APPENDIX D CEQA CHECKLIST MEMO



November 13, 2019

Ms. Jen Santos Deputy Director - Parks City of Santa Rosa Recreation and Parks Department 55 Stony Point Road Santa Rosa, CA 95401

RE: Assessment of the Appendix G CEQA Checklist Revisions on the Roseland Creek Community Park Master Plan Initial Study

Dear Jen,

The CEQA Guidelines Appendix G Checklist was updated in late 2018 to include revised questions and incorporation of several new sections including Energy and Wildfire. The Initial Study for the Roseland Creek Park Master Plan was substantially complete at that time and in administrative draft form. The City has requested an evaluation of how the changes in the CEQA Checklist affect the conclusions in the Roseland Creek Community Park Master Plan Initial Study. This memo documents the effects of the CEQA Checklist revisions on the analysis provided in the Initial Study for the project. The CEQA Checklist for the following resource areas was not revised and, therefore, they are not discussed further below: Agriculture and Forestry Resources, Greenhouse Gas Emissions, Mineral Resources, Public Facilities, and Recreation.

Assessment of CEQA Checklist Revisions

Aesthetics

The checklist was revised to clarify question c) applies to public views of the site. The Initial Study previously considered public views of the site and found the project would have minimal impact upon the visual character or quality of the site due to proposed structures being small and proposed uses being primarily of a passive nature (trails, picnic areas, etc.).

Air Quality

The checklist was revised to focus on cumulatively considerable net increases of criteria pollutants and the potential for other emissions to lead to odors adversely affecting a substantial number of people. As described in *Section 4.3 Air Quality*, the project would not exceed cumulative criteria pollutant screening levels developed by BAAQMD. The project would not create substantial odors.

Biological Resources

The checklist was revised to specifically identify consideration of state protected wetlands in the impact analysis. The project would not impact the riparian wetlands on the site and, therefore, no state protected wetlands would be affected by the project.

Cultural Resources

The checklist was revised with a minor edit to the text of question a) that would not alter the discussion or conclusions of the Initial Study. Question c) related to paleontological resources was relocated to the Geology and Soils checklist which would result in no change in the analysis of these resources.

Energy

The checklist was revised to include analysis of the energy impacts of a project. The analysis should consider whether the project would: a) Result in a potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation; or b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The project proposes a limited number of structures on the site including a nature center and restroom building north of the creek and a restroom on the south side of the creek near the parking lot, play area, multi-use turf area, and sports court. Lighting would only be provided at the nature center, restrooms, and parking areas. The park would be closed in the evening and no lighting of play areas or the sports court is proposed. Construction of the project would involve demolition and grading, as well as, construction of active park uses on approximately 4.59 acres. The placement of trails throughout the site would not result in substantial construction activity on the site. In accordance with Sonoma County Waste Management Agency's construction and demolition debris diversion program, 50 percent of construction and demolition debris would be diverted from landfills. Given the limited number of buildings and structures proposed, the construction and operation of the project would not result in wasteful, inefficient, or unnecessary consumption of energy. The project is consistent with the City's Climate Action Plan and, therefore, would not conflict or obstruct a state or local plan for renewable energy or energy efficiency.

Geology and Soils

The checklist was revised to state a project would be considered to have an impact where it directly or indirectly caused a risk of harm to life or property due to existing geology and soil conditions. The project was not found to result in significant impacts related to geology and soil conditions and would not directly or indirectly cause any adverse effects from existing geology and soil conditions on the site.

Hazards and Hazardous Materials

The checklist was revised to include consideration of excessive noise for projects within an airport land use plan or within two miles of a public airport. The project is not located within an airport land use plan or two miles of a public use airport and, therefore, the revised checklist would have no effect on the conclusions related to airports in the Initial Study. The checklist was also revised to consider direct or indirect exposure of people or structures to risks involving wildland fires. The project site is not located in a fire hazard severity zone or the Wildland Urban Interface and, therefore, the revised checklist would have no effect on the conclusions related to wildland fires in the Initial Study.

Hydrology and Water Quality

The checklist was revised to more clearly address sustainable groundwater management planning, degradation of surface and groundwater quality, the effects of increased impervious surfaces, and the potential for flooding to result in pollutant releases. The project would not place buildings or structures within the 100-year flood hazard zone area of the site and, therefore, would not result in the release of pollutants from flooding. The project would not substantially decrease groundwater or groundwater recharge with the incorporation of stormwater treatment control measures and use of low flow faucets and water efficient landscaping. The project would not conflict with a water quality control plan or sustainable groundwater management plan.

Land Use

The checklist was revised to clearly state a project's conflict with a land use plan, policy, or regulation, adopted for the purpose of mitigating an environmental effect would itself have to result in a significant environmental impact in order for the conflict to result in a land use impact. As described in *Section 4.10 Land Use*, the proposed park Master Plan does not conflict with any land use plan including Sonoma County Agricultural Preservation and Open Space District (SCAOPSD) easements on the property.

Noise

The checklist was revised to combine several questions in this section and focus on a project's potential to generate noise. The current analysis in the Initial Study addresses these issues.

Population and Housing

The checklist was revised to focus on unplanned population growth in an area. The project does not require further analysis regarding unplanned population growth as it would not provide any housing.

Transportation

The checklist was revised to focus question a) on conflicts with plans addressing the circulation system. The revisions to question a) would not change the content or conclusions in the Initial Study. Checklist question b) was also revised to focus on the new CEQA Guidelines consideration of VMT instead of LOS. The Initial Study, page 106, addresses the current status of VMT based thresholds in the City of Santa Rosa. The revisions to question b) would not change the analysis or conclusions in the Initial Study. Checklist question d) included a minor clarifying text edit that would not change the analysis or conclusions in the Initial Study.

Tribal Cultural Resources

The requirements for consideration of Tribal Cultural Resources in the checklist have not changed and were included in the Initial Study as part of the Cultural Resources section.

Utilities and Service Systems

The checklist was revised to focus discussion on existing water supply planning requirements and clarify and consolidate other checklist questions. The issues addressed by the revised checklist were previously analyzed in the Initial Study and no changes in the analysis or conclusions would result.

Wildfire

The checklist was revised to include a Wildfire section addressing potential impacts for projects located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As described in *Section 4.8 Hazards and Hazardous Materials*, the proposed park is not located in a fire hazard zone and, therefore, the checklist questions in this new section would not apply.

As described above, the revisions to the Appendix G CEQA Checklist would not result in any new impacts from the proposed Roseland Creek Community Park Master Plan.

Sincerely,

Will Burns, AICP

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Principal Project Manager