



**U.S. Department of Housing and Urban  
Development**

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Washington, DC 20410  
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## **Environmental Review for Activity/Project that is Exempt or Categorically Excluded Not Subject to Section 58.5 Pursuant to 24 CFR Part 58.34(a) and 58.35(b)**

### **Project Information**

**Project Name:** 3575 Mendocino Avenue Project

**Responsible Entity:** Sonoma County Community Development Commission  
1440 Guerneville Road  
Santa Rosa, CA 95403

**Grant Recipient** (if different than Responsible Entity): N/A

**State/Local Identifier:** Sonoma County, CA

**Preparer:** Marc Chandler (with information provided by another Responsible Entity and their consultant Stantec Consulting Services Inc.)

**Certifying Officer Name and Title:** Dave Kiff, Interim Executive Director  
Sonoma County Community Development Commission

**Consultant** (if applicable):N/A

**Project Location:** 3575 Mendocino Avenue, Santa Rosa, CA 95403

#### **Description of the Proposed Project** [24 CFR 58.32; 40 CFR 1508.25]:

The project would redevelop the approximately 13.3-acre former mobile home park site into a transit village residential development with up to 532 high-density multi-family housing units. The proposed transit village would be developed as two separate components consisting of senior affordable housing on approximately 2.5 acres and market rate (i.e., not restricted to age or income level) housing on approximately 9 acres of the project site. The affordable housing component would be developed as two separate phases Phase I and Phase II and available to affordable to low-, very low-, and extremely low-income senior households with rental priority given to qualifying (based on age and income) residents of the former Journey's End Mobile Home Park displaced by the 2017 Tubbs Wildfire. The project would also include construction of a new public street (0.8 acre), approximately one acre of shared open space, on- and off-site utility infrastructure, parking (including surface, covered, and an above ground parking garage),

driveways, frontage improvements, landscaping, and a new storm water outfall into Russell Creek (located off-site). The Community Development Block Grant Disaster Recovery Multifamily Housing funds provided through Sonoma County will be used in phase II of the project to assist with the new construction of at least 15 affordable senior units.

**Level of Environmental Review Determination:**

Activity/Project is Exempt per 24 CFR 58.34(a): \_\_\_\_\_

Activity/Project is Categorically Excluded Not Subject To §58.5 per 24 CFR 58.35(b):  
\_\_\_\_\_

**Funding Information**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
Unassigned (to be determined)	Community Development Block Grant – Disaster Recovery – CA HCD Multifamily Housing Program (CDBG-DR-MHP)	\$2,436,753
5021-3265-21	Community Development Block Grant – Disaster Recovery (CDBG-DR)	\$11,917,110
Assigned	Section 8 Project Based Vouchers (PBVs)	30 vouchers
Unassigned (to be determined)	Community Development Block Grant – Disaster Recovery (CDBG-DR)	\$5,000,000

**Estimated Total HUD Funded Amount:** \$19,353,863 and 30 Section 8 PBVs.

**This project anticipates the use of funds or assistance from another Federal agency in addition to HUD in the form of (if applicable):** N/A

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:** \$100,151,693

**I certify that I have completed this review and prepared the environmental findings and determinations where applicable. If information was supplied by another party (i.e., applicant, contractor, or another RE), I have independently evaluated the information for accuracy and supplemented it if necessary to conform to the requirements of 24 CFR Part 58.**

Project Name

Project Locality and State

HEROS Number

Preparer Signature: \_\_\_\_\_ Date: 01/18/2022

Name/Title/Organization: Marc Chandler, Community Development Manager, Sonoma County Community Development Commission

Responsible Entity Agency Official Signature:

\_\_\_\_\_ Date: 1-18-2022

Name/Title: Dave Kiff, Interim Executive Director, Sonoma County Community Development Commission

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

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

**3575 Mendocino Avenue Project**

July 2021

Prepared by:

Stantec Consulting Services Inc.  
1340 Treat Boulevard, Suite 300  
Walnut Creek, California 94597

On Behalf of:

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

## Table of Contents

<b>1.0</b>	<b>PROJECT INFORMATION</b> .....	<b>5</b>
<b>2.0</b>	<b>PROJECT LOCATION</b> .....	<b>6</b>
<b>3.0</b>	<b>DESCRIPTION OF THE PROPOSED PROJECT [24 CFR 50.12 &amp; 58.32; 40 CFR 1508.25]:</b> .....	<b>6</b>
3.1	AFFORDABLE HOUSING COMPONENT .....	6
3.2	MARKET RATE HOUSING COMPONENT .....	7
3.3	POPULATION .....	7
3.4	CONSTRUCTION.....	7
<b>4.0</b>	<b>STATEMENT OF PURPOSE AND NEED FOR THE PROPOSAL [40 CFR 1508.9(B)]</b> .....	<b>8</b>
<b>5.0</b>	<b>EXISTING CONDITIONS AND TRENDS [24 CFR 58.40(A)]</b> .....	<b>10</b>
<b>6.0</b>	<b>FUNDING INFORMATION</b> .....	<b>10</b>
<b>7.0</b>	<b>COMPLIANCE WITH 24 CFR 50.4, 58.5, AND 58.6 LAWS AND AUTHORITIES</b> .....	<b>12</b>
<b>8.0</b>	<b>ADDITIONAL STUDIES PERFORMED</b> .....	<b>33</b>
8.1	FIELD INSPECTION (DATE AND COMPLETED BY).....	34
8.2	LIST OF SOURCES, AGENCIES AND PERSONS CONSULTED [40 CFR 1508.9(B)] .....	34
8.3	LIST OF PERMITS OBTAINED .....	34
8.4	PUBLIC OUTREACH [24 CFR 50.23 & 58.43]: .....	34
<b>9.0</b>	<b>CUMULATIVE IMPACT ANALYSIS [24 CFR 58.32]</b> .....	<b>35</b>
<b>10.0</b>	<b>ALTERNATIVES [24 CFR 58.40(E); 40 CFR 1508.9]</b> .....	<b>35</b>
10.1	NO ACTION ALTERNATIVE [24 CFR 58.40(E)].....	35
<b>11.0</b>	<b>SUMMARY OF FINDINGS AND CONCLUSIONS</b> .....	<b>36</b>
<b>12.0</b>	<b>MITIGATION MEASURES AND CONDITIONS [40 CFR 1505.2(C)]</b> .....	<b>36</b>
<b>13.0</b>	<b>DETERMINATION</b> .....	<b>43</b>
<b>14.0</b>	<b>REFERENCES</b> .....	<b>44</b>

### LIST OF TABLES

Table 1.	Construction Schedule .....	8
Table 2.	3575 Mendocino Avenue Grant Funding .....	10
Table 3:	Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities.....	12
Table 4:	Environmental Assessment .....	22

Table 5: Mitigation Measures .....36

**LIST OF FIGURES**

- Figure 1 – Project Site
- Figure 2 – Project Site Plan
- Figure 3 – Delineation of Potential Waters of the U.S.

**LIST OF APPENDICES**

- Appendix A – Thermal Radiation Memo
- Appendix B – Section 106 Consultation



## 1.0 PROJECT INFORMATION

**Project Name:** 3575 Mendocino Avenue Project

**Responsible Entity:** City of Santa Rosa

**Grant Recipient** (if different than Responsible Entity): City of Santa Rosa

**State/Local Identifier:** 3575 Mendocino Avenue Project, City of Santa Rosa, Sonoma County, California

**Preparer:** Stantec Consulting Services Inc. on behalf of City of Santa Rosa

**Certifying Officer Name and Title:** Clare Hartman, Deputy Director, Planning and Economic Development

**Consultant** (if applicable): Stantec Consulting Services Inc.

**Direct Comments to:**

**Nicole Rathbun, Interim Housing and Community Services Manager  
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Santa Rosa, California 95404  
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Supporting documentation for this Environmental Assessment is found in the Sustainable Communities Environmental Assessment (SCEA) (and supporting documents) prepared for this Project (City of Santa Rosa 2020); available online at the following URL: <https://srcity.org/425/Plans-Studies-EIRs>.

## 2.0 PROJECT LOCATION

The 3575 Mendocino Avenue Project (project) is located within the City of Santa Rosa (City) in Sonoma County, California (Figure 1). The project site is bordered by Mendocino Avenue to the east, Russell Creek and Kaiser Permanente Santa Rosa Medical Center to the south, US Highway 101 to the west, and the Mendocino Overcrossing to the north (Figure 1). The site is centrally located on Mendocino Avenue, a major arterial that connects the project site with downtown Santa Rosa to the south and greater Sonoma County to the north. The project site is approximately 13.3 acres and consists of a single parcel identified as Assessor's Parcel Number (APN) 173-030-001; however, the proposed stormwater outfall for the project would be located within Russell Creek, an urban tributary located offsite on the adjacent parcel identified as APN 173-030-002.

## 3.0 DESCRIPTION OF THE PROPOSED PROJECT [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The project would redevelop the approximately 13.3-acre former mobile home park site into a transit village residential development with up to 532 high-density multi-family housing units. The proposed transit village would be developed as two separate components consisting of senior affordable housing on approximately 2.5 acres and market rate (i.e., not restricted to age or income level) housing on approximately 9 acres of the project site. The affordable housing component would be affordable to low-, very low-, and extremely low-income senior households with rental priority given to qualifying (based on age and income) residents of the former Journey's End Mobile Home Park displaced by the 2017 Tubbs Wildfire. Details of each component are described separately below.

The project would also include construction of a new public street (0.8 acre), approximately one acre of shared open space, on- and off-site utility infrastructure, parking (including surface, covered, and an aboveground parking garage), driveways, frontage improvements, landscaping, and a new storm water outfall into Russell Creek (located off-site).

Project details and data analysis conducted are included in the SCEA prepared for this project (City of Santa Rosa 2020).

### 3.1 AFFORDABLE HOUSING COMPONENT

The project site is currently vacant as a result of structures being burned down during, or removed after, the 2017 Tubbs Wildfire. As such, there is currently no permanent housing located on the project site. The proposed affordable housing component, totaling approximately 136,185 gross square feet (gsf), would provide 162 new units (including two manager's units) of deed-restricted affordable senior rental housing in 3 residential structures (Buildings 1, 2, and 3 as shown in Figure 2). The buildings would be predominately four stories in height with two- and three-story elements incorporated at the building corners and entries to reduce the perceived scale and highlight the building entries. Each building would have associated private open space programmed for outdoor recreation opportunities. Building 1 would have a formal forecourt for waiting outside for pick-up and drop-off at the covered entry as well as a courtyard facing the new public street. The courtyards and private open space would be interconnected by walkways.

The proposed 162 units would include 158 one-bedroom/one-bath units and 4 two-bedroom/one-bath units. The units would range in size from approximately 530 to 800 square feet. The affordable housing would also include onsite amenities, such as multi-purpose activity common rooms, a health and wellness room, media room, laundry rooms, bicycle rooms, manager's offices, reception areas with alternative

transportation real-time data kiosks or monitors, and community gardens. The affordable housing component is anticipated to be GreenPoint rated.

The units would be affordable to seniors, age 55 and older, with household incomes between approximately 30 to 60 percent of the Sonoma County area median income. The project has been awarded 30 Project-Based Vouchers by the Santa Rosa Housing Authority.

When the new affordable units are completed, qualifying (e.g. by age, income, etc.) residents of the former Journey's End Mobile Home Park would be given first priority as tenants in the new affordable housing units. Onsite management would be provided 24 hours per day, 7 days per week by two dedicated onsite staff. Professional facilities repair and maintenance staff as well as tenant services staff would also support the affordable housing.

### **3.2 MARKET RATE HOUSING COMPONENT**

The market rate housing would be located on approximately 9 acres located north of the affordable housing component and the shared open space (Figure 2). The market rate housing would have frontage on Mendocino Avenue and abut the Mendocino Overcrossing to the north and Highway 101 to the west (Figure 2).

The market rate component would consist of up to 510,531 gsf and include up to 370 units in conformance with the allowed density of the Transit Village Medium (TVM) land use designation and development standards of the Transit Village Residential (TV-R) zoning district. The proposed buildings would be three and four stories tall. Building 4a would also include an above ground parking garage comprised of four levels and approximately 72,000 gsf. The market rate housing units are anticipated to consist of 18 studios, 111 one-bedroom units, 185 two-bedroom units, and 56 three-bedroom units. The units would range in size from approximately 500 to 1,300 square feet. The market rate component would include a natural gas fireplace in each of the 370 units, as well as one in each of the eight building lobbies. The market rate housing component is anticipated to be GreenPoint rated. Onsite management would be provided 24 hours per day, 7 days per week by dedicated onsite staff. Professional facilities repair and maintenance staff, as well as tenant services staff, would support the market rate housing.

### **3.3 POPULATION**

The City of Santa Rosa's General Plan, the plan that addresses issues related to the physical development and growth of Santa Rosa and guides the City's planning and zoning functions, and its associated Environmental Impact Report (EIR) estimates an average of 2.69 persons per household in 2020 resulting in a projected population for the project of 1,431 residents (City of Santa Rosa 2009a as cited in City of Santa Rosa 2020). However, the senior affordable component would include a combination of one-bedroom and two-bedroom units and the market rate housing component would include a mix of studio, one-bedroom, two-bedroom, and three-bedroom units. Therefore, based on the proposed unit mix, the average number of occupants per unit would range from 1.9 to 3.25 occupants resulting in 1,383 residents at the project site, if fully occupied. The 1,383 residents generated by the project would be within the projected population estimated by the City's General Plan (City of Santa Rosa 2020).

### **3.4 CONSTRUCTION**

The affordable housing component is anticipated to be developed in three phases; each phase would be located on a separate parcel for financing purposes. The market rate component would be developed in two or more phases (the exact number of which would be determined at a later date); each phase would be located on a separate parcel for financing purposes. Upon approval of the project, the affordable housing component and the market rate component, each with its associated sequencing, would proceed on

individual schedules. However, for analysis purposes, the project is assumed to be built concurrently with each component (both the affordable housing and market rate housing as well as the shared open space) proceeding at the same time.

The project would require a series of construction activities that would take place for both the affordable housing and market rate components. Table 1 shows the anticipated construction schedule, for both components as well as the shared open space, based on the assumptions that they would be built concurrently, that all phases of both components would begin at the same time in 2021, and all phases of both components would be completed by early 2023 (22 months of construction are anticipated). However, construction may extend up to 24 additional months due to market conditions. A 22-month construction schedule is a conservative assumption that focuses potential impacts over a more concentrated time period, rather than spreading construction activities out over four years. It is anticipated that ancillary improvements would occur concurrently with the construction of the facilities.

**Table 1. Construction Schedule**

Task	Start Date	End Date
Demolition and Site Preparation	June 1, 2021	July 31, 2021
Grading	August 1, 2021	August 15, 2021
Building Construction	August 16, 2021	December 31, 2022
Architectural Coating	November 1, 2022	December 17, 2022
Paving	January 3, 2023	March 11, 2023

Construction activities associated with the project would require demolition, grading, utility connections, building construction, construction of the new public street and frontage improvements (e.g., new curb, gutter, sidewalk, and driveway construction), and landscaping on the project site.

## **4.0 STATEMENT OF PURPOSE AND NEED FOR THE PROPOSAL [40 CFR 1508.9(B)]**

The purpose of the project is to construct affordable senior housing and market rate housing needed to address a local and regional shortage of housing within the City of Santa Rosa and Sonoma County.

Building new housing is a priority for many counties in California as a result of the high cost of living and lack of affordable housing, especially in the San Francisco Bay Area (Bay Area). In addition, Sonoma County recently faced significant devastation from wildfires. The Tubbs Wildfire in October 2017 burned 36,810 acres of land and destroyed 3,098 structures in Santa Rosa consisting of 2,668 single-family homes, 209 multi-family homes, 190 mobile homes, and 31 commercial buildings - including the homes previously located on the project site (City of Santa Rosa 2017 as cited in City of Santa Rosa 2020). Since then, at least two more large-scale wildfires have occurred in Sonoma County. Such events perpetuate the housing crisis by reducing the amount of housing stock and leaving many people homeless.

California mandates each jurisdiction create its fair share of housing, called the Regional Housing Needs Allocation (RHNA). As part of RHNA, the California Department of Housing and Community Development (HCD) determines the total number of new homes and how affordable the homes need to be so that the Bay Area can meet the housing needs of people at all income levels (City of Santa Rosa 2019).

The Metropolitan Transportation Commission/Association of Bay Area Governments (MTC/ABAG), working with the Housing Methodology Committee, then distributes a share of the region’s housing need to each city, town, and county. Each local government must then update the Housing Element of its General Plan

**PART-58-EA 3575 MENDOCINO AVENUE**

to show the locations where housing can be built and the policies and strategies necessary to meet the community’s housing needs (City of Santa Rosa 2019).

At the time of preparation of this EA, the amount of new housing production in Santa Rosa does not meet the production levels identified in the RHNA for any income category. The following table shows the projected remaining need by income category at the end of the 2015-2023 Housing Element reporting period, as of 2019 (City of Santa Rosa 2019).

<b>Units Issued Building Permits by Income Category 2015 - 2023</b>						
<b>Income Category</b>	<b>Extremely Low</b>	<b>Very Low</b>	<b>Low</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>TOTAL</b>
<b>ABAG RHNA Objectives</b>	<b>520</b>	<b>521</b>	<b>671</b>	<b>759</b>	<b>2,612</b>	<b>5,083</b>
2015	0	0	24	8	94	126
2016	0	1	0	16	246	263
2017	0	0	0	23	327	350
County Issued Permits 2015-2019 *	24	35	53	2	148	262
2018	24	17	12	77	301	431
2019	0	6	12	50	379	447
<b>Total Issued (2015-2019)</b>	<b>48</b>	<b>59</b>	<b>101</b>	<b>176</b>	<b>1495</b>	<b>1879</b>
<b>Remaining Need</b>	<b>472</b>	<b>462</b>	<b>570</b>	<b>583</b>	<b>1117</b>	<b>3204</b>

\* With the annexation of the Roseland area on November 1, 2017, RHNA allocations and credits for three housing projects that lie within that area were transferred from the County to the City. Specifically, the transfer moved the allocations/credits for 421 housing units within the Crossroads, Roseland Village, and Paseo Vista projects. The transfer was approved by the Association of Bay Area Governments (ABAG) and the California Department of Housing and Community Development (HCD) in January 2018. In 2019, 13 building permits were issued for above moderate units within the Paseo Vista project.

Senate Bill 375 requires all metropolitan regions in California to complete a Sustainable Communities Strategy (SCS) as part of a Regional Transportation Plan. In the Bay Area, the MTC/ABAG is responsible for developing and adopting a SCS that integrates transportation, land use, and housing to meet greenhouse gas reduction targets set by the California Air Resources Board (CARB) and the provision of adequate housing for the region’s projected population growth, regardless of income. To do so, they created Plan Bay Area 2040 (Plan Bay Area), an integrated long-range transportation and land use plan to help guide where development would be most efficient to meet the RHNA. Plan Bay Area’s core strategy is to locate “focused growth” in existing communities along the existing transportation network through Priority Development Areas (PDAs) (MTC/ABAG 2017).

PDA's are areas where new development will support the needs of residents and workers in a pedestrian friendly environment served by transit. Local jurisdictions, including the City, define the character of their PDA's according to existing conditions and future expectations as regional centers, mixed-use corridors, city centers, suburban centers, and/or transit town centers. The Mendocino Avenue/Santa Rosa Avenue Corridor PDA is identified as a mixed-use corridor PDA by Plan Bay Area. The updated Housing Element of the City's General Plan (adopted in 2015) identifies the Mendocino Avenue/Santa Rosa Avenue PDA as a transportation corridor for new development with increased densities that will support use of bus transit. It is expected that buildout of the Mendocino Avenue/Santa Rosa Avenue Corridor PDA would add approximately 2,510 housing units and 6,850 jobs by 2040 (MTC/ABAG 2017).

The project would be located within the Mendocino Avenue/Santa Rosa Avenue mixed-use corridor PDA under Plan Bay Area (City of Santa Rosa 2020) and would create up to 532 housing units within a compact, pedestrian friendly, transit-oriented, sustainable, master planned high-density residential transit village along Mendocino Avenue. The project would redevelop the former Journey's End Mobile Home Park previously located at the project site that was destroyed by the 2017 Tubbs Wildfire. The Journey's End Mobile Home Park was home to 161 mobile homes, the residents of which were all displaced by the wildfire. The project's affordable senior housing component is meant to offer affordable housing to qualifying former residents of the Journey's End Mobile Home Park by facilitating the creation of 162 affordable housing units.

## **5.0 EXISTING CONDITIONS AND TRENDS [24 CFR 58.40(A)]**

The project site was previously developed for mobile home park use and was occupied by the Journey's End Mobile Home Park until it was destroyed in October 2017 by the Tubbs Wildfire; only a few mobile homes remained after the fire. The fire destroyed the mobile home park's utility infrastructure and, therefore, the few remaining mobile homes were deemed uninhabitable. Since then, the mobile home park has been formally closed, all structures have been removed, and the property is vacant. The project site is generally comprised of paved areas (primarily asphalt), dirt and gravel, and limited fire-damaged vegetation. The project Applicant (BRJE Communities, LLC) will develop and lease the property from the property owner who has owned the property since the 1950's, including at the time of the 2017 Tubbs fire.

## **6.0 FUNDING INFORMATION**

The project is currently pursuing the funding identified below. On January 25, 2021, the Project was identified by the Santa Rosa Housing Authority for a conditional commitment of \$11,917,110 of Community Development Block Grant – Disaster Recovery (CDBG-DR) funds through HCD's Disaster Recovery Multifamily Housing Program (DR-MHP) for construction-related costs and 30 Project Based Vouchers (PBVs) for Phase I of the affordable housing component. Funding for additional phases has not been awarded at the time of preparation of this report.

**Table 2. 3575 Mendocino Avenue HUD Funding**

Loan Number	HUD Program	Funding Amount
5021-3265-21	Community Development Block Grant – Disaster Recovery (CDBG-DR)	\$11,917,110
Assigned	Section 8 Project Based Vouchers (PBVs)	30 vouchers
Unassigned – To be Determined	Community Development Block Grant – Disaster Recovery (CDBG-DR)	\$5,000,000
Unassigned – To be Determined	Section 8 Project Based Vouchers (PBVs)	33 vouchers

**Estimated Total HUD Funded Amount:** \$17,000,000 and 63 Section 8 PBVs

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$100,151,693

## 7.0 COMPLIANCE WITH 24 CFR 50.4, 58.5, AND 58.6 LAWS AND AUTHORITIES

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

**Table 3: Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities**

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b> 24 CFR Part 51 Subpart D	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	There are no airports in the vicinity of the project site. The nearest airport to the project site is the Charles M. Schulz-Sonoma County Airport, which is located approximately 4.5 miles to the northwest of the project. The project site does not lie within any airport clear zones or accident potential zones.  Source: City of Santa Rosa 2020
<b>Coastal Barrier Resources</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No Coastal Barrier Resources are identified within the State of California, including the project area.  Source: HUD Exchange 2020a
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The Federal Emergency Management Agency (FEMA) prepares Flood Insurance Rate Maps (FIRMs) which identify areas subject to flood inundation, most often from a flood having a one percent chance of occurrence in a given year (i.e. a base flood or 100-year flood). The project site is shown on FIRM Number 06097C0726E which indicates that the project site is located in an area of minimal flood hazard, not within a 100-year or 500-year flood zone. Flood insurance is not required.  Source: FEMA 2008

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<p><b>Clean Air</b> Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>The project is located in the Bay Area Air Quality Management District (BAAQMD) which is in attainment for all National ambient air quality standards except for ozone (O<sub>3</sub>) and fine particulate matter 2.5 micrometers or less in diameter (PM<sub>2.5</sub>). The BAAQMD has developed thresholds that are more stringent than Clean Air Act conformity thresholds, including 54 pounds/day for reactive organic gases (ROG) and nitrous oxides (NO<sub>x</sub>), 82 pounds/day for PM<sub>10</sub>, and 54 pounds/day for PM<sub>2.5</sub>.</p> <p>All construction and operational emissions associated with the project would fall below the BAAQMD regional significance thresholds (see tables 4.2-4, 4.2-5, and 4.2-6 in City of Santa Rosa 2020). Therefore, the project does not require additional compliance with the Clean Air Act or require further review for compliance with federal air quality standards.</p> <p>The project would also result in exposure of Toxic Air Contaminants (TACs), such as Diesel Particulate Matter (DPM), to sensitive receptors both on- and off-site. 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 one 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 microgram per cubic meter (µg/m<sup>3</sup>). The project would exceed the BAAQMD cancer risk thresholds for both on- and off-site receptors (see Tables 4.2-8 and 4.2-9 in City of Santa Rosa 2020). Therefore, mitigation measures AIR-1 and AIR-2 (see Section 12.0) would be required in order to reduce potential effects related to air quality emissions during construction to below cancer risk thresholds. With mitigation measures implemented, the project would not exceed the BAAQMD cancer risk thresholds for both on- and off-site receptors</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>(see Tables 4.2-10 and 4.2-11 in City of Santa Rosa 2020). Therefore, with mitigation incorporated (see Section 12.0), future residents of the project would not be subjected to excess cancer risks from any nearby sources.</p> <p>Source: City of Santa Rosa 2020;  <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p><b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The project site is located approximately 20 miles inland from the coast of the Pacific Ocean and is not located within a Coastal Zone Management Area. A Coastal Development Permit is not required.</p> <p>Source: <a href="https://koordinates.com/layer/20522-us-coastal-zone-management-act-boundary/">https://koordinates.com/layer/20522-us-coastal-zone-management-act-boundary/</a>  Accessed September 30, 2020</p>
<p><b>Contamination and Toxic Substances</b>  24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p><u>Database Review</u> - A review of potential hazards for the project site and immediate vicinity was conducted through the California State Water Resources Control Board (SWRCB) and California Department of Toxic Substances Control (DTSC) online database systems of waste and hazardous substances clean up and remediation sites. Both the SWRCB GeoTracker and the DTSC EnviroStor online databases did not identify the project site on any known hazardous materials cleanup or remediation sites (SWRB 2020; DTSC 2020).</p> <p><u>Onsite Hazards</u> - The 2017 Tubbs Wildfire, which destroyed most of the mobile homes on the project site, resulted in asbestos-containing waste materials and fire-related debris (City of Santa Rosa 2020). As a result, on January 29, 2018 the U.S. Environmental Protection Agency (USEPA) removed all asbestos-containing waste materials from the project site (USEPA 2018). Additionally, the U.S. Army Corps of Engineers (USACE) removed all fire-related debris and collected soil samples from the project site on February 28, 2018 and March 27, 2018 to determine the presence of hazardous materials. Based on the lab results of the soil samples</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>tested, the USACE determined that the project site meets the USEPA Regional Screening Levels and the CalEPA Human Health Screening Levels and is suitable for redevelopment with residential uses (USACE 2018).</p> <p>The Phase I Environmental Site Assessment completed for the project site on August 6, 2018 (see Appendix J of City of Santa Rosa 2020) indicates there is no evidence of recognized environmental conditions in connection with the project site and no additional hazardous cleanup is required for the project site.</p> <p><u>Conclusion</u> - There are no hazardous materials cleanup or remediation sites located on or immediately adjacent to the project site. Previously, it was determined that asbestos containing waste materials and fire-related debris were present onsite; however, the USEPA and USACE removed all debris and waste materials in 2018 and the site does not require any additional hazardous cleanup. No structures remain on the project site; all mobile homes that previously occupied the site have been removed.</p> <p>Sources: SWRB 2020, DTSC 2020, USEPA 2018, USACE 2018, City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p><b>Endangered Species</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Official species lists and critical habitat maps obtained from the USFWS and California Natural Diversity Database indicate that no threatened or endangered, proposed, or candidate species have moderate or high potential to be located within the project area due to the absence of suitable habitat. Therefore, the project would have no adverse effect on species protected under the Endangered Species Act (ESA).</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p><b>Explosive and Flammable Hazards</b></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Data obtained from the CalEPA Regulated Site Portal indicates 3 aboveground storage tanks and 84 chemical storage facilities are located</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
24 CFR Part 51 Subpart C		<p>within 1 mile of the Project. The closest occurrence, an above ground petroleum (diesel) storage tank with a maximum capacity of 11,999 gallons, is located at the Kaiser Permanente Santa Rosa Medical Center approximately 740 feet from the project site. A potential fire hazard could occur if the tank were to fail and the contents ignited; however, because the 11,999-gallon diesel fuel storage tank is not under pressure, this would result in a liquid pool fire, not an explosion (Appendix A). Therefore, the tank does not constitute a blast over pressure hazard, only a thermal radiation hazard.</p> <p>According to 24 CFR Part 51 Subpart C, thermal radiation limits from a potential hazardous materials fire are 10,000 BTU/square foot-hour for a building on the project site and 450 BTU/square foot-hour for people at the project site. Based on calculations done by a licensed Fire Protection Engineer, the heat flux that would be experienced by people or buildings at the project site due to a pool fire resulting from the 11,999-gallon diesel storage tank is approximately 11.5 BTU/square foot-hour, well below the 450 BTU/square foot-hour limit set forth by 24 CFR Part 51 (Appendix A). Therefore, the project complies with 24 CFR Part 51 Subpart C and no additional mitigation measures are required.</p> <p>Source: HUD Exchange 2020b;  <a href="http://siteportal.calepa.ca.gov/nsite/map/results">http://siteportal.calepa.ca.gov/nsite/map/results</a>.                      Accessed September 22, 2020.</p>
<p><b>Farmlands Protection</b>                      Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The project site is located in an urbanized area of the City of Santa Rosa and does not contain any farmland resources. The surrounding area also consists of urban infrastructure, buildings, and development and does not contain any farmland resources that could be affected by the project.</p> <p>Source: City of Santa Rosa 2020;  <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>As addressed under Flood Insurance above, the project is not located in a flood hazard area or an area subject to 100-year or 500-year floods. The project site is not considered to be within a floodplain or Special Flood Hazard Area and is therefore in compliance with the Executive Order 11988.</p> <p>Source: FEMA 2008</p>
<p><b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>As addressed in materials prepared in support of Section 106 consultation (Appendix B), the project qualifies as a federal undertaking under Section 106 of the National Historic Preservation Act of 1966 (NHPA). An identified Area of Potential Effects (APE) includes the project site and surrounding properties where visual, atmospheric, or audible effects may occur to historic properties. For this project, one potential historic site, Journey's End Mobile Home Park was identified within the project area and, at the request of the Federated Indians of Graton Rancheria, one previously recorded archaeological site outside the project area was included within the APE.</p> <p>The cultural resources records search, desktop review, cultural resources survey, and extended phase I testing did not identify any archaeological resources within the project area of direct impact. However, at the request of the Federated Indians of Graton Rancheria, one archaeological site outside of the project area was included within the APE. Although unlikely, there is the possibility of encountering unrecorded archaeological resources within the project. As such, a Cultural Resources Monitoring Plan dated May 25, 2021 has been prepared for the project in consultation with the affiliated tribe. The Plan identifies the type of archaeological material that could potentially be found within the project area and procedures to follow should any material be encountered during ground disturbing activities. The Plan provides procedures and guidelines for in-field assessment of the significance of any</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>archaeological material identified during monitoring (Appendix B).</p> <p>The only built resource located within the APE is the former Journey’s End Mobile Home Park which was largely destroyed by the October 2017 Tubbs fire. The former mobile home park is recommended as not eligible for listing on the NRHP due to lack of significance under all criteria as set forth in 36 CFR Part 60.4 (Appendix B). Additionally, one archaeological site outside of the project area was included within the APE but will not be affected by the project. The State Historic Preservation Officer (SHPO) concurred with this finding on June 7, 2021. Consequently, the Section 106 finding is Conditional No Adverse Effects subject to the Cultural Resources Monitoring Plan and includes a condition that SHPO “be periodically updated on the progress of this undertaking and afforded the opportunity to comment in the event that historic properties are discovered during implementation of the undertaking.” No resolution of adverse effects through avoidance or mitigation measures are required under Section 106 because the one identified archaeological site is located outside of the project area and will not be affected by the project.</p> <p>Source: Appendix B</p>
<p><b>Noise Abatement and Control</b>                      Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>HUD environmental noise regulations are set forth in 24 CFR Part 51 Subpart B which specify the following noise standards for new housing construction:</p> <ul style="list-style-type: none"> <li>• 65-day night average sound level (DNL) or less = Acceptable</li> <li>• Exceeding 65 DNL but not exceeding 75 DNL = Normally Acceptable</li> <li>• Exceeding 75 DNL = Unacceptable</li> <li>• The interior standard is 45 decibels</li> </ul> <p>The exterior traffic noise levels in the project area would remain the same or slightly decrease due to shielding provided by the proposed</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>buildings on the project site (City of Santa Rosa 2020). Based on modeled noise levels, interior noise levels would range from 60-80 dB(A) L<sub>dn</sub> depending on the direction the unit is facing; levels that exceed the interior standards. The project would implement Mitigation Measures NOI-1 and NOI-2 (see Section 12.0) to ensure the interior noise levels of the residential units do not exceed 45 dB(A) L<sub>dn</sub>. The implementation of these mitigation measures would require a qualified acoustical engineer or noise specialist to verify that applicable measures are incorporated into the project design to reduce noise exposure, including noise exposure from traffic noise, to levels below 45 dB(A) L<sub>dn</sub> in habitable rooms and 60 dB(A) L<sub>dn</sub> in private and shared recreational facilities and open spaces as required by Policy NS-B-4 of the City of Santa Rosa’s General Plan.</p> <p>Implementation of Mitigation Measure NOI-3 (see Section 12.0) would ensure on-site equipment would incorporate measures to reduce noise levels from project fixed sources that may affect nearby properties.</p> <p>Construction noise impacts could range into the “unacceptable” range as defined in 24 CFR Part 51, Subpart B. Therefore, the project would implement Mitigation Measure NOI-4 to reduce construction noise levels. In addition, Mitigation Measure NOI-5 would be required to ensure a construction site notice which includes pertinent information for the public to stay informed of project construction activities (City of Santa Rosa 2020). Therefore, with the implementation of mitigation measures NOI-1, NOI-2, NOI-3, NOI-4, and NOI-5 (see Section 12.0), no adverse effects are expected as a result of the project.</p> <p>Source: HUD Exchange 2020c; City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<b>Sole Source Aquifers</b>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project is not served by a USEPA designated sole-source aquifer, is not located

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149		<p>within a sole-source aquifer watershed and would not affect a sole-source aquifer.</p> <p>Source: USEPA 2020</p>
<p><b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Based on field studies conducted onsite, one perennial stream and one freshwater feature was observed within the project area and a 200-foot buffer survey area. However, through consultation with USACE and Regional Water Quality Control Board (RWQCB) during the project permitting process, and after adoption of the SCEA, only the perennial stream was deemed to be jurisdictional (Figure 3).</p> <p>The perennial stream (Russell Creek), located within the survey area, contains approximately 0.192 acre of waters of the U.S.; however, only 0.009 acre (400 square feet) would be temporarily impacted, and less than 0.001 acre (2 square feet) would be permanently impacted through the installation of the storm water outfall. These temporary and permanent impacts would not have a substantial adverse effect on any riparian habitat or sensitive natural community (City of Santa Rosa 2020).</p> <p>The project would implement avoidance and minimization measures to reduce inadvertent impacts to waters of the U.S through implementation of Mitigation Measure BIO-2 and Mitigation Measure BIO-3 (see Section 12.0). Mitigation Measure BIO-2 requires coordination and permit approval from the appropriate resource agencies (e.g., USACE and RWQCB) and in accordance with applicable existing regulations, such as the Clean Water Act or “no net loss” policy for wetlands, which require mitigation to off-set impacts to potential waters of the U.S. and waters of the State. Mitigation Measure BIO-3 requires restoration of temporary impacts to waters of the U.S. to preconstruction conditions and permanent impacts to waters of the U.S. to be mitigated through onsite restoration, i.e., appropriate planting as</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>approved by the City per the landscaping plan (see Section 12.0).</p> <p>Source: City of Santa Rosa 2020;  <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p><b>Wild and Scenic Rivers</b>                      Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>No Wild and Scenic Rivers are designated within the project area and none are located in close proximity to the project site. The nearest designated Wild and Scenic River is the Lower American River, which is located approximately 65 miles east of the project site.</p> <p>Source: National Park Service 2020</p>
<b>ENVIRONMENTAL JUSTICE</b>		
<p><b>Environmental Justice</b>                      Executive Order 12898</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>The project consists of an affordable housing development that would provide low-, very low-, and extremely low-income housing to seniors in need in the City of Santa Rosa as well as market rate housing. The project would exceed the City's Inclusionary Housing Ordinance (Section 21-02.050 of the City Code) by constructing 30 percent of the total number of new dwelling units (162 units) on-site as affordable to low-, very low-, and extremely low-income senior households. No minority or low-income populations would be disproportionately affected by the project.</p> <p>Source: City of Santa Rosa 2020;  <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>

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

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

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

**Table 4: Environmental Assessment**

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	<p>The project site is located in the City of Santa Rosa and currently consists of a previously developed, vacant parcel that used to house the former Journey’s End Mobile Home Park. The project site is surrounded on all sides by existing development and infrastructure.</p> <p>On December 8, 2020, the Santa Rosa City Council approved the project’s request for a General Plan Amendment for the project site to Transit-Village Medium, which would allow up to 532 units of high-density multi-family residential at a density of 40 dwelling units per acre, and rezone of the project site to Transit-Village Residential with Resilient City (RC) and Senior Housing (SH) combining districts.</p> <p><u>General Plan Designation</u> - The City of Santa Rosa General Plan designates the parcel as Transit-Village Medium. The project site is also identified within the Mendocino Avenue/Santa Rosa Avenue Corridor PDA. This PDA is intended to include new development with increased densities around Mendocino Avenue and Santa Rosa Avenue to support the use of bus transit.</p> <p><u>Zoning Designation</u> - The City’s Zoning Ordinance designates the project site as Transit-Village Residential with RC combining district. The Transit Village Residential zoning</p>

		<p>district allows multi-family units with the allowable density established by the General Plan. The RC combining district seeks to facilitate reconstruction and resilience of areas impacted by the Tubbs and Nuns Wildfires in October 2017. Parcels located within fire-affected areas are zoned RC. The SH combining district establishes a clear set of requirements in accordance with federal and state fair housing laws and is applicable to the affordable senior housing component that seeks automobile and bicycle parking allowances based on the City's senior housing parking requirements.</p> <p><u>Scale and Urban Design</u> - The proposed buildings would range from three to four stories in accordance with the maximum height requirements for the TV-R zoning district. The larger buildings, including the proposed parking garage, would be located closer to the southern property line where their scale and massing would be more compatible with the adjacent 20+-acre, five-story Kaiser Permanente Santa Rosa Medical Center. The proposed buildings would reduce in size and scale as they move closer to Mendocino Avenue and Fountaingrove Parkway. Therefore, no impacts are expected to scale and urban design as a result of the project.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</p>	<p>3</p>	<p>The City is within a potential landslide hazard area; however, the project site is flat and is not located near a slope that would result in a landslide hazard. Because the project would disturb more than 1 acre, it is required to comply with the National Pollutant Discharge Elimination System (NPDES) permitting program and implement a Stormwater Pollution Prevention Plan (SWPPP). The project would implement a SWPPP and associated BMPs as part of Mitigation Measure HYD-1 (see Section 12.0) to reduce the potential for water pollution and sedimentation during and after construction. The SWPPP would comply with the City's Grading and Erosion Control Ordinance, as specified in Chapter 19-64.010 in the City Code, as well as the Waste Discharge Requirements of the North Coast RWQCB Permit. As part of the project, a new 24-inch public storm water drainage line would be constructed with an outfall into Russell Creek. The new outfall and storm water drainage facilities would be designed in accordance with the requirements of Sonoma Water's Flood Management Design Manual (City of Santa Rosa 2020).</p> <p>Additionally, the Geotechnical Report (see Appendix I in City of Santa Rosa 2020) concluded that ground water is present approximately 5 to 9 feet below existing ground surface; therefore, groundwater would potentially impact below grade</p>

		<p>excavations during construction. The project does not include below grade parking or basements and therefore groundwater is not anticipated to impact below grade structures, Mitigation Measure GEO-1 would be implemented to reduce potential impacts identified in the Geotechnical Report. As part of Mitigation Measure GEO-2, the project would prepare and implement dewatering and shoring plans if excavation to 4.4 feet below ground surface or deeper occurs or shoring methods are used. The plans would be submitted to the City for approval and would follow all applicable federal, state, and local regulations. With the implementation of Mitigation Measures HYD-1, GEO-1, and GEO-2 (see Section 12.0) no adverse effects are expected as a result of the project.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p>Hazards and Nuisances including Site Safety and Noise</p>	<p>3</p>	<p><u>Hazardous Materials</u> - As discussed in the “Contamination and Toxic Substances” section above, a review of the SWRCB GeoTracker and DTSC EnviroStor databases was conducted. Based on review of these sites, the project site is not located in an area that is a known hazardous cleanup or remediation site. All asbestos containing waste materials and fire-related debris that was present onsite after the Tubbs wildfire has been removed and there is no evidence of recognized environmental conditions in connection with the project site and no additional hazardous cleanup is required for the project site. No structures remain on the project site; all mobile homes that previously occupied the site have been removed.</p> <p><u>Natural Hazards</u> - The project site is in a seismically active region and earthquake-related ground shaking is expected to occur during the design life of the project. As required by the City of Santa Rosa General Plan policy NS-C-2, a Geotechnical Study was conducted for the project. Due to the location of the project within a seismically active region, potential for ground shaking and failure, including liquefaction, exists. To minimize potential impacts from ground shaking and/or failure, Mitigation Measure GEO-1 would be implemented (see Section 12.0). The project is also required to comply with the California Building Code requirements, which include engineering standards appropriate to withstand anticipated ground acceleration at the project site.</p> <p>Additionally, while the project is not located within a very high fire hazard severity zone or a Wildland Urban Interface zone, the former Journey’s End Mobile Home Park which used to sit on the project site was destroyed by wildfire and therefore the project site could be subject to wildfire in the future. To reduce wildfire risk, the project would implement Mitigation Measure WF-1 and WF-2 (see Section 12.0). With the implementation of</p>

		<p>Mitigation Measures GEO-1, WF-1, and WF-2 and adherence to the current California Building Code and California Fire Code requirements, no adverse effects are expected as a result of the project.</p> <p><u>Noise</u></p> <p>As discussed in the “Noise Abatement and Control” section above, applicable features would be incorporated into the project design to reduce interior and exterior noise levels to below 45 dB(A) L<sub>d</sub> in habitable rooms and 60 dB(A) L<sub>d</sub> in private and shared recreational facilities with implementation of Mitigation Measure NOI-1 and NOI-2. Implementation of Mitigation Measure NOI-3 would reduce noise levels from project fixed sources that may affect nearby properties. Mitigation Measures NOI-4 and NOI-5 would provide substantial reductions in construction noise levels and ensure a construction site notice is provided for the public to stay informed of project construction activities. All potential effects related to noise would be reduced with implementation of mitigation measures NOI-1, NOI-2, NOI-3, NOI-4, and NOI-5 (see Section 12.0), therefore, no adverse effects are expected as a result of the project.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
Energy Consumption	1	<p>The project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulations (CCR). Title 24 regulations including the CALGreen code, are enforced through local plan checks and project inspections. The project would meet these requirements as well as the City’s General Plan policies related to energy consumption (City of Santa Rosa 2020). The Project would incorporate a variety of operational sustainability features that would reduce its demand for resources, use non-toxic materials, and promote waste reduction, including, but not limited to: the use of renewable energy sources (i.e., solar thermal or photovoltaic panels); and the proposed residential units are within walking distance of public transit, major employers, retail, restaurant, and market/grocery and provides onsite bicycle amenities and real-time transportation kiosks with public transit schedules, reducing the number of vehicle miles traveled. Additionally, the housing components are anticipated to be GreenPoint rated (City of Santa Rosa 2020). Therefore, there is a slight beneficial impact to energy consumption patterns identified as a result of the project.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<b>SOCIOECONOMIC</b>		

<p>Employment and Income Patterns</p>	<p>1</p>	<p>The project site, which previously contained the former Journey’s End Mobile Home Park, is currently vacant. The project is anticipated to house up to 1,383 residents of which 309 are expected to be low-, very low-, or extremely low-income seniors. Qualifying residents of the former mobile home park that were displaced by the 2017 Tubbs Wildfire would be given first priority as tenants in the new senior affordable housing component. The project would also employ up to 17 staff. The 17 staff members are anticipated to be a part of the local labor force and would support the affordable housing and market rate housing components, including facilities repair and maintenance management as well as tenant services.</p> <p>Additionally, construction of the project would provide additional temporary jobs in the area. Construction workers required for each phase of the project would fluctuate between approximately 22 and 160 workers per day, with an average of approximately 91 workers per day. It is anticipated that the construction workforce would come from the surrounding community or nearby communities. Therefore, there is a slight beneficial impact to employment and income patterns identified as a result of the project.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p>Demographic Character Changes, Displacement</p>	<p>2</p>	<p>The City of Santa Rosa had a population of 175,753 in 2019, as estimated by the US Census Bureau. The project represents 0.79% of the population. The project is not large enough in scale to have any adverse effects to demographics of the City of Santa Rosa. The project site is currently vacant and therefore the project would not result in any dislocation of people, businesses, institutions, or community facilities.</p> <p>Source: <a href="https://www.census.gov/quickfacts/santarosacitycalifornia">https://www.census.gov/quickfacts/santarosacitycalifornia</a></p>
<p><b>COMMUNITY FACILITIES AND SERVICES</b></p>		
<p>Educational and Cultural Facilities</p>	<p>3</p>	<p><u>Educational Facilities</u> – The Santa Rosa City School District (SRCSD) uses a blended student generation factor of 0.147 student per household for transitional kindergarten through sixth grade and 0.148 student per household for seventh through twelfth grade. Therefore, it is conservatively estimated that the project could generate as many as 408 students (based on the total projected population increase of 1,383 residents) which could result in a 2.5% increase in the SRCSD. However, this estimate is conservative as 309 of the 1,383 residents are expected to be seniors that are unlikely to have school age children. Currently, many schools are at or near capacity and the project would result in an increased demand for school services within the District’s service area. Under</p>

		<p>Senate Bill 50, and as further required by the City’s Standard Conditions of Approval, the project would be required to pay school impact fees to ensure that adequate school and related facilities would be available (City of Santa Rosa 2020). Nearby schools include Steele Lane Elementary School, Hilliard Comstock Jr High School, and Santa Rosa High School (City of Santa Rosa 2020).</p> <p><u>Cultural Facilities</u> - The project is within 10 miles of cinemas, conference facilities, community centers, galleries, libraries, museums, and theatres. The nearest public library is the Northwest Regional Library, located at 150 Coddington Center, approximately 1 mile south of the project site (City of Santa Rosa 2020). The project is located along a transit corridor which affords other opportunities for cultural enrichment outside the immediate area.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
Commercial Facilities	2	<p>The project site is surrounded by urban development and is located in close proximity to commercial facilities, including healthcare and medical services, retail, restaurant, and market/grocery. Residents would be able to access existing and proposed sidewalks to reach nearby transit stops, healthcare facilities, and retail uses (City of Santa Rosa 2020). The site is also located adjacent to Highway 101 and Bicentennial Way, one of the City’s high quality transit corridors, which provide access to facilities throughout Santa Rosa and the North Bay.</p> <p>The project would not displace any existing commercial facilities because there are no existing commercial facilities on-site. The additional residents anticipated as a result of the project would not result in any adverse effects on the demand for commercial facilities in the area.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
Health Care and Social Services	2	<p><u>Health Care</u></p> <p>The project is located immediately north of the Kaiser Permanente Santa Rosa Medical Center which provides full 24-hour emergency services, full hospital and non-emergency medical offices, and specialty departments.</p> <p>The project site is located central to the Santa Rosa Memorial Hospital / St. Joseph Health – Sonoma County, located at 1165 Montgomery Drive, to the south of the project, and the Sutter Santa Rosa Regional Hospital located at 30 Mark West Springs Road, to the north of the project. Both facilities are approximately 3.3 miles away or an 11-minute drive. Santa</p>

		<p>Rosa Memorial has a Level II Trauma Center and Emergency Department, and Sutter has a 24-hour full-service emergency room, 84 acute care beds, and a heliport for airlifted patients. Additionally, there are a number of private practice offices located just across from the project site on Mendocino Avenue.</p> <p>There are no adverse effects to healthcare facilities anticipated as a result of the project.</p> <p><u>Social Services</u> - The County of Sonoma provides social services and income-based programs to county residents by providing food assistance, healthcare, welfare, employment and job training, protective services, childcare, youth services, and services for disabled residents. The nearest service office to the project is located at 2550 Paulin Drive in Santa Rosa, approximately 1 mile south of the project site. Adverse effects to social services are not expected as a result of the project.</p> <p>Sources: <a href="http://kp.org">http://kp.org</a>, <a href="https://www.stjoesonoma.org/">https://www.stjoesonoma.org/</a>; <a href="http://www.suttersantarosa.org/">http://www.suttersantarosa.org/</a>; <a href="http://sonomacounty.ca.gov/Human-Services/">http://sonomacounty.ca.gov/Human-Services/</a></p>
<p>Solid Waste Disposal / Recycling</p>	<p>2</p>	<p>Solid waste and recycling services are provided to the City by Recology Sonoma Marin (Recology). Recology collects and transports commercial and solid waste to the Central Disposal Site Transfer Station at 500 Meacham Road, north of Petaluma. Once at the transfer station, the solid waste is sorted and hauled to the nearby Potrero Hills Landfill, Redwood Sanitary Landfill, or Keller Canyon Landfill.</p> <p>The local landfills in the region would have adequate capacity to serve the construction waste generated by the project and the project would comply with all State and local waste diversion requirements, including Chapter 9-12 of the City Code, regarding waste collection (City of Santa Rosa 2020).</p> <p>Operationally, the project would generate approximately 1,351 tons of solid waste per year or 3.7 tons per day. No impacts are anticipated to existing solid waste facilities in the area, as the solid waste generated by the residents and employees would be relatively small and therefore within the capacity of the nearby landfills (City of Santa Rosa 2020).</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p>Wastewater / Sanitary Sewers</p>	<p>2</p>	<p>Wastewater and sanitary sewer services would be provided by the City and served by the Laguna Wastewater Treatment Plant. The project is expected to result in a less than one percent increase in the average flow at the Laguna Wastewater</p>

		<p>Treatment Plant thus, the Laguna Wastewater Treatment Plant would have sufficient capacity to serve the project and no relocation or construction of new or expanded wastewater facilities are anticipated for the project.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p>Water Supply</p>	<p>2</p>	<p>Water to the project site would be provided by the City of Santa Rosa Water Department. A letter dated June 4, 2020 from the City Water Department (see Appendix B in City of Santa Rosa 2020) concluded that the project would not substantially increase water demand or affect the ability of the City’s water system to provide sufficient water supplies to the project.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p>Public Safety – Police, Fire and Emergency Medical</p>	<p>3</p>	<p><u>Police</u> - Police service is provided to the project site by the Santa Rosa Police Department. The nearest police station is located approximately 2.6 miles southeast of the project site, at 965 Sonoma Avenue. The project would construct additional access points to improve physical access to the project site for the ingress and egress of emergency personnel and equipment. The Santa Rosa Police Department has 254 employees and operates 24 hours per day, 365 days per year. In 2018, the average response time for Priority I calls was 6 minutes and 48 seconds, Priority II calls averaged 12 minutes and 33 seconds, and Priority III calls averaged 38 minutes and 16 seconds. In 2019, the Santa Rosa Police Department handled 255,224 dispatch calls and officers responded to 137,690 calls for service.</p> <p>In a letter dated August 11, 2020, the Santa Rosa Police Department indicated the project site is within patrol beat 2, an area that continues to rebuild from the 2017 Tubbs Wildfire. It is anticipated that at full build-out of the project calls for service to the project site would increase and potentially exceed the police service response time goal (SRPD 2020 as cited in City of Santa Rosa 2020). The City of Santa Rosa requires new development projects to pay all current fees; revenues and taxes generated from the proposed project would contribute to funding for future service needs in the City. It is not anticipated that the project would require the construction of a new police station or the alteration of an existing police station.</p> <p><u>Fire and Emergency Medical</u> - Fire protection and emergency medical services to the project site are provided by the Santa Rosa Fire Department. The Kaiser Permanente Santa Rosa Medical Center which provides full 24-hour emergency services is located immediately south of the project site. The nearest fire</p>

		<p>station is Fire Station No. 3, which is located approximately 0.88-mile west of the project site at 3311 Coffey Lane. The City of Santa Rosa is also proposing to rebuild a fire station that served the area and was destroyed by the 2017 Tubbs Wildfire. The Santa Rosa Fire Department has 151 employees and operates 24 hours per day, 365 days per year. In 2019, the Department's emergency resources arrived on scene within 5 minutes of dispatch 70 percent of the time on average, below the General Plan's response time goal. The General Plan goal is 90 percent of the time. In a letter dated August 17, 2020 from the Santa Rosa Fire Department, it is estimated that full build-out of the project could potentially impact response time (SRFD 2020 as cited in City of Santa Rosa 2020). The City of Santa Rosa requires new development projects to pay all current fees; revenues and taxes generated from the proposed project would contribute to funding for future service needs in the City. The project is not however anticipated to require the construction of a new fire station or the alteration of an existing fire station.</p> <p>The project would be constructed with fire and life safety systems, fire-resistant materials, certified alarm systems, and fire sprinkler systems, to be reviewed by the Santa Rosa Fire Department prior to installation. The project site will include additional access points and street and driveway widths designed to accommodate emergency vehicles and facilitate ingress and egress at the project site. Compliance with the provisions of the California Building Code and the California Fire Code for new and existing development would ensure fire safety and accessibility for the project site and would reduce the potential need for additional fire protection services (City of Santa Rosa 2020). The proposed project would also connect to the City's water system, thereby providing an adequate and reliable water supply and water pressure to aid in fire suppression.</p> <p>Sources: City of Santa Rosa; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p>Parks, Open Space and Recreation</p>	<p>2</p>	<p>The project would add approximately 1,383 new residents to the project site which could increase the demand for parks or other recreational facilities. The project itself would include approximately 1-acre of shared open space that would serve as a gathering place for the future residents. The shared open space would include both active and passive recreational opportunities including a central lawn, green landscaped areas, sports court, exercise equipment, children's play area, and picnic area with shade trees. In addition, the affordable housing component would include approximately 0.46-acre of private open space and the market rate housing component would include approximately 0.34-acre of private open space, consisting of a series of walking paths and courtyards, covered</p>

		<p>patio spaces, raised communal garden beds, seat walls, balconies, and/or lawn space for exercise and activities. Therefore, the increase in residents would not result in an increase in demand of existing recreational facilities because there would be sufficient on-site recreational facilities. No adverse impacts are anticipated.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p>Transportation and Accessibility</p>	<p>1</p>	<p><u>Transportation</u> - The project would include a new public street, private drives, and 160 new bicycle parking spaces. Residents would have easy access to bicycle lanes along Mendocino Avenue to connect to other bicycle facilities in the City and the new street system would allow for adequate ingress and egress through and around the site. Additionally, the project would improve access to transit by relocating the existing Route 10 bus stop on Mendocino Avenue approximately 130 feet to the south and provide a new turn-out for buses to onboard or offload riders out of the way of vehicles and bicycles. The relocated bus stop would provide real-time transit arrival and departure monitors for riders. The project site is also approximately 0.2 mile (0.38-mile walking distance) from the Bicentennial Way Transit Facility, which is served by CityBus Route 1, with 15-minute weekday headways. Therefore, the project would result in a minor beneficial impact to transportation in the area.</p> <p><u>Accessibility</u> - The site would meet or exceed accessibility requirements by local building officials, ADA requirements, and HUD program requirements. No adverse impacts to accessibility are anticipated.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
<p><b>NATURAL FEATURES</b></p>		
<p>Unique Natural Features, Water Resources</p>	<p>3</p>	<p><u>Unique Natural Features</u> - The project site consists of a previously developed, vacant parcel which used to house the former Journey’s End Mobile Home Park; no unique natural features occur on or near the site.</p> <p><u>Water Resources</u> - As discussed in the “Wetland Protection” section above, one perennial stream and one freshwater feature were observed within the project area and the 200-foot buffer survey area. However, through consultation with the USACE and RWQCB during the project permitting process, and after adoption of the SCEA, only the perennial stream was determined to be jurisdictional. The perennial stream (Russell Creek) contains approximately 0.192 acre of waters of the U.S. within the survey area; however, only 0.009 acre (400 square</p>

	<p>feet) would be temporarily impacted, and less than 0.001 acre (2 square feet) would be permanently impacted through the installation of a storm water outfall. Temporary and permanent impacts would be mitigated as identified in Mitigation Measure BIO-3 (see Section 12.0).</p> <p>Additionally, as discussed in the “Soil Suitability/Slope/Erosion/Drainage/Storm Water Runoff” section above, ground water is present approximately 5 to 9 feet below the existing ground surface, therefore, groundwater would potentially impact below grade excavations during construction. The project does not include below grade parking or basements and therefore groundwater is not anticipated to impact below grade structures. As part of Mitigation Measure GEO-2, the project would prepare and implement dewatering and shoring plans if excavation to 4.4 feet below ground surface or deeper occurs or shoring methods are used (see Section 12.0).</p> <p>Water would be provided by the City; however, two existing, private wells are located on the project site and may be used to irrigate landscaping. The project would connect to the City’s sewer line and does not propose to use septic tanks or alternative wastewater disposal systems. As discussed in the “Soil Suitability/Slope/Erosion/Drainage/Storm Water Runoff” section above, the project would implement a SWPPP and associated BMPs as part of Mitigation Measure HYD-1 to reduce the potential for water pollution and sedimentation to Russel Creek during and after construction (see Section 12.0).</p> <p>With the implementation of mitigation measures (see Section 12.0), no adverse effects to water resources are expected as a result of the project.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
Vegetation, Wildlife	<p>3</p> <p><u>Vegetation</u> - The project site consists of a previously developed, vacant parcel with barren and ruderal vegetation and a few trees. There are 53 trees on the project site, including 6 heritage trees. Chapter 17-24 of the City’s Code seeks to protect certain trees, referred to as heritage trees, which are an essential part of the City’s natural heritage. Of the six heritage trees on the project site, five heritage trees are planned for removal as part of the project. Removal of the heritage trees would be mitigated by either replacing the heritage trees or paying an in-lieu fee.</p> <p><u>Wildlife</u> – No special-status species were determined to be present or have a high or moderate potential to occur and no designated critical habitat is present on the project site. The presence of trees and shrubs on-site could provide for suitable</p>

	<p>nesting and foraging habitat for various bird species that are protected by the Migratory Bird Treaty Act. Construction activities could have the potential to affect nesting birds if construction activities were to occur during the breeding season (i.e., February 1 through August 31). Therefore, mitigation measure BIO-1 would be required in order to ensure that, if construction activities would occur between February 1<sup>st</sup> through August 31<sup>st</sup>, pre-construction surveys for nesting birds are conducted prior to construction. If nesting birds are discovered on-site, a qualified biologist would establish a no-work buffer around the nest to avoid disturbance to the species and reduce potential impacts to the nesting bird(s). Therefore, with implementation of mitigation, no adverse effects to bird species protected by the Migratory Bird Treaty Act are expected.</p> <p>Source: City of Santa Rosa 2020; <a href="https://srcity.org/425/Plans-Studies-EIRs">https://srcity.org/425/Plans-Studies-EIRs</a></p>
Other Factors	N/A

## 8.0 ADDITIONAL STUDIES PERFORMED

Data analyses conducted for preparation of the SCEA (City of Santa Rosa 2020) were used for the preparation of this EA.

Additionally, the following technical studies were conducted for the SCEA and are attached as appendices to the SCEA:

- Arborist's Report & Tree Inventory – Prepared by Becky Duckles Consulting Arborist and Landscape Advisor in September 2020.
- Air Quality and Greenhouse Gas Methodology and Assumptions Memorandum – Prepared by Stantec Consulting Services Inc. in August 2020.
- Biological Resources Technical Report – Prepared by Stantec Consulting Services Inc. in August 2020.
- Delineation of Potential Waters of the U.S. and State – Prepared by Stantec Consulting Services Inc. in July 2020.
- Section 106 Inventory and Evaluation Report – Prepared by Stantec Consulting Services Inc. and submitted to the State Historic Preservation Office (SHPO) on January 25, 2021.
- Energy Consumption – Prepared by Stantec Consulting Services Inc. in August 2020.
- Geotechnical Study Report – Prepared by RGH Consultants in December 2019 and updated in September 2020.
- Phase 1 Environmental Site Assessment – Prepared by Harris and Lee Environmental Sciences, LLC in August 2018 and updated in September 2020.
- Roadway Construction Noise Modeling – Prepared by Stantec Consulting Services Inc. in July 2020.
- Traffic Impact Analysis – Prepared by W-Trans in September 2020.

## **8.1 FIELD INSPECTION (DATE AND COMPLETED BY)**

Several field inspections were conducted during the preparation of the SCEA including the following:

- Arborist Tree Inventory – Prepared September 14, 2020 by Becky Duckles Consulting Arborist and Landscape Advisor (Appendix A in Santa Rosa 2020)
- Reconnaissance-level Biological Survey – Conducted June 3, 2020 by Stantec Consulting Services Inc. (Appendix E in Santa Rosa 2020)
- Waters of the U.S. Delineation - Conducted June 3, 2020 by Stantec Consulting Services Inc. (Appendix F in Santa Rosa 2020)
- Cultural Field Survey – Conducted June 16, 2020 by Stantec Consulting Services Inc.
- Cultural resources Testing – Conducted April 5, 2021 by Stantec Consulting Services Inc.

## **8.2 LIST OF SOURCES, AGENCIES AND PERSONS CONSULTED [40 CFR 1508.9(B)]**

Source documents were identified for each constraint in Tables 2 and 3 above. In addition, a list of references is included in Section 14.0 below.

The SCEA was made available for public review between September 28, 2020 and October 27, 2020 and is available online at <https://srcity.org/425/Plans-Studies-EIRs>.

The following agencies were consulted during preparation of the SCEA:

- US Army Corps of Engineers
- State Water Resources Control Board
- Regional Water Quality Control Board, District 1
- Bay Area Air Quality Management District

## **8.3 LIST OF PERMITS OBTAINED**

No development permits for the project have been issued at this time. The project is currently in the process of obtaining permits from RWQCB, USACE, and California Department of Fish and Wildlife (CDFW). All applicable state and local permits will be obtained prior to construction.

## **8.4 PUBLIC OUTREACH [24 CFR 50.23 & 58.43]:**

The SCEA was made available for public review from September 28, 2020 through October 27, 2020, for a 30-day review period.

A notice of availability of the EA and the FONSI will be published in a newspaper of general circulation in the area. Information about where the public may find the Environmental Review Record pertinent to the project can be found in the FONSI Notice.

## **9.0 CUMULATIVE IMPACT ANALYSIS [24 CFR 58.32]**

Construction of the project would occur over a 22-month period (anticipated to be June 2021 through March 2023; see Table 1); however, based on market conditions, phasing could extend up to 24 months. Therefore, the temporal boundary for cumulative effects is the duration of construction activities (2021 through 2025). The spatial boundary for cumulative effects includes the previously developed, vacant parcel that formerly housed the Journey's End Mobile Home Park and adjacent off-site Russell Creek for most environmental constraints evaluated above; however, cumulative effects to community infrastructure (i.e., water, sewer, and electricity) and public services (i.e., police, fire, and emergency response) were evaluated for the City of Santa Rosa.

Other than the current project, no other projects are known or planned within the vacant lot that used to house the former Journey's End Mobile Home Park or the adjacent off-site Russell Creek. Therefore, no cumulative effects to resources within the project area are anticipated.

Construction of the project would accommodate up to 1,383 new residents, which represents 1.5% of the City's anticipated growth by 2035 (City of Santa Rosa 2020). Additionally, the project would be consistent with the previous residential use of the project site and would not result in a substantial increase in unplanned population growth. Therefore, no adverse cumulative impacts from increased population, and thus increased burden on community infrastructure or public services, are expected. It is anticipated the project will provide an overall community benefit by increasing the number of affordable, low-, very low-, and extremely low-income senior housing units and high-density transit-oriented market rate housing units and addressing a local and regional shortage of housing in Sonoma County and the City of Santa Rosa.

## **10.0 ALTERNATIVES [24 CFR 58.40I; 40 CFR 1508.9]**

Two alternatives have been proposed: the preferred alternative (i.e., the proposed project) and the no action alternative.

The project site was chosen because it is located within a PDA intended for increased residential density and was identified as a site to be rebuilt after the 2017 Tubbs Wildfire; therefore, no off-site options were considered. The final site plan was chosen because it would provide affordable housing for seniors with 162 affordable residential units to replace the 161 mobile homes that previously occupied the project site. Rental priority in the senior affordable housing component would be given to qualified (based on age and income), displaced residents of the former Journey's End Mobile Home Park previously located on the project site. Additionally, the project would add up to 370 units of market rate housing to increase the City's post-fire housing stock and help achieve the City's RHNA after approximately 3,000 homes were destroyed by the 2017 Tubbs Wildfire.

### **10.1 NO ACTION ALTERNATIVE [24 CFR 58.40(E)]**

Under the no action alternative [24 CFR 58.40(c)], the Project would not be constructed, and no development would occur on the project site. The existing lot would remain vacant, undeveloped, and affordable housing and market rate housing would not be built onsite. The No Action Alternative does not address the local and regional shortage of housing within Sonoma County and the City of Santa Rosa, and, therefore, does not meet the purpose and need of the Project.

## 11.0 SUMMARY OF FINDINGS AND CONCLUSIONS

The Project will not result in significant adverse effects to the natural or human environment. In addition, the Project is anticipated to provide overall beneficial effect to the Mendocino Avenue/Santa Rosa Avenue Corridor PDA and the surrounding community by increasing the number of affordable senior housing and market rate housing units within a compact, pedestrian friendly, transit-oriented, sustainable, master planned, high-density residential transit village community and addressing a local and regional shortage of housing within the City of Santa Rosa and Sonoma County.

## 12.0 MITIGATION MEASURES AND CONDITIONS [40 CFR 1505.2(C)]

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

**Table 5: Mitigation Measures**

Law, Authority, or Factor	Mitigation Measure
Clean Air Act	<p><b>AIR-1 Tier 4 Final Engine Requirements:</b> All cranes used during project construction activities shall be required to meet Tier 4 final emissions standards. Prior to the issuance of any demolition, grading, or building permits a note shall be added to the project plans requiring all cranes used for project construction activities to meet Tier 4 final emissions standards. The construction contractor shall maintain records documenting efforts to comply with this requirement and shall submit records of compliance to the City prior to issuance of certificate of occupancy for each building.</p>
Clean Air Act	<p>Mitigation Measure AIR-2 is a measure adopted from the Plan Bay Area (PBA) Environmental Impact Report (EIR). The Plan Bay Area EIR includes mitigation measures designed to help avoid or minimize significant environmental impacts and, as such, this project incorporates relevant mitigation measures previously identified by the Plan Bay Area EIR, where applicable (City of Santa Rosa 2020). Those mitigation measures previously identified by the Plan Bay Area EIR are referred to as Plan Bay Area Environmental Impact Report Mitigation Measures (PBA EIR MM).</p> <p><b>AIR-2 (PBA EIR MM 2.9-1[a]: Sensitive Receptors Exposure to TACs and PM<sub>2.5</sub> Concentrations in Transit Priority Areas):</b></p> <p>When locating sensitive receptors in TAC risk areas, implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based</p>

	<p>on project- and site-specific considerations that include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• Install, operate, and maintain in good working order a central heating, ventilation, and air conditioning (HVAC) system or other air intake system in the building, or in each individual unit, that meets or exceeds a minimum efficiency reporting value (MERV) of 13 or higher. The HVAC system shall include the following features: Installation of a high efficiency filter and/or carbon filter to filter particulates and other chemical matter from entering the building. Either high efficiency particulate air (HEPA) filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) certified 85% supply filters shall be used.</li> <li>• Maintain, repair and/or replace HVAC system on an ongoing and as needed basis or shall prepare an operation and maintenance manual for the HVAC system and the filter. The manual shall include the operating instructions and the maintenance and replacement schedule. This manual shall be included in the Covenants, Conditions and Restrictions (CC&amp;R) for residential projects and/or distributed to the building maintenance staff. In addition, the applicant shall prepare a separate homeowners manual. The manual shall contain the operating instructions and the maintenance and replacement schedule for the HVAC system and the filters.</li> <li>• Install passive electrostatic filtering systems with low air velocities (i.e., less than 1 mph).</li> <li>• Individual and common exterior open space and outdoor activity areas proposed as part of individual projects shall be located as far away as possible within the project site boundary, face away from major freeways, and shall be shielded from the source (i.e., the roadway) of air pollution by buildings or otherwise buffered to further reduce air pollution for project occupants.</li> <li>• Locate air intakes and design windows to reduce PM exposure (e.g., windows nearest to the roadway do not open).</li> <li>• Sensitive receptors within buildings shall be located in areas upwind of major roadway traffic to reduce exposure to reduce cancer risk levels and exposure to PM2.5.</li> <li>• Planting trees and/or vegetation between sensitive receptors and pollution source. Trees that are best suited to trapping PM shall be planted, including one or more of the following species: Pine (<i>Pinus nigra var. maritima</i>), Cypress (<i>X Cupressocyparis leylandii</i>), Hybrid poplar (<i>Populus deltoids X trichocarpa</i>), California pepper tree (<i>Schinus molle</i>) and Redwoods (<i>Sequoia sempervirens</i>).</li> <li>• Idling of heavy-duty diesel trucks at these locations shall be prohibited or limited to no more than 2 minutes.</li> </ul>
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	<ul style="list-style-type: none"> <li>Emissions from diesel trucks shall be reduced through establishing truck routes to avoid residential neighborhoods or other land uses serving sensitive populations, such as hospitals, schools, and childcare centers. A truck route program, along with truck calming, parking, and delivery restrictions, shall be implemented to direct traffic activity at non-permitted sources and large construction projects.</li> </ul>
<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff and Hazards and Nuisances including Site Safety and Noise</p>	<p><b>GEO-1 Implement Geotechnical Design Recommendations:</b> Prior to issuance of grading permits, all design specifications and recommendations contained within the Geotechnical Study Report dated December 20, 2019 (Updated September 2, 2020) shall be incorporated into relevant project plans and specifications. The project site plans shall be submitted to the City and reviewed as part of the building permit review process.</p>
<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</p>	<p><b>GEO-2 Prepare and Implement Dewatering and Shoring Plans:</b> If excavation to 4.4 feet below ground surface or deeper is required for the project, a dewatering plan shall be submitted to the City for approval prior to the issuance of a grading permit. At a minimum, the dewatering plan shall detail dewatering methods, location of dewatering activities, equipment, groundwater sampling, disposal, and discharge point in accordance with the requirements of the North Coast RWQCB. In the event shoring methods are implemented for any excavations, shoring plans shall be submitted to the City for approval prior to the issuance of a grading permit. All shoring plans shall be prepared in accordance with the California Division of Occupational Safety and Health regulations and the City of Santa Rosa Public Works Department engineering standards and specifications.</p>
<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</p>	<p><b>HYD-1 Prepare and Implement a Stormwater Pollution Prevention Plan [SWPPP]:</b> Coverage shall be obtained for the project under the City of Santa Rosa’s Construction General Permit (Order No. 2009-009-DWQ, as amended by 2010-0014-DWQ and 20152-006-DWQ). Per the requirements of the California State Water Resources Control Board, a Stormwater Pollution Prevention Plan (SWPPP) shall be prepared for the project to reduce the potential for water pollution and sedimentation from project activities. The SWPPP shall address site runoff, assuring that project runoff shall not affect or alter the drainage patterns on the project site. The SWPPP shall comply with the City’s Grading and Erosion Control Ordinance, as specified in Chapter 19-64.010 in the City Code, as well as the Waste Discharge Requirements of the North Coast RWQCB Permit.</p>
<p>Nesting Birds</p>	<p><b>BIO-1 Avoid Disturbance of Nesting Birds:</b> Vegetation removal and initial ground disturbance activities should be initiated during the non-nesting season for migratory birds from September 1 to January 31. If work cannot be initiated during this</p>

	<p>period, a nesting bird survey should be performed by a qualified biologist for species protected by the Migratory Bird Treaty Act and California Fish and Game Code within a 250-foot radius of proposed construction activities for passerines, no more than 2 weeks prior to the start of construction activities. If active nests are found, a no-disturbance buffer should be placed around the nest until young have fledged or the nest is determined to be no longer active by the biologist. The size of the buffer shall be determined by the biologist based on species and proximity to activities and may be reduced at the discretion of the biologist. Active nests shall be monitored periodically to determine time of fledging.</p> <ul style="list-style-type: none"> <li>•</li> </ul>
<p>Aquatic Feature Protection</p>	<p><b>BIO-2 (PBA EIR MM 2.9-2: Riparian Habitat, Federally Protected Wetlands, or Other Sensitive Natural Communities):</b> Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations that include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Where avoidance of jurisdictional waters is not feasible, project sponsors shall minimize fill and the use of in-water construction methods, and place fill only with express permit approval from the appropriate resource agencies (e.g., USACE, RWQCB, CDFW, Bay Area Conservation District [BCDC], and California Coastal Commission [CCC]) and in accordance with applicable existing regulations, such as the Clean Water Act or local stream protection ordinances.</li> <li>• Project sponsors shall arrange for compensatory mitigation in the form of mitigation bank credits, on-site or off-site enhancement of existing waters or wetland creation in accordance with applicable existing regulations and subject to approval by the USACE, RWQCB, CDFW, BCDC, and CCC. The following minimum performance standards (or other standards as required by the permitting agencies) shall apply to any wetland compensatory mitigation:             <ul style="list-style-type: none"> <li>– Compensation shall be provided at a minimum 1:1 ratio for restoration and preservation but shall in all cases be consistent with mitigation ratios set forth in locally applicable plans (e.g., general plans, Habitat Conservation Plans [HCPs]/ Natural Community Conservation Plans [NCCPs], etc.), or in project-specific permitting documentation. Compensatory mitigation may be a combination of onsite restoration/creation/enhancement or offsite restoration, preservation, and/or enhancement. Compensatory mitigation may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning (RAMP), as deemed appropriate by the permitting agencies.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• In accordance with CDFW guidelines and other instruments protective of sensitive or special- status natural communities, project sponsors shall avoid and minimize impacts on sensitive natural communities when designing and permitting projects. Where applicable, projects shall conform to the provisions of special area management or restoration plans, such as the Suisun Marsh Protection Plan or the East Contra Costa County HCP, which outline specific measures to protect sensitive vegetation communities.</li> <li>• Compliance with existing local regulations and policies, including applicable HCP/NCCPs that exceed or reasonably replace any of the above measures protective of jurisdictional wetlands or special-status natural communities.</li> </ul>
<p>Aquatic Feature Protection</p>	<p><b>BIO-3 Sensitive Aquatic Habitat:</b> Following the completion of construction, temporary impacts to the perennial stream (Russell Creek) shall be restored to return the impacted area to preconstruction conditions, including grading and revegetation using a local native seed mix. Permanent impacts to the perennial stream and emergent wetland shall be mitigated at a 1:1 (impact:mitigation) ratio through the purchase of wetland mitigation credits at a local mitigation bank approved by North Coast RWQCB.</p>
<p>Noise Abatement and Control and Hazards and Nuisances including Site Safety and Noise</p>	<p><b>NOI-1 Interior/Exterior Noise Levels:</b> A qualified acoustical engineer or noise specialist shall verify that applicable features are incorporated into the project design to reduce noise exposure, including noise exposure from traffic noise, to levels below 45 dB(A) Ldn in habitable rooms and 60 dB(A) Ldn in private and shared recreational facilities as required by Policy NS-B-4 of the General Plan.</p>
<p>Noise Abatement and Control and Hazards and Nuisances including Site Safety and Noise</p>	<p><b>NOI-2 (PBA EIR MM 2.6-2: Increased Noise from Traffic and Transit):</b> To reduce exposure from traffic-noise, lead agencies and/or project sponsors shall consider mitigation measures including, but not limited to those identified below:</p> <ul style="list-style-type: none"> <li>• Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is noise compatible with adjacent transportation facilities and land uses.</li> <li>• Maximize the distance between noise-sensitive land uses and new noise-generating facilities and transportation systems.</li> </ul>
<p>Noise Abatement and Control and Hazards and Nuisances including Site Safety and Noise</p>	<p><b>NOI-3 (PBA EIR MM 2.6-5: Ambient Noise):</b> To reduce exposure to new and existing sensitive receptors from non-transportation noise associated with projected development, implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations that include, but are not limited to:</p>

	<ul style="list-style-type: none"> <li>Local agencies approving land use projects shall require that external mechanical equipment, including HVAC units, associated with buildings incorporate features designed to reduce noise to below 70 dB(A) CNEL (Ldn) or the local applicable noise standard. These features may include, but are not limited to, locating equipment within equipment rooms or enclosures that incorporate noise reduction features, such as acoustical louvers, and exhaust and intake silencers. Equipment enclosures shall be oriented so that major openings (i.e., intake louvers, exhaust) are directed away from nearby noise-sensitive receptors.</li> </ul>
<p>Noise Abatement and Control and Hazards and Nuisances including Site Safety and Noise</p>	<p><b>NOI-4 (PBA EIR MM 2.6-1[a]: Construction Noise Levels and Groundborne Vibration):</b> To reduce construction noise levels, implementing agencies and/or project sponsors shall:</p> <ul style="list-style-type: none"> <li>Comply with local construction-related noise standards, including restricting construction activities to permitted hours as defined under local jurisdiction regulations);</li> <li>Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silencers, wraps);</li> <li>Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors; and</li> <li>Locate stationary equipment such as generators, compressors, rock crushers, and cement mixers a minimum of 50 feet from sensitive receptors, but further if possible.</li> </ul>
<p>Noise Abatement and Control and Hazards and Nuisances including Site Safety and Noise</p>	<p><b>NOI-5 Construction Activity:</b> A construction site notice shall be posted at the project site 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 project site, and City telephone numbers where violations can be reported. The notice shall be approved by the City, posted and maintained at the project site prior to the start of construction, and displayed in a location that is readily visible to the public.</p>
<p>Public Safety - Police, Fire and Emergency Medical</p>	<p><b>WF-1 Project Emergency Response and Preparedness Plan:</b> An Emergency Response and Preparedness Plan shall be prepared for the project to ensure that future residents are informed and prepared to evacuate in the event of a wildfire emergency. The Plan shall include detailed guidelines for reasonably foreseeable emergencies and disasters that might occur in the project area, including a potential wildfire. The Plan shall include the following:</p> <ul style="list-style-type: none"> <li>Emergency contact information for Santa Rosa Fire Department, Santa Rosa Police Department, and property management</li> <li>Responsibility for coordinating response in the event of an emergency</li> </ul>

	<ul style="list-style-type: none"> <li>• Requirements for residents' emergency preparedness</li> <li>• Identified evacuation routes for residents</li> <li>• Detailed emergency and disaster procedures</li> </ul> <p>The Plan shall focus on actions that can be taken before, during, and after an emergency such that residents may be better prepared at any point during a possible emergency. The Plan shall be provided to all residents upon move-in and to management staff. The applicant shall provide a copy of the Emergency Response and Preparedness Plan to the City, including Santa Rosa Fire Department and Santa Rosa Police Department, for informational purposes.</p>
<p>Public Safety - Police, Fire and Emergency Medical</p>	<p><b>WF-2 Fire Resistant Landscaping Plans:</b> The project landscaping plans shall include fire-resistant landscaping (consistent with the 2018 East Bay Municipal Utility District Firescape guidelines) and landscape design. The project plans shall be submitted to the City and reviewed as part of the building permit review process.</p>
<p><i>Note: Cultural Resource monitoring is described above in the Section 106 summary included in Table 3: Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities, subsection Historic Preservation.</i></p>	

### 13.0 DETERMINATION

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

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

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

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

Preparer Signature:  Date: 07/07/2021

Name/Title/Organization: Stacey Parks, Senior Scientist, Stantec

Certifying Officer Signature:  Date: 7/28/2021

Name/Title: Clare Hartman, Interim Assistant City Manager

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

## 14.0 REFERENCES

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PART-58-EA 3575 MENDOCINO AVENUE

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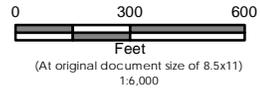
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**Legend**

- Bicentennial Way Transit Facility (Major Transit Stop)
- Existing Santa Rosa CityBus/Sonoma County Transit Bus Stop
- Proposed Relocated Bus Stop
- High Quality Transit Corridor
- Project Site
- Proposed Stormwater Outfall Disturbance Area
- Mendocino Avenue/ Santa Rosa Avenue Priority Development Area



*Project Location*  
Santa Rosa, CA

*Project*  
3575 Mendocino Avenue Project

*Figure No.*  
1

*Title*  
Project Site

**Note:**  
*This aerial basemap does not represent the baseline condition of the project site because a current version was not readily available at the time of preparation of this environmental document. As of July 2020, all structures have been removed and the project site is vacant.*

Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.

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Source: Van Meter Williams Pollack, September 2020



*Project Location*

Santa Rosa, CA

*Project*

3575 Mendocino Avenue Project

*Figure No.*

2

*Title*

Project Site Plan

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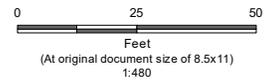
*This aerial basemap does not represent the baseline condition of the project site because all structures have been removed and the project site is vacant.*

Summary of Potential Waters of the United States				
Label	Type	Area (ac)	Length (ft)	Location (lat, long)
PS-1	Perennial Stream	0.192	1045	38.472516, -122.728285
<b>Total Other Waters</b>		<b>0.192</b>	<b>1045</b>	
<b>Total Waters of the United States</b>		<b>0.192</b>	<b>1045</b>	



- Project Site (13.3 acres)\*
- Biological Study Area (29.874 acres)
- Proposed Stormwater Outfall Disturbance Area
- + Control Point
- Elevation Contours (1' interval)

- Potential Waters of the U.S.**
- Other Waters
  - Ordinary High Water Mark
  - Top of Bank



*Project Location*

Santa Rosa, CA

*Project*

3575 Mendocino Avenue Project

*Figure No.*

**3**

*Title*

**Delineation of Potential Waters of the U.S.**

\*The 13.3-acre project site primarily consists of APN 173-030-001, but the proposed stormwater outfall would be within Russell Creek, which is located on the adjacent parcel identified as APN 173-030-002.

**Notes**  
Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet

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## Appendix A THERMAL RADIATION MEMO

To: Stantec Internal  
Walnut Creek, CA

From: Tom Gramza, P.E.  
Burlington, MA

File:   
Date: January 19, 2021

**Reference: HUD – 3575 Mendocino Avenue Project**

The purpose of this memo is to address the facility siting of the proposed 3575 Mendocino Avenue project site, as it relates to a nearby 12,000-gallon above-ground diesel storage tank located at 401 Bicentennial Way.

HUD's Barrier Design Guidebook 6600.G, which references 24 CFR Part 51.203, sets the thermal radiation limits from a potential hazardous materials fire as 10,000 BTU/sq.ft-hr to the HUD building, and 450 BTU/sq.ft-hr for people for any HUD site.

While the HUD Barrier Design Guidebook provides a thermal radiation calculation procedure in Section IX (page 18), this calculation is intended for a liquid-gas (vapor) mixture contained under pressure. That situation does not apply to a diesel fuel storage tank, since the contents of a diesel day tank are not under pressure. A potential fire hazard from a diesel storage tank would occur if the tank were to fail and the contents were ignited, resulting in a liquid pool fire.

To calculate the approximate heat flux generated from a potential 12,000 gallon diesel fuel pool fire, the Society of Fire Protection Engineers (SFPE) Manual – 3<sup>rd</sup> Edition was consulted. The Shokri and Beyler Correlation, found on page 3-273, can be used to model thermal radiation from a large-scale pool fire. This is a commonly-accepted methodology used for facility siting of hydrocarbon processing facilities. The equation is as follows:

$$\dot{q}'' = 15.4 \left( \frac{L}{D} \right)^{-1.59}$$

<b>Where:</b>	
$\dot{q}''$	= heat flux (kw/sq.m)
L	= distance from center of pool fire to target
D	= diameter of pool fire

- Based on available satellite images, the diesel storage tank is located within a secondary containment of approximately 200 sq.ft., or 20 sq.m. The effective diameter of a pool fire (D) originating from the containment area would be 5 sq.m. using the formula provided in the SFPE manual.
- L, the distance from the diesel containment area to the proposed HUD project site, is 740 ft.

The calculated heat flux which would be experienced by people or buildings at the proposed HUD project site is approximately 0.04 kw/sq.m, or 11.5 BTU/sq.ft.-hr. This is well below the 450 BTU/sq.ft.-hr. limit set forth by 24 CFR Part 51.

Therefore, it is our opinion that the proposed HUD site is outside the required thermal exclusion zone of a potential fire originating from the nearby 12,000 gallon diesel storage tank, which is located approximately 740 ft. from the project site.

January 19, 2021

Stantec Internal

Page 2 of 2

**Reference:** HUD – 3575 Mendocino Avenue Project

**Stantec Architecture and Engineering P.C.**



**Tom Gramza** P.E.  
Senior Fire Protection Engineer

Phone: 781 221 1030

Fax:

Tom.Gramza@stantec.com

Attachment:

c.

## **Appendix B SECTION 106 CONSULTATION**

**(Confidential Appendix. Please contact the City of Santa Rosa for further information.)**