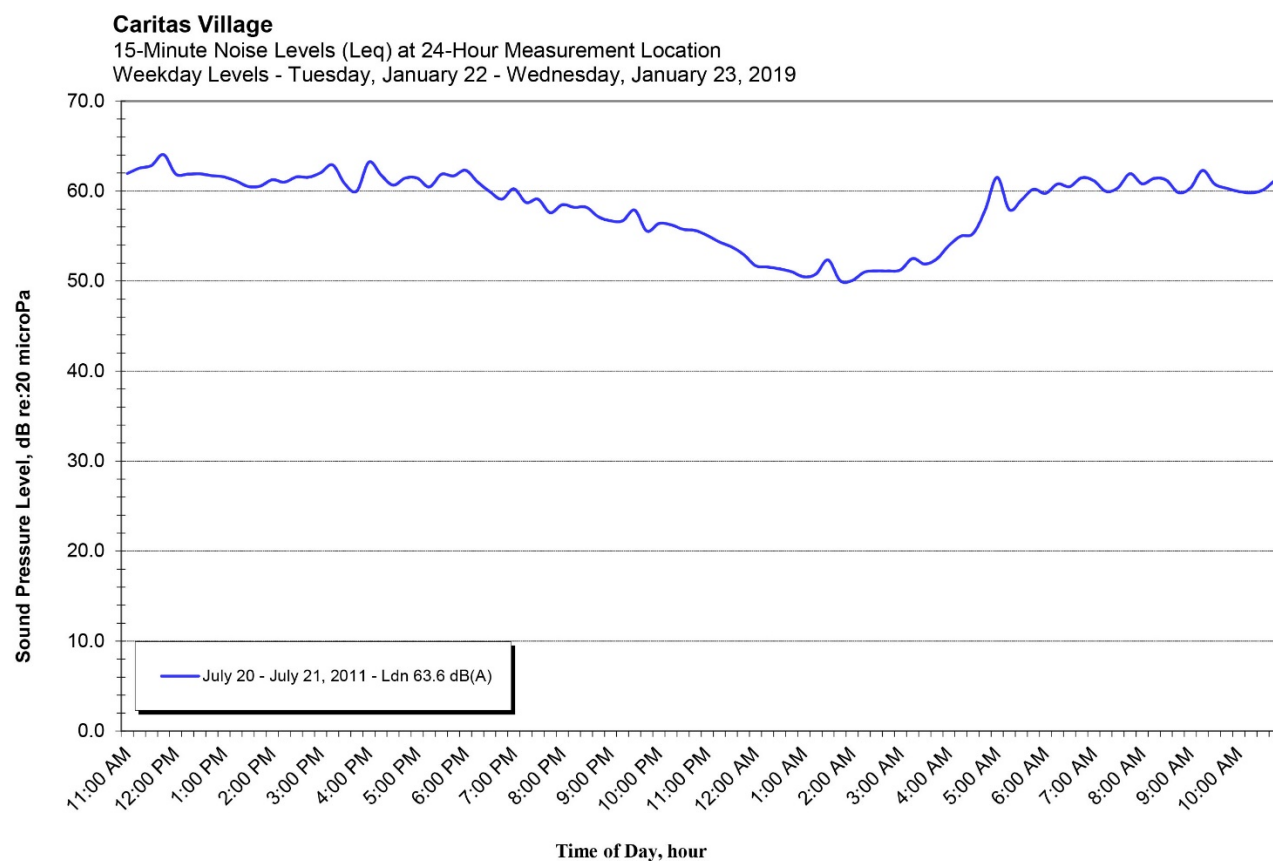


design for the building must also specify a ventilation or air conditioning system to provide a habitable interior environment.





**Figure 3.7-2: 15-Minute Noise Levels at the 24-Hour Measurement Location**





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## California Green Building Standards (CALGreen)

The 2016 California Green Building Standards (CALGreen) establishes interior noise insulation standards for nonresidential occupied buildings, such as offices. CALGreen Section 5.507 "Environmental Comfort," states the following:

*5.507.4.1 Exterior noise transmission. Wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall meet a composite Sound Transmission Class (STC) rating of at least 50 or a composite Outside-Inside Transmission Class (OITC) rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 in the following locations:*

- 1. Within the 65 CNEL noise contour of an airport*

*Exceptions:*

- 1.  $L_{dn}$  or CNEL for military airports shall be determined by the facility Air Installation Compatible Land Use Zone (AICUZ) plan.*
- 2.  $L_{dn}$  or CNEL for other airports and heliports for which a land use plan that has not been developed shall be determined by the local general plan noise element.*
- 3. Within the 65 CNEL or  $L_{dn}$  noise contour of a freeway or expressway, railroad, industrial source or fixed-guideway noise source as determined by the Noise Element of the General Plan.*

*5.507.4.1.1 Noise exposure where noise contours are not readily available. Buildings exposed to a noise level of 65 dB  $L_{eq}$ -1-hr during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum STC of 40 (or OITC 30).*

*5.507.4.2 Performance method. For buildings located as defined in Section 5.507.4.1 or 5.507.4.1.1, wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly equivalent noise level ( $L_{eq}$  -1Hr) of 50 dB(A) in occupied areas during any hours of operations*

*5.507.4.2.1 Site features. Exterior features such as sound walls or earth berms may be utilized as appropriate to the building, addition or alteration project to mitigate sound migration to the interior.*

*5.507.4.2.2 Documentation of compliance. An acoustical analysis documenting complying interior sound levels shall be prepared by personnel approved by the architect or engineer of record.*

*5.507.4.3 Interior sound transmission. Wall and floor-ceiling assemblies separating tenant spaces and tenant spaces and public places shall have an STC of at least 40.*



## California Environmental Quality Act

The CEQA Guidelines Appendix G indicates a significant noise impact may occur if a project exposes persons to noise or vibration levels in excess of local general plans or noise ordinance standards or causes a substantial permanent or temporary increase in ambient noise levels. CEQA standards are discussed under the Thresholds of Significance criteria section.

### Local

#### Santa Rosa General Plan

The Noise Element, Section 12-3, of the November 2, 2009, City of Santa Rosa General Plan 2035 identifies land use compatibility noise standards for noise-sensitive land uses affected by transportation and non-transportation noise sources. As shown in Figure 3.7-3, the ranges for noise-sensitive multifamily residential land uses and office building land uses that are affected by transportation noise sources are as follows:

##### *Multi-Family Residential Land Uses*

- “Normally Acceptable”: 50-65 dB(A) Ldn/CNEL
- “Conditionally Acceptable”: 60-70 dB(A) Ldn/CNEL
- “Normally Unacceptable”: 70-75 dB(A) Ldn/CNEL
- “Clearly Unacceptable”: 75-85 dB(A) Ldn/CNEL

##### *Office Building Land Uses*

- “Normally Acceptable”: 50-70 dB(A) Ldn/CNEL
- “Conditionally Acceptable”: 67-77 dB(A) Ldn/CNEL
- “Normally Unacceptable”: 75-85 dB(A) Ldn/CNEL

Sites with ambient noise at “conditionally acceptable” levels are allowed, provided that needed noise mitigation measures have been incorporated, and interior noise levels are maintained within “normally acceptable” levels. New construction with exterior noise levels in the “Normally Unacceptable” range would require a detailed analysis of the noise reduction requirements and noise insulation features to be incorporated in the project to maintain “normally acceptable” interior noise levels.

Section 12-8 “Goals and Policies” within the 2035 General Plan also lists several relevant policies relating to noise including the following:

- Policy NS-B-3: Prevent new stationary and transportation noise sources from creating a nuisance in existing developed areas. Use a comprehensive program of noise prevention through planning and mitigation and consider noise impacts as a crucial factor in project approval.
- Policy NS-B-4: Require new projects in the following categories to submit an acoustical study, prepared by a qualified acoustical consultant:
  - All new projects proposed for areas with existing noise above 60 dB(A) average day-night sound level (DNL). Mitigation shall be sufficient to reduce noise levels below 45 dB(A) DNL in habitable rooms and 60 dB(A) DNL in private and shared recreational facilities. Additions to existing housing are exempt.



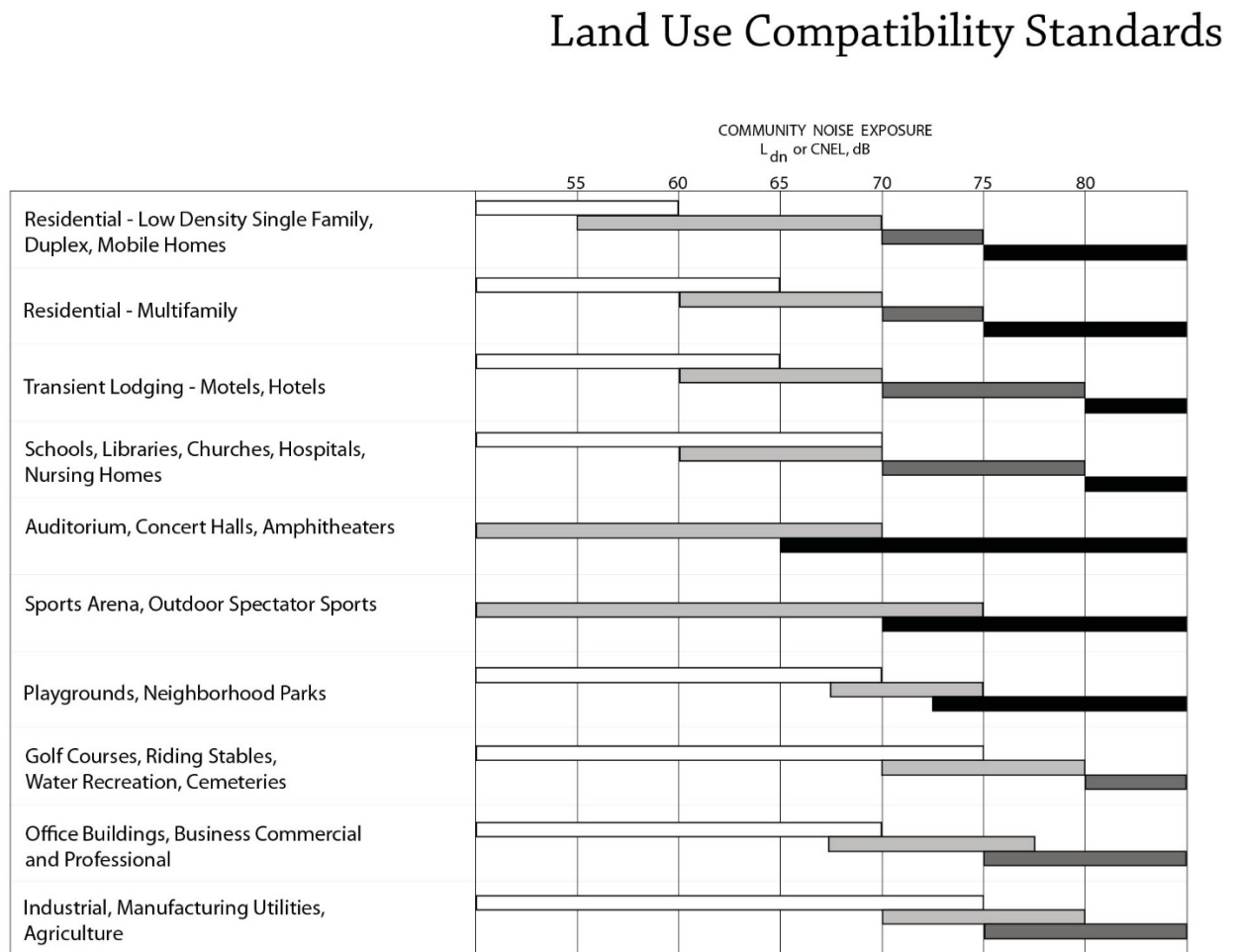
- All new projects that could generate noise whose impacts on other existing uses would be greater than those normally acceptable (as specified in the Land Use Compatibility Standards).



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Figure 3.7-3: Santa Rosa Land Use Compatibility Standards



LEGEND:



**NORMALLY ACCEPTABLE**

Specified land use is satisfactory, based upon the assumption that any building involved is of normal conventional construction, without any special noise insulation requirements.



**CONDITIONALLY ACCEPTABLE**

New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.



**NORMALLY UNACCEPTABLE**

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.



**CLEARLY UNACCEPTABLE**

New construction or development should generally not be undertaken.

Source: Environmental Science Associates, 2001



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## Santa Rosa City Code

Section 17-16 “Noise”, Section 17-16.030 “Ambient base noise level criteria” in the Santa Rosa City Code sets criteria for ambient noise levels for which noise levels can be compared to help determine nuisance. The noise levels vary by receiving property zoning and time of day as follows:

**Table 3.7-7: City of Santa Rosa Ambient Base Noise Level Criteria**

| Zone                 | Time          | Sound Level A (decibels)<br>Community Environment<br>Classification |
|----------------------|---------------|---|
| R1 and R2            | 10 PM to 7 AM | 45  |
| R1 and R2            | 7 PM to 10 PM | 50  |
| R1 and R2            | 7 AM to 7 PM  | 55  |
| Multi-family         | 10 PM to 7 AM | 50  |
| Multi-family         | 7 AM to 10 PM | 55  |
| Office & Commercial  | 10 PM to 7 AM | 55  |
| Office & Commercial  | 7 AM to 10 PM | 60  |
| Intensive Commercial | 10 PM to 7 AM | 55  |
| Intensive Commercial | 7 AM to 10 PM | 65  |
| Industrial           | Any time      | 70  |

Source: City of Santa Rosa City Code, current through Ordinance 2018-020 and the December 2018 code supplement.

Section 17-16.120 of the City Code states, “It is unlawful for any person to operate any machinery, equipment, pump, fan, air-conditioning apparatus, or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient base noise level more than five decibels.”

Section 17-16.010.(C) defines “emergency work” as means made necessary to restore property to a safe condition following a public calamity or work required to protect persons or property from an imminent exposure to danger or work by private or public utilities when restoring utility service. The Santa Rosa City Code does not specifically exempt noise from emergency work from the requirements of Section 17-16.120.

Title 20 “Zoning”, Chapter 20-30 “Standards for All Development and Land Uses,” Section 20-30.090.F “Performance Standards” states the following regarding ground vibration, “No ground vibration shall be generated that is perceptible without instruments by a reasonable person at the property lines of the site, except for vibrations from temporary construction or demolition activities, and motor vehicle operations.”

No specific mention of construction noise restrictions is listed in the Santa Rosa City Code.





### 3.7.3 Environmental Impacts

This section analyzes the project's potential to result in significant noise impacts. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid that impact.

#### Methodology for Analysis

Results from the short-term and 24-hour site measurements were used to provide baseline noise conditions at nearby sensitive receptors and within the project site vicinity. For the purpose of this analysis, potential sensitive receptors were determined by reviewing current aerial photography and by walking the sites.

Impacts from future project-related traffic were estimated using predicted traffic counts from the traffic report provided by Stantec.

Short-term site noise data were used as an input to the Federal Highway Administration Roadway Construction Noise Model (RCNM) as the existing ambient noise level input. The RCNM is used as the Federal Highway Administration's national standard for predicting noise generated from construction activities. The RCNM analysis includes the calculation of noise levels ( $L_{max}$  and  $L_{eq}$ ) at incremental distances for a variety of construction equipment. The spreadsheet inputs include acoustical use factors,  $L_{max}$  values, and  $L_{eq}$  values at various distances depending on the ambient noise measurement location. For this analysis, it was assumed that a worst-case noise scenario for construction activity would entail the operation of three noisiest pieces of equipment (grader, dozer, and compactor) simultaneously.

#### Thresholds of Significance

In accordance with the CEQA Guidelines' Appendix G Environmental Checklist, the following questions were analyzed and evaluated to determine whether noise impacts are significant. Would the proposed project result in:

- Generation of a substantial temporary or permanent increase in the ambient noise levels in the vicinity of the project noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- Generation of excessive groundborne vibration or noise levels?

The following questions were determined to have no impact or a less than significant impact during the NOP Scoping. These issues are summarized in Section 7, Effects Found Not to Be Significant, and are not discussed further in this section.

- For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

#### EPA Guidelines

The EPA has established guidelines (EPA 1978) for assessing the impact of an increase in noise levels. These guidelines have been used for several years as industry standards to determine the potential



impact of noise increases on communities. Most people will tolerate a small increase in background noise (up to about 5 dB(A)) without complaint, especially if the increase is gradual over a period of years (such as from gradually increasing traffic volumes). Increases greater than 5 dB(A) may cause complaints and interference with sleep. Increases above 10 dB(A) (heard as a doubling of judged loudness) are likely to cause complaints and should be considered a serious increase. Table 3.7-8 defines each of the traditional impact descriptions, their quantitative range, and the qualitative human response to changes in noise levels.

**Table 3.7-8: EPA Impact Guidelines**

| Increase over Existing or Baseline Sound Levels | Impact Per EPA Region Guidelines | Qualitative Human Perception of Difference in Sound Levels                                   |
|---|----------------------------------|--|
| 0 dB to 5 dB                                    | Minimum impact                   | Imperceivable or Slight difference   |
| 6 dB to 10 dB                                   | Significant impact               | Significant Noticeable difference—complaints possible  |
| Over 10 dB                                      | Serious impact                   | Loudness changes by a factor of two or greater. Clearly audible difference—complaints likely |

Notes:

dB = decibels

EPA = U.S. Environmental Protection Agency

## Project Impact Analysis and Mitigation Measures

### Noise Levels in Excess of Standards

|                     |  |
|---------------------|--|
| <b>Impact NOI-1</b> | <b>The proposed project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</b> |
|---------------------|--|

### Impact Analysis

#### Exterior Traffic Noise Level Impacts

To describe future noise levels due to traffic added from the project, AM and PM peak hour traffic counts (with and without the project) listed in the traffic study prepared by Stantec (Appendix H) were used to determine the percentage increase of traffic on the roads adjacent to the project sites and adjacent sensitive receivers.

Table 3.7-9 shows the peak hour counts associated with traffic on the local roadway network under the baseline and baseline plus project traffic conditions. The last two columns in the table show the overall percentage change and the estimated difference in peak hour noise level.



**Table 3.7-9: Traffic Peak Hour Counts and Estimated Noise Increase**

| Roadway  | Baseline Peak Hour Traffic Count <sup>1</sup> | Peak Hour Traffic Count with Project <sup>1</sup> | Percentage Change <sup>1</sup> | Estimated dB Change <sup>1</sup> |
|--|---|---|--------------------------------|----------------------------------|
| 6 <sup>th</sup> Street<br>between Morgan and A streets                             | 357 (562)                                     | 389 (604)   | 9% (7%)                        | 0.4 (0.3)                        |
| A Street<br>between 7 <sup>th</sup> and 6 <sup>th</sup> streets / Santa Rosa Plaza | 304 (488)                                     | 359 (541)   | 18% (11%)                      | 0.7 (0.4)                        |
| Morgan Street<br>between 7 <sup>th</sup> and 6 <sup>th</sup> streets               | 251 (225)                                     | 265 (248)   | 6% (10%)                       | 0.2 (0.4)                        |
| 7 <sup>th</sup> Street<br>between Morgan and A streets                             | 29 (36)                                       | 35 (48)   | 21% (33%)                      | 0.8 (1.3)                        |
| 7 <sup>th</sup> Street<br>between A and B streets                                  | 525 (706)                                     | 554 (737)   | 6% (4%)                        | 0.2 (0.2)                        |
| A Street<br>between 7 <sup>th</sup> and 8 <sup>th</sup> streets                    | 292 (362)                                     | 316 (380)   | 8% (5%)                        | 0.3 (0.2)                        |

Notes:

1. Numbers in parentheses are PM peak hour traffic volumes.

dB = decibel

Source: Stantec 2019. Noise Modeling Results. See Appendix H of this EIR.

Based on the short- and long-term measurements, a 24-hour noise level of 66.1 dB(A)  $L_{dn}$  was estimated for the apartment buildings, and a 1-hour maximum noise level of 65.5 dB(A)  $L_{eq}$  was estimated for the office buildings. The existing noise levels are within the “Conditionally Acceptable” range for multifamily residential and office land uses as defined in the City’s General Plan (City 2009). As shown in Table 3.7-9, the addition of project traffic would not substantially increase, and therefore ambient noise levels would increase by 0.2 to 1.3 dB(A). According to the EPA Impact Guidelines (Table 3.7-8), an increase in noise levels of 0 to 5 dB(A) over the existing ambient conditions is imperceivable. As such, existing ambient noise levels would remain within the “Conditionally Acceptable” range with implementation of project traffic, resulting in a less than significant impact.

#### Interior Traffic Noise Level Impacts – Residential Buildings

Based on the ambient noise level measurements, noise levels at the project site are expected to be 66.1 dB(A)  $L_{dn}$ . The California Building Code states that the interior noise levels attributable to exterior sources shall not exceed 45 dB(A)  $L_{dn}$  in any habitable room. In addition, the City’s General Plan Policy NS-B-4 requires new projects proposed in areas with existing noise levels above 60 dB(A) DNL to reduce noise levels below 45 dB(A) DNL in habitable rooms.

The needed sound isolation requirements of a residential building exterior façade system are dependent on the following conditions:

- The dimensions of the rooms with exterior windows;



- The finishes within the rooms;
- The ratio of clear glass to solid wall in the exterior wall assembly; and
- The exterior solid wall construction.

Modern construction with punch windows typically provides a 25 dB(A) exterior-to-interior noise level reduction with windows closed. Therefore, sensitive receptors exposed to exterior noise of 70 dB(A)  $L_{dn}$  or less are required to comply with the California Building Code interior noise level standard. Modern construction using window walls, curtainwalls, or a high ratio of exterior clear glass provides less reduction with the windows closed. Buildings using a high amount of glass will typically comply with the interior noise-level standard required by the code if exposed to exterior noise levels of 67 dB(A)  $L_{dn}$  or less.

Based on the ambient noise level measurements, noise levels at the project site are expected to be 66.1 dB(A)  $L_{dn}$ , which is less than 70 dB(A)  $L_{dn}$ . Therefore, interior noise levels would comply with the California Building Code and City Code requirements with standard construction, and impacts would be less than significant.

#### Interior Traffic Noise Level Impacts – Office Buildings

CalGreen states that, if the office building is exposed to a noise level of 65 dB(A)  $L_{eq}$ -1-hr during any hour of operation, the exterior façade design would be required to incorporate noise reduction features. Exterior ambient noise measurements indicate that the façades of the project office buildings would be exposed to 1-hour  $L_{eq}$  noise levels up to 65.5 dB(A) and would be subject to this requirement.

Using the floor plans, sections, and elevations contained within the October 31, 2018, Caritas Village Planning Department Submittal drawing set, the offices would have absorptive ceilings and would use windows with a minimum OITC rating of OITC 18. Windows with minimum OITC ratings of 18 are standard construction materials and would achieve the 50 dB(A) 1-hour  $L_{eq}$  noise level as required by the CalGreen code. Therefore, the use of standard construction would be acceptable for the office buildings to achieve the CalGreen code requirements, and impacts would be less than significant.

#### Project Fixed-Source Noise

Typical residential and office building construction involves operation of new rooftop mechanical equipment such as air handling units, condensing units, make-up air units, and exhaust fans. This equipment generates noise that could radiate to neighboring properties. In addition, the project includes a diesel-powered emergency generator for Caritas Center. The generator would be located in the southeast corner of the parking lot for Caritas Center. The unit output shall be a minimum of 300 kW, which corresponds to 400 hp. This equipment generates noise that could radiate to neighboring properties. The operation of mechanical equipment is required to comply with the maximum noise limits listed in Sections 17-16.030 and 17-16.120 of the Santa Rosa City Code. Therefore, the onsite equipment would be designed to incorporate measures such as shielding and appropriate attenuators to reduce noise levels that may affect nearby properties. In addition, nighttime noise limits would be applicable to any equipment required to operate between the hours of 10:00 PM and 7:00 AM. As such, compliance with the City Code would ensure that impacts from fixed-source noise would be less than significant.

#### Project Operational Noise

The operation of the current facility often results in groups of people gathering and talking loudly in front of the services building at the corner of 7<sup>th</sup> and A streets and in the residential parking lot near the corner



of A and 6<sup>th</sup> streets. The current location of the services building places crowd-based noises close to the noise-sensitive residential receivers near 7<sup>th</sup> and A streets.

The planned layout of the new facility helps to reduce the potential for crowd-based noise received by the adjacent noise-sensitive receivers. The Caritas Center services building would be relocated to the corner of 6<sup>th</sup> and A streets, so people gathering in front of the building along 6<sup>th</sup> Street, in the courtyards, or in the plaza are well-removed from the residences across 7<sup>th</sup> Street. The residential parking lot, courtyards, and plaza are central to the site and are shielded from the single-family residences across 7<sup>th</sup> Street by the Caritas Homes buildings themselves.

While crowd-based noise from groups of people gathering is inherent to the operation of the Caritas Village facility, the design of the site shields the noise from the closest noise-sensitive receivers, and the impact to the neighboring properties would be less than significant.

### Short-Term Construction Noise Impacts

Two types of short-term noise impacts could occur during construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the project site. This increased traffic would be comprised of vehicles, medium trucks, and heavy trucks.

#### *Construction Traffic*

Existing traffic and ambient noise levels were observed to include a component of construction activity. The associated short-term noise from construction vehicles along 6<sup>th</sup>, A, and Morgan streets would be perceptible. However, this increase in noise levels would be instantaneous and short-term. Furthermore, the proposed project would be required to implement mitigation measure NOI-1 and limit construction activities between 7:00 AM and 7:00 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays, with no noise generating construction on Sundays or holidays. In addition, the Federal Transit Administration (FTA) offers construction mitigation measures listed in Section 12.1.3 “Mitigation of Construction Noise” in the Transit Noise and Vibration Impact Assessment document (FTA-VA-90-1003-06 May 2006). This document recommends re-routing truck traffic away from residential streets, if possible. Select streets with fewest homes, if no alternatives are available. Mitigation measure NOI-2 follows the FTA recommendations to limit noise to the closest noise-sensitive receivers. Therefore, impacts to neighboring properties from construction traffic noise would be less than significant with implementation of mitigation measures NOI-1 and NOI-2.

#### *Construction Activities*

The second type of short-term noise impact is related to noise generated from construction activities. Construction activities would include excavation activities and grading, foundation work, building construction, and paving. Each construction stage has its own mix of equipment and, consequently, its own noise characteristics. These various construction operations would change the character of the noise generated at the project site, and therefore, the ambient noise level as construction progresses. The loudest phases of construction include excavation, building construction, and grading phases, as these phases would require use of the noisiest construction equipment for earthmoving and grading activities. Table 3.7-10 lists types of construction equipment that may be used throughout construction and the maximum and average operational noise level as measured at 59 feet from the operating equipment. The



59-foot distance represents the approximate distance between the Phase 1 residential building and the closest single-family residence at 700 Morgan Street.

**Table 3.7-10: Summary of Federal Highway Administration Roadway Construction Noise Model**

| Construction Equipment Source at the Phase 1 Residential Building | Distance to Nearest Sensitive Receptor | Sound Level at Residence |                           |                 |
|---|--|--------------------------|---------------------------|-----------------|
|   |  | L <sub>max</sub>         | Acoustical Use Factor (%) | L <sub>eq</sub> |
| Backhoe   | 59 feet                                | 76.2                     | 40                        | 72.2            |
| Compactor (ground)  | 59 feet                                | 81.8                     | 20                        | 74.8            |
| Crane   | 59 feet                                | 79.1                     | 16                        | 71.2            |
| Concrete Mixer Truck  | 59 feet                                | 77.4                     | 40                        | 73.4            |
| Compressor (air)  | 59 feet                                | 76.3                     | 40                        | 72.3            |
| Bulldozer   | 59 feet                                | 80.3                     | 40                        | 76.3            |
| Excavator   | 59 feet                                | 79.3                     | 40                        | 75.3            |
| Front End Loader  | 59 feet                                | 77.7                     | 40                        | 73.7            |
| Flat Bed Truck  | 59 feet                                | 72.8                     | 40                        | 68.9            |
| Generator   | 59 feet                                | 79.2                     | 50                        | 76.2            |
| Grader  | 59 feet                                | 83.6                     | 40                        | 79.6            |
| Paver   | 59 feet                                | 75.8                     | 50                        | 72.8            |
| Pickup Truck  | 59 feet                                | 73.6                     | 40                        | 69.6            |
| Pneumatic Tools   | 59 feet                                | 83.8                     | 50                        | 80.8            |
| Welder / Torch  | 59 feet                                | 72.6                     | 40                        | 68.6            |
| Tractor   | 59 feet                                | 82.6                     | 40                        | 78.6            |

Notes:

L<sub>eq</sub> = equivalent sound level

L<sub>max</sub> = maximum sound level

Source: Stantec 2019. Noise Measurements. See Appendix H of this EIR, FHWA 2006

The construction of the entire project would be conducted in three sequential phases:

- Phase I – Caritas Homes Phase I. Building at the corner of 7<sup>th</sup> and Morgan streets.
- Phase II – Caritas Center. Building at the corner of 6<sup>th</sup> and A streets.
- Phase III – Caritas Homes Phase II. Building at the corner of 7<sup>th</sup> and A streets.



Each phase would consist of separate stages and each stage would use different pieces of construction equipment. The main noise-producing equipment for each construction phase and stage, and the approximate distance to the closest noise-sensitive receiver are shown below in Table 3.7-11.

**Table 3.7-11: Construction Phases Equipment and Distance to Closest Receiver**

| Construction Phase        | Construction Stage              | Planned Equipment  | Distance to Closest Noise-Sensitive Receiver      |
|---------------------------|---------------------------------|--|---|
| Phase 1 – Caritas Homes   | Stage 1 – Demolition            | Concrete / industrial saws<br>Dozer<br>Tractor<br>Backhoe    | ~58 feet-9 inches from home at 700 Morgan Street  |
|                           | Stage 2 – Site preparation      | Grader<br>Backhoe  |   |
|                           | Stage 3 – Grading               | Concrete / industrial saw<br>Dozer<br>Tractor<br>Backhoe     |   |
|                           | Stage 4 – Building construction | Crane<br>Forklifts (2)<br>Tractor<br>Backhoe                 |   |
|                           | Stage 5 – Paving                | Cement / mortar mixer (4)<br>Paver<br>Roller<br>Tractor      |   |
|                           | Stage 6 – Architectural coating | Air compressor   |   |
| Phase II – Caritas Center | Stage 1 – Demolition            | Concrete / industrial saws<br>Dozers (2)<br>Excavators (3)   | ~344 feet-8 inches from home at 700 Morgan Street |
|                           | Stage 2 – Site preparation      | Tractor<br>Loader<br>Backhoes (2)<br>Dozers (3)              |   |
|                           | Stage 3 – Grading               | Excavator<br>Grader<br>Dozer<br>Tractor<br>Loader<br>Backhoe |   |
|                           | Stage 4 – Building construction | Generator set<br>Crane<br>Forklifts (3)<br>Tractor           |   |



| Construction Phase        | Construction Stage              | Planned Equipment   | Distance to Closest Noise-Sensitive Receiver      |
|---------------------------|---------------------------------|---|---|
|                           |                                 | Loader<br>Backhoe<br>Welder   |   |
|                           | Stage 5 – Paving                | Pavers (2)<br>Cement and mortar<br>Mixers (2)<br>Rollers (2)<br>Tractor |   |
|                           | Stage 6 – Architectural coating | Air compressor  |   |
| Phase III – Caritas Homes | Stage 1 – Demolition            | Concrete / industrial saw<br>Dozer<br>Tractor<br>Backhoe                | ~122 feet-9 inches from home at 700 Morgan Street |
|                           | Stage 2 – Site preparation      | Grader<br>Backhoe   |   |
|                           | Stage 3 – Grading               | Concrete / industrial saw<br>Dozer<br>Tractor<br>Backhoe                |   |
|                           | Stage 4 – Building construction | Crane<br>Forklifts (2)<br>Tractor<br>Backhoe                            |   |
|                           | Stage 5 – Paving                | Cement / mortar mixers (4)<br>Paver<br>Roller<br>Tractor                |   |
|                           | Stage 6 – Architectural coating | Air compressor  |   |

Source: Stantec 2019. See Appendix H.

A worst-case condition for construction activity would assume that all noise-generating equipment were operating at the same time and at the same distance away from the closest noise-sensitive receiver. Using this assumption, the RCNM program calculated the following combined  $L_{eq}$  and  $L_{max}$  noise levels from each phase and stage of construction as shown in Table 3.7-12.





**Table 3.7-12: Calculated Noise Level from Each Construction Stage**

| Construction Phase        | Distance to Closest Noise Sensitive Receiver | Construction Stage              | Calculated $L_{eq}$ | Calculated $L_{max}$ |
|---------------------------|--|---------------------------------|---------------------|----------------------|
| Phase I – Caritas Homes   | 58'-9"                                       | Stage 1 – Demolition            | 84.2 dB(A)          | 90.0 dB(A)           |
|                           |  | Stage 2 – Site preparation      | 80.3 dB(A)          | 84.3 dB(A)           |
|                           |  | Stage 3 – Grading               | 84.2 dB(A)          | 90.0 dB(A)           |
|                           |  | Stage 4 – Building construction | 81.7 dB(A)          | 86.3 dB(A)           |
|                           |  | Stage 5 – Paving                | 82.9 dB(A)          | 84.6 dB(A)           |
|                           |  | Stage 6 – Architectural coating | 72.3 dB(A)          | 76.3 dB(A)           |
| Phase II – Caritas Center | 344 feet-8 inches                            | Stage 1 – Demolition            | 69.7 dB(A)          | 75.1 dB(A)           |
|                           |  | Stage 2 – Site preparation      | 68.7 dB(A)          | 69.7 dB(A)           |
|                           |  | Stage 3 – Grading               | 69.1 dB(A)          | 73.1 dB(A)           |
|                           |  | Stage 4 – Building construction | 68.5 dB(A)          | 72.2 dB(A)           |
|                           |  | Stage 5 – Paving                | 67.3 dB(A)          | 71.0 dB(A)           |
|                           |  | Stage 6 – Architectural coating | 56.9 dB(A)          | 60.9 dB(A)           |
| Phase III – Caritas Homes | 122'-9"                                      | Stage 1 – Demolition            | 77.8 dB(A)          | 83.6 dB(A)           |
|                           |  | Stage 2 – Site preparation      | 73.9 dB(A)          | 77.9 dB(A)           |
|                           |  | Stage 3 – Grading               | 77.8 dB(A)          | 83.6 dB(A)           |
|                           |  | Stage 4 – Building construction | 75.3 dB(A)          | 79.9 dB(A)           |
|                           |  | Stage 5 – Paving                | 76.5 dB(A)          | 78.2 dB(A)           |
|                           |  | Stage 6 – Architectural coating | 65.9 dB(A)          | 69.9 dB(A)           |

## Notes:

dB(A) = A-weighted decibel

 $L_{eq}$  = equivalent sound level $L_{max}$  = maximum sound level

Source: Stantec 2019. See Appendix H of this EIR.

Although noise levels could range into the “clearly unacceptable” range, as defined in Figure 3.7-1, increases in noise levels from construction activities would be temporary. The City Code does not have an exemption for construction noise. However, as required by the City’s 2035 General Plan, new projects are required to comply with the following policy:



- **Policy NS-B-3:** Prevent new stationary and transportation noise sources from creating a nuisance in existing developed areas. Use a comprehensive program of noise prevention through planning and mitigation and consider noise impacts as a crucial factor in project approval.

Therefore, to reduce noise impacts from construction activities the proposed project would be required to implement mitigation measures NOI-1 and NOI-2. Implementation of mitigation measure NOI-1 would require the proposed project to limit construction activities between 7:00 AM and 7:00 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays, with no noise generating construction on Sundays or holidays. Additionally, mitigation measure NOI-2 would incorporate construction mitigation measures listed in Section 12.1.3 “Mitigation of Construction Noise” in the Transit Noise and Vibration Impact Assessment document (FTA-VA-90-1003-06 May 2006). Some of the applicable measures from this document are listed below and included as mitigation measure NOI-2.

*“Design Considerations and Project Layout:*

- *Construct noise barriers such as temporary walls or piles of excavated material between noisy activities and noise-sensitive receivers.*
- *Re-route truck traffic away from residential streets, if possible. Select streets with fewest homes, if no alternatives are available.*
- *Site equipment on the construction lot as far away from noise-sensitive sites as possible.*
- *Construct walled enclosures around especially noisy activities or clusters of noisy equipment. For example, shields can be used around pavement breakers, and loaded vinyl curtains can be draped under elevated structures.*

*Sequence of Operations:*

- *Combine noisy operations to occur in the same time period. The total noise level produced shall not be significantly greater than the level produced if the operations were performed separately.*
- *Avoid nighttime activities. Sensitivity to noise increases during the nighttime hours in residential neighborhoods.*

*Alternative Construction Methods:*

- *Avoid impact pile driving where possible in noise-sensitive areas. Drilled piles or the use of a sonic or vibratory pile driver are quieter alternatives where geological conditions permit their use.*
- *Use specially quieted equipment, such as quieted and enclosed air compressors or mufflers, on all engines.*
- *Select quieter demolition methods where possible. For example, sawing bridge decks into sections that can be loaded onto trucks results in lower cumulative noise levels than impact demolition by pavement breakers.”*



As such, impacts related to construction noise would be less than significant with implementation of mitigation measures NOI-1 and NOI-2.

**Level of Significance Before Mitigation**

- Exterior traffic noise levels: Less Than Significant Impact.
- Interior noise levels—residential buildings: Less Than Significant Impact.
- Interior noise levels—office buildings: Less Than Significant Impact.
- Project fixed-source noise: Less Than Significant Impact.
- Construction traffic: Potentially Significant Impact.
- Construction activity: Potentially Significant Impact.

**Mitigation Measures**

**MM NOI-1: Construction Hours.** Construction activities shall be limited to the hours of 7:00 AM and 7:00 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays, with no noise generating construction on Sundays or holidays.

**MM NOI-2: Construction Activity.** Implementation of the following multi-part mitigation plan is required to reduce the potential construction period noise impacts.

- Use a comprehensive program of noise prevention through planning and mitigation and consider noise impacts as a crucial factor in project approval.
- Construct noise barriers such as temporary walls or piles of excavated material between noisy activities and noise-sensitive receivers.
- Site equipment on the construction lot as far away from noise-sensitive sites as possible.
- Construct walled enclosures around especially noisy activities or clusters of noisy equipment. For example, shields can be used around pavement breakers, and loaded vinyl curtains can be draped under elevated structures.
- Combine noisy operations to occur in the same time period. The total noise level produced shall not be significantly greater than the level produced if the operations were performed separately.
- Avoid nighttime activities. Sensitivity to noise increases during the nighttime hours in residential neighborhoods.
- Use rammed aggregate piers instead of pile driving to reinforce soils for the upper 20 feet of the project site to avoid impacts associated with pile driving .
- Use specially quieted equipment, such as quieted and enclosed air compressors or mufflers, on all engines.
- Select quieter demolition methods where possible. For example, sawing bridge decks into sections that can be loaded onto trucks results in lower cumulative noise levels than impact demolition by pavement breakers.



- Post a construction site notice that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City.

#### Level of Significance After Mitigation

- Construction traffic: Less Than Significant with Mitigation.
- Construction activity: Less Than Significant with Mitigation.

#### Excessive Groundborne Vibration

**Impact NOI-2      The proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels.**

#### Impact Analysis

During construction of the proposed project, equipment such as cranes, excavators, graders, loaders, backhoes, and bulldozers may be used as close as 26 feet from the nearest sensitive receptor at 513 A Street. Construction equipment that would be used during project construction would generate vibration levels between 0.003 PPV and 0.089 PPV at 25 feet, as shown below in Table 3.7-13. All the groundbourne vibration levels are below the FTA vibration threshold at which human annoyance could occur of 0.10 PPV. Additionally, construction activities would be temporary in nature and would likely occur during normal daytime working hours. Therefore, construction vibrations are not predicted to cause damage to existing buildings or cause annoyance to sensitive receptors. As such, implementation of the proposed project would have a less than significant impact related to vibration.

**Table 3.7-13: Vibration Source Levels for Construction Equipment**

| Type of Equipment | PPV at 25 Feet | PPV at 50 Feet | PPV at 100 Feet | Threshold at which Human Annoyance Could Occur | Potential for Proposed Project to Exceed Threshold |
|-------------------|----------------|----------------|-----------------|--|--|
| Large Bulldozer   | 0.089          | 0.031          | 0.011           | 0.10   | None   |
| Loaded Trucks     | 0.076          | 0.027          | 0.010           | 0.10   | None   |
| Small Bulldozer   | 0.003          | 0.001          | 0.000           | 0.10   | None   |
| Auger/Drill Rigs  | 0.089          | 0.031          | 0.011           | 0.10   | None   |
| Jackhammer        | 0.035          | 0.012          | 0.004           | 0.10   | None   |
| Vibratory Hammer  | 0.070          | 0.025          | 0.009           | 0.10   | None   |

Notes:

PPV = peak particle velocity

Source: FTA, Transit Noise and Vibration Impact Assessment Guidelines, May 2006



**Level of Significance Before Mitigation**

Less Than Significant Impact.

**Mitigation Measures**

No mitigation is necessary.

**Level of Significance After Mitigation**

Less Than Significant Impact.



## 3.8 TRANSPORTATION

This section describes the existing transportation setting and potential effects from proposed project implementation on the site and its surrounding area. Descriptions and analysis in this section are based on information contained in the Traffic Impact Analysis prepared in February 2019 by Stantec and updated in September 2019. The document is included in this Draft EIR as Appendix G.

The City's Draft Guidance for the Preparation of Traffic Operational Analysis (City of Santa Rosa, March 2019) provides recommended methodology and thresholds for traffic impacts. The Traffic Impact Study prepared for the proposed project was prepared in accordance with the City's guidelines.

### 3.8.1 Environmental Setting

#### Existing Roadway System

The project site is located northwest of Santa Rosa Plaza mall, bounded by 6<sup>th</sup> Street on the south, 7<sup>th</sup> Street on the north, A Street on the east, and Morgan Street on the west in the City of Santa Rosa. Access to the project site would be via two driveways on Morgan Street and two driveways on A Street. Regional access to the project site is provided via Highway 101.

**Morgan Street** runs in a north-south direction from 3<sup>rd</sup> Street to Ridgway Avenue. It is classified as a three-lane regional arterial street in the Santa Rosa 2035 General Plan. It runs as a one-way (northbound) street from 3<sup>rd</sup> Street to 9<sup>th</sup> Street where it transitions to a two-way street. The speed limit is 25 mph, and there is a bike lane and on-street parking on both sides of the street in the immediate vicinity of the proposed project.

**A Street** runs in a north-south direction from 6<sup>th</sup> Street to 9<sup>th</sup> Street. It is classified as a two-lane transitional collector street in the Downtown Specific Plan. It is a two-lane roadway with on-street parking and a sidewalk on both sides of the road north of 7<sup>th</sup> Street. South of 7<sup>th</sup> Street, there is a sidewalk and bike lane on both sides of the street. However, on-street parking is available only on the west side of the street. The speed limit is 25 mph.

**B Street** runs in a north-south direction from 1<sup>st</sup> Street to Lincoln Street. The Downtown Specific Plan classifies B Street as a two-lane regional arterial from Healdsburg Avenue to 7<sup>th</sup> Street and as a four-lane regional arterial street from 7<sup>th</sup> Street to First Street. It has sidewalks on both sides of the street, and it has a bike lane and on-street parking only on portions of the street.

**6<sup>th</sup> Street** is classified as a two-lane transitional collector street in the Downtown Specific Plan from the railroad right-of-way to A Street. 6<sup>th</sup> Street spans less than 1 mile and runs in an east-west direction. It begins at a cul-de-sac west of Madison Street and ends at the Santa Rosa Plaza and A Street intersection. It has on-street parking and a sidewalk on both sides of the street. The speed limit is 25 mph, and there is a railroad crossing just west of Wilson Street.

**7<sup>th</sup> Street** is classified as a two-lane transitional collector street in the Downtown Specific Plan from A Street to D Street. It runs in an east-west direction on both sides of Highway 101. West of Highway 101, it begins at Polk Street and ends at Davis Street. East of Highway 101, it begins at Morgan Street and ends at E Street. It has on-street parking and a sidewalk on both sides of the street. The speed limit is 25 mph, and there is a railroad crossing just west of Wilson Street.



**8<sup>th</sup> Street** is a local street that runs in an east-west direction on both sides of Highway 101. West of Highway 101, it begins at 9<sup>th</sup> Street and ends east of Davis Street. East of Highway 101, it begins at A Street and ends at B Street. It is a two-lane roadway with on-street parking and a sidewalk on both sides of the street. The speed limit is 25 mph, and there is a railroad crossing just west of Wilson Street.

**9<sup>th</sup> Street** runs in an east-west direction and is classified as a two-lane transitional collector street from A Street to Morgan Street in the Downtown Specific Plan. It has a sidewalk on both sides of the street. On-street parking is available on both sides of the street on sections of the roadway, and the speed limit is 25 mph. Davis Street runs in a north-south direction from 9<sup>th</sup> Street to 3<sup>rd</sup> Street. It is a two-lane roadway north of 7<sup>th</sup> Street. South of 7<sup>th</sup> Street at the Highway 101 off-ramp it transitions to a one-way street (southbound only) and ends at 3<sup>rd</sup> Street, which becomes the Highway 101 on-ramp. There is a sidewalk and a bike lane on both sides of the street.

**Highway 101** is the major highway in the North San Francisco Bay Area. It runs in a north-south direction and is located just west of the project site with the nearest on-ramp at the 6<sup>th</sup> Street and Morgan Street intersection, and an off-ramp at the Davis Street and 6<sup>th</sup> Street intersection. It connects to State Route 12 approximately 1 mile south of the project site.

### Existing Traffic Volumes and Levels of Service

Existing average daily traffic (ADT), AM, and PM peak hour count data were collected in December 2018, and ADT data were collected again in January 2019 to determine if the holiday season affected the traffic volumes collected in December. The percent change in ADT for the study area roadway segments between December 2018 and January 2019 varied from -13 percent to +16 percent, with an overall average change of 2 percent. In no case was the absolute magnitude of change substantial. Therefore, to be conservative, a seasonal adjustment of a 2 percent increase was applied to the December turning movement counts.

The results of the intersection level of service (LOS) analysis for existing conditions are shown in Table 3.8-1. Each of the signalized intersections and the stop-controlled intersections were analyzed using the Highway Capacity Manual (HCM) delay methodology. For analysis purposes, the A Street and 7<sup>th</sup> Street intersection is treated as two separate stop-controlled intersections due to its distinct orientation. As shown in the table, all the study area intersections operate at LOS A or LOS B during the AM peak hour and the PM peak hour under existing conditions.

**Table 3.8-1: Intersection Level of Service Summary – Existing Conditions**

| Intersection Name                                       | Control Type | AM Peak Hour |     | PM Peak Hour |     |
|---|--------------|--------------|-----|--------------|-----|
|   |              | Delay        | LOS | Delay        | LOS |
| 1. Morgan Street and 9 <sup>th</sup> Street             | AWSC         | 12.8         | B   | 12.5         | B   |
| 2. A Street and 8 <sup>th</sup> Street                  | TWSC         | 9.5          | A   | 9.6          | A   |
| 3. B Street and 7 <sup>th</sup> Street                  | Signal       | 9.1          | A   | 9.4          | A   |
| *4a. A Street and 7 <sup>th</sup> Street                | AWSC         | 7.9          | A   | 8.4          | A   |
| *4b. A Street and 7 <sup>th</sup> Street                | TWSC         | 11.0         | B   | 13.3         | B   |
| 5. Morgan Street and 7 <sup>th</sup> Street             | TWSC         | 9.7          | A   | 9.6          | A   |
| 6. A Street and 6 <sup>th</sup> Street/Santa Rosa Plaza | TWSC         | 10.3         | B   | 13.7         | B   |



| Intersection Name  | Control Type | AM Peak Hour |     | PM Peak Hour |     |
|--|--------------|--------------|-----|--------------|-----|
|  |              | Delay        | LOS | Delay        | LOS |
| 7. Morgan Street/Highway 101 northbound on-ramp and 6 <sup>th</sup> Street | Signal       | 7.8          | A   | 9.7          | A   |
| 8. Davis St and 6 <sup>th</sup> St   | Signal       | 6.9          | A   | 11.7         | B   |

Notes:

\* Intersection #4 is analyzed as two separate stop-controlled intersections, 4a and 4b

AWSC = all-way stop control

Delay = average vehicle delay (seconds)

LOS = level of service

TWSC = two-way stop control

Source: Stantec 2019

### 3.8.2 Regulatory Setting

#### State

##### California Department of Transportation

Caltrans is responsible for planning, designing, constructing, operating, and maintaining all state-owned roadways in Sonoma County. The state facilities providing regional access to and from the project site is Highway 101. Highway 101 serves as the primary freight route through Marin and Sonoma counties (Caltrans 2018).

##### Senate Bill 743

On September 27, 2013, SB 743 was signed into law. The legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled and thereby contribute to the reduction of GHG emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32). SB 743 started a process that will likely change transportation impact analysis as part of CEQA compliance. Changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts in many parts of California (if not statewide). The new criteria, "shall promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses" (PRC Section 21099(b)(1)). On January 20, 2016, the Governor's OPR released revisions to its proposed Draft CEQA guidelines for the implementation of SB 743. In December 2018, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package, including the Guidelines section implementing SB 743 (Section 15064.3). OPR developed a Technical Advisory on Evaluating Transportation Impacts in CEQA, which contains OPR's technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The provisions of CEQA Guidelines Section 15064.3 shall apply prospectively as described in Section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.





## Regional

### Regional Regulations Metropolitan Transportation Commission

MTC is the transportation planning, coordinating, and financing agency for the nine-county Bay Area, including Sonoma County. It also functions as the federally mandated metropolitan planning organization (MPO) for the region. Plan Bay Area is the Bay Area's RTP/ SCS. Plan Bay Area, adopted jointly by ABAG and MTC July 18, 2013, lays out a development scenario for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement) beyond the per capita reduction targets identified by CARB. The second regional housing and transportation plan adopted by MTC and ABAG on July 26, 2017, is the Plan Bay Area 2040. Plan Bay Area 2040 is a long-range blueprint to guide transportation investments and land-use decisions through 2040 while meeting the requirements of California's landmark 2008 SB 375, which calls on each of the state's 18 metropolitan areas to develop an SCS to accommodate future population growth and reduce GHG emissions from cars and light trucks. The project's relationship to GHG emissions reductions are discussed in detail in Chapter 3.5, Greenhouse Gas Emissions and Climate Change.

## Local

### City of Santa Rosa General 2035 General Plan

The City of Santa Rosa General Plan states that LOS D is to be maintained along all major corridors. While no LOS requirements are detailed for intersections, LOS D is considered an acceptable LOS for signalized intersections and is consistent with the General Plan. The following lists goals and policies from the City of Santa Rosa 2035 General Plan pertaining to transportation that are applicable to the proposed project.

**Policy T-A-3** Evaluate corridor LOS and develop strategies to improve service levels.

**Goal T-B** Provide a safe, efficient, free-flowing circulation system.

**Policy T-B-1** Require site design to focus through-traffic on regional/arterial streets. Employ the following design techniques to increase driver safety and traffic efficiency:

- Reduce the number of driveways and intersections;
- Combine driveways to serve numerous small parcels;
- Avoid residential access;
- Install and facilitate timing of traffic signals; and
- Ensure continuous sidewalks.

**Policy T-B-4** Promote the use of roundabouts in lieu of stop/signal-controlled intersections to improve safety, reduce delay and idling time, and lower vehicle emissions at new/existing intersections.

**Goal T-D** Maintain acceptable motor vehicle traffic flows.

**Policy T-D-1** Maintain a LOS D or better along all major corridors. Exceptions to meeting the standard include:



- Within downtown; (the proposed project's location would be subject to this exception)
- Where attainment would result in significant environmental degradation;
- Where topography or environmental impact makes the improvement impossible; or
- Where attainment would ensure loss of an area's unique character.

The LOS is to be calculated using the average traffic demand over the highest 60-minute period.

**Policy T-D-2** Monitor LOS at intersections to assure that improvements or alterations to improve corridor LOS do not cause severe impacts at any single intersection.

**Policy T-D-3** Require traffic studies for development projects that may have a substantial impact on the circulation system.

### 3.8.3 Environmental Impacts

This section analyzes the proposed project's potential transportation and traffic impacts associated with the construction and operation of the proposed project. When an impact was determined to be significant, mitigation measures were identified that would reduce or avoid that impact.

#### Methodology for Analysis

##### Study Periods and Scenarios

The traffic analysis focuses on the weekday AM and PM peak hours (7:00 to 9:00 AM and 4:00 to 6:00 PM, respectively). The following scenarios were analyzed:

- Existing Conditions without Project: reflects current traffic levels and roadway configurations without the project.
- Existing Conditions with Project: includes buildout of the Caritas Village Project.
- Long-Range Conditions (2040) without Project: includes year 2040 buildout of the General Plan 2035 and planned roadway improvements.
- Long-Range Conditions (2040) with Project: adds buildout of the Caritas Village Project to year 2040 buildout conditions.

##### Data Collection

Existing traffic volumes at the study intersections were obtained in December 2018 and January 2019. Sonoma County Transportation Authority (SCTA) provided traffic volume forecasts obtained from a county-wide computer traffic model maintained by SCTA, which reflects long-range (2040) cumulative conditions. Long-range cumulative conditions (2040) intersection turning movement volumes were derived based on growth rates indicated by the SCTA traffic model forecasts.

##### Level of Service

LOS is used to rank traffic operation on various types of facilities based on traffic volumes and roadway capacity using a series of letter designations ranging from LOS A to LOS F. Generally, LOS A represents free flow conditions and LOS F represents forced flow or breakdown conditions. Table 3.8-2 summarizes



the ranges of vehicle delay that correspond to LOS A through F for signalized and unsignalized intersections. The ranges are those defined in the HCM 2010 and are used for estimating intersection LOS<sup>1</sup>.

**Table 3.8-2: Level of Service Descriptions for Signalized and Unsignalized Intersections**

| LOS | Traffic Flow Description                             | Signal Control Delay (seconds) | Stop Control Delay (seconds) |
|-----|--|--------------------------------|------------------------------|
| A   | Minimal or no vehicle delay                          | ≤ 10                           | ≤ 10                         |
| B   | Slight delay to vehicles                             | > 10 – 20                      | > 10 – 15                    |
| C   | Moderate vehicle delays, traffic flow remains stable | > 20 – 35                      | > 15 – 25                    |
| D   | More extensive delays at intersections               | > 35 – 55                      | > 25 – 35                    |
| E   | Long queues create lengthy delays                    | > 55 – 80                      | > 35 – 50                    |
| F   | Severe delays and congestion                         | > 80                           | > 50                         |

Source: Stantec 2019

While ADT is a useful measure to show general levels of traffic on a facility and to provide data for other related aspects such as noise and GHG emissions, congestion is largely a peak-hour or peak-period occurrence, and ADT does not reflect peak-period conditions very effectively. Because of this, ADT is not used here as the basis for capacity evaluation. Instead, this evaluation focuses on the parts of the day when such congestion can occur, specifically the AM and PM peak hours.

For the arterial system, the peak hour is the accepted time period used for impact evaluation, and a number of techniques are available to define intersection LOS. Both the level of delay and the LOS are used in determining impact significance. Certain LOS values are deemed unacceptable by the City, and increases in delay that cause or contribute to the LOS being unacceptable are defined as a significant impact. These definitions and procedures are established by individual local jurisdictions, such as the City or the county.

LOS for arterial roadway intersections are determined based on operating conditions during the AM and PM peak hours and the geometric configuration of the intersection. For this study, HCM delay methodology is used to analyze both the signalized intersections and the stop-controlled intersection using Synchro software. The result of these calculations is an estimate of average peak-hour vehicle delay at the intersection. The LOS calculation methodology and associated LOS performance standards as used in this analysis are summarized below:

### Calculation Methodology

Level of service based on “average vehicle delay” calculated as follows:

- Synchro/HCM Sixth Edition delay-based intersection methodology for traffic signals

<sup>1</sup> The existing LOS are presented in Table 3.8-1.



- Synchro/HCM Sixth Edition delay-based intersection methodology for stop control (approach with highest average delay)
- Sidra delay-based intersection methodology for roundabouts

### Performance Standard

LOS D defined as follows<sup>2</sup>:

- Stopped delay to not exceed 55 seconds for signalized intersections
- Stopped delay to not exceed 35 seconds for stop sign intersections
- Stopped delay to not exceed 50 seconds for roundabouts

### Vehicle Miles Traveled

Following years of development and public comment, OPR and the Natural Resources Agency have issued new CEQA Guidelines for analyzing transportation impacts. These new regulations represent a significant shift in analyzing transportation impacts under CEQA. By July 1, 2020, all CEQA lead agencies must analyze a project's transportation impacts using VMT. VMT measures the per capita number of car trips generated by a project and distances cars will travel to and from a project, rather than congestion levels at intersections (level of service or "LOS," graded on a scale of A – F).

OPR provided a technical advisory to address VMT impacts. Pursuant to OPR's Technical Advisory, land use projects within one-half mile of a major transit stop or a stop along a high-quality transit corridor should be presumed to have a less than significant transportation impact. A high-quality transit corridor is a corridor with fixed-route bus service with service intervals that do not exceed 15 minutes during peak commute hours. In addition, projects that decrease VMT in the project area as compared to existing conditions should be presumed to have a less than a significant impact.

The project site is within 0.25 mile of the SMART Station and 0.30 mile from 2nd Street Transit Mall. The project site is also well served by bus service. Based on the location of the project site, which is less than 0.5 mile from the SMART Station, the proposed project would have a less than significant transportation impact based on VMT.

Where quantitative models or methods are unavailable, Section 15064.3 of the CEQA Guidelines allows agencies to assess VMT qualitatively, using factors such as availability of transit and proximity to other destinations. The Guidelines also state that the lead agency has discretion to choose the most appropriate methodology and can use its professional judgment to adjust its analysis accordingly.

The City is in the process of developing its quantitative method for analyzing VMT.

### Study Area

In consultation with the City staff, the following three signalized intersections and five unsignalized (stop-controlled) intersections in the vicinity of the project site were selected to be analyzed in the traffic study:

1. Morgan Street and 9<sup>th</sup> Street (unsignalized)

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<sup>2</sup> The City of Santa Rosa General Plan 2035, Standard TD-1 states that the City should maintain a Level of Service D or better along all the major corridors. It does not provide criteria for intersections.



2. A Street and 8<sup>th</sup> Street (unsignalized)
3. B Street and 7<sup>th</sup> Street
4. A Street and 7<sup>th</sup> Street (unsignalized)
5. Morgan Street and 7<sup>th</sup> Street (unsignalized)
6. A Street and 6<sup>th</sup> Street/Santa Rosa Plaza (unsignalized)
7. Morgan Street/Highway 101 northbound on-ramp and 6<sup>th</sup> Street
8. Davis Street and 6<sup>th</sup> Street

### Trip Generation

Table 3.8-3 summarizes the updated anticipated trip generation of the proposed project. Note that Stantec had previously prepared a trip generation estimate for the project based on an overestimate of the number of employees and clients provided by the applicants due to some clients accessing the site multiple times per year but representing only one person. After additional review, the applicants identified the overestimation and refined the project description to more accurately reflect existing operations and future expanded operations (See Section 2.0, Project Description). The Trip Generation Study Memo prepared by Stantec Consulting Services Inc. is included as Appendix G and summarized below.

The trip generation estimates for the Caritas Center's support services use and the Caritas Homes residential use were prepared using a combination of standardized Institute of Transportation Engineers (ITE) 10<sup>th</sup> Edition trip generation rates and custom rates derived for the unique uses of this site. The project primarily serves clients who are homeless, and many of them do not own vehicles. This is not a standard type of use that is accounted for in the ITE Trip Generation manual; therefore, an ITE trip rate is not available for the trips to be generated by the project's clients. Hence, the client trips were calculated based on the following assumptions.

- Approximately 50% of the daily clients own or use cars
- Vehicle occupancy of 1.2 persons per vehicle
- Sum of AM and PM peak hour volumes represent approximately 15 percent of the ADT

The Sonoma County Homeless Census & Survey Comprehensive Report 2018 shows that 24 percent of the Sonoma County unsheltered homeless live in vans, cars, or recreational vehicles. To be conservative, an assumption is made, which is noted above, that approximately 50 percent of the daily clients own or use cars, with occupancy of approximately 1.2 persons per vehicle.

As shown in Table 3.8-3, the proposed project is expected to generate approximately 1,469 ADT, with 126 trips occurring during the AM peak hour and 132 trips occurring during the PM peak hour. However, taking credit for the existing trips generated by the current facility, the net new trips generated by the proposed project would be approximately 1,062 ADT, with 85 trips occurring during the AM peak hour and 95 trips occurring during the PM peak hour. It should be noted that the residents at the Family Support Center are families, only 20 percent are estimated to have a car, and 10 percent of the Transitional Living Space residents are estimated to have a car. An assumption that there would be three persons in a family is made for calculating the residents' average daily trips.



**Table 3.8-3: Project Trip Generation Summary**

| Trip Rates   | Amount     | Units     | AM Peak Hour |           |            | PM Peak Hour |            |            | ADT          |
|--|------------|-----------|--------------|-----------|------------|--------------|------------|------------|--------------|
|  |            |           | In           | Out       | Total      | In           | Out        | Total      |              |
| General Office Building (710)  |            | Emp       | 0.31         | 0.06      | 0.37       | 0.08         | 0.32       | 0.40       | 3.28         |
| Multifamily Housing Mid-Rise (221)   |            | DU        | 0.09         | 0.27      | 0.36       | 0.27         | 0.17       | 0.44       | 5.44         |
| <b>Trip Generation</b>   |            |           |              |           |            |              |            |            |              |
| <b>Existing</b>  |            |           |              |           |            |              |            |            |              |
| Catholic Charities Facilities  | 67         | Emp       | 21           | 4         | 25         | 5            | 21         | 26         | 220          |
| Clients  | 212        | Client    | 13           | 3         | 16         | 2            | 9          | 11         | 177          |
| Residents  | 150        | Per       | -            | -         | -          | -            | -          | -          | 10           |
| <b>Total Existing Trips</b>  |            |           | <b>34</b>    | <b>7</b>  | <b>41</b>  | <b>7</b>     | <b>30</b>  | <b>37</b>  | <b>407</b>   |
| <b>Proposed</b>  |            |           |              |           |            |              |            |            |              |
| Caritas Center   | 154        | Emp       | 47           | 10        | 57         | 12           | 49         | 62         | 505          |
| Clients  | 402        | Client    | 19           | 4         | 23         | 3            | 12         | 15         | 253          |
| Residents  | 260        | Per       | -            | -         | -          | -            | -          | -          | 15           |
| <b>Total Caritas Center Trips</b>  |            |           | <b>66</b>    | <b>14</b> | <b>80</b>  | <b>15</b>    | <b>61</b>  | <b>76</b>  | <b>773</b>   |
| Caritas Homes Phase I  | 64         | DU        | 6            | 17        | 23         | 17           | 11         | 28         | 348          |
| Caritas Homes Phase II   | 64         | DU        | 6            | 17        | 23         | 17           | 11         | 28         | 348          |
| <b>Total Caritas Homes Trips</b>   | <b>128</b> | <b>DU</b> | <b>12</b>    | <b>34</b> | <b>46</b>  | <b>34</b>    | <b>22</b>  | <b>56</b>  | <b>696</b>   |
| Total Proposed Project Trips   |            |           | 78           | 48        | 126        | 49           | 83         | 132        | 1,469        |
| <b>Net New Trips</b>   |            |           | <b>44</b>    | <b>41</b> | <b>85</b>  | <b>42</b>    | <b>53</b>  | <b>95</b>  | <b>1,062</b> |
| <b>Original Project Caritas Traffic Impact Study (Net New Trips)<sup>1</sup></b> |            |           | <b>73</b>    | <b>47</b> | <b>120</b> | <b>49</b>    | <b>76</b>  | <b>125</b> | <b>1,350</b> |
| <b>Difference between Revised Project and Original Project<sup>2</sup></b>       |            |           | <b>-29</b>   | <b>-6</b> | <b>-35</b> | <b>-7</b>    | <b>-23</b> | <b>-30</b> | <b>-288</b>  |

Notes:

Trip Rate Source: Institute of Transportation Engineers (ITE), 10th Edition, 2017, with ITE code in parentheses

1. Stantec prepared a traffic study with trip generation in February 2019 based on numbers provided by the project applicants that overestimated the existing uses due to variables associated with daily and annual usage numbers where the same client may be served multiple times but would only be counted as one individual for annual numbers served. The result was that the trip generation overestimated the daily trip generation.

2. The difference represents the decrease in vehicle trip generation from the proposed project (with the updated data on existing and proposed uses) and the original trip generation estimate.

ADT = average daily trips

DU = Dwelling Unit

Emp = employee

Per = persons

Clients Trip Rate Source: see Caritas Village Traffic Study, Stantec, September 2019



For comparison, the net new trips generated by the project based on the traffic study is also shown in the table. As shown, the project would generate approximately 288 fewer daily trips, 35 fewer AM peak hour trips and 30 fewer PM peak hour trips.

As discussed above, the Caritas Village Traffic Study prepared by Stantec in February 2019 and updated in October 2019 was based on a greater number of clients and employees than what is proposed in the current project description due to an overestimation by the applicant of existing and potential client numbers because of variables associated with daily and annual clients served. Based on the current project description and refined client estimate, the change in the existing and proposed number of clients reduced by approximately 63 percent, and the number of employees reduced by approximately 44 percent. Therefore, the results provided in the Caritas Village Traffic Study prepared in October 2019 represents a worse-case condition that there would be no new impacts resulting from the refinement to existing and proposed operations.

### Project Trip Distribution

Trip distribution patterns were derived based on the project site location in relation to the surrounding uses while taking into account the proposed driveway locations, existing traffic flow patterns, and engineering judgement. Approximately 30 percent of the project trips are expected to utilize the driveways on Morgan Street, and approximately 70 percent would utilize the driveways on A Street.

### Thresholds of Significance

In accordance with the CEQA Guidelines' Appendix G Environmental Checklist, the following questions were analyzed and evaluated to determine whether noise impacts are significant. Would the proposed project:

- Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
- Result in inadequate emergency access?
- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The following questions were determined to have no impact or a less than significant impact during the NOP Scoping. These issues are summarized in Section 7, Effects Found Not to Be Significant, and are not discussed further in this section.

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?
- Substantially increase hazards to a geometric design (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The City's Draft Guidance for the Preparation of Traffic Operational Analysis provides the following operational threshold:



**Operational Thresholds.** Section 5.8, Transportation Goals & Policy of the City of Santa Rosa General Plan states:

*T-D-1 Maintain a Level of Service (LOS) D or better along all major corridors. Exceptions to meeting the standard include:*

- *Within downtown;*
- *Where attainment would result in significant degradation;*
- *Where topography or impacts makes the improvement impossible; or*
- *Where attainment would ensure loss of an area's unique character.*

*The LOS is to be calculated using the average traffic demand over the highest 60-minute period.*

*Traffic Engineering Division will require a level of service evaluation of arterial and collector corridors if deemed necessary.*

*T-D-2 Monitor level of service at intersections to assure that improvements or alterations to improve corridor level of service do not cause severe impacts at any single intersection.*

General interpretation of Policy T-D-2. The impact to an intersection is considered significant if the project related and/or future trips result in:

1. The level of service (LOS) at an intersection degrading from LOS D or better to LOS E or F, OR
2. An increase in average vehicle delay of greater than 5 seconds at a signalized intersection where the current LOS operates at either LOS E or F.
3. Queuing impacts based on a comparative analysis between the design queue length and the available queue storage capacity. Impacts include, but are not limited to, spillback queue at project access locations (both ingress and egress), turn lanes at intersections, lane drops, spill back that impacts upstream intersections or interchange ramps.
4. Exceptions may be granted under the following conditions:
  - a. Within downtown,
  - b. Where attainment would result in significant degradation,
  - c. Where topography or impacts makes the improvement impossible; or
  - d. Where attainment would ensure loss of an area's unique character.

*T-C-3 Implement traffic calming techniques on streets subject to high speed and/or cut-through traffic, in order to improve neighborhood livability, Techniques Include:*

- *Narrow Streets*
- *On-street parking*
- *Choker or diverters*
- *Decorative crosswalks*
- *Planted islands*





General interpretation of Policy T-C-3. An impact is considered significant if the project has the potential to alter community character by significantly increasing cut-through traffic, unexpected vehicle maneuvers or commercial vehicle trips in a residential area.

*T-H-3 Require new development to provide transit improvements, where a rough proportionality to demand from the project is established. Transit improvements may include:*

- *Direct and paved pedestrian access to transit stops*
- *Bus turnouts and shelters*
- *Lane width to accommodate buses.*

General interpretation of Policy T-H-3. An impact is considered significant if the project has the potential to disrupt existing transit operations or establishes transit facilities and equipment such that it creates a sight distance deficiency or vehicle conflict point.

*T-J Provide attractive and safe streets for pedestrian and bicyclists.*

General interpretation of Policy T-J. An impact is considered significant if the project generates 20 pedestrians in any single hour at an unsignalized intersection, mid-block crossing or where no crossing has been established.

An impact is further considered significant if the project interrupts existing or proposed pedestrian and bicycle facilities, path or travel, direct access resulting in excessive rerouting or creates a vehicle conflict condition which affects the safety of other roadway users.

In 2013, the State of California passed SB 743, which mandates that jurisdictions can no longer use automobile delay—commonly measured by LOS—in transportation analysis under the CEQA. The state has issued guidelines calling for the use of a broader measure called VMT, which measures the total amount of driving over a given area. Agencies have until January 2020 to begin implementing the VMT thresholds. Although not required, the proposed project has evaluated VMT impacts within this EIR.

## Project Impact Analysis and Mitigation Measures

### Traffic Increase

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**Impact TRANS-1 The proposed project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.**

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### Impact Analysis

#### Construction Impacts

The proposed project would be completed over a period of 36 months and would result in construction traffic on the nearby roadway network. The number of construction workers will fluctuate between 25 and 100 workers per day, the average number of construction workers onsite during any weekday would be 50. The proposed project would also require the hauling of soil offsite and import of project materials. The worst construction traffic would occur during grading, when up to 4,000 cubic yards of soil would be exported offsite. Total traffic during the grading phase would be equivalent to 1,060 passenger car vehicles, which is less than the operational vehicle trips. Therefore, impacts to intersections during that



period of construction would be equivalent. During the remaining construction phases construction traffic would be less than 10 percent of the operational vehicle traffic; accordingly, traffic impacts would be substantially less. Mitigation Measure NOI-1 would limit the hours of construction between 7:00 AM and 7:00 PM, Monday through Friday, and, between 9:00 AM and 5:00 PM on Saturday. Equipment and materials would be staged within the project site and additional staging and storage areas may be required on 7<sup>th</sup> Street between A Street and Morgan Street. A total closure of 7<sup>th</sup> Street between Morgan Street and A Street is being considered during the construction of the project site. The traffic impacts to the study area intersections during the short-term construction closure are evaluated, and the results are summarized in this section.

For this analysis, existing intersection lanes were assumed throughout the study area except for the 7<sup>th</sup> Street and Morgan Street intersection and the 7<sup>th</sup> Street and A Street intersection. The existing traffic volumes were used for the analysis, but the volumes turning to and from the subject section of 7<sup>th</sup> Street are diverted and distributed to the surrounding intersections.

Peak hour LOS calculated using the diverted traffic volumes are summarized in Table 3.8-4. The table indicates that the study area intersections would continue to operate at acceptable LOS A and LOS B during both the AM and the PM peak hour during construction with the closure of 7<sup>th</sup> Street.

**Table 3.8-4: Intersection Level of Service Summary – Construction Impacts with 7<sup>th</sup> Street Closure**

| Intersection Name   | Traffic Control | Construction |     |              |     |
|---|-----------------|--------------|-----|--------------|-----|
|   |                 | AM Peak Hour |     | PM Peak Hour |     |
|   |                 | Delay        | LOS | Delay        | LOS |
| 1. Morgan Street and 9 <sup>th</sup> Street                       | AWSC            | 13.3         | B   | 12.9         | B   |
| 2. A Street and 8 <sup>th</sup> Street                            | TWSC            | 9.6          | A   | 9.7          | A   |
| 3. B Street and 7 <sup>th</sup> Street                            | Signal          | 9.1          | A   | 9.4          | A   |
| *4A. A Street and 7 <sup>th</sup> Street                          | AWSC            | 8.0          | A   | 8.4          | A   |
| *4B. A Street and 7 <sup>th</sup> Street                          | TWSC            | 10.9         | B   | 13.3         | B   |
| 5. Morgan Street and 7 <sup>th</sup> Street                       | TWSC            | 0.0          | A   | 0.0          | A   |
| 6. 6th St/Santa Rosa Plaza and A Street                           | TWSC            | 10.4         | B   | 13.7         | B   |
| 7. Morgan Street and 6 <sup>th</sup> Street and SR 101 NB On-Ramp | Signal          | 7.9          | A   | 10.3         | B   |
| 8. Davis Street and 6 <sup>th</sup> Street                        | Signal          | 7.0          | A   | 11.8         | B   |

Notes:

\* Intersection #4 is analyzed as two separate stop-controlled intersections, 4a and 4b

AWSC = all-way stop control

Delay = average vehicle delay (seconds)

LOS = level of service

NB = northbound

SR = State Route

TWSC = two-way stop control

Since construction traffic would be temporary and would spread across the construction duration, the proposed project would not cause streets in the project area to exceed LOS thresholds. However, the



construction work is anticipated to occur as far as to the centerlines of A Street, 6<sup>th</sup> Street, and 7<sup>th</sup> Street and as close as 5 feet from the west curb along Morgan Street. Furthermore, improvements are being proposed in the road right-of-way. Therefore, mitigation measure TRANS-1 would be implemented that requires a Traffic Management Plan to identify appropriate traffic controls and encroachment permits during construction. The Traffic Management Plan would include measures to address traffic safety and control through the proposed work zone, thereby reducing potential traffic conflicts. Therefore, construction impacts would be less than significant with mitigation.

### Operational Impacts

This impact evaluates traffic conditions at the opening year of the proposed project. Traffic are presented in two scenarios:

- Existing Conditions with project
- Long Range conditions (2040) with project

#### *Existing Conditions with-Project*

This section provides an analysis of proposed project traffic impacts by comparing the existing traffic conditions without the project to existing with project traffic conditions. For existing with project traffic conditions, proposed project trips were added to the existing traffic to identify potential traffic impacts. For purpose of this analysis, existing intersection lanes are assumed for existing plus project conditions, meaning that no additional lanes or roadway modifications are incorporated. Peak hour intersection LOS calculated using the existing conditions traffic volumes without and with project are summarized in Table 3.8-5, which provides a comparison between without-project and with-project conditions. The table indicates that under the existing conditions, the study area intersections would continue to operate at LOS A or LOS B during both the AM and the PM peak hour and would not be significantly impacted by the proposed project.

**Table 3.8-5: Intersection Level of Service Summary – Existing Conditions with Project**

| Intersection Name                                       | Traffic Control | Without-Project |     |              |     | With-Project |     |              |     | Increase |     |
|---|-----------------|-----------------|-----|--------------|-----|--------------|-----|--------------|-----|----------|-----|
|   |                 | AM Peak Hour    |     | PM Peak Hour |     | AM Peak Hour |     | PM Peak Hour |     | AM       | PM  |
|   |                 | Delay           | LOS | Delay        | LOS | Delay        | LOS | Delay        | LOS |          |     |
| 1. Morgan Street and 9 <sup>th</sup> Street             | AWSC            | 12.8            | B   | 12.5         | B   | 13.6         | B   | 13.2         | B   | 0.8      | 0.7 |
| 2. A Street and 8 <sup>th</sup> Street                  | TWSC            | 9.5             | A   | 9.6          | A   | 9.6          | A   | 9.7          | A   | 0.1      | 0.1 |
| 3. B Street and 7 <sup>th</sup> Street                  | Signal          | 9.1             | A   | 9.4          | A   | 9.3          | A   | 9.8          | A   | 0.2      | 0.4 |
| *4a. A Street and 7 <sup>th</sup> Street                | AWSC            | 7.9             | A   | 8.4          | A   | 8.1          | A   | 8.6          | A   | 0.2      | 0.2 |
| *4b. A Street and 7 <sup>th</sup> Street                | TWSC            | 11.0            | B   | 13.3         | B   | 11.2         | B   | 14.0         | B   | 0.2      | 0.7 |
| 5. Morgan Street and 7 <sup>th</sup> Street             | TWSC            | 9.7             | A   | 9.6          | A   | 9.8          | A   | 9.7          | A   | 0.1      | 0.1 |
| 6. A Street and 6 <sup>th</sup> Street/Santa Rosa Plaza | TWSC            | 10.3            | B   | 13.7         | B   | 10.6         | B   | 14.2         | B   | 0.3      | 0.5 |



| Intersection Name   | Traffic Control | Without-Project |     |              |     | With-Project |     |              |     | Increase |     |
|---|-----------------|-----------------|-----|--------------|-----|--------------|-----|--------------|-----|----------|-----|
|   |                 | AM Peak Hour    |     | PM Peak Hour |     | AM Peak Hour |     | PM Peak Hour |     | AM       | PM  |
|   |                 | Delay           | LOS | Delay        | LOS | Delay        | LOS | Delay        | LOS |          |     |
| 7. Morgan Street/US 101 northbound on-ramp and 6 <sup>th</sup> Street | Signal          | 7.8             | A   | 9.7          | A   | 8.1          | A   | 10.7         | B   | 0.3      | 1.0 |
| 8. Davis Street and 6 <sup>th</sup> Street                            | Signal          | 6.9             | A   | 11.7         | B   | 7.9          | A   | 12.4         | B   | 1.0      | 0.7 |

Notes:

\* Intersection #4 is analyzed as two separate stop-controlled intersections, 4a and 4b

Delay – Average Vehicle Delay (seconds)

AWSC – All-Way Stop Control

TWSC – Two-Way Stop Control

Source: Stantec 2019.

### Long Range conditions (2040) with-Project

SCTA provided traffic volume forecasts obtained from a county-wide computer traffic model maintained by them, which reflects long-range (2040) cumulative conditions. The 2040 intersection turning movement volumes were derived based on growth rates indicated by the SCTA traffic model forecasts.

Peak-hour intersection LOS calculated from the cumulative conditions traffic volumes are summarized in Table 3.8-6, which provides a comparison between without-project and with-project conditions. The table indicates that under cumulative (long range) conditions, the signalized study area intersections would operate at LOS B or better during AM and PM peak hour conditions, except for the intersection of B Street and 7<sup>th</sup> Street, which would operate at unacceptable LOS F during the PM peak hour. However, it is not considered a project impact as the increase in average delay under with-project conditions is not more than 5 seconds as defined by the significant impact threshold criteria and due to the exception for intersections within the downtown area.

Of the five unsignalized intersections, the A Street and 8<sup>th</sup> Street intersection and the Morgan Street and 7<sup>th</sup> Street intersection would operate at LOS B and LOS A, respectively, under both AM and PM peak-hour conditions. The Morgan Street and 9<sup>th</sup> Street intersection would operate at unacceptable LOS E under AM and PM peak hour conditions, the A Street and 7<sup>th</sup> Street intersection would operate at LOS C during AM peak hour and an unacceptable LOS F during the PM peak hour, and the 6<sup>th</sup> Street/Santa Rosa Plaza and A Street intersection would operate at an LOS B during AM peak hour and LOS E during the PM peak hour conditions.

The following unsignalized intersections are forecast to operate at LOS E or F, and the increase in average delay under with-project conditions is more than 5 seconds. However, these intersections are not considered significantly impacted due to the exception provided to the intersections within the downtown area as defined by the performance criteria.

- Morgan Street and 9<sup>th</sup> Street
- A Street and 7<sup>th</sup> Street



**Table 3.8-6: Intersection Level of Service Summary – Cumulative Conditions (2040)**

| Intersection Name   | Traffic Control | Without-Project |     |              |     | With-Project |     |              |     | Increase |      |
|---|-----------------|-----------------|-----|--------------|-----|--------------|-----|--------------|-----|----------|------|
|   |                 | AM Peak Hour    |     | PM Peak Hour |     | AM Peak Hour |     | PM Peak Hour |     | AM       | PM   |
|   |                 | Delay           | LOS | Delay        | LOS | Delay        | LOS | Delay        | LOS |          |      |
| 1. Morgan Street and 9 <sup>th</sup> Street                           | AWSC            | 40.1            | E   | 38.9         | E   | 47.4         | E   | 43.8         | E   | 7.3      | 4.9  |
| 2. A Street and 8 <sup>th</sup> Street                                | TWSC            | 10.2            | B   | 10.4         | B   | 10.3         | B   | 10.5         | B   | 0.1      | 0.1  |
| 3. B Street and 7 <sup>th</sup> Street                                | Signal          | 14.7            | B   | 98.2         | F   | 15.1         | B   | 102.3        | F   | 0.4      | 4.1  |
| *4a. A Street and 7 <sup>th</sup> Street                              | AWSC            | 10.1            | B   | 12.4         | B   | 10.5         | B   | 12.8         | B   | 0.4      | 0.4  |
| *4b. A Street and 7 <sup>th</sup> Street                              | TWSC            | 22.2            | C   | 102.4        | F   | 23.9         | C   | 126.8        | F   | 1.7      | 24.4 |
| 5. Morgan Street and 7 <sup>th</sup> Street                           | TWSC            | 9.8             | A   | 9.7          | A   | 9.9          | A   | 9.8          | A   | 0.1      | 0.1  |
| 6. A Street and 6 <sup>th</sup> Street/Santa Rosa Plaza               | TWSC            | 14.0            | B   | 40.9         | E   | 14.4         | B   | 45.8         | E   | 0.4      | 4.9  |
| 7. Morgan Street/US 101 northbound on-ramp and 6 <sup>th</sup> Street | Signal          | 12.4            | B   | 17.2         | B   | 13.4         | B   | 18.4         | B   | 1.0      | 1.2  |
| 8. Davis Street and 6 <sup>th</sup> Street                            | Signal          | 9.4             | A   | 16.9         | B   | 9.9          | A   | 18.2         | B   | 0.5      | 1.3  |

Notes:

\* Intersection #4 is analyzed as two separate stop-controlled intersections, 4a and 4b

AWSC = all-way stop control

Delay = average vehicle delay (seconds)

LOS = level of service

TWSC = two-way stop control

Source: Stantec 2019.

### *Seventh Street – Permanent Partial Closure*

The City's Northern Downtown Pedestrian Linkages Study (2006) identifies the closure of 7<sup>th</sup> Street between A Street and the alley to the immediate west of A Street to create the Museum Square Plaza. This section analyzes the partial closure of 7<sup>th</sup> Street with an 80-foot roundabout under cumulative conditions. The cumulative conditions traffic volumes presented in the previous section were redistributed based on the closed section of roadway and LOS calculated for the affected intersections.

Peak hour LOS calculated using the redistributed traffic volumes are summarized in Table 3.8-7, which provides a comparison between without-project and with-project conditions with-the 7<sup>th</sup> Street permanent partial closure conditions. The A Street and 7<sup>th</sup> Street intersection and the A Street and 6<sup>th</sup> Street/Santa Rosa Plaza intersection were analyzed for conditions with an 80-foot roundabout. It is important to note the Downtown Specific Plan does not specify the size of the roundabout, but the Northern Downtown Pedestrian Linkages Study did include 110-foot roundabouts. The proposed project includes the modification of the roundabouts to 80-foot diameters and clarification in the Specific Plan to reduce the diameter size so that it will fit into the existing right-of-way and not impact the project site's layout.



HCM delay methodology was used to analyze the signalized intersections and the stop-controlled intersections. Roundabout analysis was conducted using SIDRA software. Detailed LOS calculation worksheets are provided in the Traffic Study.

The table shows that with the permanent partial closure of 7<sup>th</sup> Street, the study area intersections would operate at LOS C or better except the following intersections, which are forecast to operate at LOS E or LOS F with partial closure of 7<sup>th</sup> Street:

- Morgan Street and 9<sup>th</sup> Street
- A Street and 7<sup>th</sup> Street (PM) – without roundabout
- A Street and 6<sup>th</sup> Street/Santa Rosa Plaza (PM) – without roundabout

**Table 3.8-7: Intersection Level of Service Summary – 7<sup>th</sup> Street Partial Closure**

| Intersection Name  | Traffic Control | Without-Project |     |              |     | With-Project<br>With Seventh Street Partial Closure |     |              |     | Increase |       |
|--|-----------------|-----------------|-----|--------------|-----|---|-----|--------------|-----|----------|-------|
|  |                 | AM Peak Hour    |     | PM Peak Hour |     | AM Peak Hour  |     | PM Peak Hour |     | AM       | PM    |
|  |                 | Delay           | LOS | Delay        | LOS | Delay   | LOS | Delay        | LOS |          |       |
| 1. Morgan Street and 9 <sup>th</sup> Street                    | AWSC            | 40.1            | E   | 38.9         | E   | 54.7  | F   | 54.5         | F   | 14.6     | 15.6  |
| 2. A Street and 8 <sup>th</sup> Street                         | TWSC            | 10.2            | B   | 10.4         | B   | 10.5  | B   | 10.8         | B   | 0.3      | 0.4   |
| 3. B Street and 7 <sup>th</sup> Street                         | Signal          | 14.7            | B   | 98.2         | F   | 15.1  | B   | 102.3        | F   | 0.4      | 4.1   |
| *4a. A Street and 7 <sup>th</sup> Street                       | AWSC            | 10.1            | B   | 12.4         | B   | 10.3  | B   | 12.5         | B   | 0.2      | 0.1   |
| *4b. A Street and 7 <sup>th</sup> Street                       | TWSC            | 22.2            | C   | 102.4        | F   | 22.6  | C   | 113.6        | F   | 0.4      | 11.2  |
|  | Roundabout      | -               | -   | -            | -   | 11.7  | B   | 16.6         | B   | -10.5    | -85.8 |
| 5. Morgan Street and 7 <sup>th</sup> Street                    | TWSC            | 9.8             | A   | 9.7          | A   | 0.0   | A   | 0.0          | A   | -9.8     | -9.7  |
| 6. A Street and 6 <sup>th</sup> Street/ Santa Rosa Plaza       | TWSC            | 14.0            | B   | 40.9         | E   | 14.5  | B   | 47.3         | E   | 0.5      | 6.4   |
|  | Roundabout      | -               | -   | -            | -   | 10.8  | B   | 10.9         | B   | -3.2     | -30.0 |
| 7. Morgan Street /US 101 NB On-Ramp and 6 <sup>th</sup> Street | Signal          | 12.4            | B   | 17.2         | B   | 13.5  | B   | 18.7         | B   | 1.1      | 1.5   |
| 8. Davis Street and 6 <sup>th</sup> Street                     | Signal          | 9.4             | A   | 16.9         | B   | 10.0  | B   | 17.7         | B   | 0.6      | 0.8   |

Notes:

\* Intersection #4 is analyzed as two separate stop-controlled intersections, 4a and 4b

AWSC = All-Way Stop Control

Delay = Average Vehicle Delay (seconds)

LOS = Level of Service

NB = northbound

TWSC = Two-Way Stop Control

As shown in Table 3.8-7 and mentioned above, the intersection of A Street and 7<sup>th</sup> Street and the intersection of A Street and 6<sup>th</sup> Street/Santa Rosa Plaza are forecast to operate at LOS F and LOS E



respectively, during the PM peak hour with the partial closure of 7<sup>th</sup> Street. However, with the installation of a roundabout, the intersections are forecast to operate at LOS B under AM and PM peak hour conditions.

Feasible LOS improvements at the Morgan Street and 9<sup>th</sup> Street intersection are presented for information purposes only below.

The proposed project does not result in a significant impact under existing plus project conditions; therefore, no project mitigation is required.

The following intersections would operate at LOS E or LOS F under long-range cumulative conditions:

- Morgan Street and 9<sup>th</sup> Street
- A Street and 7<sup>th</sup> Street
- A Street and 6<sup>th</sup> Street/Santa Rosa Plaza (with 7<sup>th</sup> Street Partial Closure)

The intersection of Morgan and 9<sup>th</sup> Street listed above is forecast to operate at LOS E under the cumulative conditions scenario, replacing the existing stop sign with a traffic signal would improve conditions to LOS B. A signal warrant analysis conducted for the intersections has determined that the traffic volumes meet the peak hour warrant criteria for cumulative conditions both without and with the project (signal warrant analysis is provided in the Traffic Study). Installation of a traffic signal would improve the intersections to operate at LOS B under the cumulative conditions as shown in Table 3.8-8.

**Table 3.8-8: Intersection Level of Service Summary – Cumulative Conditions (2040) with Improvements**

| Intersection Name                        | Cumulative without Project |     |              |     | Cumulative with Project with Improvements |          |                |          | Net Change with Mitigation |                  |
|--|----------------------------|-----|--------------|-----|---|----------|----------------|----------|----------------------------|------------------|
|  | AM Peak Hour               |     | PM Peak Hour |     | AM Peak Hour                              |          | PM Peak Hour   |          |                            |                  |
|  | Delay                      | LOS | Delay        | LOS | Delay                                     | LOS      | Delay          | LOS      | AM                         | PM               |
| Morgan Street and 9 <sup>th</sup> Street | 40.1                       | E   | 38.9         | E   | 18.4<br>(19.9)                            | B<br>(B) | 17.1<br>(19.5) | B<br>(B) | -21.7<br>(-20.2)           | -21.8<br>(-19.4) |

Notes:

\* LOS E with the partial closure of 7<sup>th</sup> Street only

Values in parentheses represent conditions with the partial closure of 7<sup>th</sup> Street

LOS = level of service

The City of Santa Rosa's Downtown Specific Plan 2007 identifies development guidelines to install traffic calming roundabouts at the intersection of A Street and 7<sup>th</sup> Street, and at the intersection of A Street and 6<sup>th</sup> Street/Santa Rosa Plaza. To determine the feasibility of installing a roundabout at these intersections, a roundabout analysis was conducted using SIDRA software, and it was determined that a roundabout installation would improve operations at the intersections under cumulative conditions as shown in Table 3.8-9, with each intersection operating at LOS B or better. Detailed LOS calculation worksheets are provided in the Traffic Study. Table 3.8-10 lists the improvements that would improve LOS in the cumulative conditions setting.



**Table 3.8-9: Intersection Level of Service Summary – Cumulative Conditions (2040) with Roundabout**

| Intersection Name                                     | Cumulative without Project |     |              |     | Cumulative with Project with Roundabout |          |                |          | Net Change with Improvements |                  |
|---|----------------------------|-----|--------------|-----|---|----------|----------------|----------|------------------------------|------------------|
|   | AM Peak Hour               |     | PM Peak Hour |     | AM Peak Hour                            |          | PM Peak Hour   |          |                              |                  |
|   | Delay                      | LOS | Delay        | LOS | Delay                                   | LOS      | Delay          | LOS      | AM                           | PM               |
| A Street and 7 <sup>th</sup> Street                   | 22.2                       | C   | 102.4        | F   | 12.1<br>(11.7)                          | B<br>(B) | 18.0<br>(16.6) | B<br>(B) | -10.1<br>(-10.5)             | -84.4<br>(-85.8) |
| A Street and 6 <sup>th</sup> Street/Santa Rosa Plaza* | 14.0                       | B   | 40.9         | E   | 10.8<br>(10.8)                          | B<br>(B) | 10.9<br>(10.9) | B<br>(B) | -3.2<br>(-3.2)               | -30.0<br>(-30.0) |

Notes:

\* Significantly impacted with the partial closure of 7<sup>th</sup> Street only

Values in parentheses represent conditions with the partial closure of 7<sup>th</sup> Street

LOS = level of service

**Table 3.8-10: Improvements to Level of Service – Cumulative Conditions (2040) with-Project**

| Location                                 | Improvement            |
|--|------------------------|
| Morgan Street and 9 <sup>th</sup> Street | Install traffic signal |
| A Street and 7 <sup>th</sup> Street      | Install roundabout     |
| A Street and 6 <sup>th</sup> Street      | Install roundabout     |

The City's downtown exception acknowledges that it is the City's goal to grow the downtown area, and that some traffic congestion leading to LOS E or F may be a result even with implementation of mitigation.

The City's Guidance for the Preparation of Traffic Operational Analysis includes the following recommendation for applicability of Policy TD-1 of the Santa Rosa General Plan, which shall be based on the following conditions:

- a. Proximity of a critical intersection to freeway access or a critical intersection directly affected by freeway access, where such locations may require multi-jurisdictional funding and/or major cost improvements of freeway widening and overpass reconstruction.
- b. Statements of overriding consideration and/or exceptions to the LOS/VMT standards may be granted by the City Council after consideration by the Planning Commission. Such findings shall be based on a statement of overriding consideration consistent with the latest guidelines of CEQA. Consideration for exception to LOS/VMT standards under this category shall demonstrate the following:
  - i. The total benefit of the project and/or traffic mitigations associated with the project outweigh the potential traffic impacts at a given intersection or roadway segment;
  - ii. Mitigations are provided to the extent possible at the intersection or roadway segment requested for exception;





- iii. A Transportation Spend Management program is provided; and
- iv. An agreement is established with the City to provide for abatement for those intersections or roadway segments which may exceed the LOS criteria provided in this policy and the City of Santa Rosa General Plan.

Because the proposed project would not result in an impact under CEQA, the City of Santa Rosa will pursue an agreement with the Applicants under item iv. to implement feasible improvements in the form of traffic roundabouts and signalization. The feasible improvements below are provided for informational purposes only.

#### *Feasible Improvements*

Under the cumulative conditions scenario, the traffic added by the proposed project contributes to conditions of LOS E or LOS F at the following intersections. However, these are not considered to be significantly impacted due to the exception provided for intersections within the downtown area, provided that feasible improvements are incorporated:

- 1. Morgan Street and 9<sup>th</sup> Street (unsignalized)
- 4. A Street and 7<sup>th</sup> Street (unsignalized)
- 6. A Street and 6<sup>th</sup> Street/Santa Rosa Plaza (with 7<sup>th</sup> Street Partial Closure)

Potential improvements have been identified for each of the intersections listed above, which improve LOS at each location. These improvements consist of installation of a traffic signal at the intersection of Morgan Street and 9<sup>th</sup> Street, and installation of a roundabout at the A Street and 7<sup>th</sup> Street intersection, and for the A Street and 6<sup>th</sup> Street intersection as specified in the Santa Rosa's Downtown Station Area Specific Plan.

#### *Alternative Transportation Impacts*

The proposed project would be served by City Bus Routes 1, 2B, and 10, with bus stops within 0.25 mile of the project site. In addition, the project site is also located within 0.25 mile of the SMART Station and 0.30 mile from 2<sup>nd</sup> Street Transit Mall. Both the Caritas Center and Caritas Homes would provide bicycle parking spaces. In addition, there are Class II bicycle lanes on 6<sup>th</sup> Street, Morgan Street, and 7<sup>th</sup> Street east of the project site. There is also a signed bicycle route on A Street north of 7<sup>th</sup> Street. The proposed project would not eliminate the bicycle lanes or introduce a barrier to alternative transportation; therefore, the impact would be less than significant.

#### **Level of Significance Before Mitigation**

Potentially Significant Impact.



## Mitigation Measures

**MM TRANS-1: Construction Traffic Management Plan.** A traffic management plan shall be submitted to the City for review and approval prior to the issuance for construction activities of any construction permits. The traffic management plan shall be prepared in accordance with both the California's Manual on Uniform Traffic Control Devices and Work Area Traffic Control Handbook. The traffic management plan shall route trucks into the sites avoiding 7<sup>th</sup> Street, A Street north of 7<sup>th</sup> Street, and Morgan Street north of 7<sup>th</sup> Street as much as possible. Avoiding these streets keeps construction traffic removed from the sensitive single-family homes along Morgan and A streets. The traffic management plan shall also include strategies for minimizing impacts to traffic, effectively managing traffic flow and reducing the number of trips accessing the project site during the peak hours of 7 AM to 9 AM and 4 PM to 6 PM. These strategies shall include, but not be limited to:

- Temporary traffic control plan that addresses traffic safety and control through the work zone;
- Directing construction traffic with a flagger;
- Placing temporary signage, lighting, and traffic control devices if required, including but not limited to appropriate signage along access routes to indicate the presences of heavy vehicles and construction traffic;
- Require parking within designated areas on the project site and prohibit parking along the shoulders of adjacent roadways;
- Provide for emergency vehicle movement through the project site at all times during construction and operation;
- Provide approved offsite parking for workers with shuttle services to transport them onsite when and if onsite parking becomes restricted or unfeasible;
- Facilitate materials delivery during off-peak traffic hours and comply with regulations governing oversized loads;
- Encourage vanpool and carpool for construction employees commuting to the project site.

### Level of Significance After Mitigation

Less Than Significant with Mitigation.

### Vehicle Miles Traveled

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**Impact TRANS-2** The proposed project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

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### Impact Analysis

SB 743 (Steinberg 2013) required changes to the guidelines implementing CEQA Guidelines (CCR, Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. The Office of Planning and Research proposed changes to the CEQA Guidelines that identify VMT as the most appropriate



metric to evaluate a project's transportation impacts. Regulatory changes to the CEQA Guidelines that implement SB 743 were approved on December 28, 2018. The statewide implementation date is July 1, 2020, but agencies may opt-in use of new metrics prior to that date. The City has not yet adopted new guidelines or thresholds of significance for evaluating VMT. Therefore, as directed by CEQA Guidelines Section 15064.3 (b), the analysis here is limited to a qualitative evaluation.

The project site is within 0.25 mile of the SMART Station and 0.30 mile from 2<sup>nd</sup> Street Transit Mall. The project site is also well served by bus service. East of the project, the closest bus stop is located on B Street at Santa Rosa Plaza; south of the project, a bus stop is located on 5<sup>th</sup> Street at Morgan Street; west of the project, a bus stop is located on 6<sup>th</sup> Street at Wilson Street; towards north of the project site, the closest bus stop is located on 9<sup>th</sup> Street at Davis Street. CityBus Route 10 provides service every 30 minutes on a weekday from the Transit Mall to the Coddington Transit Hub, which runs through Morgan Street near the project site. CEQA Guidelines Section 15064.3, subdivision (b)(1), states that, "generally, projects within one-half mile of either an existing major transit stop, or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact". Appendix M of the CEQA Guidelines defines a "major transit stop" as "a site containing an existing rail transit station". Based on the location of the project site, which is less than half mile from the SMART Station the proposed project would have a less than significant transportation impact based on VMT. Additionally, the proposed project represents infill development and would represent a higher density development. Lastly, many of the proposed Caritas Center clients do not own vehicles and would access the site through alternative transportation modes, such as buses, walking, or bicycling.

**Level of Significance Before Mitigation**

Less Than Significant Impact.

**Mitigation Measures**

No mitigation is necessary.

**Level of Significance After Mitigation**

Less Than Significant Impact.

**Emergency Access**

---

**Impact TRANS-3 The proposed project would not result in inadequate emergency access.**

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**Impact Analysis**

Construction and operation of the proposed project may affect streets during partial closure of 7<sup>th</sup> Street during construction or under long-term conditions as the roadway improvements are constructed or the City decides to partially close 7<sup>th</sup> Street on a permanent basis. The proposed traffic improvements would be constructed to meet City standards and allow emergency access vehicles to egress and ingress to and from the project site and along the area roadways impacted by the project. Additionally, the proposed project would not affect any existing City emergency access routes. The proposed project would be designed to incorporate all required Santa Rosa Fire Department (SRFD) standards to ensure that the project would not result in hazardous design features or inadequate emergency access. Therefore, impacts would be less than significant.

**Level of Significance Before Mitigation**

Less Than Significant Impact.



### **Mitigation Measures**

No mitigation is necessary.

### **Level of Significance After Mitigation**

Less Than Significant Impact.

### **Alternative Transportation**

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**Impact TRANS-4** The proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?

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### **Impact Analysis**

The City's Downtown Specific Plan is intended to create a more opportunities for alternative transportation through walking and bicycling. The Downtown Specific Plan area contains a well-developed pedestrian bicycle network and includes the SMART multi-use path. Additional improvements are identified in the Northern Downtown Pedestrian Linkages Study. The proposed project would not result in any impacts to existing bicycle paths or pedestrian walkways. Transportation improvements to affected intersections may include signalization or roundabouts that would enhance bicycle and pedestrian safety.

The proposed project includes bicycle storage for Caritas Homes residents and Caritas Center clients and employees. Based on past experience, the residents of Caritas Homes and clients at Caritas Center would have low private vehicle ownership. According to the Downtown Specific Plan, all residential development in the Specific Plan Area would be considered transit-supportive. Increases in ridership would be expected on Santa Rosa CityBus, Sonoma County Transit, and Golden Gate Transit. As such, the proposed project would not be in conflict with adopted policies for alternative transportation but would be considered to be supportive of alternative transportation.

### **Level of Significance Before Mitigation**

Less Than Significant Impact.

### **Mitigation Measures**

No mitigation is necessary.

### **Level of Significance After Mitigation**

Less Than Significant Impact.



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## 3.9 TRIBAL CULTURAL RESOURCES

This section discusses impacts to cultural resources directly related to Native American tribal cultures that populated the area where the project is located. The distinction for tribal cultural resources is that they are described as a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. Cultural resources are generally considered as archaeological or paleontological resources that are typically beneath the surface of the ground and are discovered or uncovered through disturbance of the site. The potential tribal cultural resources impacts associated with the proposed project are identified and discussed herein.

Information in this section is based on the Archaeological Survey Report prepared by Alta Archaeological Consulting on February 25, 2019, and included as Appendix F. Where general information is applicable to both Section 3.4, Cultural Resources, and this section, the reader will be referred to Section 3.4 for additional detail.

### 3.9.1 Environmental Setting

#### Project Setting

The project site is located within the southernmost portion of the St. Rose Historic Preservation, which is dominated by residences dating from the late nineteenth and early twentieth centuries. The project site is fully developed with six structures, consisting of the Catholic Charities' Family Support Center and residential dwelling units that have been converted to support Catholic Charities' Homeless Services Center and Drop-in Center. At the time the NOP was issued, there was only one single-family unit at 512 Morgan still in use as a residence at the project site. Since that time, Catholic Charities has obtained ownership of the single-family home at 512 Morgan, and it is currently vacant.

#### Ethnographic Setting

Prior to Euro-American occupation, the Southern Pomo people occupied the central and southern portions of Sonoma County from the coast to the Russian River, extending just south of Gualala in the north to Sebastopol in the south (McLendon and Oswalt 1978:278). The Southern Pomo subsistence focused upon freshwater fish, acorns, and terrestrial game. Intertidal resources along the coast included seaweed, shellfish, and marine fish, which were harvested largely during summer months. In the winter, the Southern Pomo moved inland to fish salmon and steelhead in the Russian River, hunt deer, and gather acorns (McLendon and Oswalt 1978: 276).

The project site lies within the ethnographic territory of the *Bitakomtara* tribelet of the Southern Pomo linguistic affiliation (Stewart 1943). According to Stewart (1943:53), the tribal area of the *Bitakomtara* includes about 200 square miles. It is bounded on the north by Mark West Creek; on the east by Sonoma Canyon, Bear Creek, and the summit of the Mayacama Mountains; on the south by the peak of Sonoma Mountain (north of Cotati) and the end of the Laguna de Santa Rosa Creek; and on the west by Laguna de Santa Rosa (Stewart 1943:53). In historical documents, the Indians of the Santa Rosa Plain are often referred to as the Gualomi tribelet. Gualomi is the Coast Miwok name for the people that inhabited the Santa Rosa area, but since the missionaries used Coast Miwok guides, the people were referred to by



their Coast Miwok name. Gualomi is also used in reference to a main village site along Santa Rosa Creek.

The nearest reported ethnographic resource is the village site of *wī'łōk*. This village site is described as being at, "a point about three miles northeast of Santa Rosa" (Barrett 1908:222). No ethnographic resources are known within the current project area (Alta Archaeological Consulting 2019).

## Native American Consultation

As the lead agency under CEQA, the City is responsible for complying with the requirements of PRC Section 5097.94. The City oversees consultation with Native American tribes for this project. On September 26, 2018, the City mailed AB 52 consultation letters to the Federated Indians of the Graton Rancheria and the Lytton Rancheria of California. On October 3, 2018, the Lytton Rancheria legal representative Brenda L. Tomaras responded via email to acknowledge receipt of the AB 52 consultation request and did not request consultation.

Alta Archaeological Consulting contacted NAHC on December 20, 2018, to request a search of the Sacred Lands File and a list of Native American contacts that might have knowledge of tribal cultural resources within the project site. NAHC responded on January 8, 2019, stating that a search of the Sacred Lands File was negative. NAHC also provided a list of eight local tribes and organizations to contact for additional information on potential tribal cultural resources in the project area.

On February 19, 2019, the City sent notification letters pursuant to SB 18 to the following local tribes identified by NAHC: Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Graton Rancheria, Kashia Band of Pomo Indians of the Stewarts Point Rancheria, Lytton Rancheria, Middletown Rancheria, and the Mishewal-Wappo Tribe.

On February 20, 2019, the Tribal Cultural Resources Manager for the Stewarts Point Rancheria Band of Kashia Pomo Indians, Lorin Smith Jr., responded, stating that the proposed project is outside of the Aboriginal Territory of the Stewarts Point Rancheria Band of Kashia Pomo Indians and that the Tribe had no additional concerns or comments. On February 25, 2019, the Tribal Historic Preservation Officer for the Middletown Rancheria tribe, Larry Longee, Jr., recommended that, should any new information or evidence of human habitation be found at the project site, all work would cease, and they would be contacted immediately. No other responses from the tribal representatives have been received to date.

### 3.9.2 Regulatory Setting

Refer to Section 3.4, Cultural Resources, for additional federal and state regulations and local policies applicable to tribal cultural resources.

## State

Assembly Bill 52 (PRC Section 21084.2)

AB 52 establishes a formal consultation process for California tribes as part of CEQA and equates significant impacts on "tribal cultural resources" with significant environmental impacts (PRC Section 21084.2). AB 52 defines a "California Native American tribe" as a Native American tribe located in California that is on the contact list maintained by NAHC. AB 52 requires formal consultation with



California Native American tribes prior to determining the level of environmental documentation if a tribe has requested to be informed of proposed projects by the lead agency. AB 52 also requires that consultation address project alternatives and mitigation measures for significant effects, if requested by the California Native American tribe, and that consultation be considered concluded when either of the parties agrees to measures to mitigate or avoid a significant effect, or the agency concludes that mutual agreement cannot be reached. Under AB 52, such mitigation or avoidance measures must be recommended for inclusion in the environmental document and adopted mitigation monitoring program if determined to avoid or lessen a significant impact on a tribal cultural resource.

## Senate Bill 18

SB 18 requires cities and counties to consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Places. This allows Native American tribes the opportunity to provide input with respect to the possible preservation of, or the mitigation of impacts on, specified Native American places, features, and objects located within that jurisdiction. This consultation is required prior to amending or adopting any general plan or specific plan or designating land as open space. As noted above, the City contacted NAHC and local tribes in accordance with SB 18 requirements.

### 3.9.3 Environmental Impacts

This section analyzes the project's potential to result in significant tribal resources impacts. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid that impact.

#### Methodology

The following impact analysis is based on the Archaeological Survey Report prepared for the proposed project by Alta Archaeological Consulting on February 25, 2019, which is included as Appendix F. The archaeological survey included a records search at the NWIC, literature review, archaeological field survey, and search of the Sacred Lands File from NAHC. In addition, the City conducted AB 52 and SB 18 Native American consultations.

#### Thresholds of Significance

In accordance with the CEQA Guidelines' Appendix G Environmental Checklist, the following questions were analyzed and evaluated to determine whether impacts to tribal cultural resources are significant.

Would the proposed project:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined by PRC Section 21047 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - i. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or





- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1? In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

## Project Impact Analysis and Mitigation Measures

### Tribal Cultural Resources

---

|                     |  |
|---------------------|--|
| <b>Impact TRI-1</b> | <b>The project would not cause a substantial adverse change in the significance of a tribal cultural resource a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, local register of historical resources as defined in PRC section 5020.1(k), or by the lead agency pursuant to criteria set forth in PRC section 5024.1(c).</b> |
|---------------------|--|

---

### Impact Analysis

A search of the NAHC Sacred Lands File performed as part of the Archaeological Survey Report resulted in the identification of no known tribal cultural resources within or near the project site. Furthermore, consultation with NAHC and local tribes did not identify known tribal cultural resources within the project site. Therefore, the proposed project is not anticipated to impact any known or potential tribal cultural resources.

However, subsurface project construction activities such as excavating and grading could potentially damage or destroy previously undiscovered unique tribal cultural resources. To reduce potential impacts to previously undiscovered tribal cultural resources, the proposed project would be required to implement mitigation measures CUL-3, CUL-4, and CUL-5. Implementation of mitigation measures CUL-3 and CUL-4 would require cultural resource awareness training and construction monitoring by a qualified archaeologist. If an inadvertent discovery were to occur, the proposed project would be required to implement mitigation measure CUL-5 and stop all ground-disturbing activities within 50 feet of the find until it is evaluated by a qualified archaeologist. As such, impacts related to undiscovered tribal cultural resources would be less than significant with implementation of mitigation measures CUL-3, CUL-4, and CUL-5.

### Level of Significance Before Mitigation

Potentially Significant Impact.

### Mitigation Measures

Mitigation Measures CUL-3, CUL-4, and CUL-5 are required.

### Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.



## 3.10 ENERGY

The CEQA Guidelines amendment effective December 28, 2018, updated Section 15125.2 Consideration and Discussion of Significant Environmental Impacts with a new subsection (b), which requires analysis of energy impacts. The analysis of energy impacts has been mandatory since 2009 but was only included in Appendix F of the CEQA Guidelines and often overlooked in the preparation of EIR documents. Pursuant to the CEQA Guidelines amendments, an EIR must analyze whether project results in, “wasteful, inefficient, or unnecessary” energy consumption; determine significance; and include energy efficiency measures, if necessary. This section of the Draft EIR responds to the new checklist questions included in Appendix G of the CEQA Guidelines.

### 3.10.1 Environmental Setting

PG&E provides electricity and natural gas service to the City. The City depends on energy to maintain a vital economy and desirable lifestyle. It uses electricity and natural gas to light, heat, and cool structures and to power its office equipment, industrial machinery, public services, and home appliances. The City also uses petroleum products to move people and products along its transportation corridors. Energy is vital to the continued functioning of housing, employment, transportation, and public services and facilities in the City.

Upon buildout of the project site, electricity to the project site would be provided by PG&E. All electricity infrastructure would be located underground and would tie-in to existing infrastructure. In February 2018, PG&E announced that it had reached California's 2020 renewable energy goal 3 years ahead of schedule and now delivers nearly 80 percent of its electricity from GHG-free resources. Approximately 33 percent of PG&E's electricity came from renewable resources including solar, wind, geothermal, biomass and small hydroelectric sources in 2017. Additionally, 78.8 percent of PG&E's total electric power mix is from GHG-free sources including nuclear, large hydroelectric, and other renewable sources of energy.

### 3.10.2 Regulatory Setting

#### Federal

##### Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission (FERC) is an independent agency that regulates the interstate transmission of electricity, natural gas, and oil. FERC also reviews proposals to build liquefied natural gas terminals and interstate natural gas pipelines as well as licensing hydropower projects. Licensing of hydroelectric facilities under the authority of FERC includes input from state and federal energy and power generation, environmental protection, fish and wildlife, and water quality agencies.

##### National Highway Traffic Safety Administration Standards

Vehicle fuel efficiency is regulated at the federal level. Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards and for revising existing standards.

NHTSA and EPA are taking coordinated steps to enable the production of clean energy vehicles with improved fuel efficiency. NHTSA sets the Corporate Average Fuel Economy (CAFE) levels, which are



rapidly increasing over the next several years to improve energy security and reduce fuel consumption. The first phase of the CAFE standards (for model years 2017 to 2021) is projected to require, on an average industry fleet-wide basis, a range from 40.3 to 41.0 miles per gallon in model year 2021. The second phase of the CAFE program (for model years 2022 to 2025) is projected to require, on an average industry fleet-wide basis, a range from 48.7 to 49.7 miles per gallon in model year 2025. The second phase of standards has not been finalized due to the statutory requirement that NHTSA set average fuel economy standards not more than 5 model years at a time.

## State

### California Public Utilities Commission Requirements

The California Public Utilities Commission (CPUC) is a state agency created by a constitutional amendment to regulate privately-owned utilities providing telecommunications, electric, natural gas, water, railroad, rail transit, and passenger transportation services and in-state moving companies. CPUC is responsible for assuring that California utility customers have safe, reliable utility services at reasonable rates while protecting utility customers from fraud. CPUC regulates the planning and approval for the physical construction of electric generation, transmission, or distribution facilities and local distribution pipelines of natural gas.

### California Energy Commission

The California Energy Commission (CEC) is California's primary energy policy and planning agency. Created by the California Legislature in 1974, the CEC has five major responsibilities: (1) forecasting future energy needs and keeping historical energy data; (2) licensing thermal power plants 50 megawatts or larger; (3) promoting energy efficiency through appliance and building standards; (4) developing energy technologies and supporting renewable energy; and (5) planning for and directing state responses to energy emergencies. Under the requirements of the California PRC, CEC, in conjunction with the California Department of Conservation Division of Oil, Gas, and Geothermal Resources, is required to assess electricity and natural gas resources on an annual basis or as necessary.

### Title 20 and Title 24, California Code of Regulations

New buildings constructed in California must comply with the standards in Title 20, Energy Building Regulations, and Title 24, Energy Conservation Standards, of the CCR.

Title 20 contains a range of standards, such as power plant procedures and siting, energy efficiency standards for appliances, and ensuring reliable energy sources are provided and diversified through energy-efficiency and renewable energy resources.

Title 24 (AB 970) contains energy-efficiency standards for residential and nonresidential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy-efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs.

Part 11 of Title 24 is the CALGreen code, which sets minimum and mandatory sustainability requirements to reduce environmental impact through better planning, design, and construction practices. CALGreen works along with the mandatory construction codes of Title 24 and is enforced at the local level.



Any project-related construction would be required to comply with the Title 24 codes currently in place, including the CALGreen code. The existing 2016 standards became effective on July 1, 2017.

#### Assembly Bill 1493 – Clean Car Standards (Pavley)

This bill was passed in 2002 and requires CARB to develop and implement regulations to reduce automobile and light truck GHG emissions, through mandating gradual reductions in global warming pollutants from cars and light trucks sold in California from 2009 through 2016. The average gram-per-mile reduction of GHG emissions from new California cars and light trucks is required to be about 30 percent in 2016 compared to model year 2004 vehicles.

CARB adopted the Advanced Clean Cars (ACC) program in 2012 in coordination with EPA and NHTSA. The ACC program combined the control of criteria pollutants and GHG emissions into a single coordinated set of requirements for model years 2015 through 2025. CARB adopted a new approach to passenger vehicles—cars and light trucks—by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. The new standard drops GHG emissions to 166 grams per mile, a reduction of 34 percent compared to 2016 levels, through 2025.

#### Warren-Alquist Energy Resources Conservation and Development Act

Initially passed in 1974 and amended since, the Warren-Alquist Energy Resources Conservation and Development Act (Warren-Alquist Act) created the CEC, California's primary energy and planning agency. The seven responsibilities of CEC are: forecasting future energy needs, promoting energy efficiency and conservation through setting standards, supporting energy related research, developing renewable energy resources, advancing alternative and renewable transportation fuels and technologies, certifying thermal power plants 50 megawatts or larger, and planning for and directing state responses to energy emergencies. CEC regulates energy resources by encouraging and coordinating research into energy supply and demand problems to reduce the rate of growth of energy consumption. Additionally, the Warren-Alquist Act acknowledges the need for renewable energy resources and encourages CEC to explore renewable energy options that would be in line with environmental and public safety goals. (Warren-Alquist Act PRC section 25000 et seq.)

### Local

#### City of Santa Rosa General Plan Energy

##### **OSC-K.** Reduce energy use in existing and new commercial, industrial, and public structures

- **OSC-K-1.** Promote the use of site planning, solar orientation, cool roofs, and landscaping to decrease summer cooling and winter heating needs. Encourage the use of recycled content construction materials.
- **OSC-K-2.** Identify opportunities for decreasing energy use through installation of energy-efficient lighting, reduced thermostat settings, and elimination of unnecessary lighting in public facilities.



- **OSC-K-3.** Identify and implement energy conservation measures that are appropriate for public buildings. Implement measures that are at least as effective as those in the retrofit ordinances for commercial and office buildings.
- **OSC-K-4.** Advance the city's environmentally sensitive preferred purchasing and green fleet conversion programs.
- **OSC-K-5.** Implement measures of the Climate Action Plan that increase energy efficiency, including retrofitting existing buildings and facilitating energy upgrades.

**OSC-L.** Encourage the development of nontraditional and distributed sources of electrical generation

- **OSC-L-1.** Reconsider any existing codes and policies that constrain or prohibit the installation of environmentally acceptable forms of distributed generation:

*Distributed generation is small-scale sources of electrical generation, such as microturbines, fuel cells, photovoltaics, and other sources of electrical power that can be effectively located in office parks, industrial facilities, and other consumer buildings.*

- **OSC-L-2.** Participate in state and local efforts to develop appropriate policies and review procedures for the installation of photovoltaic solar and other environmentally acceptable forms of distributed generation.
- **OSC-L-3.** Establish a city renewable energy program that will allow the city to generate or receive a significant portion of energy from renewable sources.

**OSC-M.** Reduce Greenhouse Gas Emissions

- **OSC-M-1.** Meet local, regional and state targets for reduction of GHG emissions through implementation of the Climate Action Plan.

City of Santa Rosa Downtown Station Area Specific Plan

**Goal SP-LU-1.** Ensure land uses that promote use of transit

- **Policy SP-LU-1.2.** Improve pedestrian, bicycle, and bus transit connections from surrounding areas to the Downtown SMART Station site as well as between neighborhoods surrounding the SMART Station site.
- **Policy SP-LU-1.3.** Create pedestrian-friendly environments and provide convenient connections to the transit facility for all modes of transportation.
- **Policy SP-LU-1.4.** As part of new development and/or major renovation of Santa Rosa Plaza, require mixed-use redevelopment of the existing parking structures and provision of activity-generating uses at the street level along all street frontages, including Morgan Street, A Street, First Street, Seventh Street and B Street.

**Goal SP-LU-2.** Encourage variety in new housing development

- **Policy SP-LU-2.1.** Provide a variety of housing types and densities in the Specific Plan Area.



- **Policy SP-LU-2.2.** Consider use of “live-work” units as a transitional use between residential and industrial areas.
- **Policy SP-LU-2.3.** Utilize existing City programs and policies to encourage and facilitate development of affordable housing within the Specific Plan Area.
- **Policy SP-LU-2.4.** Allow adjustments to residential development standards for housing designed to be occupied by individuals with disabilities in accordance with the City’s Reasonable Accommodation Ordinance.
- **SP-LU-2.6.** Review the City’s Housing Allocation Plan to ensure it is a tool to provide affordable housing throughout the community, including the Station Plan Area. Evaluate alternative affordability requirements for their feasibility, including 20 percent very low and low, 20 percent moderate, and 60 percent above moderate, the existing 15 percent to low income requirement and other creative options being utilized to provide affordable housing.

**Goal SP-LU-3.** Encourage new development to incorporate sustainable building principles.

- **Policy SP-LU-3.1.** Promote site and building design that improves energy efficiency by incorporating natural cooling and passive solar heating. This may include extended eaves, window overhangs, awnings and tree placement for natural cooling, and building and window orientation to take advantage of passive solar heating.
- **Policy SP-LU-3.2.** Support the use of green or sustainable building materials, including recycled content materials that are consistent with the underlying architectural style and character of the building.
- **Policy SP-LU-3.3.** Encourage green site design by utilizing native trees and plants where possible, incorporating permeable paving and designing resource-efficient landscapes and gardens.

### 3.10.3 Environmental Impacts

#### Methodology

The energy requirements for the proposed project were determined using the construction and operational estimates generated from the Air Quality Analysis (refer to Appendix B). Short-term construction and long-term energy consumption are discussed below.

#### Thresholds of Significance

In accordance with the CEQA Guidelines’ Appendix G Environmental Checklist, the following questions were analyzed and evaluated to determine whether impacts to energy are significant. Would the proposed project:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?



## Project Impact Analysis and Mitigation Measures

### Wasteful, Inefficient, or Unnecessary Use of Energy

|                    |  |
|--------------------|--|
| <b>Impact EN-1</b> | <b>The proposed project would not result in a potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</b> |
|--------------------|--|

#### Impact Analysis

##### Short-Term Construction

##### *Off-Road Equipment*

The proposed project is anticipated to be constructed in multiple phases, with the Caritas Homes Phase 1 and the Caritas Center breaking ground as early as March 2020 and completed by September 2021. The Caritas Homes Phase 2 would begin February 2022 and be completed by February 2023. Table 3.10-1 provides estimates of the proposed project's construction fuel consumption from off-road construction equipment.

**Table 3.10-1: Construction Off-Road Fuel Consumption**

| <b>Project Component</b>                   | <b>Phase</b>                     | <b>Fuel Consumption (gallons)</b> |
|--|----------------------------------|-----------------------------------|
| Caritas Homes Phase 1                      | Demolition                       | 15,361                            |
|  | Site Preparation                 | 4,127                             |
|  | Site Grading                     | 4,056                             |
|  | Building Construction            | 210,299                           |
|  | Paving                           | 4,558                             |
|  | Architectural Coating            | 1,721                             |
|  | <b>Subtotal Fuel Consumption</b> | <b>240,123</b>                    |
| Caritas Center                             | Demolition                       | 52,378                            |
|  | Site Preparation                 | 26,964                            |
|  | Site Grading                     | 21,033                            |
|  | Building Construction            | 584,677                           |
|  | Paving                           | 23,711                            |
|  | Architectural Coating            | 3,098                             |
|  | <b>Subtotal Fuel Consumption</b> | <b>711,860</b>                    |
| Caritas Homes Phase 2                      | Demolition                       | 15,361                            |
|  | Site Preparation                 | 4,127                             |
|  | Site Grading                     | 4,056                             |
|  | Building Construction            | 210,299                           |
|  | Paving                           | 4,558                             |
|  | Architectural Coating            | 1,721                             |
|  | <b>Subtotal Fuel Consumption</b> | <b>240,123</b>                    |
| <b>Total Construction Fuel Consumption</b> |                                  | <b>1,192,105</b>                  |

Source: Stantec 2019, Appendix B



As shown in Table 3.10-1, construction activities associated with the proposed project would be estimated to consume 1,192,105 gallons of diesel fuel. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the state. Therefore, it is expected that construction fuel consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region. Furthermore, mitigation measure AQ-1 would be implemented, which includes idling restrictions to reduce potential air quality impacts and would have the co-benefit of reducing fuel consumption. A conservative estimate would assume a five percent reduction in fuel use through idling restrictions.

### On-Road Vehicles

On-road vehicles for construction workers, vendors, and haulers would require fuel for travel to and from the site during construction. Table 3.10-2 provides an estimate of the total on-road vehicle fuel usage during construction. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the state. Therefore, it is expected that construction fuel consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

**Table 3.10-2: Construction On-Road Fuel Consumption**

| Project Component                                  | Total Annual Fuel Consumption (gallons) |
|--|---|
| Caritas Homes Phase 1                              | 11,173                                  |
| Caritas Center                                     | 17,227                                  |
| Caritas Homes Phase 2                              | 11,173                                  |
| <b>Total Construction On-Road Fuel Consumption</b> | <b>39,573</b>                           |

Source: Stantec 2019, Appendix B

### Long-Term Operations Transportation Energy Demand

Table 3.10-3 provides an estimate of the daily and annual fuel consumed by vehicles traveling to and from the proposed project. These estimates were derived using the same assumptions used in the operational air quality analysis for the proposed project.

**Table 3.10-3: Long-Term Operational Vehicle Fuel Consumption**

| Vehicle Type                             | Percent of Vehicle Trips | Daily VMT | Annual VMT | Average Fuel Economy (miles/gallon) | Total Daily Fuel Consumption (gallons) | Total Annual Fuel Consumption (gallons) |
|--|--------------------------|-----------|------------|-------------------------------------|--|---|
| Passenger Cars                           | 59.2%                    | 5,873     | 2,143,652  | 34.2                                | 172                                    | 62,680                                  |
| Light Trucks                             | 21.0%                    | 2,081     | 759,665    | 26.2                                | 79                                     | 28,995                                  |
| Light-Heavy to Heavy-Heavy Diesel Trucks | 13.0%                    | 1,289     | 470,609    | 6.1                                 | 211                                    | 77,149                                  |





| Vehicle Type | Percent of Vehicle Trips | Daily VMT | Annual VMT | Average Fuel Economy (miles/gallon) | Total Daily Fuel Consumption (gallons) | Total Annual Fuel Consumption (gallons) |
|--------------|--------------------------|-----------|------------|-------------------------------------|--|---|
| Other        | 6.1%                     | 609       | 222,221    | 6.1                                 | 100                                    | 36,430                                  |
| Motorcycles  | 0.6%                     | 62        | 22,675     | 50                                  | 1                                      | 454                                     |
| Total        | 100%                     | 9,915     | 3,618,814  | -                                   | 564                                    | 205,707                                 |

## Notes:

Percent of vehicle trips and VMT provided by CalEEMod.

Average fuel economy is provided by United States Department of Transportation, Bureau of Transportation Statistics and reflects fuel economy of overall fleet, not just new vehicles.

"Other" consists of buses and motor homes.

CalEEMod = California Emissions Estimator Model

VMT = vehicle miles traveled

Source: Stantec 2019, Appendix B and Appendix G

As shown above, daily vehicular fuel consumption is estimated to be 564 gallons of both gasoline and diesel fuel. Annual consumption is estimated at 205,707 gallons.

In terms of land use planning decisions, the proposed project would constitute development within an established community and would not be opening up a new geographical area for development such that it would draw mostly new trips, or substantially lengthen existing trips. The proposed project would be well positioned to accommodate existing population and reduce VMT. For these reasons, it would be expected that vehicular fuel consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than for any other similar land use activities in the region.

### Building Energy Demand

As shown in Tables 3.10-4 and 3.10-5, the proposed project is estimated to demand 529,582 kilowatt hours of electricity and 1,106,612,100-thousands of British Thermal Units of natural gas, respectively, on an annual basis.

**Table 3.10-4: Long-Term Electricity Usage**

| Land Use                | Size (ksf) | Title 24 Electricity Energy Intensity (kWh/size/year) | Nontitle 24 Electricity Energy Intensity (kWh/size/year) | Lighting Energy Intensity (kWh/size/year) | Total Electricity Energy Demand (kWh/size/year) | Total Electricity Demand (kWh/year) |
|-------------------------|------------|---|--|---|---|-------------------------------------|
| Apartment               | 128        | 332.81  | 3054.1   | 741.44                                    | 4,128.35  | 528,429                             |
| Enclosed Parking        | 54         | 3.92  | 0  | 1.75                                      | 5.67  | 306                                 |
| General Office Building | 46.59      | 6.11  | 7.84   | 3.88                                      | 17.83   | 831                                 |



| Land Use    | Size (ksf) | Title 24 Electricity Energy Intensity (kWh/size/year) | Nontitle 24 Electricity Energy Intensity (kWh/size/year) | Lighting Energy Intensity (kWh/size/year) | Total Electricity Energy Demand (kWh/size/year) | Total Electricity Demand (kWh/year) |
|-------------|------------|---|--|---|---|-------------------------------------|
| Parking Lot | 48         | 0   | 0  | 0.35                                      | 0.35  | 17                                  |
| Total       |            |   |  |   |   | 529,582                             |

Notes:

The proposed project could potentially include a variety of uses consistent with the development standards; however, the land use selections above were based on estimating the “worst-case” scenario demand for electricity.

ksf = 1,000 square feet

kWh = kilowatt hour

Source: Stantec 2019, Appendix B

**Table 3.10-5: Long-Term Natural Gas Usage**

| Land Use                | Dwelling Units (ksf) | Title 24 Natural Gas Energy Intensity (KBTU/size/year) | Nontitle 24 Natural Gas Energy Intensity (KBTU/size/year) | Total Natural Gas Energy Demand (KBTU/size/year) | Total Natural Gas Demand (KBTU/year) |
|-------------------------|----------------------|--|---|--|--------------------------------------|
| Apartment               | 128                  | 5,484.45   | 3,155.00  | 8,639.45   | 1,105,850                            |
| General Office Building | 46.59                | 16.31  | 0.06  | 16.37  | 763                                  |
| Total                   |                      |  |   |  | 1,106,612                            |

Notes:

The proposed project could potentially include a variety of uses consistent with the development standards; however, the land use selections above were based on estimating the “worst-case” scenario demand for electricity.

ksf = 1,000 square feet

KBTU= 1,000 British Thermal Units

Source: Stantec 2019, Appendix B

Buildings and infrastructure constructed pursuant to the proposed project would comply with the versions of CCR Titles 20 and 24, including CALGreen, that are applicable at the time that building permits are issued. In addition, the City’s General Plan includes policies and programs that seek to reduce energy consumption.

It would be expected that building energy consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than for any other similar buildings in the region. Current state regulatory requirements for new building construction contained in the 2016 CALGreen and Title 24 would increase energy efficiency and reduce energy demand in comparison to existing residential structures, and therefore, would reduce actual environmental effects associated with energy use from the proposed project.

**Level of Significance Before Mitigation**

Less Than Significant Impact.

**Mitigation Measures**

No mitigation is necessary.



**Level of Significance After Mitigation**

Less Than Significant Impact.

**Conflict with Renewable Energy/Energy Efficiency Plan**

| <b>Impact EN-2</b> | <b>Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</b> |
|--------------------|---|
|--------------------|---|

**Impact Analysis**

The City's General Plan and Downtown Specific Plan include energy goals and policies to reduce the reliance on nonrenewable energy sources in existing and new commercial, industrial, and public structures through implementation of energy resource policies to encourage the use of renewable energy and decrease energy demand. The City's CAP also includes strategies focused on green building, renewable energy, transportation and land use, education and waste management.

The proposed project would not conflict with the energy objectives of the General Plan, the Downtown Specific Plan, nor the strategies in its CAP. The proposed project would constitute development within an established community and would not be opening up a new geographical area for development such that it would draw mostly new trips, or substantially lengthen existing trips. The proposed project would be well positioned to accommodate existing population and reduce VMT. The proposed project would not impede the City's bicycle and pedestrian network; the proposed project would include onsite and offsite improvements of pedestrian infrastructure (sidewalks) and would provide bicycle parking in accordance with the City's Municipal Code.

The proposed project would comply with the versions of CCR Titles 20 and 24, including CALGreen, that are applicable at the time that building permits are issued and with all applicable City measures.

For the above reasons, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The impact is less than significant.

**Level of Significance Before Mitigation**

Less Than Significant Impact.

**Mitigation Measures**

No mitigation is necessary.

**Level of Significance After Mitigation**

Less Than Significant Impact.



## 3.11 HAZARDS AND HAZARDOUS MATERIALS

This section describes the regulatory and environmental setting for hazards and hazardous materials. It also describes potential impacts regarding hazards and hazardous materials that would result from implementation of the proposed project and includes mitigation measures for significant impacts where applicable.

### 3.11.1 Environmental Setting

#### Hazardous Materials and Wastes Defined

The term hazardous substance refers to both hazardous materials and hazardous wastes. A material is defined as hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local regulatory agency or if it has characteristics defined as hazardous by such an agency. HSC, Section 25501, defines a hazardous material as follows:

*“Hazardous material” means any material that, because of its quantity, concentration, or physical, or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. “Hazardous materials” include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.*

“Hazardous wastes” are defined in HSC, Section 25141(b), as wastes that:

*...because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.*

Public health is potentially at risk whenever hazardous materials are or will be used. It is necessary to differentiate between the “hazard” of these materials and the acceptability of the “risk” that they pose to human health and the environment. A hazard is any situation that has the potential to cause damage to human health and the environment. The risk to health and public safety is determined by the probability of exposure in addition to the inherent toxicity of a material.

Factors that can influence the health effects of exposure to hazardous materials include the dose that the person is exposed to, the frequency of exposure, the duration of exposure, the exposure pathway (route by which a chemical enters a person’s body), and the individual’s unique biological susceptibility.

In addition to chemicals, which are most commonly associated with the term “hazardous materials,” other categories applicable to the definition include the following:

- Biohazardous materials including certain infectious agents (microorganisms, bacteria, molds, parasites, and viruses) that normally cause or significantly contribute to increased human mortality and organisms capable of being communicated by invading and multiplying in body tissues (HSC, Section 117635).



- Medical waste, which includes both biohazardous wastes (byproducts of biohazardous materials) and sharps (devices capable of cutting or piercing, such as hypodermic needles, razor blades, and broken glass), resulting from the diagnosis, treatment, or immunization of patients or from research pertaining to these activities (HSC, Section 117690).

## Project Setting

The project site has been fully developed with residential and institutional structures since 1950 (Brunzell Historical 2019). Most of these structures used to be dwelling units, but one was converted to the Homeless Services or Navigation Center approximately 28 years ago, two are vacant (one is not habitable), two are used for transitional housing, and one is still used as a private residence. The project site's existing uses do not involve the handling, storage, or transport of hazardous materials, waste, and biomedical waste. However, based on comments received during the public scoping meeting on February 6, 2019, biohazardous and medical waste (e.g., sharps, human waste) have been found at the project site and adjacent neighborhood and, therefore, the existing uses at the project site generate hazardous waste. Any hazardous material that is not consumed and can no longer be used is designated as a hazardous waste material (Appendix A).

### 3.11.2 Regulatory Setting

#### Federal

##### United States Environmental Protection Agency

EPA was established in 1970 to consolidate in one agency a variety of federal research, monitoring, standard-setting, and enforcement activities to ensure environmental protection. EPA's mission is to protect human health and to safeguard the natural environment—air, water, and land—upon which life depends. EPA works to develop and enforce regulations and implement environmental laws enacted by Congress, is responsible for researching and setting national standards for a variety of environmental programs, and delegates to states and tribes the responsibility for using permits and for monitoring and enforcing compliance. Where national standards are not met, EPA can issue sanctions and take other steps to assist the states and tribes to reach the desired levels of environmental quality.

##### Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) establishes a framework for national programs to achieve environmentally sound management of both hazardous and nonhazardous wastes. RCRA was designed to protect human health and the environment, reduce or eliminate the generation of hazardous waste, and conserve energy and natural resources. RCRA also promotes resource recovery techniques. A waste can legally be considered hazardous if it is classified as ignitable, corrosive, reactive, or toxic. Under RCRA, EPA regulates hazardous waste from the time that the waste is generated until its final disposal ("cradle to grave"). The Hazardous and Solid Waste Amendments of 1984 both expanded the scope of RCRA and increased the level of detail in many of its provisions. The Hazardous Waste Management subchapter of RCRA deals with a variety of issues regarding the management of hazardous materials including the export of hazardous waste, state programs, inspections of hazardous waste disposal facilities, enforcement, and the identification and listing of hazardous waste.



## State

California hazardous materials and wastes regulations are equal to or more stringent than federal regulations. EPA has granted the state primary oversight responsibility to administer and enforce hazardous waste management programs. Several key state laws pertaining to hazardous materials and wastes are discussed below.

### California Department of Toxic Substances Control

The California Department of Toxic Substances Control (DTSC), a division of the California Environmental Protection Agency (Cal/EPA), has primary regulatory responsibility over hazardous materials in California, working in conjunction with EPA to enforce and implement hazardous materials laws and regulations. DTSC can delegate enforcement responsibilities to local jurisdictions. The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (HSC, Section 25100-25259), which is implemented by regulations described in CCR Title 26. Therefore, the state program created is similar to but more stringent than the federal program under RCRA. The regulations list materials that may be hazardous and establish criteria for their identification, packaging, and disposal. Environmental health standards for management of hazardous waste are contained in CCR Title 22, Division 4.5. In addition, as required by California GC Section 65962.5, DTSC maintains a Hazardous Waste and Substances Site List for the state, called the Cortese List.

### Hazardous Materials Handling and Transport

The California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires preparation of hazardous materials business plans and disclosure of hazardous materials inventories. A business plan includes an inventory of hazardous materials handled, facility floor plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures (HSC, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the state. Local agencies are responsible for administering these regulations. Several state agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including Cal/EPA and the California Emergency Management Agency. The California Highway Patrol and Caltrans enforce regulations related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways.

### Worker Safety Requirements

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. California Occupational Safety and Health Administration (Cal/OSHA) is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA obligates many businesses to prepare injury and illness prevention plans and chemical hygiene plans. As at the federal level, the Hazard Communication Standard requires that workers be informed of the hazards associated with the materials they handle. This is achieved through actions such as requiring manufacturers to appropriately label containers, make material safety data sheets available in the workplace, and require employers to properly train workers.



OSHA's Bloodborne Pathogens Standard is intended to protect workers from the exposure of blood and bodily fluids, which is the primary means of transmittal for the most harmful infectious agents known. The Bloodborne Pathogens Standard, enforced by Cal/OSHA, ensures that infectious materials such as patient laboratory samples are handled, stored, and transported in a manner that prevents worker, community, and environmental exposure. The Hazard Communication Standard (Title 29, Part 1910 of the CFR) requires that workers be informed of the hazards associated with the materials they handle. Workers must be trained in safe handling of hazardous materials, use of emergency response equipment, and the building emergency response plan and procedures. Containers must be appropriately labeled, and material safety data sheets must also be available in the workplace.

## Public Health

The California Department of Public Health regulates the generation, handling, storage, treatment, and disposal of medical waste in accordance with the California Medical Waste Management Act (HSC, Sections 117600–118360). The California Department of Public Health also oversees all medical waste transporters. The Medical Waste Management Program provides support and oversight to the Sonoma County Environmental Health Department, which enforces the Medical Waste Management Act locally. Medical waste generators are required to register with the California Department of Public Health, Medical Waste Management Program, and submit a medical waste management plan to Sonoma County Environmental Health Department. The Medical Waste Management Act, Section 117705 of the California Health and Safety Code, considers any person whose act or process produces medical waste to be a “medical waste generator” (i.e., a facility or business that generates and/or stores medical waste onsite). Medical waste generators may be either large quantity generators (200 or more pounds per month) or small quantity generators (less than 200 pounds per month) (CDPH 2019).

Medical waste and its disposal are generally regulated in the same manner as hazardous waste, except that special provisions apply to storage, disinfection, containment, and transportation. Medical waste must be stored in closed red bags marked “biohazard” and, when transported for disposal, placed inside hard-walled containers with lids. The law imposes a cradle-to-grave tracking system and a calibration and monitoring system for onsite treatment.

## Local

### City of Santa Rosa 2035 General Plan

The following lists goals and policies from the City of Santa Rosa 2035 General Plan pertaining to hazardous materials that are applicable to the proposed project.

### *Noise and Safety Element*

#### **Goal NS-F.** Minimize dangers from hazardous materials

- **Policy NS-F-2.** Require that hazardous materials used in business and industry are transported, handled, and stored in accordance with applicable federal, state, and local regulations.
- **Policy NS-F-5.** Require commercial and industrial compliance with the Sonoma County Hazardous Materials and Waste Management Plan.



- **Policy NS-F-6.** Generate and support public awareness and participation in household waste management, control, and recycling through county programs including the Sonoma County Household Hazardous Waste Management Plan.

### Sonoma County Department of Health Services

The Medical Waste Program was established by the California Department of Health Services to ensure uniform statewide standards for the safe handling, minimization, and disposal of medical waste. The Sonoma County Department of Health Services administers the program within Sonoma County.

Sonoma County Department of Health Services provides support to medical waste generators through various administrative activities, including:

- Guidance and assistance in complying with the Medical Waste Program
- Reviewing and processing medical waste management plans from all generators
- Issuing medical waste permits and registrations
- Conducting evaluations and inspections
- Responding to complaints and emergency incidents
- Taking enforcement action when necessary

### 3.11.3 Environmental Impacts

This section analyzes the project's potential to result in significant hazards and hazardous materials impacts. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid that impact.

#### Methodology

The proposed project's effects are compared to the thresholds of significance related to hazards and hazardous materials to determine whether implementation of the proposed project would result in impacts on humans or the environment.

#### Thresholds of Significance

In accordance with the CEQA Guidelines' Appendix G Environmental Checklist, the following questions were analyzed and evaluated to determine whether hazards and hazardous materials impacts are significant. Would the proposed project:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?





The following questions were determined to have no impact or a less than significant impact during the NOP Scoping process. These issues are summarized in Section 7.0, Effects Found Not to Be Significant, and are not discussed further in this section. Would the proposed project:

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to GC Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

### Project Impact Analysis and Mitigation Measures

#### Routine Transport, Use, Or Disposal of Hazardous Materials

|                     |  |
|---------------------|--|
| <b>Impact HAZ-1</b> | <b>The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</b> |
|---------------------|--|

#### Impact Analysis

##### Site Remediation

Based on comments received during the public scoping meeting on February 6, 2019, there is the potential to encounter biohazardous and medical waste (e.g., sharps, human waste) at the project site, which could expose construction workers, neighbors, and the general public to hazardous materials. If not properly handled and disposed of, exposure to these hazardous materials could result in a potentially significant impact. Prior to construction, the applicant would be required to implement mitigation measure HAZ-1 and retain a certified biohazardous waste contractor to inspect the project site and determine if biohazardous and medical waste are present. If present, the certified contractor would remediate the project site in accordance with the California Department of Public Health regulations and Cal/OSHA worker safety requirements. The proposed project would be required to comply with applicable federal, state, and local laws pertaining to the safe handling, storage, and transport of hazardous materials. Additionally, the certified contractor would transport and dispose of all biohazardous and medical waste at a certified medical waste processing facility in accordance with the California Medical Waste Management Act. Therefore, impacts related to the transport and disposal of hazardous materials during site remediation activities would be less than significant with implementation of mitigation measure HAZ-1.

##### Construction

Once remediation activities are complete, project construction activities would involve demolition of structures, site preparation, grading, building construction, paving, and architectural coating. These activities would involve the use of heavy equipment, which would contain fuels and oils, and other various



products such as concrete, paints, and adhesives. The project construction contractor is required to comply with all applicable federal, state, and local regulations related to the transport, use, or disposal of hazardous materials, as overseen by Cal/EPA, California Department of Toxic Substances Control, and Caltrans.

In addition, project construction would involve the demolition of structures built prior to the 1980s that may contain asbestos materials, lead-based paints, and other hazardous-waste-containing building materials. If hazardous materials are present in these existing structures, demolition activities could expose construction workers and site neighbors to hazards associated with airborne asbestos and lead, resulting in a potentially significant impact. To reduce this potential impact, the proposed project would be required to implement mitigation measure HAZ-2 and retain a certified hazardous waste contractor to identify the presence of asbestos-containing materials and lead-based paint in accordance with applicable state and federal regulations including EPA's Asbestos National Emissions Standards for Hazardous Air Pollutants and the Cal/OSHA Construction Lead Standard (8 CCR 1432.1) during demolition activities and disposal of contaminated materials. Additionally, the applicant would be required to notify the BAAQMD of the asbestos demolition pursuant to Regulation 11 Hazardous Air Pollutants, Rule 2 Asbestos Demolition, Renovation, and Manufacturing. Therefore, impacts related to the transport, use, and disposal of hazardous materials during project construction would be less than significant with implementation of mitigation measure HAZ-2.

## Operation

During project operation, hazardous materials used would be associated with landscaping products such as fertilizer and pesticides and household cleaning products. The proposed Caritas Center would also participate in the Nightingale Program, which provides minor medical assistance to homeless individuals that require care once they are discharged from the hospital. Clients that are part of the Nightingale Program receive temporary and minor care from nurses, but there are no doctors onsite, nor are any medical procedures provided as part of this program. Minor medical assistance would include but not be limited to aiding with medications, mobility, and similar items to recover. Therefore, various drugs and hazardous materials required for providing medical assistance are expected to be handled, stored, and disposed of onsite. The use, transport, handling, storage, and disposal of all medical-related hazardous materials are regulated by federal, state, and local laws and requirements. The applicant would be required to comply with the California Medical Waste Management Program and submit a Medical Waste Management Plan to the Sonoma County Department of Health Services. The Medical Waste Management Plan would describe the types and amounts of medical waste generated at the project site and indicate how wastes are managed onsite to ensure treatment, containment, and disposal is in accordance with the California Medical Waste Management Act.

In addition, to ensure that hazardous materials are properly disposed of by residents and visitors at the project site the project would implement mitigation measure HAZ-3, requiring the applicant to obtain a Home-Generated Sharps Consolidation Point Permit from Sonoma County and to install a Sharps Kiosk at the project site. The Sharps Kiosk would be placed onsite in an area that is accessible to visitors, residents, and the public to safely dispose of hazardous waste. Once collected, these hazardous materials are regulated as medical waste. The applicant would retain a biohazardous waste contractor to collect the hazardous materials from the kiosk weekly and transport them to a certified medical waste processing facility for disposal. Installation of the Sharps Kiosk station would ensure biohazardous and



medical waste is contained, transported, and disposed of in accordance with the California Medical Waste Management Act.

Catholic Charities strives to respond to neighborhood concerns in a way that respects the needs of the neighborhood, programs, and program participants. Therefore, all residents and program participants at the project site are required to follow Catholic Charities' "good neighbor rules," which prohibit loitering within the adjacent neighborhoods both during the day and at night. To ensure compliance with this rule, the proposed project would implement mitigation measure HAZ-4 and incorporate environmental design features to reduce illicit behaviors such as loitering, trespassing, littering, disposal of sharps, and bathroom incivility. Furthermore, the proposed project would implement mitigation measures PS-1 and PS-2. Mitigation measure PS-1 would require the applicant to install exterior lighting systems for security purposes to provide clear visibility of the project site's perimeter and outdoor open space areas. Mitigation measure PS-2 would require the applicant to hire a private security firm to patrol the project site and the adjacent neighborhood during the day and at night. The implementation of mitigation measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, PS-1, and PS-2 would reduce the potential for illegal disposal of biohazardous and medical waste at the project site and within the adjacent neighborhood. Therefore, impacts related to the transport, use, and disposal of hazardous materials would be less than significant.

### Level of Significance Before Mitigation

Potentially Significant Impact

### Mitigation Measures

- MM HAZ-1: Removal of Biohazardous and Medical Waste.** Prior to construction, the applicant shall retain a certified biohazardous waste contractor to inspect the project site and determine if biohazardous and medical waste are present. If present, the certified contractor would remediate the project site in accordance with the California Department of Public Health regulations and Cal/OSHA worker safety requirements. The certified contractor would dispose of all biohazardous and medical waste at a certified medical waste processing facility in accordance with the California Medical Waste Management Act to ensure that these materials are not released into the environment.
- MM HAZ-2: Removal of Asbestos Containing Materials and/or Lead Based Paint.** A comprehensive survey for the presence of asbestos-containing material and lead-based paint shall be conducted at the project site prior to any demolition activities. Demolition of buildings containing asbestos materials or lead based paint must be achieved in accordance with state and federal regulations, including EPA's Asbestos National Emissions Standards for Hazardous Air Pollutants, Cal/OSHA's Construction Lead Standard (8 CCR 1432.1), and California Department of Toxic Substances Control and EPA requirements for disposal of hazardous waste. Disposal of any asbestos-containing materials or lead-based paint found on the site shall be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work and in accordance with the appropriate state and federal standards to ensure that these materials are not released into the air in the project vicinity.
- MM HAZ-3: Install Sharps Kiosk Station.** The applicant shall obtain a Home-Generated Sharps Consolidation Point permit from Sonoma County to install a Sharps Kiosk at the project site. The kiosk shall be placed onsite in an area that is accessible to visitors and



residents. The applicant shall retain a biohazardous waste contractor to collect the hazardous materials from the kiosk weekly and transport them to a certified medical waste processing facility for disposal in accordance with the California Medical Waste Management Act.

**MM HAZ-4: Install Environmental Design Features.** The applicant must install environmental design features at the project site to reduce illicit behaviors such as loitering, trespassing, littering and garbage, disposal of sharps, and bathroom incivility. The design features must include additional lighting, camera surveillance, provision of proper disposal containers, or other design features approved by the City.

#### Level of Significance After Mitigation

Less Than Significant with Mitigation.

#### Accidental Release of Hazardous Materials

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|                     |  |
|---------------------|--|
| <b>Impact HAZ-2</b> | <b>The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</b> |
|---------------------|--|

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#### Impact Analysis

##### Site Remediation

As discussed in Impact HAZ-1, based on comments received during the public scoping meeting on February 6, 2019, there is potential to encounter biohazardous and medical waste at the project site. Prior to project construction, the applicant would be required to implement mitigation measure HAZ-1 and retain a certified biohazardous waste contractor to determine if such hazards are onsite and, if present, remediate the project site in accordance with California Department of Public Health regulations and Cal/OSHA worker safety requirements. The proposed project would be required to comply with applicable federal, state, and local laws pertaining to the safe handling, storage, and transport of hazardous materials. Furthermore, the certified biohazardous waste contractor would dispose of all biohazardous and medical waste at a certified medical waste processing facility in accordance with the California Medical Waste Management Act to ensure that these hazardous materials are not released into the environment or exposed to neighbors and the general public. Therefore, impacts related to the accidental release of hazardous materials into the environment would be less than significant with implementation of mitigation measure HAZ-1.

##### Construction

Project construction activities would involve limited use of hazardous materials including paints, solvents, fuels, and oils. The project would be required to comply with applicable federal, state, and local laws pertaining to the safe handling, storage, and transport of hazardous materials. Additionally, the project would implement mitigation measure HAZ-2 and retain a certified hazardous waste contractor to identify the presence of asbestos-containing materials and lead-based paint in the existing structures. Disposal of any asbestos-containing materials or lead-based paint found on the site shall be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work in accordance with the appropriate state and federal standards to ensure that these materials are not released into the air in the project vicinity. The project applicant would also comply with notification procedures to the BAAQMD



pursuant to Regulation 11 Hazardous Air Pollutants, rule 2 Asbestos Demolition, Renovation, and Manufacturing. Therefore, project construction activities are not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset or accident, and impacts would be less than significant with implementation of mitigation measure HAZ-2.

### Operation

During project operation, hazardous materials used would be associated with landscaping products such as fertilizer and pesticides and household cleaning products. In addition, the proposed Caritas Center would provide minor medical assistance to homeless individuals that require care once they are discharged from the hospital. Therefore, various drugs and hazardous materials required for providing medical assistance are expected to be handled, stored, and disposed of onsite. The use of these substances is not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset or accident. However, the applicant would be required to submit a Medical Waste Management Plan to the Sonoma County Department of Health services in accordance with the California Medical Waste Management Program, which would include an emergency response plan.

The proposed project would also implement mitigation measure HAZ-3 and install a sharps kiosk station onsite to allow visitors, residents, and the public to safely dispose of biohazardous and medical waste. The applicant would retain a biohazardous waste contractor to weekly collect the hazardous materials from the kiosk and transport to a certified medical waste processing facility for disposal. Installation of the Sharps Kiosk station would ensure that biohazardous and medical waste is contained, transported, and disposed of in accordance with the California Medical Waste Management Act. The proposed project would also implement mitigation measure HAZ-4 to reduce illicit behaviors such as loitering, trespassing, littering and garbage, disposal of sharps, and bathroom incivility. The implementation of these mitigation measures would reduce the potential for illegal disposal of biohazardous and medical waste at the project site and within the adjacent neighborhood. Therefore, impacts related to the accidental release of hazardous materials during operation would be less than significant with mitigation measures HAZ-3 and HAZ-4.

### Level of Significance Before Mitigation

Potentially Significant Impact.

### Mitigation Measures

Mitigation Measures HAZ-1, HAZ-2, HAZ-3, and HAZ-4 are required.

### Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

### Emission of Hazardous Materials near an Existing School

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|---------------------|--|
| <b>Impact HAZ-3</b> | <b>The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</b> |
|---------------------|--|

### Impact Analysis

The nearest school is the Kid Learning Center at 709 Davis Street, located approximately 0.1 mile west of the project site on the west side of Highway 101 in the City. The Kid Learning Center is private property and, therefore, access to the school is limited by fencing and the gated driveway entrance.



The use of hazardous materials during construction would be confined to the project site and within existing roadways. The use of potentially hazardous materials is regulated by health and safety requirements under federal, state, and local regulations including handling, storage, and disposal of the materials as well as emergency spill response. Similarly, during operation of the proposed project, health and safety requirements under federal, state, and local regulations would be applicable to address potential biohazardous and medical waste. For example, SB 1159, signed into law on January 1, 2005, states that it is unlawful to discard or dispose of hypodermic needles or syringes upon the grounds of a playground, beach, park, or any public or private elementary, vocational, junior high, or high school (Sonoma County Department of Health Services 2019). As such, the proposed project would not expose an existing or proposed school to hazardous materials and the impacts would be less than significant.

**Level of Significance Before Mitigation**

Less Than Significant Impact.

**Mitigation Measures**

No mitigation is necessary.

**Level of Significance After Mitigation**

Less Than Significant Impact.



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## 3.12 PUBLIC SERVICES

This section describes existing fire and police protection services provided to the project site and potential effects that would occur with implementation of the proposed project. Descriptions and analysis are based on service response letters from SRFD and the Santa Rosa Police Department (SRPD) and review of Santa Rosa's General Plan and City Code. Response letters from the SRFD and SRPD are provided in Appendix K.

### 3.12.1 Environmental Setting

The project site is within the St. Rose Historic District in the western part of downtown. The St. Rose Historic District is a highly developed area and mostly consists of single-family homes with some office and commercial uses, such as the Santa Rosa Plaza shopping mall. Existing development at the project site consists of Catholic Charities' Homeless Services Center and Family Support Center. In addition, there are several residential dwelling units on the project site that are either vacant or owned by Catholic Charities to provide transitional housing. There is one residential dwelling unit at the project site that is used as a private residence. The existing uses at the project site receive fire protection and emergency medical services from SRFD and police protection services from SRPD. Services provided by SRFD and SRPD are discussed in the following sections.

#### Fire Protection and Emergency Medical Services

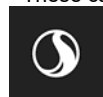
SRFD is responsible for responding to emergency incidents within the City including protecting life, property, and the environment from fire, explosion, and hazardous materials incidents. SRFD has a staff of 146 employees serving a community population of more than 181,000 residents. There are ten fire stations in Santa Rosa. Each fire station houses an engine company and is staffed 24 hours per day. Additionally, Station 1 and Station 2 each house a truck company (SRFD 2019a). The nearest fire station is Fire Station 1 located at 955 Sonoma Avenue, approximately 1 mile east of the project site. In addition, Fire Station 11 is located at 550 Lewis Road, approximately 1.5 miles north of the project site.

The SRFD responds to more than 27,000 calls for service per year specific to fire, emergency medical, rescue, and hazardous materials incidents. The General Plan's fire emergency response time goal is that SRFD responds to an emergency within 5 minutes of notification by the dispatch center 90 percent of the time. This time goal does not include the additional 70-second standard for the dispatch center call taking and emergency medical dispatching. Currently, SRFD's response times are at 5 minutes and 55 seconds 90 percent of the time (ESCI 2019). In 2018, the SRFD received 157 calls for service from 465 A Street and 600 Morgan Street (SRFD 2019b).<sup>1</sup>

#### Police Protection Services

The SRPD is headquartered at 965 Sonoma Avenue, approximately 1 mile east of the project site. In addition, the SRPD has a substation downtown near the Transit Mall, approximately 0.5 mile southeast of the project site, and a substation on West Steele Lane, approximately 1.5-mile northwest of the project site. The SRPD has approximately 267 employees and operates 24 hours per day, 365 days per year. The City is divided into nine "beats" covered by eight patrol teams plus traffic units and sergeants. The

<sup>1</sup> These calls do not represent calls in the surrounding area related to homeless calls for service.





primary function of the SRPD is to respond to calls for service generated by 911 calls and calls received on their non-emergency lines. Calls are prioritized into three categories: Priority I, Priority II, and Priority III. In 2018, the average response time to Priority I calls was 6 minutes and 26 seconds. Priority II calls averaged a 12 minute and 24 second response, and Priority III calls averaged 26 minutes and 16 seconds. The SRPD received 260,787 calls in 2018. Officers responded to or self-initiated 140,356 calls for service. Fifteen percent of the total calls for service involved contact with individuals experiencing homelessness.

The project site is within Beat 9, which encompasses most of the downtown area. In 2018, the Santa Rosa Police Department received 941 calls for service at the existing Homeless Services Center located at 600 Morgan Street (SRPD 2019).

### 3.12.2 Regulatory Setting

#### State

##### California Building Code

Title 24 of CCR, also known as the California Building Code, is a compilation of three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes,
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions, and
- Building standards authorized by the California legislature that constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

The California Fire Code is a component of the California Building Code and contains fire safety-related building standards.

#### Local

##### City of Santa Rosa 2035 General Plan

This section lists goals and policies from the City of Santa Rosa 2035 General Plan pertaining to public services that are applicable to the proposed project.

##### *Public Services and Facilities Element*

**Goal NS-F.** Minimize dangers from hazardous materials

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

- The Fire Department shall achieve 90 percent performance of arrival of the first fire company at an emergency within 5 minutes of notification by the dispatch center.



- The Fire Department shall achieve 90 percent performance of arrival of all units on first alarm fire suppression incidents within 9 minutes of notification by the dispatch center.

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

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

### 3.12.3 Environmental Impact Analysis

This section analyzes the project's potential to result in significant public services impacts. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid that impact.

#### Methodology for Analysis

Stantec consulted with SRFD and SRPD about their ability to serve the proposed project. The service response letters from SRFD and SRPD are provided in Appendix K.

#### Thresholds of Significance

According to the CEQA Guidelines' Appendix G Environmental Checklist, the following questions were analyzed and evaluated to determine whether impacts to public services impacts are significant. Would the proposed project:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times, or other performance objectives for any of the public services from the following agencies:
  - Fire Protection and Emergency Services and
  - Police Protection

The following questions were determined to have no impact or a less than significant impact during the Notice of Preparation Scoping. These issues are summarized in Section 7.0, Effects Found Not to Be Significant, and are not discussed further in this section.

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times, or other performance objectives for any of the public services from the following agencies:
  - Schools
  - Libraries
  - Other public facilities



## Project Impact Analysis and Mitigation Measures

### Fire and Police Protection Facilities

|                    |   |
|--------------------|---|
| <b>Impact PS-1</b> | <b>The proposed project would not require the construction of new or physically altered fire protection or police protection facilities, which could cause significant environmental impacts.</b> |
|--------------------|---|

### Impact Analysis

#### Fire Protection and Emergency Medical Services

Since 2016, SRFD calls related to homeless people consisted of approximately 82 percent medical calls, 12 percent good intent calls, 3 percent service calls, and less than 3 percent other calls (e.g., service, fire incidents, hazardous conditions) (City 2018). Citywide, SRFD calls consisted of approximately 71 percent medical calls, 7 percent good intent calls, 8 percent service calls, 6 percent false calls, 3 percent null calls, and less than 5 percent other calls (e.g., fire incidents, hazardous conditions) (City 2018). While medical calls were higher for homeless people, other type of calls are comparable citywide. As noted above in Section 3.12.1, Environmental Setting, SRFD received approximately 157 calls from the project site in 2018. The number of calls from the project site represents approximately 8 percent of the total 1,899 service calls SRFD received citywide in 2018 (SRFD 2018). The proposed project would add 622 total residents (20 transitional residents + 200 family residents + 40 Nightingale residents + 362 Caritas Homes residents), a net increase of 410 new people over the 212 residents currently on the project site. SRFD estimates that this would result in an increase of 193 calls per year at the project site. The proposed project would include a Medical Service—Doctor's Office that may help reduce the number of calls for service by providing trained medical staff who could respond to minor incidents onsite and reduce the number of calls for service for medical needs. The exact reduction in calls for service is unknown; therefore, the SRFD estimate for calls for service is what is evaluated.

SRFD's response letter indicates the proposed project would be required to provide compliant aerial, engine, and operational personnel access to the project site; fire sprinklers and standpipes (three-story and taller buildings) for the buildings; fire alarms onsite and offsite monitoring for water flow; control valves; smoke alarms; kitchen hood extinguishing system; manual pull devices; air handling smoke detection devices; and elevators of appropriate size to accommodate an emergency medical gurney (SRFD 2018). The Santa Rosa Fire Marshal would review the project to verify that the final design would not impede fire protection services and would comply with the California Building Code and California Fire Code requirements.

The project site is within the response area of Fire Engine 1. Based on the response from SRFD, Fire Engine 1 is responding to nearly 5,000 calls per year and exceeds the 10 percent unit workload hours suggested by the National Fire Protection Association. The unit workload performance is measured at the 90<sup>th</sup> percentile. Unit hour utilization greater than 10 percent means that the response unit would not be able to provide on-time response and meet the 90 percent target even if response is its only activity. Therefore, as call volumes for Engine 1 increase, another engine would respond to the project site on occasion. This other engine may be a ladder truck, or Engine 11 from the Santa Rosa Junior College neighborhood area. The SRFD indicated that when Engine 11 is assigned to a call outside of their normal response area, this leaves a void within the City (SRFD 2019b). Additionally, SRFD indicates that Engine 11 is responding above the National Fire Protection Association's suggested workload hours.



Based on these existing conditions, SRFD is concerned that implementation of the project would place additional demand on the fire department. While demand on fire services may increase with implementation of the project, this concern does not relate to the CEQA standard of significance, which is whether implementation of the project would require the construction of a new fire station or the expansion of an existing fire station. As determined in the *City of Hayward v. Board of Trustees of the California State University* (2015) court case, the obligation to provide adequate fire and emergency medical services is the responsibility of the City. Therefore, the need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate. The City has considered SRFD's recommendation of adding an additional response unit to the fire department response system. SRFD indicates that this could be achieved by adding a rescue squad staffed with two firefighters or by placing an additional firefighter on Fire Engine 1 to increase scene productivity and reduce commitment time for the engine. Reducing scene time would allow the engine to respond to additional calls for service and maintain engines within their appropriate coverage areas throughout the City (SRFD 2019b). The City may pursue other avenues for recovery of fees to enable the implementation of the SRFD's recommendation, such as the Mitigation Fee Act (GC, § 66000 et seq.).

The proposed project is not anticipated to result in the construction of a new fire station or the alteration of an existing fire station. If required, construction associated with expanding or adding additional fire station facilities within the City would be subject to environmental review under CEQA. Furthermore, given the location and the downtown setting it is unlikely that, if the City needs to add more fire staff to respond to the potential increase in calls, they would have to expand their fire facilities in a manner that would cause significant environmental impacts. Therefore, the impact related to providing fire protection services to the project would be less than significant.

#### Police Protection Services

The project site is within SRPD's Beat 9 patrol area, which encompasses most of the downtown area. Geographically, Beat 9 is the smallest beat but has a higher population density and therefore generates the most calls for service in the City (SRPD 2019). In 2018, SRPD received 941 calls for service at the project site (SRPD 2019). Based on the calls for service data provided by SRPD, other parts of the City received service calls that were comparable to the project site during 2018. These locations include the Palms Inn located at 3345 Santa Rosa Avenue, which had 700 calls, and the Santa Rosa Community Health Center located at 983 Sonoma Avenue, which had 419 calls (SRPD 2019).

In their response letter, SRPD indicated that it is difficult to estimate the exact demand the project would have on police services. However, based on the site's existing volume of service calls and the number of people that the project would generate, SRPD expects the project site's number of service calls to increase (SRPD 2019). While demand on police services may increase with implementation of the project, this concern does not relate to the CEQA standard of significance, which is whether implementation of the project would require the construction of a new police station or the expansion of an existing police station.

The proposed project would not result in the construction of a new police station or the alteration of the City's existing police station. Furthermore, given the location and the downtown setting, it is unlikely that, if the City needs to add more police staff to respond to the potential increase in calls, that they would have to expand their police facilities in a manner that would cause significant environmental impacts.



Therefore, the impact related to providing police protection services to the project would be less than significant.

**Level of Significance Before Mitigation**

Less Than Significant Impact.

**Mitigation Measures**

No mitigation is necessary.

**Level of Significance After Mitigation**

Less Than Significant Impact.



## 4.0 CUMULATIVE EFFECTS

### 4.1 INTRODUCTION

Section 15130(a) of the State CEQA Guidelines requires a discussion of the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulatively considerable, as defined in CEQA Guidelines Section 15065(a)(3), means that the, "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The State CEQA Guidelines Section 15355 defines a cumulative impact as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over time.

According to the CEQA Guidelines:

*Cumulative impacts refer to two or more individual effects that, when considered together, are considerable and that compound or increase other environmental impacts.*

- a) *The individual effects may be changes resulting from a single project or multiple separate projects.*
- b) *"The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probably future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." (CCR, Title 14, Division 6, Chapter 3, Section 15355)*

In addition, as stated in CEQA Guidelines:

*The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable (CCR, Title 14, Division 6, Chapter 3, Section 15064[T][5]).*

### 4.2 CUMULATIVE IMPACT SETTING

Cumulative impact discussions for each environmental issue area are provided within each individual impact section. As established in the CEQA Guidelines, related projects consist of "closely related past, present, and reasonably foreseeable probable future projects that would likely result in similar impacts and are located in the same geographic area" (CCR, Title 14, Division 6, Chapter 3, Section 15355).

The State CEQA Guidelines define a cumulative impact as two or more individual impacts that, when considered together, are significant or that compound or increase other significant environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over time (State CEQA Guidelines Section 15355). The incremental impact of a project, although less than significant on its own, may be considerable when viewed in the cumulative context of other closely related past, present, and reasonably foreseeable projects. A considerable contribution is considered significant from the point of view of cumulative impact analysis.



CEQA Guidelines Section 15130 identifies two basic methods for establishing the cumulative environment in which a project is considered: the use of a list of past, present, and probable future projects or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. This cumulative analysis uses a combination of the “list” approach and the “projections” approach to identify the cumulative setting. The plan and projections approach relies on an adopted plan or reliable projection that describes the significant cumulative impact. This Draft EIR combines both the project list and projection approaches to generate the most reliable future projections possible.

### 4.3 GEOGRAPHIC SCOPE

The geographic area analyzed for cumulative impacts is dependent on the resource being analyzed. The geographic area associated with the proposed project’s environmental impacts defines the boundaries of the area used for compiling the list of past, present, and reasonably foreseeable projects considered in the cumulative impact analysis.

Each section of this Draft EIR considers the specific geographic area that is directly related to the individual topic addressed within that section. For example, the analysis of air quality is based on a regional level because air quality impacts are regional in nature, whereas analysis of aesthetic impacts only considers related projects in the vicinity of the project site because of the localized nature of the impact.

The geographic area that could be affected by implementation of the proposed project in combination with other projects varies depending on the type of environmental resource being considered. Table 4-1 provides the geographic area and the method of evaluation utilized in the cumulative analysis for each resource areas.

**Table 4-1: Geographic Scope of Cumulative Impact and Method of Evaluation**

| Resource Topic                                 | Geographic Area  | Method of Evaluation     |
|--|--|--------------------------|
| Aesthetics                                     | Immediate project vicinity   | Projects                 |
| Air Quality                                    | Local (toxic air contaminants)<br>air basin (construction-related and<br>mobile sources) | Projects and Projections |
| Biological Resources                           | Immediate project vicinity and<br>region   | Projects                 |
| Cultural and Historical Resources              | Project site only (does not<br>contribute to cumulative impacts)                         | Projects                 |
| Greenhouse Gas Emissions and<br>Climate Change | State  | Projections              |
| Land Use and Planning                          | Immediate project vicinity   | Projects                 |
| Noise and Vibration                            | Immediate project vicinity (effects<br>are highly localized)                             | Projects                 |
| Transportation                                 | Immediate project vicinity   | Projects and Projections |
| Tribal Cultural Resources                      | Project site only (does not<br>contribute to cumulative impacts)                         | Projects                 |
| Energy   | Immediate project vicinity and<br>region   | Projects and Projections |



| Resource Topic  | Geographic Area   | Method of Evaluation     |
|-----------------|---|--------------------------|
| Hazards         | Project site only (does not contribute to cumulative impacts) | Projects                 |
| Public Services | Immediate project vicinity                                    | Projects and Projections |

Notes:

Projects = the use of a list of past, present, and reasonably foreseeable projects

Projections = the use of projections contained in relevant planning documents

For those environmental resources that were evaluated based on the projections approach, the projections take into consideration future projects that are not included in the below list of related plans and projects.

## 4.4 LIST OF RELATED PLANS AND PROJECTS

The list of past, present, and probable future projects used for this cumulative analysis is restricted to those projects that have occurred or are planned to occur (i.e., pending applications at the time of the NOP release) within the vicinity of the project site. For the purposes of this discussion, these projects that may have a cumulative effect on the resources of the project area will be referred to as the “related projects.” These related projects are described in Table 4-2.

CEQA defines “probable future projects” as those with an active application at the time the NOP was released for a project (in this case, January 24, 2019). The list of projects in Table 4-2 was used in the development and analysis of the cumulative settings and impacts for each resource topic. Past and current projects in the project vicinity were also considered as part of the cumulative setting as they contribute to the existing conditions upon which the project and each probable future project’s environmental effects are compared.

Unless otherwise specified, significance criteria are the same for cumulative impacts as they are for project impacts for each environmental topic area. When considered in relation to other reasonably foreseeable projects, cumulative impacts to some resources would be significant and more severe than those caused by the project alone.

**Table 4-2: List of Related Projects**

| Lead Agency        | Project Name                          | Project Address            | Project Description  |
|--------------------|---------------------------------------|----------------------------|--|
| City of Santa Rosa | 888 4 <sup>th</sup> Street Apartments | 891 3 <sup>rd</sup> Street | Multifamily dwelling general retail—up to 20,000 square feet |
| City of Santa Rosa | Art House                             | 620 7 <sup>th</sup> Street | Multifamily dwelling general retail—up to 20,000 square feet |
| City of Santa Rosa | Acacia East                           | 660 Acacia Lane            | Single-family dwelling                                       |
| City of Santa Rosa | Saraceni Village                      | 705 Acacia Lane            | Single-family dwelling                                       |
| City of Santa Rosa | Acacia Village                        | 746 Acacia Lane            | Single-family dwelling                                       |





| Lead Agency        | Project Name                     | Project Address               | Project Description   |
|--------------------|----------------------------------|-------------------------------|---|
| City of Santa Rosa | Prospect Village II              | 807 Acacia Lane               | Single-family dwelling small lot residential project  |
| City of Santa Rosa | Fir Ridge Workforce Housing      | 3700 Fir Ridge Drive          | Multifamily dwelling<br>Single-family dwelling  |
| City of Santa Rosa | Terrazzo at Fountaingrove        | 1601 Fountaingrove Parkway    | Single-family dwelling  |
| City of Santa Rosa | Bicentennial Estates Units 2 & 3 | 3450 Lake Park Drive          | Single-family dwelling  |
| City of Santa Rosa | The Arbors                       | 3500 Lake Park Drive          | Single-family dwelling  |
| City of Santa Rosa | Spring Lake Village East Grove   | 0 Melita Road                 | Community care facility—seven or more clients   |
| City of Santa Rosa | Fountaingrove Inn Condos         | 3586 Mendocino Avenue         | Multifamily dwelling  |
| City of Santa Rosa | 420 Mendocino                    | 420 Mendocino Avenue          | Multifamily dwelling  |
| City of Santa Rosa | Middle Rincon Subdivision        | 117 Middle Rincon Road        | Single-family dwelling small lot<br>Residential project   |
| City of Santa Rosa | Courthouse Square Hotel          | 25 Old Courthouse Square, #X  | Lodging—hotel or motel<br>restaurant café<br>Coffee shop—table service<br>restaurant café<br>Coffee shop—counter ordering |
| City of Santa Rosa | Skyfarm Unit 3                   | 3925 Saint Andrews Drive      | Single-family dwelling  |
| City of Santa Rosa | Prospect Oaks                    | 4599 Sonoma Highway           | Multifamily dwelling  |
| City of Santa Rosa | Vista Gabrielle                  | 5150 Sonoma Highway           | Single-family dwelling  |
| City of Santa Rosa | The Shops at Austin Creek        | 5173 Sonoma Highway           | General retail—more than 20,000 square feet and up to 50,000 square feet  |
| City of Santa Rosa | Canyon Oaks                      | 4611 Thomas Lake Harris Drive | Multifamily dwelling  |
| City of Santa Rosa | Deturk Village                   | 8 W 9 <sup>th</sup> Street    | Multifamily dwelling<br>Commercial recreational facility—indoor   |
| City of Santa Rosa | Airway Community Care            | 3737 Airway Drive             | Community care facility—seven or more clients   |
| City of Santa Rosa | Kanaplya Cultivation Facility    | 2150 Bluebell Drive           | Cannabis cultivation  |



| Lead Agency        | Project Name                 | Project Address       | Project Description   |
|--------------------|------------------------------|-----------------------|---|
| City of Santa Rosa | Myers Restaurant Supply      | 1599 Cleveland Avenue | Warehouse retail  |
| City of Santa Rosa | Umma, LLC                    | 3187 Coffey Lane      | Cannabis retail shop  |
| City of Santa Rosa | Lands of Furia               | 3364 Coffey Lane      | Single-family dwelling  |
| City of Santa Rosa | College Station              | 80 College Avenue     | Drive-through retail sales<br>general retail—up to 20,000 square feet |
| City of Santa Rosa | Liner Village                | 2063 Dennis Lane      | Single-family dwelling  |
| City of Santa Rosa | Auberge Du Soleil 2          | 2113 Dennis Lane      | Single-family dwelling  |
| City of Santa Rosa | Miller Village               | 2121 Dennis Lane      | Single-family dwelling  |
| City of Santa Rosa | Weller Subdivision           | 2137 Dennis Lane      | Single-family dwelling  |
| City of Santa Rosa | Kerry Ranch 1–3              | 2181 Francisco Avenue | Second dwelling unit<br>Single-family dwelling                        |
| City of Santa Rosa | Francisco Village            | 2601 Francisco Avenue | Single-family dwelling small lot<br>Residential project               |
| City of Santa Rosa | Courtney Estates             | 1500 Fulton Road      | Multifamily dwelling<br>Single-family dwelling                        |
| City of Santa Rosa | North Village II             | 2406 Fulton Road      | Multifamily dwelling  |
| City of Santa Rosa | Katherine Subdivision        | 1810 Guerneville Road | Single-family dwelling  |
| City of Santa Rosa | Indyone Cannabis Cultivation | 3320 Industrial Drive | Cannabis cultivation  |
| City of Santa Rosa | Oak Park Village             | 1550 Ridley Avenue    | Single-family dwelling  |

Source: K. Toomians, personal communication, December 18, 2018

## 4.5 CUMULATIVE IMPACT ANALYSIS

For purposes of this EIR, the Caritas Village Project would result in a significant cumulative effect if:

- the cumulative effects of related projects (past, current, and probable future projects) are not significant, and the incremental impact of implementing the Caritas Village Project is substantial enough when added to the cumulative effects of related projects to result in a new cumulatively significant impact; or
- the cumulative effects of related projects (past, current, and probable future projects) are already significant, and implementation of the Caritas Village Project makes a considerable contribution to the effect. The standards used herein to determine a considerable contribution are that either the impact must be substantial or must exceed an established threshold of significance.



This cumulative analysis assumes that all mitigation measures identified in Sections 3.1 through 3.12 to mitigate project impacts are adopted. The analysis herein analyzes whether, after adoption of project-specific mitigation, the residual impacts of the project would cause a cumulatively significant impact or would contribute considerably to existing and anticipated (without the project) cumulatively significant effects. Where the project would so contribute, additional mitigation is recommended where feasible.

#### 4.5.1 Aesthetics

Like the rest of downtown, the project site is in a highly urbanized area that is characterized in visual terms by a variety of uses. The project site is developed with one- and two-story residential and public facility buildings, approximately 15 to 25 feet tall, and a surface parking lot. The area immediately surrounding the project site consists of a mix of residential, commercial, and office uses, interspersed with utility and transportation infrastructure, including distribution lines and parking facilities. Mature vegetation is present throughout the streetscape. Buildings adjacent to the project site range in scale and height.

Although the proposed project buildings would be taller than the original structures, they would be within maximum building heights allowed by zoning regulations and height concessions requested pursuant to Santa Rosa City Code Section 21-02.050.B. While the project would change the built environment onsite, the overall view of the project site in the context of views available along A, Morgan, 7<sup>th</sup>, and 6<sup>th</sup> streets and throughout the downtown area would not be substantially different from other development through downtown. The overall project design would be subject to design review to ensure that the proposed project is consistent with the visual character of the surrounding area regarding scale, architectural style, and use as defined by the City's Core Area Design Guidelines. Other development within the project vicinity would similarly be required to comply with the City's Core Area Design Guidelines. As such, in addition to other anticipated development included in Table 4-2, the project would not result in a cumulatively considerable impact to aesthetics. Therefore, the project's cumulative visual impacts would not be considerable, and overall cumulative visual impacts would remain less than significant.

#### 4.5.2 Air Quality

The project would result in less than significant impacts to air quality. If a project is proposed in a city or county with a General Plan that is consistent with the Clean Air Plan, and the project is consistent with that general plan (i.e., it does not require a general plan amendment), then the project will not have a significant cumulative impact (provided, of course, that the project does not individually have any significant impacts). Regarding a project's cumulative impacts, past, present and future development projects in the BAAQMD region contribute to adverse air quality impacts in the region on a cumulative basis. Air pollution is largely a cumulative impact by its very nature. No single project is sufficient in its overall emission, in isolation, to result in nonattainment of ambient air quality standards. A project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. The BAAQMD significance thresholds are intended to analyze whether a project's contribution to the cumulative impact is considerable. Therefore, if a project exceeds the identified significance thresholds, its emissions would also be considered cumulatively considerable, resulting in a significant adverse air quality impact to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary (BAAQMD 2017). Although the project requires a general plan amendment, the estimated population growth is well within the City's projections for its 2035 General Plan. Furthermore, the project promotes the use of alternative transportation by locating higher density near existing transit to reduce VMT and consequently air pollution emissions. The project would not result



in significant impacts to air quality and therefore would not result in cumulatively considerable air quality impacts.

#### 4.5.3 Biological Resources

The study area, which covers the entire 2.78-acre project site and encompasses all project components, is located in a highly disturbed urban setting that includes paved parking lots, a vacant lot, and existing buildings surrounded by residential streets. The study area lacks any form of a natural habitat corridor (e.g., riparian areas along streams, rivers, or other natural features) that would allow for wide-ranging plants and animals from other habitats to ingress or egress to the study area. The two primary habitat types within the project area are barren and urban habitats. Other land uses in the project vicinity are similarly developed with barren and urban habitats. The project would implement mitigation measures to reduce potential impacts to birds and trees to a less than significant level and be consistent with the City's biological policies and tree ordinance. It is reasonable to assume that other related projects in the project vicinity and region would implement mitigation that would reduce potential impacts to special status species and comply with local biological policies and ordinances. Therefore, while cumulative impacts to biological resources within the region are considered significant, the project's contribution to cumulative impacts on biological resources would not be cumulatively considerable.

#### 4.5.4 Cultural and Historical Resources

The project site does not contain any recorded archaeological or paleontological resources or burial sites. However, there is the possibility that previously undiscovered resources could be encountered by subsurface earthwork activities; implementation of standard construction mitigation measures would ensure that undiscovered cultural resources are not adversely affected by project-related construction activities, which would prevent the destruction or degradation of potentially significant undiscovered cultural resources in the Santa Rosa area.

The project site contains historical resources and involves the demolition of those resources, resulting in a significant and unavoidable impact. Mitigation for the loss of historical resources would be accomplished through the preparation of a salvage report, development of interpretive materials, and documentation of historical resources. Mitigation would not reduce the impact to a less than significant level. For these reasons, the proposed project would result in significant changes to the existing ambient cultural resources environment of the Santa Rosa area. Because of the unique nature of cultural resources, loss of these resources cannot be replaced by other resources, and the overall development in the area could lead to significant cumulative impacts. While the project is not expected to contribute to cumulative impacts on historic resources, cumulative impacts to historic resources within the region are considered significant. It is reasonable to assume that other related projects would similarly implement standard construction mitigation measures to protect undiscovered cultural resources during construction; however, there is the possibility that like the project historic resources are demolished to allow the construction of new development. Accordingly, the project would have a cumulatively considerable impact on cultural resources.

#### 4.5.5 Greenhouse Gas Emissions and Climate Change

GHG impacts are a cumulative impact. As discussed in Section 3.5, Greenhouse Gases, the project would not have a significant impact with regard to GHG emissions and would be consistent with State



plans for achieving GHG reductions to meet established targets. GHG emissions are inherently a cumulative impact discussion. On their own, GHG emissions from one project cannot result in changes in climatic conditions; therefore, the emissions from one project must be considered in the context of their contribution to cumulative global emissions, which is a significant cumulative impact. GHG emissions resulting from the project would result in a net reduction in GHG emissions compared with the previously approved uses and would not exceed the threshold of 1,100 MTCO<sub>2</sub>e emissions per year. The project is consistent with best practices for reducing GHGs through the incorporation of greater energy efficiency, higher densities, and locating development near transit. Other projects in the region and the state would have to show consistency with GHG reduction plans as well. The project would not have a considerable contribution to a significant cumulative GHG impact.

### **Cumulative Impacts of Climate Change on the Project**

The discussion of the impacts of climate change on the project under impact GHG-3 in Section 3.5, Greenhouse Gas Emissions and Climate Change, concludes that the project would be located in an area that has existing programs to increase the development's resiliency to elevated risk of wildfires. The project would not be located in an area prone to flooding or avalanches that may become more prevalent with climate change. The project would not have a considerable contribution to any potential significant cumulative impact related to the effects of climate change on existing and future projects.

#### **4.5.6 Land Use and Planning**

The land use analysis in Section 3.6, Land Use and Planning, found the project to be consistent with the current General Plan and zoning requirements. Other development in the project vicinity would be required to demonstrate consistency with the General Plan and zoning through project design or the implementation of mitigation measures. Therefore, the proposed project in conjunction with other planned projects would not have a cumulatively considerable impact on land use.

#### **4.5.7 Noise and Vibration**

Cumulative impacts from construction-generated noise could result if other future planned construction activities were to take place near the project and cumulatively combine with construction noise from the project. A list of current and future projects considered for the cumulative analysis is presented in Table 4-2. Deturk Village project is the closest construction project to the project and is located approximately 0.25 mile west of the project site. Construction activities associated with the project would be temporary (e.g., approximately 36 months) and would not include blasting or pile driving. As described under impact NOI-1 in Section 3.7, Noise and Vibration, construction noise from the project would not exceed City standards and thus would not result in any significant short-term noise impacts. Therefore, because construction activities would be limited to the project site, construction-generated noise would not combine with any other proposed construction activities within the City nor result in a substantial contribution such that a new significant cumulative construction noise impact would result. Cumulative construction noise impacts would continue to be less than significant.

#### **4.5.8 Transportation**

Section 3.8, Transportation, evaluated the cumulative impact of the proposed project with traffic volume forecasts provided by SCTA to simulate long-range 2040 conditions. As discussed in Section 3.8,



because of the General Plan Policy T-D-1, which allows exception for maintaining LOS D within the downtown area, the proposed project would not result in a cumulative significant impact. As a condition of approval to maintain the community integrity and consistency with General Plan and Specific Plan goals and in accordance with the City's transportation operational guidelines, the project would be conditioned to replace the existing stop signs at the Morgan Street and 9<sup>th</sup> Street intersection with a traffic signal. A signal warrant analysis was conducted for the intersection, which determined that the traffic volumes met the peak hour warrant criteria for cumulative conditions both without and with the proposed project. Installation of a traffic signal would fully mitigate the significant impact, and the intersection would operate at LOS B under the cumulative conditions.

While the 6<sup>th</sup> Street/Santa Rosa Plaza and A Street intersection is not significantly impacted by the proposed project, it has been shown to operate deficiently under cumulative conditions. The City of Santa Rosa's Downtown Specific Plan 2007 identifies development guidelines to install traffic calming roundabouts at the intersection of A Street and 7<sup>th</sup> Street and 6<sup>th</sup> Street/Santa Rosa Plaza and A Street. Because of the downtown exception described above, the proposed project would not have a significant cumulative impact on the above intersections, although the intersections would perform an unacceptable LOS under the cumulative conditions of General Plan buildout. As a condition of approval, in order to maintain community integrity and consistency with the General Plan and Specific plan goals and in accordance with the City's transportation operational guidelines, the project will be required to pay its fair-share for 80-foot roundabouts mitigate the significant impact under the cumulative conditions.

The identified impacts occur under cumulative conditions and are needed either without or with the proposed project. The proposed project would not contribute to the cumulative impact because of the downtown exception. However, the project will be conditions to be responsible for its fair-share of the costs of feasible improvements to be consistent with General Plan and Specific Plan Goals. Accordingly, the project would not have a cumulatively considerable impact to transportation.

#### 4.5.9 Tribal Cultural Resources

According to CEQA, the importance of tribal cultural resources is the value of the resource to California Native American tribes culturally affiliated with the project area. Therefore, the issue that must be explored in a cumulative analysis is the loss of tribal cultural resources. For tribal cultural resources that are avoided or preserved through dedication within open space, no impacts would occur. However, if avoidance or dedication of open space to preserve tribal cultural resources is infeasible, those impacts must be considered in combination with tribal cultural resources that would be impacted for other projects included in the cumulative project list.

Cumulative projects located in the region would have the potential to result in a cumulative impact associated with the loss of tribal resources through development activities that could cause a substantial adverse change in the significance of a tribal resource. The cumulative projects are listed in Table 4-2, List of Related Projects. Any cumulative projects that involve ground-disturbing activities would have the potential to result in significant impacts to tribal resources. All projects would be regulated by applicable federal, state, and local regulations to avoid the destruction of tribal cultural resources. As discussed in Section 3.9, Tribal Cultural Resources, no tribal cultural resources have been identified during the cultural evaluation or through government-to-government consultation. As such, impacts to tribal cultural resources would be unlikely to occur with implementation of the project. The project would not be likely to



cumulatively contribute to a significant tribal cultural impact. Therefore, cumulative impacts would be less than significant.

#### 4.5.10 Energy

The project's structures would be designed in accordance with Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (heating, ventilation, air conditioning, and water heating systems), indoor and outdoor lighting, and illuminated signs. Other projects in the vicinity and region would similarly be designed to meet existing Title 24 standards. Additionally, the project would be designed to be GreenPoint-rated and would result in additional energy efficiencies above Title 24 standards. This would ensure that the project would not result in the inefficient, unnecessary, or wasteful consumption of energy. Thus, the proposed project, in conjunction with other planned projects, would not have a cumulatively considerable impact on energy.

#### 4.5.11 Hazards

The project would not result in the use of substantial quantities of hazardous materials or the creation of new hazards. However, there is the potential to have discarded hazardous materials from people accessing services at the project site. Mitigation measures such as enhanced lighting, hazardous waste containers, and security patrols have been incorporated into the project to reduce impacts of hazardous materials to a less than significant level. It is reasonable to assume that other related projects would be required to implement similar mitigation to reduce impacts from hazardous materials. The project would not have a cumulatively considerable impact on hazardous materials.

#### 4.5.12 Public Services

##### Police

The proposed project would increase service demands for police protection. The proposed project is not anticipated to have a cumulative impact on police protection such that it would necessitate the construction of new or expanded police facilities that would have adverse physical impacts. Other planned and approved projects would be reviewed for impacts on police protection and would be required to address any potential impacts with mitigation. Therefore, the proposed project, in conjunction with other planned and approved projects, would not have a cumulatively considerable impact on law enforcement.

##### Fire and Emergency

The proposed project would increase service demands for fire and emergency services. The proposed project would be required to provide compliant aerial, engine, and operational personnel access to the project site; fire sprinklers and standpipes (three-story and taller buildings) for the buildings; fire alarms onsite and offsite monitoring for water flow; control valves; smoke alarms; kitchen hood extinguishing system; manual pull devices; air handling smoke detection devices; and elevators of appropriate size to accommodate an emergency medical gurney. The proposed project is not anticipated to have a cumulative impact on fire and emergency services such that it would necessitate the construction of new or expanded fire and emergency facilities that would have adverse physical impacts. Other planned and



approved projects would be reviewed for impacts on fire and emergency services and would be required to address any potential impacts with mitigation. Therefore, the proposed project, in conjunction with other planned and approved projects, would not have a cumulatively considerable impact on fire and emergency services.





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## 5.0 ALTERNATIVES TO THE PROPOSED PROJECT

### 5.1 INTRODUCTION

The purpose of an alternatives analysis pursuant to CEQA is to identify feasible options that would attain most of the basic objectives of a proposed project while reducing its significant effects. Provisions of CEQA Guidelines (Section 15126.6) that address the number of project alternatives required in an EIR state the following:

*The range of alternatives required in an EIR is governed by a “rule of reason;” the EIR must evaluate only those alternatives necessary to permit a reasonable choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of a proposed project while meeting most of the underlying project objectives.*

### 5.2 REQUIREMENTS FOR THE CONSIDERATION OF ALTERNATIVES

An important aspect of EIR preparation is the identification and assessment of alternatives to the proposed project that have the potential to avoid or substantially lessen potentially significant impacts. In addition to mandating consideration of the no project alternative, CEQA Guidelines (Section 15126.6(e)) emphasize the selection of a reasonable range of feasible alternatives and adequate assessment, which allows decision-makers to use a comparative analysis. CEQA Guidelines (Section 15126.6(a)) states:

*An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.*

In accordance with CEQA Guidelines 15126.6, this EIR contains a comparative impact assessment of alternatives to the proposed project. The primary purpose of this assessment is to provide decision-makers and the public with a reasonable number of feasible project alternatives that could attain most of the basic project objectives while avoiding or reducing any of the project's significant adverse environmental effects. Important considerations for these alternatives' analyses are provided below:

- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
  - Failure to meet most of the basic project objectives
  - Infeasibility
  - Inability to avoid significant environmental effects



### 5.2.1 No Project Alternative

CEQA Guidelines require that the alternatives be compared to the project's environmental impacts and that the "no project" alternative be considered (CEQA Guidelines Section 15126.6(d)(e)). Section 15126.6(d)(e)(1) states:

*The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.*

The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

### 5.2.2 Consistency with Project Objectives

A project's statement of objectives describes the purpose of the project and the reasons for undertaking the project. To be considered for detailed analysis in the EIR, an alternative must meet most of the project objectives. Among the suite of project objectives identified by the applicants, the City as lead agency has identified the following as the basic objectives for purposes of screening potential alternatives to the proposed project:

- Orderly and systematic development of an integrated and sustainable residential community that is consistent with the goals and policies of the City of Santa Rosa General Plan and Downtown Station Area Specific Plan for this area.
- Construct new affordable housing and expanded homeless services predominately on land already owned by Catholic Charities.
- Continue to provide homeless and family support services at their existing location because the purchase funding for these parcels requires these services to be on-going.
- Continue to provide homeless and family support services at their existing location because this is a known and familiar location for them. These services have been offered here since 1989, and the public is familiar with and expects these services to be offered at this location. Preserving homeless services at this location is of particular importance to maintain participant enrollment and for continuity of services, and ease of use by Catholic Charities' clients.
- Since many of the service recipients and potential tenants do not own vehicles, construct the expanded center and housing within walking distance of the SMART Train Station and Transit Mall so clients and tenants have easy access to transportation to public services and jobs.
- Provide onsite support services for residents of Caritas Homes.
- Help as many people as practicable by developing the project site to the highest residential density allowed by the City's General Plan.



- Develop transit and pedestrian-oriented affordable rental housing in downtown Santa Rosa within 0.25 mile of the SMART Train Station in Railroad Square and within 0.30 mile of Bus Route 1. Bus Route 1 is one of only two city routes that picks up passengers in 15-minute increments.
- Reduce vehicle miles traveled by siting affordable rental housing at sites that can be developed with high densities near public transportation to reduce greenhouse gas emissions.

### 5.2.3 Feasibility

According to CEQA Guidelines (Section 15126.6(f)(1):

*Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.*

Based on CEQA Guidelines, “feasible” is defined as, “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (CEQA Guidelines Section 15364). CEQA does not require that an EIR determine the ultimate feasibility of a selected alternative, but rather that an alternative be potentially feasible.

For the screening analysis, the potential feasibility of potential alternatives was assessed using the following considerations:

**Technological Feasibility:** Is the alternative feasible from a technical perspective, considering available technology? Are there any construction, operation, or maintenance constraints that cannot be overcome?

**Legal Feasibility:** For example, do legal protections on lands or financing strategies preclude or substantially limit the feasibility of constructing the alternative?

**Economic Feasibility:** Is the alternative so costly that its costs would prohibit its implementation?

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project’s significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, an EIR must contain a discussion of “potentially feasible” alternatives, the ultimate determination whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body (See PRC Section 21081[a][3]).

### 5.2.4 Potential to Avoid or Lessen Significant Environmental Effects

CEQA requires that alternatives to a proposed project have the potential to avoid or substantially lessen one or more significant effects of the project (CEQA Guidelines Section 15126.6). At the project and/or cumulative level, the Draft EIR has identified the following environmental issues that may result in significant impacts. This list only includes those impacts that were determined to be significant and unavoidable.



## Cultural Resources

- The proposed project would cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.
- The proposed project would cause a cumulatively considerable adverse change in the significance of a historical resource as defined in §15064.5.

## 5.3 METHODOLOGY AND SCREENING CRITERIA

A range of potential alternatives was developed and subjected to the screening criteria. Several representative alternatives were considered. There was no attempt to include every conceivable alternative. The following criteria were used to screen potential alternatives:

- Does the alternative meet most of the project objectives?
- Is the alternative potentially feasible?
- Would the alternative substantially reduce one or more of the significant impacts associated with the project?

## 5.4 ALTERNATIVES CONSIDERED AND REJECTED FROM FURTHER CONSIDERATION

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision-makers. (See PRC, § 21081(a)(3).) At the time of action on the project, the decision-makers may consider evidence beyond that found in this EIR in addressing such determinations. The decision-makers, for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-makers adopt a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (City of Del Mar v. City of San Diego [1982] 133 Cal.App.3d 401, 417; California Native Plant Society v. City of Santa Cruz [2009] 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's



determination. The following alternatives were considered by the county but are not evaluated further in this Draft EIR for the reasons discussed below.

#### 5.4.1 Site Redesign – One Building Along 6<sup>th</sup> Street or One Building Along A Street

This alternative would locate Caritas Center and Caritas Homes within a single-building along 6<sup>th</sup> Street or along A Street and would preserve the historic structures on Morgan Street (the historic four-plex at 608 Morgan and the historic single family residence at 520 Morgan). This would move the project slightly farther away from the single-family homes north of 7<sup>th</sup> Street. This alternative was evaluated in response to comments at the pre-application community meeting and the pre-application joint design review and CHB meeting.

This alternative had prohibitive practical implications, such as:

- When placing a concrete garage at the core of a building's ground floor, all spaces for people must wrap the outer edges facing the streets. Consequently, these spaces would only have natural light and views from one side, which limits the space available for Caritas Center programs along the outer edges of the building. Also, the space allocated for people must be shallower since the natural light is coming from one side only.
- The dining space and some programs must move to the second floor for daylight and access to outdoor space above the garage. However, the kitchen must remain on the first floor for ease of servicing. This would necessitate installing a single-use service elevator to connect the kitchen with the dining space. This introduces a number of problems, such as bringing up finished food and taking out waste.
- The housing must use ground floor space for its lobby, office(s), mail room, elevator, and bike storage, displacing other center programs that must move to the second floor.
- This design results in 75 parking spaces in the garage at a cost of \$25,000 per stall. In addition to the high per parking space cost, from a practical perspective, 75 spaces are not enough for a combined building. The proposed project would include 99 parking spaces and is requesting a parking reduction. This alternative would result in a short-fall of 24 parking spaces on top of the reduction being requested.
- The housing would be structured for wood framing, which means the center must be concrete in order to support the housing and maintain its column-free spaces. This would cost more than the final proposed project, which is a combination of steel and wood.
- The outdoor space in the second-floor courtyard would cost about four times more than the same outdoor space that would be at ground level with the proposed project.
- For Burbank Housing to obtain all its dwelling units, it would need three floors above Caritas Center, requiring the overall building be five stories, which would require a height concession from the City, as the height limit in the Courthouse Square Area is four stories. The total height would be 60 feet plus about 5 feet for parapet, for a total of 65 feet. Although the height concession could be requested, going from a four-story building to a five-story building would require additional



engineering, design, and materials to address deeper footing requirements and structural design requirements to properly support the additional height. The additional engineering and design would add increased costs to the building, making it cost-prohibitive.

This alternative would also have prohibitive funding and legal implications. First, a smaller building footprint means a taller building would be needed. A taller building would significantly increase costs for Caritas Village because it means going from Building Type IV or V construction to Building Type II or III<sup>1</sup>. Specifically, this alternative design would require a concrete structure, which is far costlier than the present design. The outdoor space would also be more expensive to build, and the parking garage would cost about eight times as much per parking space than a surface parking lot. Surface parking lot spaces cost approximately \$3,000 per space.

Second, neither Caritas Housing nor Caritas Center could move forward until both nonprofits have all of their funding in place. The financing strategy for both Caritas Center and Caritas Homes centers around tax credit equity financing. In the case of Caritas Homes, federal low-income housing tax credits may be integral part of the financing. This complex financing mechanism involves essentially selling tax credit to private investors that take a 99.99 percent equity ownership position in the affordable housing development. Thus, for each new affordable rental housing project, a limited partnership is established as the ownership entity to utilize tax credit investment. For Caritas Center, a primary funding source may be New Markets Tax Credits that are complex and require a single asset ownership structure. For both low-income housing tax credits and new market tax credits, the equity investors shoulder considerable risk because the project must be economically and operationally feasible for long periods of time, otherwise investors face substantial income tax liability. Because tax credits are potentially a major source of project funding, the investors have great influence on the parameters of the project and are very sensitive to any and all project risks, perceived or real.

Third, if Burbank Housing and Catholic Charities developed Caritas Center and Caritas Homes as a single building, it would be necessary to structure development ownership using two commercial condominiums. This is inherently complicated because there are multiple building systems that would be shared by both legal entities such as elevators, heating and air-conditioning systems, shared space like reception areas, etc. Thus, both commercial condominium owners would need to negotiate complex agreements for the financing and operational maintenance of these shared systems. Because of this increase in complexity and the corresponding probability of conflict, tax credit investors will view this project more warily than others, and the result may be a dearth of investment proposals or receipt of proposals with less favorable financial terms than would be the case if the two projects were isolated in separate buildings on separate parcels.

By combining the homeless and housing components within a single building either along 6<sup>th</sup> Street or along A Street, the project would avoid demolishing the historic four-plex at 608 Morgan and the historic single family residence at 520 Morgan, while also preserving the other structures along Morgan Street. While this alternative would avoid the significant and unavoidable impact to a historical resource as defined in §15064.5, it would not be economically feasible and would comprise the objectives of the project by creating substantial uncertainty for completion of the project.

<sup>1</sup> Building types are classified as I – V. A skyscraper is level I and a simple single-family home is level V. Type I structures require more engineering, enhanced fire systems, and other items that are far costlier than what a simple, single-family home requires.



### 5.4.2 Increased Density

Under this alternative, the project site would be developed to a higher density with additional affordable housing units. Increasing the density of the project would increase impacts to transportation, noise, and aesthetics relative to the proposed project and would not eliminate the significant and unavoidable impact to a historical resource as defined in §15064.5. Furthermore, in response to neighborhood concerns at a community meeting held on March 21, 2018, the project applicants revised their project to reduce the number of housing units from 137 to 126 to address community concerns with parking. While increasing the density of the site would meet the project's objectives and would help more people obtain housing, it would not be responsive to community concerns.

### 5.4.3 Alternative Location

Offsite alternatives are generally considered in EIRs when one of the means to avoid or eliminate the significant impacts of a project is to develop it in a different available location. Such alternatives are especially appropriate where a project would put a site to uses different than those contemplated in the governing general plan or zoning district, which presumably reflect land use policies reached after much deliberation and public involvement, and also in instances where there is an ample supply of similarly situated land that could be developed for a project. Such sites would need to be large enough to accommodate the size of the project and be located within proximity to alternative transportation and jobs (within walking distance of the SMART Station and downtown bus depot). This would put the alternative location within the downtown Santa Rosa area.

Generally, community-based nonprofit organizations (NPOs) are poorly situated to buy property on the open market because sellers expect a potential buyer to place a sizable down payment as part of a purchase offer and further expect the buyer to be able to close the transaction quickly. When community-based NPOs seek to acquire real estate, they very often rely on third-party financing such as local governments. This can often entail waiting for a funder to issue a Notice of Funding Availability, which is typically only issued once per year. This, in turn, triggers very long escrow periods, even longer than 1 year in some instances, and makes it difficult to compete for real estate sold on the open market. Therefore, many NPO real estate acquisitions are from government organizations who can tolerate a long escrow that a private commercial seller could not. As a practical matter, for either Burbank Housing or Catholic Charities to succeed in buying downtown Santa Rosa property that hits the market, the agency would need to have the internal financial resources available to act quickly and nimbly. For both agencies, like most community NPOs, this financial capacity does not exist.

As noted above, alternatives may be eliminated from detailed consideration in an EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid or substantially reduce any significant environmental effects. Therefore, this alternative was eliminated from further consideration because of the following:

- It would not substantially reduce the significant environmental impacts associated with cultural resources as location within the downtown Santa Rosa area would likely impact historical resource as defined in §15064.5.
- If an alternative location outside the downtown Santa Rosa areas was secured, it would not meet the objective of locating near existing transit.





- It would not reduce existing noise, hazardous materials, and public service impacts that currently occur on the site because the family and support services would still need to continue to operate on the project site.
- It would fail to meet the Applicant's objectives for the proposed project related to consolidating and expanding existing services on land already owned by Catholic Charities.

## 5.5 ALTERNATIVES CONSIDERED

Section 15126 of CEQA Guidelines requires an EIR to identify and discuss a no project alternative, as well as a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the proposed project and would avoid or substantially lessen any of the significant environmental impacts.

Alternatives to the proposed project considered for analysis in this EIR are:

- No project
- Site redesign – two buildings/reduced footprint/higher density
- Partial preservation

### 5.5.1 Alternative 1 – No Project

CEQA Guidelines Section 15126.6(e)(1) requires that the no project alternative be described and analyzed, "to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project." The no project analysis is required to discuss, "the existing conditions at the time the Notice of Preparation is published . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (Section 15126.6(e)(2)).

The No project alternative assumes that no additional development would occur on the project site.

This alternative would continue to use the existing structures on the project site to provide family and homeless support services. Catholic Charities has undertaken adaptive reuse of all of the structures on this block for decades. The old hospital was repurposed and serves as the Family Service Center. Single-family homes along Morgan Street were repurposed to serve as the Navigation Center. Currently, an 1,811-square-foot single-family home serves as the Navigation Center for 325-425 daily visits and 1,090 clients per year.

While the no project alternative would avoid the significant and unavoidable impact to a historical resource as defined in §15064.5, it would not meet two critical project objectives: increasing services to homeless individuals and providing permanent housing to people who have been or are at risk of homelessness.

## Impact Analysis

### Aesthetics

If the no project alternative is implemented, there would be no change to the existing landscape. Therefore, there would be no impacts related to aesthetics.



## Air Quality

Under the no project alternative, the existing uses would continue to operate on the project site, and there would be no change in air emissions. Therefore, there would be no impacts related to air quality due to construction or increased operational emissions. However, the existing project site would need to continue to provide homeless services in accordance with grant funding received from the U.S.

Department of Housing and Urban Development, which requires the provision of services at the existing location until 2070. The residents of the transitional housing at 520 and 516 Morgan would continue to be used for housing, but long-term placement of individuals in the home would not be allowed pursuant to the environmental analysis conducted for the U.S. Department of Housing and Urban Development grant funding. As demonstrated by that previous analysis and confirmed by the HRA prepared for the proposed project, long-term residents would be exposed to pollution from the adjacent freeway, and the long-term cancer risk would exceed BAAQMD's thresholds of significance. The current heating, venting, and air conditioning system for 516 and 520 Morgan would need to be upgraded to allow long-term residents, and the costs to upgrade the system would be prohibitive; therefore, cancer risks would continue to be mitigated by limiting occupancy to 9 months or less. Air quality impacts would be lessened due the elimination of construction emissions and fewer operational emissions when compared to the proposed project.

## Biological Resources

Under the no project alternative, the proposed project would not be constructed and operated, and the project site would continue to be used for the Family Support Center and homeless Navigation Center. Existing trees on the project site would not be removed. Therefore, the no project alternative would not have an impact on biological resources.

## Cultural Resources

Under the no project alternative, there would be no subsurface ground disturbance that could impact undiscovered cultural resources, and there would be no demolition. Accordingly, impacts to historical resource as defined in §15064.5 would not occur. The no project alternative would not have an impact on cultural resources.

## Greenhouse Gas Emissions

Under the no project alternative, the existing uses would continue to operate on the project site, and there would be no change in GHG emissions. However, the no project alternative would not develop higher density housing near transit, would not construct more energy efficient structures, and therefore, would not help reduce future GHG emissions. Accordingly, long-term impacts to GHG emissions may be greater than the proposed project.

## Land Use and Planning

Under the no project alternative, the existing uses would continue to occur onsite; however, increased density and housing as envisioned by the Downtown Station Area Plan would not occur. The no project alternative would not further the goals of the Santa Rosa General Plan to foster compact development and promote development within walking distance of the downtown SMART Station. Land use and planning impacts would be greater under the no project alternative.



## Noise

Under the no project alternative, the existing uses would continue to operate on the project site, and there would be no change to the existing site layout. While the proposed project would have some increase in noise during construction, the increases would be temporary and addressed through mitigation. Operationally, the proposed project would shield the noise through building construction and attenuation of stationary heating, ventilation, and air conditioning sources. This shielding would not occur under the no project alternative, and noise impacts would be greater compared to the proposed project.

## Transportation

Under the no project alternative, the existing uses would continue to operate on the project site. The no project alternative would not generate additional traffic. However, the no project alternative would not help promote higher density uses near transit that would serve to reduce VMT from future growth and development. Impacts related to transportation would be greater under the no project alternative.

## Tribal Cultural Resources

Under the no project alternative, there would be no subsurface ground disturbance that could impact undiscovered tribal cultural resources. The no project alternative would not have an impact on tribal cultural resources.

## Energy

Under the no project alternative, the existing uses would continue to operate on the project site, and there would be no demolition and construction of more energy efficient buildings. The no project alternative would not help build energy efficient buildings to serve growth and development. Accordingly, energy impacts may be greater than the proposed project.

## Hazards and Hazardous Materials

If the no project alternative is implemented, the proposed project would not be constructed or operated, and the existing uses would continue onsite. The proposed project includes the implementation of mitigation for biohazardous waste, which may not occur under the no project alternative, therefore, impacts related to hazards or hazardous materials may be greater compared to the proposed project.

## Public Services

The no project alternative would continue existing operations on the site. As discussed in Section 3.12, Public Service, demands for service of police, fire and emergency services are substantial. The no project alternative would not construct the comprehensive facilities to help the homeless and keep the individuals contained within a single facility. While the calls for service may not increase, the no project alternative would not address existing issues that may reduce calls for service, such as provision of medical care to homeless individuals and trained employees who could respond to minor incidents without calling for emergency assistance. Accordingly, impacts to public services would be greater compared to the proposed project.



## Conclusion and Relationship to Project Objectives

The no project alternative would reduce the significant and unavoidable impact to historical resources, but it would have greater impacts to GHGs, land use and planning, noise, transportation, energy, and hazards and hazardous materials. The no project alternative would not achieve the project objectives shown below:

- Orderly and systematic development of an integrated and sustainable residential community that is consistent with the goals and policies of the City of Santa Rosa General Plan and Downtown Station Area Specific Plan for this area.
- Construct new affordable housing and expanded homeless services predominately on land already owned by Catholic Charities.
- Since many of the service recipients and potential tenants do not own vehicles, construct the expanded center and housing within walking distance of the SMART Train Station and Transit Mall so clients and tenants have easy access to transportation to public services and jobs.
- Provide onsite support services for residents of Caritas Homes.
- Help as many people as practicable by developing the project site to the highest residential density allowed by the City's General Plan.
- Develop transit and pedestrian-oriented affordable rental housing in downtown Santa Rosa within 0.25 mile of the SMART Train Station in Railroad Square and within 0.30 mile of Bus Route 1. Bus Route 1 is one of only two city routes that picks up passengers in 15-minute increments.
- Reduce VMT by siting affordable rental housing at sites that can be developed with high densities near public transportation to reduce greenhouse gas emissions. This allows Burbank Housing to pursue state affordable housing and sustainable communities funding through the state's innovative cap-and-trade program. Qualifying sites for the program are rare in Sonoma County.

### 5.5.2 Alternative 2 – Site Redesign – Two Buildings/Reduced Footprint/Higher Density

The site redesign alternative would construct two separate buildings for Caritas Center and Caritas Homes. Construction adjacent to Morgan Street would be eliminated by reducing the Caritas Center footprint adjacent to Morgan Street and 6<sup>th</sup> Street and constructing a higher density single building for Caritas Homes along A Street. The acreage for each component would be approximately 0.75 acre. For analytical purposes it was assumed that this alternative would provide approximately 75 percent of the square footage/housing units requested by the proposed project. Figure 5-1 provides a conceptual project site boundary for both project components. Surface parking may be reduced or eliminated to allow the two building footprints to be conformed to the reduced footprint. Each of the buildings would be taller than the proposed project. Caritas Homes would be a minimum of four stories in height above the ground-level podium parking. Caritas Center would be four stories in height. This alternative would eliminate the demolition of structures adjacent to Morgan Street including the historic four-plex at 608 Morgan and the historic single-family home at 520 Morgan. The structures at 516 and 520 Morgan may continue to be used for transitional housing with constraints placed on the term of occupancy due to cancer risk impacts



from air pollutants under long-term occupancy conditions. Other structures on Morgan may also to be used as site facilities such as offices or meeting space, but potential long-term occupancy would not be permitted due to the cancer risk from air pollutants unless the HVAC system is upgraded on those structures to be able to incorporate high filtration systems with a minimum efficiency reporting value filter rating of 13 filters be installed in the buildings. The site redesign alternative would reduce the significant and unavoidable impact to historical resources.

**Figure 5-1: Site Redesign Layout**



## Impact Analysis

### Aesthetics

Under the site redesign alternative, the heights of the buildings would be increased, and there would not be a stepped up transition from the residential dwelling units adjacent to 7<sup>th</sup> Street. There would be beneficial aesthetic impacts related to the preservation of structures adjacent to Morgan. Impacts to aesthetics would be equivalent compared to the proposed project.

### Air Quality

Under the site redesign alternative, construction of two taller buildings may require additional equipment; however, the third building would not be constructed. Equipment usage would be equivalent to the proposed project. There may be a reduction in the housing unit counts as a result of the site redesign; therefore, operational emissions may decrease slightly. Air quality impacts would be less compared to the proposed project.



## Biological Resources

If the site redesign alternative is implemented, fewer trees would be removed from the project site. Impacts to biological resources would be less compared to the proposed project.

## Cultural Resources

Under the site redesign alternative, there would still be subsurface ground disturbance, and most of the structures would still be demolished. However, the demolition of the historic four-plex at 608 Morgan and the historic single-family home at 520 Morgan would be eliminated. Accordingly, impacts to historical resources as defined in §15064.5 would not occur. The site redesign alternative would have less of an impact on cultural resources compared to the proposed project.

## Greenhouse Gas Emissions

If the site redesign alternative is implemented, there would still be the provision of higher density units near transit, more energy efficient buildings, and reduced VMT. The existing structures adjacent to Morgan Street would continue to be used for transitional housing and/or office and meeting space, so GHG impacts would be slightly greater compared to the proposed project.

## Land Use and Planning

Similar to the proposed project, the site redesign alternative would further the goals of the Downtown Station Area Plan and the City of Santa Rosa General Plan to foster compact growth and development within walking distance of the downtown SMART Station and public transportation. Impacts to land use and planning would be equivalent to the proposed project.

## Noise

Under the site redesign alternative, courtyards and plazas included in the proposed project may be redesigned or eliminated, and public gathering areas may not be as shielded as the proposed project. Therefore, noise impacts under the site redesign alternative may be greater than the proposed project.

## Transportation

Under the site redesign alternative, there would be less traffic compared to the proposed project, and payment of fair-share fees for roundabouts at A Street and 7<sup>th</sup> Street, A Street and 6<sup>th</sup> Street, and signals at Morgan Street and 9<sup>th</sup> Street to facilitate future traffic growth under the cumulative General Plan conditions would still be required. The reduction in vehicle trips associated with the reduced square footage and housing units would not be enough to reduce potential traffic impacts because the impacts are caused by the cumulative build-out conditions under the General Plan. The site redesign alternative would help promote higher density uses near transit that would serve to reduce VMT from future growth and development, but not to the same extent as the proposed project. Impacts related to transportation would be equivalent.

## Tribal Cultural Resources

Like the proposed project, the site redesign alternative would still involve subsurface ground disturbance that could potentially impact previously undiscovered tribal cultural resources; however, the extent of subsurface disturbance would be reduced. The Morgan Street area and the relocation site for the single-





family homes would remain undisturbed. Accordingly, the site redesign alternative would have less impacts to tribal cultural resources compared to the proposed project.

## Energy

Under the site redesign alternative, two higher density buildings would be constructed to house the Caritas Center and Caritas Homes. Those buildings would be energy efficient and would help serve growth and development. However, this alternative would maintain the existing less efficient homes along Morgan Street. Accordingly, energy impacts may be greater than the proposed project.

## Hazards and Hazardous Materials

If the site redesign alternative is implemented, mitigation measures for hazardous materials and biohazardous waste for the proposed project would also be applicable. However, with the continued existence of the Morgan Street structures, there would be less opportunity to address potentially hazardous conditions through site design. Accordingly, impacts to hazards and hazardous materials may be greater than the proposed project.

## Public Services

The site redesign alternative may result in similar calls for police, fire, and emergency services as the proposed project. However, the continued existence of the Morgan Street structures would provide fewer opportunities to address public safety issues that result in calls for service through site design. Accordingly, impacts to public services may be greater than the proposed project.

## Conclusion and Relationship to Project Objectives

The site redesign alternative would eliminate the significant and unavoidable impact under CEQA Guidelines Section 15064.5 to historic resources by preserving the historic four-plex at 608 Morgan and the historic single-family home at 520 Morgan. This alternative would have equivalent impacts compared to the proposed project on air quality, land use and planning, and transportation. The site redesign alternative would have less impacts compared to the proposed project on biological resources, cultural resources, and tribal cultural resources. This alternative would result in greater impacts to aesthetics, noise, energy, hazards and hazardous materials, and public services. The site redesign alternative would not achieve the project objective shown below:

- Help as many people as practicable by developing the project site to the highest residential density allowed by the City's General Plan.

The site redesign would require modification of the site layout and a reduction in building size and the number of housing units that can be built. As such, the project site would not be built to as high a density as possible, and fewer affordable housing units would be available.

### 5.5.3 Alternative 3 – Partial Preservation

The partial preservation alternative would involve the demolition of all structures on the project site except for the historic single-family home at 520 Morgan and the single-family home at 512 Morgan. 520 and 512 Morgan would be relocated to two vacant lots, 501 A Street (relocation site for 520 Morgan) and 507 A Street (relocation site for 512 Morgan), that have been used for a garden in the past and are under



Catholic Charities ownership. 507 A Street would be used as a residence, and 501 A Street would be used as administrative offices by Catholic Charities staff. The partial preservation alternative would reduce the significant and unavoidable impact to historic resources by eliminating the demolition of the historic single-family home at 520 Morgan Street, however the historic four-plex at 608 Morgan would still be demolished.

## **Impact Analysis**

### **Aesthetics**

The partial preservation alternative is the same as the proposed project with the addition of the preservation of some structures to reduce impacts to historic resources. The relocated homes would be consistent with the existing character of the neighborhood. The partial preservation alternative impacts to aesthetics would be equivalent to the proposed project as it would involve the same project components.

### **Air Quality**

The partial preservation alternative is the same as the proposed project with the addition of the preservation of some structures to reduce impacts to historic resources. The partial preservation alternative would not substantially increase short-term construction or long-term operational emissions. Air quality impacts would be equivalent to the proposed project.

### **Biological Resources**

The partial preservation alternative is the same as the proposed project with the addition of the preservation of some structures to reduce impacts to historic resources. The number of trees required to be removed to develop this alternative would be consistent with the proposed project. Similar mitigation measures would be applicable to this alternative. Impacts to biological resources would be equivalent to the proposed project.

### **Cultural Resources**

The partial preservation alternative is the same as the proposed project with the addition of the preservation of some structures to reduce impacts to historic resources. The structures on the project site are historic-period buildings, but only the four-plex at 608 Morgan and the single-family home at 520 Morgan were determined to be historic resources under CEQA. The two structures were determined to be eligible for listing as St. Rose Historic Preservation District contributors. The partial preservation alternative would relocate 520 Morgan to 501 A Street. The four-plex at 608 Morgan would still be demolished due to the deteriorated building conditions and likely collapse during a relocation process (MKM & Associates, 2019). Under the partial preservation alternative, there would still be subsurface ground disturbance, and most of the structures would still be demolished. However, 520 Morgan Street, a historic resource as defined by CEQA Guidelines Section 15064.5, would not be demolished. Accordingly, impacts to historical resources as defined in CEQA Guidelines Section 15064.5 would be reduced.

During the archaeological field survey, a prehistoric lithic scatter was discovered at Assessor's Parcel Numbers 010-031-001 and 010-031-002 within the community garden where the historic resources would be relocated. The lithic scatter identified during the survey does not meet the criteria in Section 21083.2 of CEQA for consideration as an historical resource, and subsurface testing conducted in conjunction with





the survey did not identify any subsurface deposits of cultural resources (e.g., artifacts) within the relocation site. Regardless of the results of survey and subsurface testing, there are previously recorded sites near the project site, and surface conditions (e.g., pavement) limited visibility during the survey. Therefore, the project could inadvertently impact unknown archaeological resources. Similarly to the proposed project, mitigation measures for the inadvertent discovery of resources would be implemented that would reduce potential significant impacts to a less than significant level.

The partial preservation alternative would have less of an impact on historical resources compared to the proposed project, but the impact would still be significant and unavoidable.

#### Greenhouse Gas Emissions

The partial preservation alternative is the same as the proposed project with the addition of the preservation of some structures to reduce impacts to historic resources. The partial preservation alternative would not substantially increase short-term construction or long-term GHG emissions. If this alternative is implemented, there would still be the provision of higher-density units near transit, more energy efficient buildings, and reduced VMT. GHG impacts would be equivalent to the proposed project.

#### Land Use and Planning

The partial preservation alternative would further the goals of the Downtown Station Specific Plan and the City of Santa Rosa General Plan to foster compact growth and development within walking distance of the downtown SMART Station and public transportation. As such, impacts related to land use and planning would be equivalent to the proposed project.

#### Noise

The partial preservation alternative is the same as the proposed project with the addition of the preservation of some structures to reduce impacts to historical resources. The partial preservation alternative would not substantially increase short-term construction noise or long-term operational noise. Courtyards, plazas, and public gathering areas would still be included in the design and would be shielded like the proposed project. Stationary source equipment would also be attenuated to meet the City's noise thresholds. Therefore, noise impacts under the partial preservation alternative would be equivalent to the proposed project.

#### Transportation

The partial preservation alternative is the same as the proposed project with the addition of the partial preservation to reduce impacts to historic resources. The partial preservation alternative would help promote higher-density uses near transit that would serve to reduce VMT from future growth and development. As such, transportation impacts would be equivalent to the proposed project.

#### Tribal Cultural Resources

The partial preservation alternative would still involve subsurface ground disturbance, which could potentially impact previously undiscovered tribal cultural resources. This alternative would involve slightly greater ground disturbance due to the relocation of 512 and 520 Morgan Street to 507 and 501 A Street, respectively. Accordingly, the partial preservation alternative would have the potential to have greater impacts to tribal cultural resources compared to the proposed project. Those impacts would be reduced to



a less than significant level with the incorporation of mitigation measures included for the proposed project to address the unanticipated discovery of tribal cultural resources. Impacts to tribal cultural resources would be greater compared to the proposed project.

### Energy

The energy demand associated with the partial preservation alternative would be slightly greater compared to the proposed project because it would retain the less energy efficient structures at 512 and 520 Morgan Street and relocate those to 507 and 501 A Street, respectively. Accordingly, energy impacts may be greater compared to the proposed project.

### Hazards and Hazardous Materials

Mitigation measures for hazardous materials and biohazardous waste for the proposed project would also be applicable to the partial preservation alternative. Accordingly, impacts to hazards and hazardous materials would be equivalent to the proposed project.

### Public Services

The partial preservation alternative may result in similar calls for police, fire, and emergency services as the proposed project. The partial preservation alternative would provide opportunities to address public safety issues that result in calls for service through site design. Accordingly, impacts to public services would be equivalent to the proposed project.

## Conclusion and Relationship to Project Objectives

The partial preservation alternative would have equivalent impacts to all resource areas, with the exception of energy and tribal cultural resources, which would have slightly greater impacts compared to the proposed project. The partial preservation alternative would reduce the significant and unavoidable impact to a historic resources as defined by CEQA Guidelines 15064.5 by eliminating the demolition of the historic single-family home at 520 Morgan Street and relocating it to 501 A Street; however, the demolition of the historic four-plex at 608 Morgan would still result in a significant and unavoidable impact. The partial preservation alternative would achieve all of the project objectives.

## 5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an “environmentally superior alternative.” The qualitative environmental effects of each alternative in relation to the proposed project are summarized in Table 5-1. To quantitatively identify an environmentally superior alternative a value has been applied to each environmental effect. Additionally, Table 5-2 provides a comparison of the alternatives with the project objectives. Accordingly, the alternative with the fewest amounts of impacts and the ability to achieve the most project objectives is the environmentally superior alternative.

The partial preservation alternative is the environmentally superior alternative because it would reduce the significant and unavoidable impacts to historic resources as defined in §15064.5 by preserving the historic single-family home at 520 Morgan and relocating it to 501 A Street, but it would not eliminate the significant unavoidable impacts to historic resources because the four-plex at 608 Morgan would still be demolished. All other resource areas would be less than significant or less than significant with mitigation.



The partial preservation alternative would also meet all of the project objectives and it would be more consistent with the Downtown Specific Plan and Northern Downtown Pedestrian Study.



**Table 5-1: Project Alternative Impacts Comparison**

| Environmental Resource Area     | Proposed Project | No Project<br>(Alternative 1) | Site Redesign<br>(Alternative 2) | Partial Preservation<br>(Alternative 3)                 |
|---------------------------------|------------------|-------------------------------|----------------------------------|---|
| Aesthetics                      | LTS              | L                             | E                                | E   |
| Air Quality                     | LTS/M            | L                             | R                                | E   |
| Biological Resources            | LTS/M            | L                             | L                                | E   |
| Cultural Resources              | SU               | L                             | L                                | L – Historic Structures<br>E – Archaeological resources |
| Greenhouse Gases                | LTS/M            | G                             | G                                | E   |
| Land Use and Planning           | LTS              | G                             | E                                | L   |
| Noise                           | LTS/M            | G                             | G                                | E   |
| Transportation and Traffic      | LTS/M            | G                             | E                                | E   |
| Tribal Cultural Resources       | LTS/M            | L                             | L                                | G   |
| Energy                          | LTS              | G                             | G                                | G   |
| Hazards and Hazardous Materials | LTS/M            | G                             | G                                | E   |
| Public Services                 | LTS/M            | G                             | G                                | E   |

Notes:

NI = No Impact

LTS = Less than Significant Impact

LTS/M = Less than Significant Impact with Mitigation

SU = Significant and Unavoidable

L = Less impact than the proposed project

E = Equivalent impact to the proposed project

G = Greater impact than the proposed project



**Table 5-2: Project Alternatives Comparison to Project Objectives**

| Project Objectives   | Proposed Project | No Project<br>(Alternative 1) | Site Redesign<br>(Alternative 2) | Partial Preservation<br>(Alternative 3) |
|--|------------------|-------------------------------|----------------------------------|---|
| Orderly and systematic development of an integrated and sustainable residential community that is consistent with the goals and policies of the City of Santa Rosa General Plan and Downtown Station Area Specific Plan for this area.   | X                |                               | X                                | X                                       |
| Construct new affordable housing and expanded homeless services predominately on land already owned by Catholic Charities.   | X                |                               | X                                | X                                       |
| Continue to provide homeless and family support services at their existing location because the purchase funding for these parcels requires these services to be ongoing. CDBG partially funded Catholic Charities' acquisition of its parcels. CDBG funding restrictions require Catholic Charities to operate a Family Support Center and Homeless Services Center on the main part of the project site for at least 55 years, beginning in 2015.                                    | X                | X                             | X                                | X                                       |
| Continue to provide homeless and family support services at their existing location, because this is a known and familiar location for them. These services have been offered here since 1989, and the public is familiar with and expects these services to be offered at this location. Preserving homeless services at this location is of particular importance to maintain participant enrollment and for continuity of services, and ease of use by Catholic Charities' clients. | X                | X                             | X                                | X                                       |
| Since many of the service recipients and potential tenants do not own vehicles, construct the expanded Center and housing within walking distance of the SMART Train Station and Transit Mall so clients and tenants have easy access to transportation to public services and jobs.   | X                |                               | X                                | X                                       |
| Provide onsite support services for residents of Caritas Homes.  | X                |                               | X                                | X                                       |
| Help as many people as practicable by developing the project site to the highest residential density allowed by the City's General Plan.   | X                |                               |                                  | X                                       |



| Project Objectives   | Proposed Project | No Project<br>(Alternative 1) | Site Redesign<br>(Alternative 2) | Partial Preservation<br>(Alternative 3) |
|--|------------------|-------------------------------|----------------------------------|---|
| Develop transit- and pedestrian-oriented affordable rental housing in downtown Santa Rosa within 0.25 mile of the SMART Train Station in Railroad Square and within 0.30 mile of Bus Route 1. Bus Route 1 is one of only two city routes that picks up passengers in 15-minute increments.   | X                |                               | X                                | X                                       |
| Reduce vehicle miles travelled by siting affordable rental housing at sites that can be developed with high densities near public transportation to reduce GHG emissions. This allows Burbank Housing to pursue state affordable housing and sustainable communities funding through the state's innovative cap-and-trade program. Qualifying sites for the program are rare in Sonoma County. | X                |                               | X                                | X                                       |



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## 6.0 OTHER CEQA CONSIDERATIONS

This section describes the other statutorily required topics including growth inducing impacts, significant and unavoidable impacts, significant irreversible environmental changes, and mandatory findings of significance. It also provides a discussion of energy conservation as required by Section 15126.4 of the CEQA Guidelines.

### 6.1 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that an EIR evaluate the growth-inducing impacts of a proposed action:

*Discuss the way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this EIR, to reach the conclusion that a project is growth-inducing as defined by CEQA, the EIR must find that it would foster (i.e., promote, encourage, or allow) additional growth in economic activity, population, or housing, regardless of whether the growth is already approved by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with Section 15126.2(d) of the State CEQA Guidelines. If the analysis conducted for the EIR results in a determination that a project is growth-inducing, the next question is whether that growth may cause adverse effects on the environment. Environmental effects resulting from induced growth (i.e., growth-induced effects) fit the CEQA definition of “indirect” effects in Section 15358(a)(2) of the State CEQA Guidelines. These indirect or secondary effects of growth may result in significant environmental impacts. CEQA does not require that the EIR speculate unduly about the precise location and site-specific characteristics of significant, indirect effects caused by induced growth, but a good-faith effort is required to disclose what is feasible to assess. Growth-inducing impacts can occur when development of a project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional development in the project area. Also included in this category are projects that would remove physical obstacles to population growth, such as the construction of a new roadway into an undeveloped area or a wastewater treatment plant with excess capacity to serve additional new development. Construction of these types of infrastructure projects cannot be considered isolated from the immediate development that they facilitate and serve. Projects that physically remove obstacles to growth or projects that indirectly induce growth are those that may provide a catalyst for future unrelated development in the area (such as a new residential community that requires additional commercial uses to support residents). The growth-inducing potential of a project could also be considered significant if it fosters growth in excess of what is





assumed in the local master plans and land use plans, or in projections made by regional planning agencies.

### 6.1.1 Direct Population Growth

The decision to allow/approve projects that result from induced growth (e.g., new commercial areas, new housing) is the subject of separate discretionary processes by individual lead agency (or agencies) responsible for considering such projects, in this case, the City Planning Commission or, on appeal, the City Council. Projects resulting from induced growth would themselves be discretionary and subject to CEQA. Therefore, the following discussion is intended to disclose the potential for environmental effects that could occur more generally because of the project rather than the site-specific impacts of induced growth. Its purpose is to inform the City decision-making body that additional environmental effects may be a possibility if growth-inducing projects are approved. However, the decision of whether projects are approved and the impacts associated with them still rests with the City decision-making body at such times as complete applications for development are submitted.

The proposed project would cause direct population growth by constructing 128 residential units as part of Caritas Homes, 50 private family rooms, and housing for 40 participants as part of the emergency shelter and transitional housing components of Caritas Center. These dwelling units would directly generate population growth of an estimate 472 new residents to the City's population (622 total with the existing 150 residents). The project is an in-fill development on existing developed but underutilized land and would not induce development in the area beyond that which has already been planned for as part of the General Plan and the Downtown Station Specific Plan. Caritas Center currently has 67 employees onsite. The proposed project would increase the number of employees by 65 for a total of 132 employees. Caritas Homes would have a manager for each building. The total number of employees on the project site would be 134. The existing jobs would be retained by current employees, but it is anticipated that the local employment pool would fill the remaining positions. Therefore, the project would not substantially induce population growth through the provision of new housing units or employment.

### 6.1.2 Removal of Barrier to Growth

The proposed project would be served by existing utilities in the project area and would not result in the extension of urban infrastructure to an area that is currently not serviced. The additional demand for utilities and public services generated by operation of the proposed project would be met with existing facilities, as described in the NOP. The Project would be constructed within the City's Urban Growth Boundary. Therefore, the proposed project would not result in significant growth-inducing impacts.

## 6.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126(b) requires an EIR to "describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

Section 3.0, Environmental Impact Analysis, provides a description of the potential environmental impacts of the proposed project and recommends mitigation measures to reduce impacts to a less than significant level, where possible. Section 4.0, Cumulative Impacts, determines whether the incremental effects of



this project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. After implementation of the recommended mitigation measures, the following resource area would have significant unavoidable impacts:

### 6.2.1 Cultural Resources

#### Historic Resources

Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Cause a cumulatively considerable adverse change in significance of historical resources as defined in §15064.5.

## 6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

As mandated by the CEQA Guidelines, the EIR must address any significant irreversible environmental change that would result from implementation of the proposed project. Specifically, pursuant to the CEQA Guidelines (Section 15126.2(c)), such an impact would occur if:

- The project would involve a large commitment of nonrenewable resources;
- Land area committed to new project facilities;
- Irreversible damage can result from environmental accidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

Development of the proposed project would result in an irretrievable commitment of nonrenewable natural and energy resources, such as water resources during construction and operation. The use of fuels resulting from project-related construction would be considerably higher than under existing conditions. However, this consumption would not be considered wasteful.

Resources that would be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels. The proposed project is an in-fill development on existing developed but underutilized land and would not induce development in the area beyond that which has already been planned for as part of the General Plan and the Downtown Specific Plan. The proposed project would support transit and as described in Section 3.8, Transportation, would be considered to result in a less than significant impact based on VMT given its proximity to transit, with concomitant reductions in congestion, air pollutant emissions, GHG emissions, and transportation energy consumption compared to equivalent amounts of development at suburban or other locations less central in the region. The proposed project would exceed both city and state minimum green building requirements. It would be GreenPoint-rated and is anticipated to be certified with the GreenPoint Gold rating. The proposed project would target a sustainability rating equivalent to a LEED Gold certification. Solar photovoltaic panels would be used on the rooftops to lower energy costs; these panels would also be incorporated into the exterior sunshade strategies to lower dependence on air conditioning. The proposed project would also comply with the City's Water Efficient Landscape Ordinance and install low water use fixtures. These measures, planning policies, standard conservation features, and mitigation measures would ensure that natural resources are conserved to the maximum extent possible. Although the proposed project would result in an irretrievable commitment of nonrenewable resources, the commitment of these resources would not be significantly inefficient, unnecessary, or wasteful.



The proposed project would develop residential and support services on approximately 2.78 acres. None of these uses would handle large quantities of hazardous materials or engage in activities that have the potential to result in serious environmental accidents (chemical manufacturing, mineral extraction, refining, etc.). As such, the proposed project would not have the potential to cause serious environmental accidents.

## 6.4 MANDATORY FINDINGS OF SIGNIFICANCE

PRC Section 21083 requires lead agencies to make a finding of a “significant effect on the environment” if one or more of the following conditions exist:

1. A proposed project has the potential to degrade the quality of environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare, or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
2. The possible effects of a project are individually limited but cumulatively considerable.
3. The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

**Finding No. 1: The proposed project would not have the potential to significantly affect biological resources but would result in a significant and unavoidable impact to cultural resources, specifically historic resources.**

As discussed in Section 3.3, Biological Resources, all project-related impacts on biological resources can be mitigated to a level of less than significant. This pertains to potential impacts on nesting birds and trees, and potential conflicts with the City of Santa Rosa’s tree ordinance.

As discussed in Section 3.4, Cultural and Historical Resources, the proposed project would have a significant and unavoidable impact to historic resources.

**Finding No. 2: The proposed project would have cumulatively considerable impacts.**

Projects considered in the cumulative analysis are located within the City and are described in Section 3.0, Environmental Impact Analysis, Table 3-3. The proposed project would have cumulatively considerable impacts to historical resources.

**Finding No. 3: The proposed project would not cause substantial adverse effects on human beings.**



## 7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Pursuant to CEQA and the CEQA Guidelines, the discussion of the potential effects on the physical environment is focused on those impacts that may be significant or potentially significant. CEQA allows a lead agency to limit the details of discussion of the environmental effects that are not considered potentially significant (CEQA Guidelines Section 15126.2[a] and 15128). CEQA requires that the discussion of any significant effects on the environment be limited to substantial or potentially substantial adverse changes in physical conditions that exist within the affected area, as defined in PRC Section 21060.5 (Statutory definition of “environment”).

Effects determined to be insignificant or unlikely to occur need not be discussed further in the Draft EIR unless the lead agency subsequently receives information inconsistent with the finding (CEQA Guidelines Section 15143).

The NOP was circulated for public review between January 24, 2019, and February 22, 2019 and is contained in Appendix A of this Draft EIR. During the NOP process, evidence regarding emergency police and fire services times and the potential conflict as it relates to the proposed project were received. Additionally, information regarding potential health hazards from human waste and drug paraphernalia were raised as well as the Kid Street Learning Center being located within 0.25 mile. Therefore, the following potential impacts have been determined to require further analysis in this Draft EIR:

- **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:**
  - Fire protection?
  - Police protection?
- **Emit hazardous emissions or handle hazardous or acutely-hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**
- **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- **Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

For the remainder of the NOP, it was determined that implementation of the proposed project would result in no impact or less than significant environmental impacts (without mitigation) related to the resource categories listed below. Analyses supporting the conclusions for these resource areas is included in Appendix A as part of the NOP. The following resource thresholds are not discussed at further length in this Draft EIR:



**Aesthetics:**

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

There are no designated scenic vistas or state scenic highways in or near the proposed project area. Additionally, the proposed project would not create or contribute to new sources of lighting or glare and would comply with all City Zoning Codes related to lighting and glare. Therefore, a less than significant impact would occur and these issues are not discussed further in this Draft EIR.

**Agriculture and Forestry Resources:**

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- Conflict with existing zoning for agricultural use or a Williamson Act contract?
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by GC Section 51104(g))?
- Result in the loss of forest land or conversion of forest land to non-forest use?
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?

The proposed project would be located in an existing urban environment that is surrounded by residential and commercial parcels. The proposed project is not adjacent to or located within any lands that are zoned for forest land, timberlands, or agricultural uses. Therefore, no impacts to agricultural and forestry resources would occur and this issue is not discussed further in this Draft EIR.

**Air Quality and Greenhouse Gases:**

- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The proposed project would create construction-related diesel exhaust and ROG/volatile compounds that could cause objectionable odors; however, these emissions would be temporary and would disperse quickly, thus would result in a less than significant impact. Operationally, the project site is not located on or near a particular land use typically associated with objectionable odors; therefore, the operational impact would also be less than significant and is not discussed further in this Draft EIR.



### Biological Resources:

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations, or by the California Department of Fish or USFWS?
- Have a substantial adverse effect on state- or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan?

The proposed project site does not contain any riparian habitat, wetlands or jurisdictional waters, substantial wildlife corridors, or associated habitat conservation plans or Natural Community Conservation Plan. Project construction and operation would not substantially affect the movement of any wildlife species. Therefore, these impacts would be less than significant and are not discussed further in this Draft EIR.

### Geology and Soils:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
  - Strong seismic ground shaking?
  - Seismic-related ground failure, including liquefaction?
  - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- Be located on strata or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?
- Be located on expansive soil, as defined in Table 18.1-B of the Uniform Building Code, creating substantial risks to life or property?
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for disposal of wastewater?



- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The proposed project site is not located within an Alquist-Priolo Earthquake Fault Zone, liquefaction hazard zone, or landslide zone. Earthquakes are a common occurrence in North America; however, the proposed project would comply with all federal, state, and local regulations governing construction of buildings, and impacts would be less than significant and are not discussed further in this Draft EIR. Additionally, the project would also be required to comply with a site-specific stormwater pollution prevention plan and would be required to complete a geotechnical investigation (pursuant to General Plan Policy NS-C-2) for the project to ensure that any construction-related erosion is minimized, and the project soils are adequate to support the project. Therefore, these impacts would be less than significant and are not discussed further in this Draft EIR. The proposed project would not include the use of septic tanks or alternative wastewater disposal systems and, therefore, there would be no impact and this issue will not be discussed further in this Draft EIR. Further, although not anticipated, undiscovered paleontological resources could be discovered onsite during construction and would be required to comply with General Plan Policies HP-A-2 and HP-A-3, which would ensure that any paleontological discoveries are undisturbed. Therefore, this impact is not discussed further in this Draft EIR.

#### **Hazards and Hazardous Materials:**

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to GC Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The proposed project would require the use of hazardous materials during both construction and operation of the project; however, these hazardous materials would be minimal and consistent with standard construction procedures, and the project would be required to comply with all applicable federal, state, and local regulations related to the transport, use, or disposal of hazardous materials. Therefore, impacts related to transport and potential release of hazardous materials would be less than significant and these impacts are not discussed at further length in this Draft EIR. Additionally, there are no schools within 0.25 mile of the proposed project site, the proposed project would not affect any hazardous



materials sites pursuant to GC Section 65962.5, there are no airports that would be substantially affected by project construction or operation within the vicinity of the proposed project site, the project site is not located in a fire hazard area, and emergency response plans and emergency evacuation plans would not be physically interfered by project construction or operations. Therefore, these impacts would be less than significant and are not discussed further in this Draft EIR.

#### **Hydrology and Water Quality:**

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - Result in substantial erosion or siltation on- or offsite?
  - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?
  - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
  - Impede or redirect flood flows?
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The proposed project would be required to comply with all federal, state, and local regulations governing water quality during both construction and operation of the project. Specifically, a site-specific stormwater pollution prevention plan and Santa Rosa urban stormwater mitigation plan would be required for the project and would ensure that construction and post-construction water quality and erosion impacts are minimized. The proposed project would not conflict with groundwater recharge or obstruct water quality control plans; therefore, these impacts would be less than significant and are not discussed further in this Draft EIR. Further, the proposed project is not located in a flood hazard, tsunami, or seiche zone. Therefore, no impact would occur, and these issues are not discussed further in this Draft EIR.

#### **Land Use and Planning:**

- Physically divide an established community?
- Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?





The proposed project site is located in a previously developed site and would not include an incompatible use in the area or any physical features that would physically divide the community or result in a significant environmental impact due to a conflict with any plans, policies, or regulations. Therefore, impacts would be less than significant and are not discussed further in this Draft EIR.

**Mineral Resources:**

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The proposed project site is not located in a state-designated mineral zone, and no mineral extraction activities exist on the project site. Therefore, there would be no impact and these issues are not discussed further in this Draft EIR.

**Noise:**

- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The project site is within the vicinity of a private airstrip or an airport land use plan. The nearest private airport is the Graywood Ranch Airport, located at 7935 Sonoma Highway, approximately 8.4 miles east of the project site. The nearest public airport is the Charles B. Schulz-Sonoma County Airport, located at 2200 Airport Boulevard, approximately 6.25 miles northwest of the project site. Therefore, no potential impacts associated with aviation noise at the project site would occur, and this issue is not discussed further in this Draft EIR.

**Population and Housing:**

- Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed project would add 622 total residents (40 Nightingale Program residents, 20 transitional residents, 200 family residents, and 362 Caritas Homes residents). The net increase, however, would be 472 people; this is an increase of approximately 0.002 percent of the total existing City population and 0.002 percent of the projected population growth through 2035. Based on the estimated increase in residents, the population growth is not substantial. The expanded Caritas Center would require 65 additional employees to provide the comprehensive services envisioned by the project. The increase in employment would be minimal. Therefore, impacts from population growth would be less than significant. Additionally, the proposed project does not include roads or infrastructure, and no growth in population would result from the extension of roads or infrastructure. Therefore, impacts from population growth would be less than significant, and this issue is not discussed further in this Draft EIR. Further, although



the proposed project would require the demolition of existing homes, the majority of these residences are vacant and would not displace substantial numbers people. Therefore, the proposed project would have a less than significant impact concerning displacement of existing housing, and this issue is not discussed further in this Draft EIR.

#### **Public Services:**

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
  - Schools?
  - Parks?
  - Other Public Facilities?

The proposed project could introduce the addition of approximately 14 new students to the Santa Rosa City School District, which would represent a nominal increase (less than 0.1 percent) in the student population. Additionally, the project would be required to pay a fee to offset school impacts in accordance with GC Section 65996. Therefore, impacts would be less than significant, and this issue is not discussed further in this Draft EIR. The proposed project would also generate the demand for approximately 1.64 acres of park land to be consistent with the General Plan minimum overall city ratio of 6.0 acres of parkland per 1,000 residents. As such, the project applicant would be required to dedicate land or pay a fee in-lieu thereof, or both, for park or recreation purposes. Therefore, this impact would be less than significant and is not discussed further in this Draft EIR. Further, the addition of up to 274 new residents would create an incremental increase in the demand for library facilities and community centers. In accordance with California Development Code Section 53090, development impact fees would be required to offset any additional service needs. With payment of legislated development fees, impacts would be less than significant and is not discussed further in this Draft EIR.

#### **Recreation:**

- Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed project could increase the demand for parks; however, the proposed project itself would include private recreational facilities to serve the future residents such as covered gathering areas, communal lawn area, pet relief area, tenant vegetable garden planter, day-use courtyard, family courtyard, play structure, chapel courtyard, and office patio. These facilities would alleviate the demand on existing and proposed recreational facilities generated by the project residents. In addition, in accordance with Santa Rosa City Code Section 19-70.060, the project applicant would be required to dedicate land or pay a fee in-lieu thereof, or both, for park and recreational purposes. With the mandatory compliance with the City's in-lieu fee requirements, the project's impacts to recreational facilities would be less than significant, and this issue is not discussed further in this Draft EIR.



**Traffic and Transportation:**

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?
- Substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project is not within the vicinity of an airport and would not cause any change in air traffic patterns, therefore there would be no impact and this issue is not discussed further in this Draft EIR. Additionally, the proposed project would not involve an increase in hazards or result in an incompatible use, thus these impacts would be less than significant and are not discussed further in this Draft EIR.

**Utilities and Service Systems:**

- Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed project would not result in the relocation or construction of new or expanded wastewater treatment, water treatment, stormwater drainage, electrical and natural gas, or telecommunication facilities that would cause an adverse effect on the environment. Therefore, the impacts would be less than significant, and these issues are not discussed further in this Draft EIR. Additionally, the proposed project would not substantially deplete water supplies, substantially increase wastewater treatment capacity needs, or generate substantial amounts of solid waste. Therefore, these impacts would be less than significant and are not discussed further in this Draft EIR.

**Wildfires:**

- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project;
  - Substantially impair an adopted emergency response plan or emergency evacuation plan?
  - Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?



- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?



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## 8.0 LIST OF PREPARERS AND ORGANIZATIONS CONSULTED

### Lead Agency

#### City of Santa Rosa

##### *Planning and Economic Development*

David Guhin .....Planning & Economic Development Director

William Rose .....Supervising Planner

Kristinae Toomians .....Senior Planner

##### *City Attorney's Office*

Sue A. Gallagher .....City Attorney

Ashle Crocker.....Assistant City Attorney

### Consultant

#### Stantec Consulting Services Inc.

Senior Principal .....Trevor Macenski

Senior Project Manager/Air Quality Scientist.....Elena Nuño

Environmental Planner .....Kaela Johnson

Senior Planner .....Tina Garg

Senior Associate Acoustics.....Tracie Ferguson

Senior Planner/Visual Resources Practice Lead .....Josh Hohn

Principal, Transportation Planning & Traffic Engineering .....Daryl Zerfass

Senior Transportation Planner .....Sandhya Perumalla

Environmental Scientist.....Kate Gross Gray

Senior Biologist .....Loni Cooper

Senior Biologist/Certified Arborist .....Nick Eide

Project Biologist .....Leticia Morris

Environmental Scientist/GIS .....Willow Campbell

Environmental Planner.....Zoryana Pope



Environmental Planner ..... Anna Radonich  
Technical Editor/Word Processor ..... Chris Broderick

## **Subconsultants**

### **Alta Archaeology**

Risa DeGeorgey, M.A. RPA..... Managing Member, Principal/Project Manager  
Alex DeGeorgey ..... Principal/Lead Archaeologist

### **Brunzell Historical**

Kara Brunzell.....Principal/Architectural Historian



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