

Santa Rosa City Hall Development Agreement

Initial Study

Lead Agency:

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

Project Applicant:

City of Santa Rosa
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Santa Rosa, CA 95404

CEQA Consultant:

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August 2026

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ACRONYM LIST

A-P	Alquist-Priolo Earthquake Fault Zoning Act
AB	Assembly Bill
ACM	asbestos containing material
ADA	Americans with Disabilities Act
AQMP	Air Quality Management Plan
APN	Assessor's Parcel Numbers
BAAQMD	Bay Area Air Quality Management District
BMPs	best management practices
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CMU-DSA	Core Mixed Use–Downtown Station Area
DSASP	Downtown Station Area Specific Plan
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
HCP	Habitat Conservation Plan
LUST	leaking underground storage tank
NCCP	Natural Community Conservation Plan
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PPP	Plans, Programs, or Policies
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SFBAAB	San Francisco Bay Area Air Basin
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	toxic air contaminant
TPZ	Timberland Production Zone
USFWS	United States Fish and Wildlife Service
VMT	vehicle miles traveled

1. INTRODUCTION

1.1. PURPOSE OF THE INITIAL STUDY

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000 et seq.); and Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 et seq.)

Pursuant to CEQA, this Initial Study has been prepared to analyze the potential for significant impacts on the environment resulting from implementation of the proposed Project, described in greater detail in Section 3.0, Project Description. As required by CEQA Guidelines Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the City of Santa Rosa, to identify the environmental effects of the Project and determine which environmental topics require further analysis in a focused Supplemental Environmental Impact Report (Supplemental EIR). The Initial Study also identifies environmental effects that would not be significant and therefore do not require further analysis in the Supplemental EIR.

This Initial Study is being prepared in conjunction with a focused Supplemental EIR that will supplement the prior environmental review prepared for the Downtown Station Area Specific Plan (DSASP) and will address potential impacts to Cultural Resources that could result from the City's execution of a development agreement with Museum on the Square, LLC (the "Developer"). Pursuant to CEQA Guidelines Section 15082, the City will also issue a Notice of Preparation (NOP) to provide notice of the Supplemental EIR and solicit input regarding the scope and content of the environmental analysis.

This Initial Study informs City of Santa Rosa decision-makers, affected agencies, and the public of potentially significant environmental impacts associated with the implementation of the Project. A "significant effect" or "significant impact" on the environment means *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project"* (CEQA Guidelines Section 15382).

Given the Project's level of detail, combined with previous analyses and current information about the site and environs, the City's intent is to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations (Public Resources Code Section 21003.1).
- Use the Initial Study to identify environmental effects that do not require further analysis and to focus the Supplemental EIR on environmental effects that require additional evaluation (CEQA Guidelines Section 15063[c][3]).
- Utilize prior environmental analysis from the Downtown Station Area Specific Plan EIR, where appropriate, to avoid unnecessary duplication and focus the Supplemental EIR on the information necessary to address the proposed Project.

1.2. DOCUMENT ORGANIZATION

This Initial Study includes the following sections:

Section 1. Introduction

Provides information about CEQA and its requirements for environmental review and explains that an Initial Study was prepared to evaluate the proposed Project's potential impact to the physical environment and to identify the environmental topics requiring further analysis in the focused Supplemental EIR.

Section 2. Environmental Setting

Provides information about the proposed Project's location and existing environmental setting.

Section 3. Project Description

Includes a description of the proposed Project's physical features and characteristics.

Section 4. Environmental Checklist

Includes the summarized results for the Environmental Checklist from Appendix G of the CEQA Guidelines and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment. Identifies the environmental topics that require further analysis in the Supplemental EIR and those that do not require additional EIR-level analysis.

Section 5. Environmental Analysis

Includes the information and data that was analyzed leading to the results of the Environmental Checklist.

Section 6. References

Lists the sources of information used to support the analysis contained herein.

2. ENVIRONMENTAL SETTING

“Project,” as defined by the CEQA Guidelines, means “the whole of an action, which has a potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment.”

The Project analyzed in this Initial Study involves consideration of a Development Agreement between the City of Santa Rosa and Museum on the Square, LLC with respect to property located at 90 Santa Rosa Avenue, 631 1st Street, 655 1st Street, and a portion of 100 Santa Rosa Avenue (the “City Hall Campus”). The Development Agreement also contemplates future development of the City Hall Campus, including the potential for adaptive reuse or redevelopment consistent with the DSASP. The Project would involve the relocation of Santa Rosa City Hall functions to the Museum on the Square property at 520 3rd Street, also identified as 521 2nd Street (the “Developer Property”), and the potential demolition of the existing buildings located on the City-owned properties proposed for conveyance, including 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1st Street, and 655 1st Street, as described in Section 3.1, Project Features. The City would retain approximately 1.61 acres at 100 Santa Rosa Avenue for potential open space, park, recreational use, public access, flood control and/or other public purposes. The City properties proposed for conveyance encompass approximately 5.96 acres. The Project properties and associated Assessor’s Parcel Numbers (APNs) are identified in Table 2-1, Project Properties.

The Supplemental EIR will supplement the 2007 Downtown Station Area Specific Plan Program Environmental Impact Report (2007 DSASP EIR) and the 2020 Final Subsequent Environmental Impact Report, Updated Downtown Station Area Specific Plan (2020 DSASP SEIR). The Supplemental EIR analyzes the Project at a project level of detail based on the terms of the development agreement under consideration by the City. The environmental analysis focuses on whether demolition of the existing buildings and associated features on the City-owned properties would cause a substantial adverse change in the significance of a historical resource.

Table 2-1: Project Properties		
Address	APN(s)	Acres
100 Santa Rosa Avenue	009-191-021	6.13*
90 Santa Rosa Avenue	009-073-023	0.70
631 1 st Street	009-073-019, 009-073-020, 009-073-021, 009-073-022, and 009-073-COM	0.33
655 1 st Street	009-073-018	0.41
Total		7.57

*Note: Approximately 1.61 acres of the 100 Santa Rosa Avenue property would be retained by the City for potential open space, park, recreational use, public access, flood control and/or other public purposes. The remaining approximately 4.52 acres of 100 Santa Rosa Avenue would be conveyed, resulting in a total conveyance area of approximately 5.96 acres.

2.1. PROJECT LOCATION

The Project site is located in downtown Santa Rosa within the Downtown Station Area Specific Plan (DSASP) Plan Area and encompasses approximately 7.57 gross acres. Approximately 5.96 acres are proposed for conveyance, while approximately 1.61 acres at 100 Santa Rosa Avenue would be retained by the City for potential open space, park, recreational use, public access, flood control and/or other public purposes.

Regional access to the Project site is provided by U.S. Highway 101 and State Route 12. Local access is provided by Santa Rosa Avenue, 1st Street, and Sonoma Avenue. The Project site is located within the U.S. Geological Survey Santa Rosa, California 7.5-minute quadrangle map.

The Project's regional location and local setting are shown in Figure 2-1, Regional Location; Figure 2-2, Local Vicinity; and Figure 2-3, *Aerial View*.

2.2. EXISTING SITE DEVELOPMENT

100 Santa Rosa Avenue

The property at 100 Santa Rosa Avenue encompasses approximately 6.13 acres and is developed with the existing Santa Rosa City Hall complex. The property contains 10 existing buildings totaling approximately 49,585 square feet of gross building area. The complex consists of low-profile, cast-in-place concrete and glass buildings arranged around a central courtyard. The buildings are connected by outdoor plazas and walkways, some of which are covered, and the complex contains multiple entrances and a partially below-ground parking garage. The buildings are arranged at varying heights and angles within an irregular site plan and are integrated with landscaped areas.

The Santa Rosa City Hall complex was constructed in 1969 and was designed by architect Richard L. Heglund. The complex was developed as part of the urban renewal and redevelopment of downtown Santa Rosa and was designed in the Brutalist architectural style. The property is currently used for municipal governmental functions. The 2020 Santa Rosa Downtown Station Area Catalyst Site Survey identified Santa Rosa City Hall as eligible for listing in the National Register of Historic Places and California Register of Historical Resources and for designation as a Santa Rosa Landmark. The 2023 Downtown Station Area Historic Resources Survey Report also identifies 100 Santa Rosa Avenue as a contributor to the survey-identified potential Civic Center Historic District. Notwithstanding its historic eligibility, the property is in desperate need of urgent critical repairs to address, among other things, roof failures, water intrusion, asbestos, lead, Americans with Disabilities Act (ADA) deficiencies, pest intrusion, failing HVAC and plumbing, and indoor environmental concerns. This is not a single repair need and extends across buildings, infrastructure, systems, and occupied space.

90 Santa Rosa Avenue

The property at 90 Santa Rosa Avenue encompasses approximately 0.70 acre and is developed with the existing City Hall Annex. The building was constructed in 1969 as the Summit Savings and Loan Association and is currently used for municipal governmental functions. The building contains approximately 22,369 square feet of gross building area.

The City Hall Annex is a freestanding Brutalist-style building with generally square massing, rough-aggregate concrete panels, a prominent roofline, cylindrical columns, projecting shed-roof bays, and a recessed glass entrance along Santa Rosa Avenue. The property also contains landscaping and a rear driveway. The 2020 Santa Rosa Downtown Station Area Catalyst Site Survey evaluated the Summit Savings & Loan Association property and determined that it was not an eligible historic resource. The 2023 Downtown Station Area Historic Resources Survey Report, however, identifies 90 Santa Rosa Avenue as a contributor to the survey-identified potential Civic Center Historic District. Like the City Hall complex, the City Hall Annex is in need of urgent critical repairs to address, among other things, roof failures, water intrusion, asbestos, lead, ADA deficiencies, pest intrusion, failing HVAC and plumbing, and indoor environmental concerns.

631 1st Street

The property at 631 1st Street encompasses approximately 0.33 acre and is developed with the Chamber Plaza complex, which was constructed in 1973. The property contains approximately 10,936 square feet of gross building area. Chamber Plaza, located at 631–637 1st Street, has previously been identified as eligible for the California Register of Historical Resources and designation as a Santa Rosa Landmark. The 2023 Downtown Station Area Historic Resources Survey Report also identifies 631–637 1st Street as a contributor to the survey-identified potential Civic Center Historic District.

655 1st Street

The property at 655 1st Street encompasses approximately 0.41 acre and is developed with an existing City-owned building. The building was constructed in 1972 and contains approximately 14,921 square feet of gross building area. The building has been decommissioned from active use due to its poor condition. The 2023 Downtown Station Area Historic Resources Survey Report identifies 655 1st Street as a contributor to the survey-identified potential Civic Center Historic District. The potential Civic Center Historic District has not been formally established as a City preservation district. Existing conditions at the Project site are shown in Appendix A, *Existing Site Photos*.

2.3. EXISTING PROJECT SITE LAND USE AND ZONING DESIGNATIONS

The Project site has a General Plan Land Use designation of Core Mixed Use (CMU), as shown on Figure 2-4, General Plan Land Use Designation.

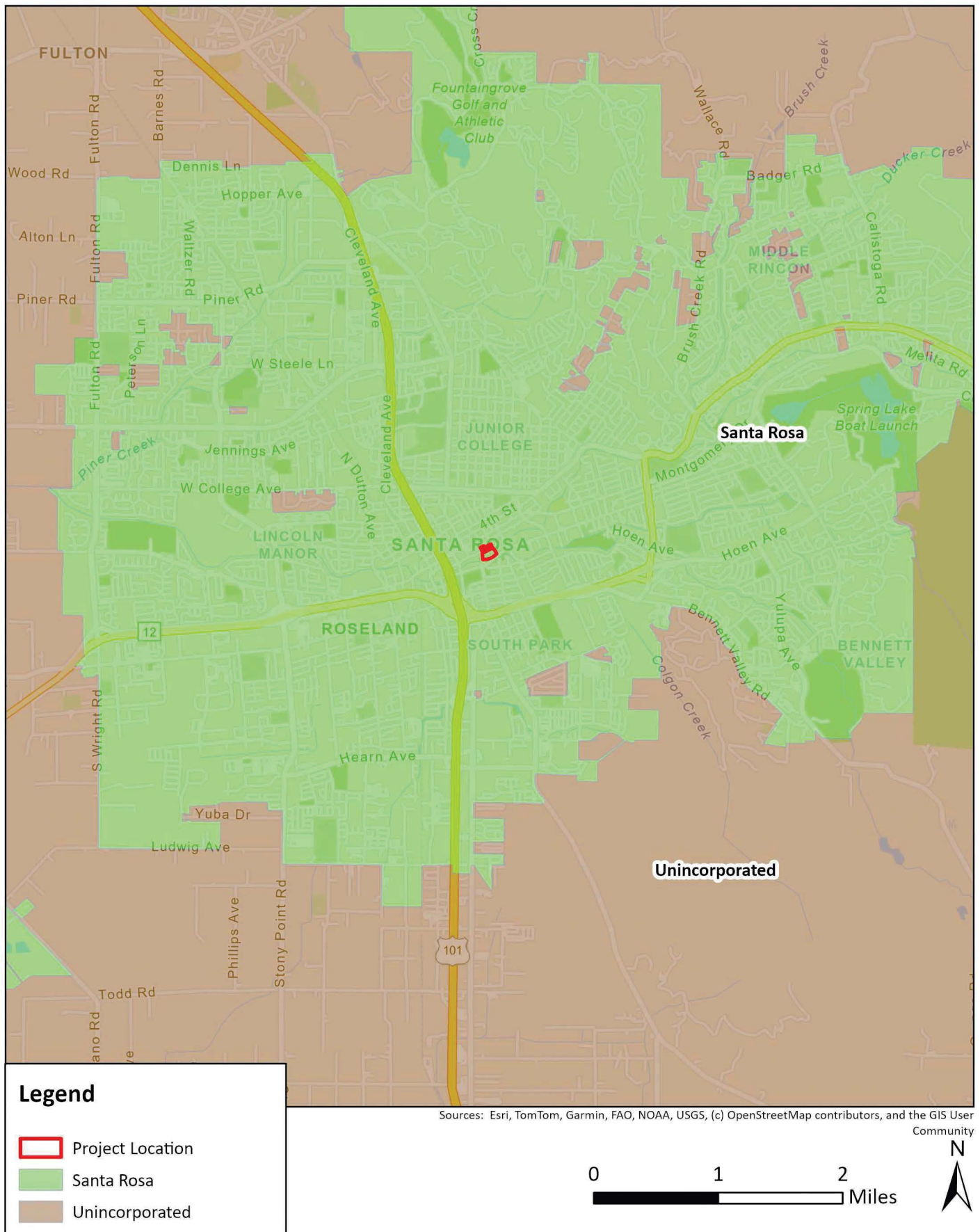
The Project site has zoning designations of CMU and Core Mixed Use–Downtown Station Area (CMU-DSA), as shown in Figure 2-5, Zoning Designation. The City of Santa Rosa Zoning Code Section 20-23.020 states that the purpose of the CMU district is to foster a mix of residential and nonresidential uses within downtown Santa Rosa, including governmental, business, retail, tourism, entertainment, and cultural uses. The Downtown Station Area combining district is intended to enhance and reinforce distinctive characteristics within the Downtown Station Area Specific Plan area and create environments that are comfortable to walk in by establishing development form, intensity, streetscape, and public realm standards.

2.4. SURROUNDING LAND USES

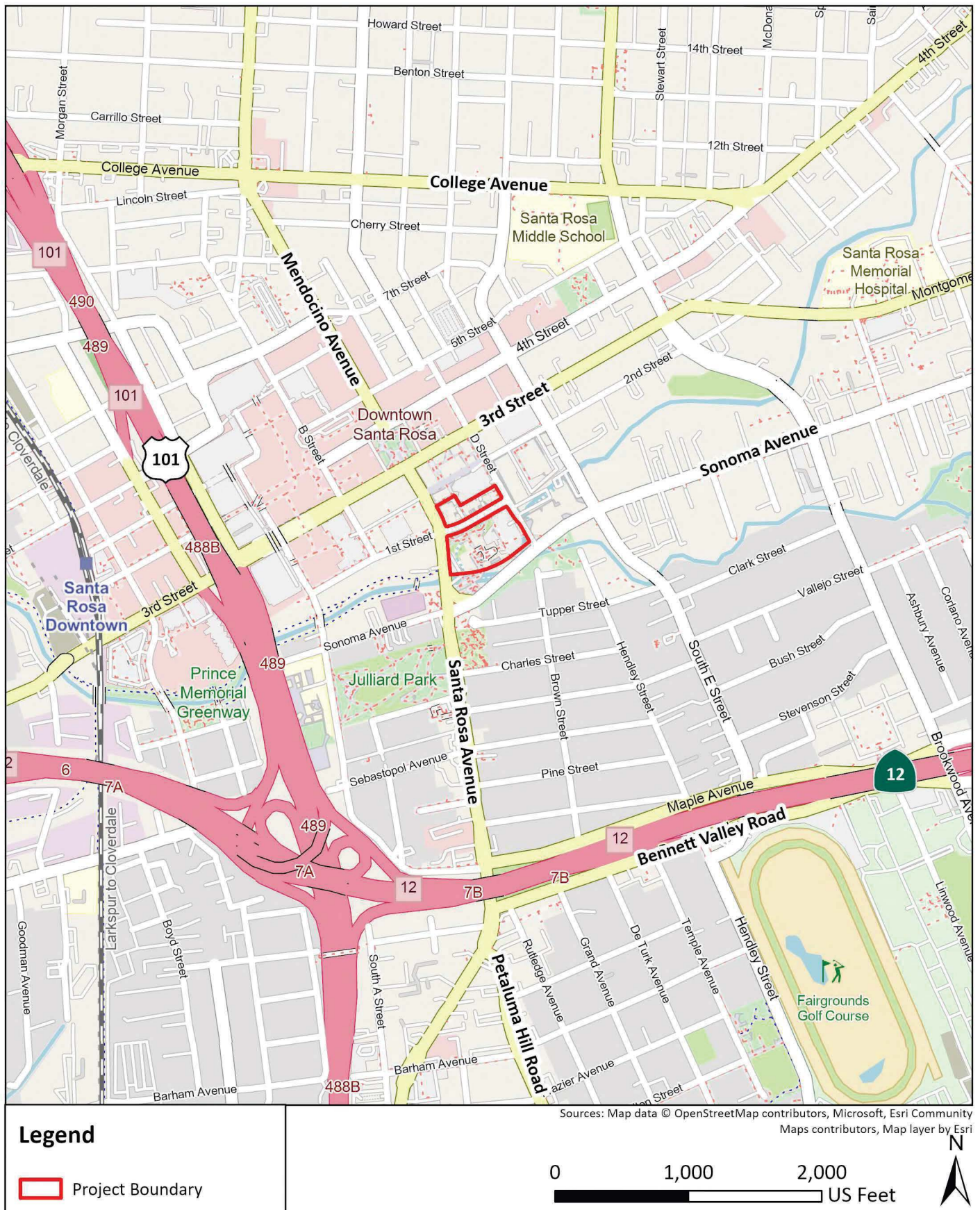
The Project site is entirely surrounded by lands located within the City of Santa Rosa and within the Downtown Station Area Specific Plan (DSASP) Plan Area. Areas surrounding the Project site consist of residential, governmental and office uses, commercial and mixed-use development, parking facilities, public streets, and public open-space and recreational uses. Nearby features include other City-owned properties, Santa Rosa Creek, Matanzas Creek, and the Prince Memorial Greenway. The surrounding land uses are shown on Figure 2-2, Local Vicinity, and Figure 2-3, Aerial View, and described below in Table 2-2.

Table 2-2: Surrounding Existing Uses, General Plan Land Use, and Zoning

Direction	Existing Use	General Plan Land Use	Zoning
North	Restaurants, Banks, and Commercial services	Core Mixed Use	CMU CMU-DSA
East	Federal Resource Buildings	Core Mixed Use	CMU
South	Single family residential and Juilliard Park	Medium Density Residential Parks/Recreation	PD-H PD-H-MMH-S OSR
West	Park Bank Audiologist Center Movie Theater	Core Mixed Use Parks/Recreation Public/Institutional	CMU CMU-DSA OSR PI-DSA



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Legend

 Project Boundary

0 150 300
US Feet



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3. PROJECT DESCRIPTION

3.1. PROJECT FEATURES

The Project involves a Development Agreement between the City of Santa Rosa and Museum on the Square, LLC (“Developer”) with respect to the City Hall Campus. At this time, the Developer has not submitted a site-specific development proposal. The Development Agreement identifies anticipated development and potential uses for the City Hall Campus, including the potential for adaptive reuse or redevelopment; however, it does not establish a fixed site-specific development program, and the mix, configuration, and extent of development have not been determined. Rather, the Development Agreement contemplates future development of the City Hall Campus that would be consistent with the permitted uses, density and intensity of use, maximum building height and size, and other applicable development standards established by the DSASP. The environmental effects associated with development under the DSASP, including the general types and intensities of development contemplated by the Development Agreement, were previously evaluated at a programmatic level in the 2007 DSASP EIR and 2020 DSASP Subsequent EIR. Future site-specific development would remain subject to applicable DSASP requirements and subsequent City review and approvals. It is reasonably foreseeable that redevelopment of the City Hall Campus could involve demolition of some or all of the existing buildings and associated improvements located on the City-owned properties proposed for conveyance. Because the specific buildings and improvements that would ultimately be removed have not yet been determined, this Initial Study conservatively evaluates the potential removal of all existing buildings associated with the properties proposed for conveyance. The City would retain approximately 1.61 acres at 100 Santa Rosa Avenue for potential open space, park, recreational use, public access, flood control and/or other public purposes.

Proposed Demolition

For purposes of the conservative analysis, the Project is assumed to include the potential demolition of all 13 existing buildings, totaling approximately 97,811 square feet of gross building area, as well as associated site improvements. The partially below-ground parking garage at 100 Santa Rosa Avenue and existing surface parking areas associated with the buildings assumed to be demolished are also conservatively assumed to be removed.

The properties proposed for conveyance encompass approximately 5.96 acres, including approximately 4.52 acres of the 100 Santa Rosa Avenue property. The City would retain approximately 1.61 acres of the 100 Santa Rosa Avenue property for potential open space, park, recreational use, public access, flood control and/or other public purposes. One existing building at 100 Santa Rosa Avenue partially encroaches onto the City-retained area pursuant to an encroachment agreement to be executed in connection with the exchange. For purposes of the conservative analysis, the potential removal of the entire building, including the portion extending into the retained area, is assumed.

Historical and Architectural Features

As described in Section 2.2, Existing Site Development, the Project site contains buildings and site features that have previously been identified as eligible or potentially eligible for historical designation, or as potential contributors to a potential historic district.

The Project would potentially demolish the existing buildings and associated architectural, landscape, and site features assumed to be removed for purposes of the conservative analysis. Potential effects to identified historical resources are evaluated in Section 5.5, Cultural Resources, of this Initial Study. As discussed therein, potential impacts to historical resources will be further analyzed in the focused Supplemental EIR.

Retained Land

The City would retain approximately 1.61 acres at 100 Santa Rosa Avenue for potential open space, park, recreational use, public access, flood control and/or other public purposes. The retained area is located along the southerly portion of the property adjacent to Sonoma Avenue, as identified in the legal description and associated exhibit. One existing building partially encroaches onto the retained area pursuant to an encroachment agreement to be executed in connection with the exchange. Except for the potential removal of the portion of this building that extends into the retained area, the retained property would remain under City ownership and is not proposed for conveyance.

3.2. DEMOLITION AND GROUND DISTURBANCE

For purposes of environmental review, the Initial Study evaluates a conservative demolition scenario that assumes demolition of all 13 existing buildings identified in Section 3.1, totaling approximately 97,811 square feet of gross building area, together with associated foundations, paved areas, parking facilities, utilities, landscaping, and other site improvements.

Because detailed demolition plans have not yet been prepared, the precise construction schedule, equipment fleet, grading quantities, haul routes, and limits of excavation are not known. Accordingly, the environmental analysis evaluates the reasonably foreseeable types and extent of activities that could occur under the conservative demolition scenario described above. These activities could include establishment of temporary construction fencing and staging areas; utility disconnection and abatement; hazardous material abatement; interior building removal; structural demolition using conventional demolition equipment; removal of foundations and subsurface improvements; pavement and parking area removal; limited grading and excavation; loading and hauling of demolition debris and excavated material; temporary stockpiling; dust control; and site stabilization following demolition.

Demolition and associated ground disturbance would generally occur within previously developed portions of the Project site, except for temporary construction access and haul truck movements on surrounding streets. Ground disturbance would generally be associated with removal of existing buildings, foundations, utilities, paved areas, and other existing improvements. Removal of foundations and underground utilities could require excavation below existing grade. No excavation associated with construction of future buildings is included in the demolition activities evaluated in this Initial Study.

Demolition would generate temporary construction worker trips, equipment deliveries, and haul truck trips associated with removal and disposal or recycling of building materials, pavement, concrete, soil, and other debris. Demolition materials would be transported to appropriately permitted recycling, processing, or disposal facilities. Construction access, staging, and haul routes would be established as part of subsequent demolition permitting and would be subject to applicable City requirements.

The duration and sequencing of demolition would depend on buildings ultimately authorized for removal and contractor means and methods. The environmental analysis conservatively evaluates the reasonably foreseeable demolition and ground disturbing activities described above. If subsequent demolition plans materially differ from the assumptions evaluated in this Initial Study and Supplemental EIR, the City will determine whether additional environmental review is required.

3.3. PROJECT OBJECTIVES

The intent of the proposed Project is to relocate Santa Rosa City Hall functions to the Museum on the Square property, potentially demolish the existing buildings and associated improvements located on the City-owned properties proposed for conveyance, and retain approximately 1.61 acres at 100 Santa Rosa Avenue for potential open space, park, recreational use, public access, flood control and/or other public purposes.

CEQA Guidelines Section 15124(b) states that an EIR shall contain a clearly written statement of project objectives that should include the underlying purpose of the project and may discuss project benefits. The CEQA Project objectives include the following:

1. Provide the City with a long-term solution for City administrative needs and substantial public benefit through the Exchange Agreement to allow the City to move City Hall functions to a newer, cleaner, safer, existing building.
2. Address a significant systemic liability that exists at the City Hall Campus by eliminating building, site, systems and operational deficiencies.
3. Establish a new City Hall location to avoid service interruption and waste of taxpayer dollars.
4. Provide the Developer assurances with respect to vesting of legal rights to develop the City Hall Campus in accordance with the Development Agreement.
5. Demolish the existing dilapidated buildings and associated improvements at the City Hall Campus to make way for redevelopment of the area consistent with the Specific Plan.
6. Retain the Retained Land for potential open space, park, recreational use, public access, flood control and/or other public purposes.

3.4. DISCRETIONARY ACTIONS REQUIRED

In accordance with Sections 15050 and 15367 of the CEQA Guidelines, the City of Santa Rosa is the designated Lead Agency for the proposed Project and has principal authority and jurisdiction for CEQA actions and Project approval.

The discretionary actions to be considered by the City as part of the proposed Project include:

- **Development Agreement:** Approval of a development agreement between the City and the Developer to allow for vesting of development rights at the City Hall Campus and to facilitate the relocation of City Hall to the Developer Property.

Additional future permits or approvals that may be required to implement activities contemplated by the Development Agreement include:

- **Demolition Permit(s):** Future permit(s) required prior to demolition of existing buildings and associated improvements. No demolition permit application has been submitted at this time.

The responsible agencies, trustee agencies, and other public agencies that may be required to grant approvals and permits or coordinate implementation of the proposed Project include, but are not limited to:

- **None**

4. ENVIRONMENTAL CHECKLIST

4.1. BACKGROUND

Project Title: Santa Rosa City Hall Development Agreement
Lead Agency: City of Santa Rosa
Lead Agency Contact: Jessica Jones, Deputy Director—Planning
Project Location: The Project involves consideration of a Development Agreement between the City and Museum on the Square, LLC with respect to City-owned properties located at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1 st Street, and 655 1 st Street in downtown Santa Rosa, California. Santa Rosa City Hall functions would be relocated to the existing Museum on the Square property at 520 3 rd Street, also identified as 521 2 nd Street.
Project Sponsor's Name and Address: City of Santa Rosa 100 Santa Rosa Avenue Santa Rosa, CA 95404
General Plan and Zoning Designation: The Project site has a General Plan land use designation of Core Mixed Use (CMU) and a zoning designation of Core Mixed Use—Downtown Station Area (CMU-DSA). The Project properties are located within the Downtown Station Area Specific Plan (DSASP) Plan Area.
Project Description: The Project would relocate Santa Rosa City Hall functions to the Museum on the Square property at 520 3 rd Street, also identified as 521 2 nd Street. The Project involves consideration of a Development Agreement between the City and Museum on the Square, LLC with respect to the City Hall Campus. No site-specific development application is currently proposed. The Development Agreement identifies anticipated development and potential uses for the City Hall Campus, including potential adaptive reuse or redevelopment, but does not establish a fixed site-specific development program. Future development would be required to remain consistent with the DSASP and would be subject to applicable DSASP requirements and subsequent City review and approvals. Following relocation, the Project would involve the potential demolition of existing buildings and associated improvements located on the City-owned properties proposed for conveyance at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1 st Street, and 655 1 st Street. Because the specific buildings and improvements that might ultimately be removed have not yet been determined, the environmental analysis conservatively evaluates the potential removal of all existing buildings associated with the properties proposed for conveyance. The City would retain approximately 1.61 acres at 100 Santa Rosa Avenue for potential open space, park, recreational use, public access, flood control and/or other public purposes.
Surrounding Land Uses and Setting: North: 1 st Street followed by governmental, office, commercial, and mixed-use development. East: Governmental and office uses, commercial and mixed-use development, and parking facilities. South: Sonoma Avenue and the Burbank Gardens residential neighborhood. West: Santa Rosa Avenue followed by governmental, office, commercial, and mixed-use development.
Other Public Agencies Whose Approval is Required:

None

4.2. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The subject areas checked below were determined to be potentially significant environmental effects or identified effects that would have a substantial increase in severity due to implementation of the proposed project, as indicated by the checklist and discussion on the following pages.

☐	Aesthetics	☐	Agriculture/Forestry Resources	☐	Air Quality
☐	Biological Resources	☒	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards/Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities and Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

4.3. DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☒ I find that the proposed Project MAY have a significant effect on the environment. An Initial Study has been prepared to identify the environmental effects that have been adequately addressed by prior environmental review and those that require further analysis. A focused SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT is required to analyze the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

/S

Signature

08/31/26

Date

Jessica Jones Deputy Director - Planning

Name and Title

City of Santa Rosa

Lead Agency

4.4. EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, a Supplemental EIR is required.
4. “Negative Declaration: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross-referenced).
5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Guidelines Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - Earlier Analysis Used. Identify and state where they are available for review.
 - Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.

9. The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

5. ENVIRONMENTAL ANALYSIS

This section provides evidence to substantiate the conclusions in the environmental checklist.

5.1. AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	☒
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Have a substantial adverse effect on a scenic vista?

No Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or “vista” of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project’s proposed height, mass, and location relative to surrounding land uses and travel corridors.

The Project site is located within the developed downtown area of Santa Rosa and is currently developed with City-owned buildings and associated improvements. Scenic views and vistas within Santa Rosa include views of surrounding foothills and natural ridgelines. The 2007 DSASP EIR determined that implementation of applicable City goals, policies, development standards, and design guidelines would reduce impacts to scenic vistas within the DSASP Plan Area to less than significant.

The proposed Project would involve the potential demolition of existing buildings and associated improvements at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1st Street, and 655 1st Street. No site-specific building or vertical development is currently proposed as part of the Development Agreement. Future DSASP-consistent development contemplated by the Development Agreement would remain subject to the applicable DSASP zoning, design, and scenic-quality requirements evaluated in the prior DSASP EIRs. If the buildings are demolished, removal of the existing buildings and improvements would not block an existing scenic vista or substantially degrade the scenic quality of a scenic vista. Therefore, no impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. According to the California Department of Transportation (Caltrans) State Scenic Highway Map, no officially designated State scenic highways are located within the DSASP Plan Area. The nearest officially designated State scenic highway is the designated portion of State Route 12 east of Santa Rosa, approximately 5.15 linear miles east of the Project site. The nearest portion of State Route 12 eligible for official scenic highway designation is located approximately 0.5 mile south of the Project site. The Project site is not within the viewshed of the officially designated scenic portion of State Route 12 (Caltrans, 2018). Therefore, the Project would have no impact on scenic resources within a State scenic highway, and this topic will not be further analyzed in the Supplemental EIR.

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

Less than Significant Impact. The Project site is located within an urbanized area in downtown Santa Rosa and is surrounded by governmental and office uses, commercial and mixed-use development, parking facilities, public streets, and public open-space and recreational uses. Nearby features include Santa Rosa Creek and the Prince Memorial Greenway. The existing character of the site and surrounding area reflects a developed urban downtown environment.

The Project would involve the potential demolition of existing buildings and associated improvements at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1st Street, and 655 1st Street. For purposes of conservative analysis, the Project assumes the potential demolition of all 13 existing buildings, totaling approximately 97,811 SF of gross building area, as well as associated site improvements. At this time, no site-specific development application has been submitted. The Development Agreement contemplates future development of the City Hall Campus consistent with the uses permitted by the DSASP, the potential environmental effects of which were evaluated at a programmatic level in the prior DSASP EIRs.

The Project site has a General Plan land use designation of Core Mixed Use (CMU) and a zoning designation of Core Mixed Use–Downtown Station Area (CMU-DSA). The Project would not change the existing General Plan land use or zoning designations. Applicable regulations governing scenic quality include the urban design principles, standards, and guidelines in Chapter 4 of the DSASP, which address scenic qualities, view corridors, visual connections to creeks, the public realm, and the visual character of new development. Future development contemplated by the Development Agreement would remain subject to applicable DSASP regulations governing scenic quality.

Although potential demolition would alter the appearance of the Project site by removing existing buildings and associated improvements, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Therefore, the Project would result in a less than significant impact, and this topic will not be further analyzed in the Supplemental EIR.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact. Light spill occurs when exterior lighting illuminates areas beyond those intended to be lit, while glare can result from excessively bright light sources or reflective materials. No site-specific development application is currently proposed in connection with the Development Agreement. Future DSASP-consistent development contemplated by the Development Agreement would remain subject to applicable DSASP requirements.

The City of Santa Rosa Zoning Code Section 20-30.080, Outdoor Lighting, establishes standards for outdoor lighting on private property. Among other requirements, lighting fixtures are required to be shielded or recessed to reduce light bleed to adjoining properties and to confine glare and reflections within the boundaries of the site to the maximum extent feasible. The Project site is currently developed with City-owned buildings, parking areas, and associated improvements within the developed downtown area of Santa Rosa. Existing sources of light in the vicinity include streetlights, parking-area lighting, exterior building and security lighting, and light from building interiors.

The 2007 DSASP EIR identified potentially significant glare impacts associated with construction of multi-story buildings along the Highway 101 and Highway 12 corridors and adopted Mitigation Measure AES-1 requiring glare-reducing building materials. No site-specific development application is currently proposed in connection with the Development Agreement. The Development Agreement requires future development to be consistent with the DSASP. Future site-specific development would remain subject to applicable DSASP requirements and previously adopted mitigation measures, including Mitigation Measure AES-1, as applicable.

The proposed Project would involve the potential demolition of existing buildings and associated improvements at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1st Street, and 655 1st Street. Potential demolition itself would not install new permanent exterior lighting or introduce new reflective building materials. Potential demolition activities could require temporary lighting for safety or security. Any such lighting would be limited to the duration of potential demolition activities and would be directed and/or shielded, as applicable, to minimize spillover onto adjacent properties and public areas. Given its temporary nature, potential demolition lighting would not create a substantial source of light or glare that would adversely affect day or nighttime views. Therefore, impacts related to light and glare would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact. The State of California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) is charged with producing maps for analyzing impacts on the State's agricultural resources. California's agricultural lands are rated based on soil quality and irrigation status. Pursuant to Public Resources Code Section 21060.1, the following categories qualify as "agricultural land": Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.

Per the FMMP Map, the Project site is designated as Urban and Built-Up Land (California Department of Conservation, 2022). Therefore, the Project would result in no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and this topic will not be further analyzed in the Supplemental EIR.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act (California Land Conservation Act of 1965) restricts the use of agricultural and open space lands to farming and ranching by enabling local governments to contract with private landowners for indefinite terms in exchange for reduced property tax assessments.

The Project site is currently developed with City-owned governmental buildings and associated improvements and does not contain land used or zoned for agricultural purposes. The Project properties are zoned CMU and CMU-DSA, neither of which is an agricultural zoning designation. The Project site is also not currently under a Williamson Act contract. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and this topic will not be further analyzed in the Supplemental EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The Project site is currently developed with City-owned governmental buildings and associated improvements within the urbanized downtown area of Santa Rosa. The Project properties are zoned Core Mixed Use (CMU) and Core Mixed Use–Downtown Station Area (CMU-DSA) and are not zoned for forest land or timberland use or as Timberland Production Zone (TPZ) land. The Project would not change the existing zoning designations or require rezoning of any property containing forest land, timberland, or TPZ land. Therefore, no impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As discussed above, the Project site is currently developed with City-owned governmental buildings and associated improvements and does not include forest land. Therefore, the Project would have no impact on forest land and will not be further analyzed in the Supplemental EIR.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The Project site is within an urbanized area and is currently developed with City-owned governmental buildings and associated improvements. The surrounding area consists predominantly of developed urban uses, with public open-space and recreational uses also located nearby. The Project site does not contain Farmland or forest land. Therefore, the Project would not result in an impact related to the conversion of Farmland to a non-agricultural use or conversion of forest land to a non-forest use and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or State ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The Project site is located within the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The 2017 Clean Air Plan: Spare the Air, Cool the Climate is BAAQMD's current regional air quality plan and establishes control measures intended to reduce emissions of criteria air pollutants, toxic air contaminants, and greenhouse gases and assist the region in attaining State and federal ambient air quality standards (BAAQMD, 2017).

The 2020 DSASP Subsequent EIR evaluated implementation of the DSASP in relation to the 2017 Clean Air Plan, including applicable control measures, and determined that implementation of the DSASP, together with adherence to applicable DSASP policies and BAAQMD requirements, would not result in a significant air quality impact.

The proposed Project would relocate existing City Hall functions to the Museum on the Square property and involve the potential demolition of existing buildings and associated improvements at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1st Street, and 655 1st Street. For purposes of the conservative analysis, the Project assumes potential demolition of 13 existing buildings totaling approximately 97,811 square feet of gross building area. No site-specific development application is currently proposed in connection with the Development Agreement. The Development Agreement requires future development to be consistent with the DSASP. Air quality effects associated with development under the DSASP were evaluated at a programmatic level in the 2020 DSASP Subsequent EIR, and future site-specific development would remain subject to applicable DSASP policies, BAAQMD requirements, and subsequent City review. Demolition activities would be temporary and would be subject to applicable BAAQMD rules and requirements. Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan, impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or State ambient air quality standard?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR recognized that regional air pollution is cumulative in nature and evaluated construction and operational emissions associated with implementation of the DSASP. The analysis determined that construction activities could temporarily generate criteria pollutant emissions from construction equipment, worker and haul truck trips, demolition, and ground disturbance. The 2020 DSASP Subsequent EIR identified Policy PSS 5-4, which requires projects within the DSASP Plan Area to reduce construction-related emissions through implementation of BAAQMD-recommended best practices, and concluded that construction-related criteria pollutant impacts would be less than significant.

If the City Hall Campus is demolished, in whole or in part, the proposed Project would generate temporary criteria pollutant emissions during demolition from off-road equipment, worker and haul truck trips, demolition activities, and associated ground disturbance. These emissions would be limited to the demolition period. The 2020 DSASP Subsequent EIR evaluated construction and operational criteria pollutant emissions associated with development under the DSASP at a programmatic level. The Development Agreement requires future development to be consistent with the DSASP, and future site-specific development would remain subject to applicable DSASP policies, BAAQMD requirements, and subsequent City review. Demolition activities would implement applicable DSASP policies, including Policy PSS 5-4, and applicable BAAQMD construction-related requirements and best management practices. The BAAQMD recommends implementation of construction best management practices (BMPs) for fugitive dust and feasible measures to minimize construction exhaust emissions.

Given the temporary nature of demolition emissions, implementation of applicable construction-related emission controls, and the prior programmatic evaluation of construction and operational emissions associated with development under the DSASP, the Project would not result in a cumulatively considerable net increase of a criteria pollutant for which the region is in nonattainment. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The 2020 DSASP Subsequent EIR evaluated potential exposure of sensitive receptors to substantial pollutant concentrations associated with asbestos, toxic air contaminants (TACs), construction activities, and carbon monoxide. The 2020 analysis determined that demolition activities involving asbestos-containing materials would be subject to applicable federal and BAAQMD requirements, including asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements and BAAQMD Regulation 11, Rule 2, and concluded that impacts associated with asbestos exposure would be less than significant.

The proposed Project would involve temporary demolition activities that could generate diesel particulate matter and other construction-related pollutants in proximity to existing sensitive receptors. Demolition activities would be subject to applicable BAAQMD requirements and DSASP Policy PSS 5-4, which requires implementation of construction-related emission reduction practices. In addition, DSASP Policy PSS 5-5 requires projects within 1,000 feet of sensitive receptors to consider construction-related diesel emissions, project phasing, and receptor distance and to consult with BAAQMD regarding the need for a project-specific construction-phase health risk assessment. Residential uses are located within 1,000 feet

of the Project site, including residences south and east of the Project site along Tupper Street and Brown Street. The Project would comply with these requirements, as applicable.

Potential demolition involving asbestos-containing materials would also be subject to applicable federal requirements and BAAQMD Regulation 11, Rule 2. No site-specific development application is currently proposed in connection with the Development Agreement. The Development Agreement requires future development to be consistent with the DSASP. Future site-specific development, including any residential or other sensitive land uses, would remain subject to applicable DSASP air quality requirements, BAAQMD requirements, and subsequent City review. Potential demolition itself would not introduce a new permanent sensitive land use. Given the temporary nature of potential demolition activities and compliance with applicable asbestos, construction-emission, and sensitive-receptor requirements, the Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR evaluated potential impacts associated with emissions of odors from future development within the DSASP Plan Area. The analysis determined that future development would be required to comply with applicable City Code performance standards addressing noxious odors and BAAQMD regulations. The 2020 DSASP Subsequent EIR also identified diesel exhaust, asphalt paving, and architectural coatings and solvents as potential sources of temporary odors during construction. Construction-related odors were determined to be temporary and unlikely to result in nuisance odors that would violate BAAQMD Regulation 7, Odorous Substances. Accordingly, the 2020 DSASP Subsequent EIR determined that impacts associated with odors would be less than significant and no mitigation measures were required.

The proposed Project would involve the potential temporary demolition of existing buildings and associated improvements. No site-specific development application is currently proposed in connection with the Development Agreement. The Development Agreement requires future development to be consistent with the DSASP. Future development within the DSASP Plan Area, including potential odor effects associated with such development, was evaluated at a programmatic level in the 2020 DSASP Subsequent EIR. Future site-specific development would remain subject to applicable City and BAAQMD odor requirements and subsequent City review. Potential demolition itself would not introduce a new permanent source of odors. Demolition activities could generate temporary odors from diesel-powered construction equipment and haul trucks. However, these odors would be temporary and localized and would be subject to applicable BAAQMD regulations. Accordingly, potential demolition activities would not result in a new operational source of objectionable odors. Therefore, the Project would not result in other emissions, including odors, that would adversely affect a substantial number of people. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

Plans, Programs, or Policies

PPP AQ-1 **PSS 5-4:** Ensure that development projects within the Downtown Station Area require their contractors, as a condition of contract, to reduce construction-related emissions

through the implementation of Bay Area Air Quality Management District (BAAQMD) recommended best practices for mitigating construction-related emissions.

PPP AQ-2 **PSS 5-5:** Require that proponents of projects proposed within 1,000 feet of sensitive receptors such as homes, schools, hospitals, and nursing homes consider mass diesel emissions, project phasing, distance to sensitive receptors, and earth-moving quantities among other factors, and consult with BAAQMD regarding the need for a construction-phase human health risk assessment.

5.4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less than Significant with Mitigation Incorporated. The Project site is located within the developed and urbanized Downtown Station Area and is currently developed with City-owned governmental buildings, parking areas, landscaping, and associated improvements. The 2007 DSASP EIR determined that much of the Specific Plan Area consists of developed areas with buildings, paved or gravel parking areas, roads, and ornamental landscaping. Although these developed areas generally provide limited wildlife habitat,

landscaped vegetation may provide habitat for birds, and existing buildings may provide roosting or nesting habitat for bats.

The 2007 DSASP EIR determined that, although the Specific Plan Area is heavily urbanized, existing trees, landscaping, and buildings may provide nesting or roosting habitat for certain bird and bat species. In particular, the EIR determined that tree removal during the nesting season could affect nesting birds, including Allen's hummingbird, and that demolition of older buildings or structures could affect special-status bats if those structures contain roosting or nursery sites. The EIR therefore determined that tree removal, structure demolition, and other construction disturbances could result in a significant impact to candidate, sensitive, or special-status species. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had arisen that would require further analysis of biological resources beyond that provided in the 2007 DSASP EIR. No new information or changed circumstances have been identified indicating that the Project would result in biological resource impacts that are substantially more severe than those previously analyzed or that Mitigation Measure BIO-2 would no longer be effective.

The Project proposes to potentially demolish existing buildings and associated improvements at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1st Street, and 655 1st Street. For purposes of the conservative analysis, the Project assumes potential demolition of 13 existing buildings totaling approximately 97,811 square feet of gross building area. Demolition of existing structures and removal of vegetation, if required, could disturb nesting birds and special-status bats using buildings, trees, or other vegetation within the Project site.

Mitigation Measure BIO-2 from the 2007 DSASP EIR requires preconstruction surveys where vegetation, buildings, or other structures that could provide nesting or roosting habitat would be removed and establishes procedures for avoiding disturbance to active bird nests and bat roosts or nurseries. Mitigation Measure BIO-2 would continue to apply to the proposed Project. With implementation of Mitigation Measure BIO-2, potential impacts to candidate, sensitive, or special-status species would be reduced to a less than significant level. Therefore, impacts would be less than significant with mitigation incorporated and this topic will not be further analyzed in the Supplemental EIR.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less than Significant with Mitigation Incorporated. The Project site is located within the developed and urbanized Downtown Station Area. The 2007 DSASP EIR determined that riparian habitat within the Specific Plan Area occurs along Santa Rosa Creek. Although much of the creek has been riprapped or channelized and riparian vegetation is limited in some areas, the EIR identified remaining riparian vegetation along the creek as a sensitive natural community because of its value to wildlife.

The 2007 DSASP EIR determined that removal of riparian vegetation or development in close proximity to Santa Rosa Creek could adversely affect riparian habitat and identified this potential effect as significant. Mitigation Measure BIO-3 requires implementation of Mitigation Measure BIO-1, which requires development to minimize disturbance to waterways and riparian vegetation and establishes requirements for work in or in close proximity to Santa Rosa Creek. The 2020 DSASP Subsequent EIR subsequently

determined that no new conditions or information had arisen that would require further analysis of biological resources beyond that provided in the 2007 DSASP EIR.

The proposed Project would involve the potential demolition of existing buildings and associated improvements, including activities in proximity to Santa Rosa Creek. The Project does not propose work within Santa Rosa Creek, creek restoration, a new creek crossing, or other improvements within the creek corridor. However, demolition and associated ground-disturbing activities near the creek could potentially affect adjacent riparian habitat. Therefore, Mitigation Measures BIO-1 and BIO-3 would continue to apply to minimize disturbance to Santa Rosa Creek and associated riparian vegetation. With implementation of these measures, potential impacts to riparian habitat or other sensitive natural communities would be reduced to a less than significant level. Therefore, impacts would be less than significant with mitigation incorporated and this topic will not be further analyzed in the Supplemental EIR.

c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project site is located within the developed and urbanized Downtown Station Area. The 2007 DSASP EIR evaluated wetlands within the Specific Plan Area and determined that the Specific Plan Area does not contain federally protected wetlands, including marshes, vernal pools, or coastal areas. Accordingly, the 2007 DSASP EIR determined that no impact to federally protected wetlands would occur. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had arisen that would require further analysis of biological resources beyond that provided in the 2007 DSASP EIR.

Although Santa Rosa Creek occurs in the vicinity of the Project site, no State or federally protected wetlands have been identified within the Project disturbance area. The proposed Project consists of demolition of existing buildings and associated improvements within an already developed site and would not result in the direct removal, filling, or hydrological interruption of a State or federally protected wetland. Therefore, the Project would result in no impact and this topic will not be further analyzed in the Supplemental EIR.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant with Mitigation Incorporated. Wildlife corridors are areas where wildlife movement is concentrated due to natural or anthropogenic constraints and corridors provide access to resources such as food, water, and shelter. Animals use these corridors to move between different habitats and provide avenues for wildlife dispersal, migration, and contact between other populations.

The Project site is located within the developed and urbanized Downtown Station Area. However, the 2007 DSASP EIR identified Santa Rosa Creek as a migratory corridor for Central California Coast steelhead and California Coastal Chinook salmon. The 2007 DSASP EIR determined that construction activities affecting the creek could impair water quality or otherwise interfere with the movement of these migratory fish species. The 2007 DSASP EIR also determined that removal of trees and other vegetation could affect nesting birds and that demolition of buildings or other structures could disturb bat nursery

sites. Accordingly, the 2007 DSASP EIR determined that implementation of the DSASP could result in a significant impact related to migratory wildlife movement and wildlife nursery sites.

The 2020 DSASP Subsequent EIR determined that no new conditions or information had arisen that would require further analysis of biological resources beyond that provided in the 2007 DSASP EIR. In addition, because portions of the Project site, including the 100 Santa Rosa Avenue property, are in proximity to Santa Rosa Creek, Project activities could potentially affect the creek and associated biological resources.

The proposed Project would involve the potential demolition of existing buildings and associated improvements. Demolition activities and any associated vegetation removal could disturb nesting birds or bats using buildings, trees, or other vegetation within the Project site. In addition, because Santa Rosa Creek occurs in the vicinity of the City Hall properties, Project activities would be required to avoid or minimize disturbance to the creek and associated biological resources.

Mitigation Measure BIO-4a requires implementation of Mitigation Measure BIO-1, which requires development to minimize disturbance to waterways and riparian vegetation and establishes protections for work in or in close proximity to Santa Rosa Creek. Mitigation Measure BIO-4b requires implementation of Mitigation Measure BIO-2, which requires preconstruction surveys and measures to avoid disturbance to nesting birds and bat roosts or nurseries where potentially suitable vegetation or structures would be removed. With implementation of Mitigation Measures BIO-4a and BIO-4b, potential impacts related to migratory wildlife movement and wildlife nursery sites would be reduced to a less than significant level. Therefore, impacts would be less than significant with mitigation incorporated and this topic will not be further analyzed in the Supplemental EIR.

e) Conflict with any local policies or ordinances protecting biological resources?

Less than Significant Impact. The 2007 DSASP EIR evaluated potential conflicts with local policies and ordinances protecting biological resources, including policies addressing Santa Rosa Creek and the City's requirements for tree protection and removal. The City of Santa Rosa regulates the alteration, removal, and protection of trees pursuant to City Code Chapter 17-24, *Trees*. Development projects involving regulated trees are subject to applicable tree preservation, removal, replacement, and protection requirements. The 2007 DSASP EIR determined that adherence to applicable City policies and ordinances protecting waterways, riparian resources, and trees would result in a less than significant impact. The Project would also be subject to applicable biological resource policies of the Santa Rosa General Plan 2050 and other applicable City plans and regulations addressing creek, riparian, and biological resources.

The proposed Project would involve the potential demolition of existing buildings and associated site improvements and may include removal or disturbance of existing landscaping and trees. Any removal or disturbance of regulated trees would be subject to the applicable requirements of City Code Chapter 17-24. The Project does not propose any action that would conflict with applicable City policies or ordinances protecting biological resources. Therefore, impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact. The Project site is developed and in an urban area. The 2007 DSASP EIR determined that there were no formal Habitat Conservation Plans covering the Specific Plan Area and concluded that

implementation of the DSASP would result in no impact related to habitat conservation plans. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had arisen that would require further analysis of biological resources beyond that provided in the 2007 DSASP EIR.

The Sonoma County Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) is currently identified by the California Department of Fish and Wildlife as being in preparation and has not been adopted. The Santa Rosa Plain Conservation Strategy provides a regional conservation framework for certain listed species but is not an adopted HCP or NCCP. Accordingly, the Project site is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Programs, or Policies (PPP)

PPP BIO-1 **City of Santa Rosa City Code Chapter 17-24, *Trees*.** This ordinance requires that a permit be obtained prior to the alteration, removal or relocation of trees.

Mitigation Measures (MM)

MM BIO-1: Development shall be designed to minimize disturbance to waterways and riparian vegetation in order to avoid potential impacts to federally listed salmonids. For work in or in close proximity to Santa Rosa Creek, in-stream work shall not start before June 15 and shall be completed by October 15, unless otherwise approved by appropriate agencies. The City shall consult with NOAA Fisheries and CDFG [now referred to as California Department of Fish and Wildlife, or CDFW] and implement protection measures specified in consultation with those agencies.

MM BIO-2: If there is the potential for destruction of a nest or substantial disturbance to nesting birds or bats due to construction activities, a plan to monitor nesting birds or bats during construction shall be prepared and submitted to the USFWS [United States Fish and Wildlife Service] and CDFG for review and approval. The City shall comply with all USFWS or CDFG guidance for protection of nesting birds.

If vegetation, buildings or bridges that potentially provide nesting sites must be removed, a qualified wildlife biologist shall conduct pre-construction surveys. If an active bird nest is found, the bird shall be identified to species and the approximate distance from the closest work site to the nest estimated. No additional measures need be implemented if active nests are more than the following distances from the nearest work site: (a) 300 feet for raptors; or (b) 75 feet for other non-special-status bird species. Disturbance of active nests shall be avoided to the extent possible until it is determined that nesting is complete and the young have fledged. Bats shall be absent or flushed from roost locations prior to demolition of buildings. If flushing of bats from buildings is necessary, it shall be done by the biologist during the non-breeding season from October 1 to March 31. When flushing bats, structures shall be moved carefully to avoid harming individuals, and torpid bats given time to completely arouse and fly away. During the maternity season from April 1 to September 30, prior to building demolition or construction, a qualified biologist shall

determine if a bat nursery is present at any sites identified as potentially housing bats. If an active nursery is present, disturbance of bats shall be avoided until the biologist determines that breeding is complete and young are reared.

Mitigation Measure BIO-3: See Mitigation Measure BIO-1.

Mitigation Measure BIO-4a: See Mitigation Measure BIO-1.

Mitigation Measure BIO-4b: See Mitigation Measure BIO-2.

5.5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Potentially Significant Impact. The 2007 DSASP EIR determined that development and redevelopment within the Specific Plan Area could result in the demolition, destruction, relocation, or adverse alteration of historical resources or could adversely affect the character and setting of a historic district. The 2007 DSASP EIR adopted Mitigation Measures CULT-2a through CULT-2c and CULT-3a and CULT-3b to address potential impacts to historical resources from construction, demolition, incompatible design elements, and construction-related vibration.

The 2020 DSASP Subsequent EIR subsequently determined that implementation of the updated DSASP could cause a substantial adverse change in the significance of historical resources. The 2020 DSASP Subsequent EIR adopted Mitigation Measures CUL-1a through CUL-1c, which require evaluation of age-eligible properties that have not previously been evaluated and consultation with the City to determine whether a project can be redesigned or revised to avoid significant adverse impacts to identified historical resources. Where avoidance is infeasible, the measures require feasible actions to reduce impacts, including conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, where applicable. The applicability and adequacy of the previously adopted historical-resource mitigation measures will be evaluated in the Supplemental EIR, and applicable measures will be retained, modified, or supplemented as necessary.

The proposed Project would involve the potential demolition of 13 existing buildings totaling approximately 97,811 square feet of gross building area, together with associated improvements, at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1st Street, and 655 1st Street. The Santa Rosa City Hall complex at 100 Santa Rosa Avenue and the Chamber Plaza complex at 631–637 1st Street have been identified as individually significant historical resources. The 2023 Downtown Station Area Historic Resources Survey Report also identifies 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631–637 1st Street, and 655 1st Street as contributors to the survey-identified potential Civic Center Historic District. The City Hall Annex at 90 Santa Rosa Avenue and the building at 655 1st Street have not been identified as individually significant historical resources but have been identified as contributors to the potential historic district. Potential demolition affecting an individually significant historical resource or

contributing property could materially impair the physical characteristics that convey the historical significance or integrity of the affected resource or potential historic district.

Because the Project could involve demolition of individually significant historical resources and properties contributing to the survey-identified potential Civic Center Historic District, the Project could materially impair the physical characteristics that convey their historical significance and therefore could cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. The Supplemental EIR will evaluate the Project's impacts to historical resources and the applicability and adequacy of previously adopted mitigation measures, including whether additional or revised mitigation measures are feasible. Therefore, this impact is potentially significant and will be further analyzed in the Supplemental EIR.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant with Mitigation Incorporated. The 2007 DSASP EIR identified archaeological resources within the DSASP Plan Area and determined that construction and redevelopment involving ground disturbance could damage or destroy previously recorded or undiscovered archaeological deposits. The 2007 DSASP EIR therefore adopted Mitigation Measures CULT-1a through CULT-1c to require archaeological monitoring and testing where appropriate, worker awareness training in archaeologically sensitive areas, and cessation of work and evaluation if buried cultural materials are discovered. With implementation of these measures, impacts to archaeological resources were determined to be less than significant.

The 2020 DSASP Subsequent EIR reevaluated cultural-resource conditions within the DSASP Plan Area and did not identify new circumstances or information demonstrating that development under the updated DSASP would result in substantially more severe impacts to archaeological resources than those previously analyzed.

The proposed Project would occur within the previously developed downtown area and could involve potential demolition of existing buildings and associated improvements. Although much of the Project area has been disturbed by existing development, potential demolition, foundation removal, utility disconnection, and other ground-disturbing activities could encounter previously unidentified archaeological resources. Accordingly, previously adopted Mitigation Measures CULT-1a through CULT-1c would remain applicable to Project activities, as appropriate.

With implementation of Mitigation Measures CULT-1a through CULT-1c, potential impacts to archaeological resources would be reduced to a less-than-significant level. Therefore, impacts would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The 2007 DSASP EIR reported that no human remains were known to exist within the DSASP Plan Area based on the records search and consultation with the Native American Heritage Commission. Although the likelihood of encountering human remains was considered low, the 2007 DSASP EIR recognized that ground-disturbing activities could inadvertently encounter previously unidentified remains.

The proposed Project would occur within the previously developed downtown area and would involve demolition of existing buildings and associated improvements. Although the Project properties have been disturbed by existing development, potential demolition, foundation removal, utility disconnection, and related ground-disturbing activities could inadvertently encounter human remains.

If human remains are discovered, further excavation or disturbance of the site and any nearby area reasonably suspected to overlie adjacent remains would cease in accordance with California Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5. The Sonoma County Coroner would be notified and would determine whether the remains are subject to the Coroner's authority. If the Coroner determines that the remains are Native American, the Coroner would contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC would identify the Most Likely Descendant, who may provide recommendations regarding treatment or disposition of the remains in accordance with Public Resources Code Section 5097.98.

Compliance with these mandatory requirements, identified as PPP CUL-1, would ensure that inadvertently discovered human remains are treated appropriately. Therefore, impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Programs, or Policies (PPP)

PPP CUL-1 Human Remains. If human remains are discovered, further disturbance in the vicinity of the discovery shall cease in accordance with California Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5. The Sonoma County Coroner shall be notified and shall determine the appropriate treatment and disposition of the remains. If the Coroner determines that the remains are Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours in accordance with Public Resources Code Section 5097.98. The Native American Heritage Commission shall identify a Most Likely Descendant to provide recommendations regarding treatment of the remains.

Mitigation Measures (MM)

MM CULT-1a: Archaeological monitoring shall be conducted during earth-disturbing activities in the areas of potential impact. If an archaeological site has been identified in the close vicinity of a construction project, the adverse impact shall be mitigated by conducting Phase I archaeological testing in order to determine the boundaries of the site, and to ensure site avoidance before the commencement of construction activities. If construction personnel locate buried cultural materials, work shall be halted or shifted to another area and a qualified archaeologist shall be contacted to determine proper treatment of the find.

MM CULT-1b: A worker orientation program shall be conducted prior to and during earth-disturbing activities in sensitive areas. The program shall summarize relevant laws and regulations that protect archaeological resources, and review applicable avoidance and minimization measures to protect archaeological resources. Exclusionary plastic mesh fencing shall be installed and maintained to prohibit the general public from disturbing sub-surface soils and impacting possible archaeological deposits.

MM CULT-1c: The City must initiate consultation with Native American tribes, specifically the Federated Indians of Graton Rancheria and Dry Creek Rancheria Band of Pomo Indians, as applicable, to evaluate potential impacts to Native American cultural or sacred places, including human burials, and determine appropriate treatment. Potential project-specific measures include avoidance, capping, incorporating the resource into recreational space, or data recovery.

5.6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The 2020 DSASP Subsequent EIR evaluated energy consumption associated with construction and operation of development within the DSASP Plan Area, including any potential uses that may be developed on the Project site under the Specific Plan. The analysis recognized that construction would consume gasoline and diesel fuel through the operation of off-road construction equipment and on-road vehicles. However, the 2020 DSASP Subsequent EIR determined that construction activities would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The analysis further determined that implementation of the DSASP would reduce overall and per-capita energy consumption compared to existing conditions and concluded that impacts would be less than significant. No mitigation measures were required for Impact 3.3-1.

The proposed Project would involve the relocation of existing City Hall functions to the Museum on the Square property and the potential demolition of existing buildings and associated improvements at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1st Street, and 655 1st Street. Project demolition activities would require temporary consumption of gasoline and diesel fuel by construction equipment, haul trucks, and worker vehicles. No site-specific development application is currently proposed in connection with the Development Agreement. The Development Agreement requires future development to be consistent with the DSASP. Operational energy demand associated with development under the DSASP was evaluated at a programmatic level in the 2020 DSASP Subsequent EIR, and future site-specific development would remain subject to applicable energy-efficiency requirements and subsequent City review. Potential demolition itself would not introduce new long-term operational energy demands. Energy consumed during potential demolition would be temporary and necessary to complete the proposed Project. Accordingly, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR evaluated whether implementation of the DSASP would conflict with or obstruct applicable State or local plans for renewable energy or energy efficiency. The analysis considered applicable building energy-efficiency requirements, renewable-energy

requirements, transportation-related energy reduction strategies, and DSASP policies intended to reduce vehicle travel and energy consumption. The 2020 DSASP Subsequent EIR determined that implementation of the DSASP would not conflict with or obstruct applicable renewable-energy or energy-efficiency plans and concluded that impacts would be less than significant. No mitigation measures were required for Impact 3.3-2.

The proposed Project would primarily involve the relocation of existing governmental functions and temporary potential demolition activities. No site-specific development application is currently proposed in connection with the Development Agreement. Approval of the Development Agreement would not alter the land use framework established by the DSASP, and future development pursuant to the Development Agreement would be required to be consistent with the DSASP and applicable State and local renewable-energy and energy-efficiency requirements. Project demolition activities would also be subject to applicable energy-efficiency and fuel-efficiency requirements in effect at the time of demolition. Therefore, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42)	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Less Than Significant Impact. In 1972, the Alquist-Priolo Special Studies Zones Act was signed into law. In 1994, it was renamed the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act). The primary

purpose of the Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The A-P Act requires the State Geologist of the California Geological Survey to delineate Earthquake Fault Zones along faults that are sufficiently active and well-defined.

The 2007 DSASP EIR determined that no active or potentially active faults are mapped across the Specific Plan Area. The nearest mapped Earthquake Fault Zone identified in the 2007 DSASP EIR is associated with the Rodgers Creek Fault, with the western edge of the fault zone located approximately 2,500 feet east of the eastern edge of the Specific Plan Area and the mapped fault trace approximately 3,000 feet east of the Specific Plan Area. Accordingly, the 2007 DSASP EIR determined that the risk associated with surface fault rupture would be less than significant. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged that would require further analysis of geology and soils beyond that provided in the 2007 DSASP EIR.

The proposed Project would involve the potential demolition of existing buildings and associated improvements. Demolition activities would not alter the location of an existing fault or increase the potential for surface fault rupture. No site-specific development application is currently proposed in connection with the Development Agreement. Future site-specific development contemplated by the Development Agreement would be required to be consistent with the DSASP and would remain subject to applicable seismic, geologic, building, and development requirements and subsequent City review. Therefore, the Project would not directly or indirectly cause substantial adverse effects associated with rupture of a known earthquake fault. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project site is located within a seismically active region of Northern California. The 2007 DSASP EIR determined that the Specific Plan Area could experience strong to violent ground shaking from earthquakes occurring on regional faults, including the Rodgers Creek, San Andreas, Maacama, and Hayward faults. The 2007 DSASP EIR determined that strong seismic ground shaking represented a significant impact to new development within the Specific Plan Area because future development would introduce new structures and occupants subject to seismic hazards. The 2020 DSASP Subsequent EIR determined that no new conditions or information had emerged requiring additional analysis of geology and soils.

The proposed Project would involve the potential demolition of existing buildings and associated improvements. Although the Project site would remain subject to regional seismic ground shaking, the Project would not increase the probability or severity of seismic ground shaking or introduce new structures or occupants that would be exposed to long-term seismic hazards. Demolition activities would be conducted in accordance with applicable City demolition, building, and construction safety requirements. Therefore, the Project would not directly or indirectly cause substantial adverse effects

associated with strong seismic ground shaking. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Soil liquefaction is a phenomenon in which saturated, cohesionless soils lose strength as a result of seismic shaking, potentially resulting in settlement or other forms of ground failure.

The 2007 DSASP EIR determined that soils within the Specific Plan Area have moderate susceptibility to liquefaction. The EIR noted that site-specific subsurface investigations would be necessary to more precisely determine liquefaction potential for individual development sites and concluded that liquefaction could represent a significant impact to new development within the Specific Plan Area. The 2007 DSASP EIR identified this impact in the context of future development because new structures, foundations, pavements, and utilities could be subject to damage from liquefaction-related ground failure. The 2020 DSASP Subsequent EIR determined that no new conditions or information had emerged requiring additional analysis of geology and soils.

The proposed Project would involve the potential demolition of existing buildings and associated improvements. Potential demolition would not alter the underlying seismic or soil conditions or otherwise increase the potential for liquefaction to occur. No site-specific development application is currently proposed in connection with the Development Agreement. Future site-specific development contemplated by the Development Agreement would remain subject to applicable site-specific geotechnical investigation, seismic design, building, and development requirements and subsequent City review. Accordingly, although the Project site is within an area previously identified as having liquefaction susceptibility, implementation of the Project would not directly or indirectly cause substantial adverse effects associated with seismic-related ground failure or liquefaction. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

iv. Landslides?

Less than Significant Impact. Landslides and other slope failures are secondary seismic effects that can occur during or following earthquakes. Areas most susceptible to earthquake-induced landslides generally include steep slopes underlain by weak soils and areas on or adjacent to existing landslide deposits.

The 2007 DSASP EIR determined that the Specific Plan Area is generally flat and that the potential for slope failure throughout most of the Specific Plan Area is low. However, the EIR identified the potential for localized slope instability along the banks of Santa Rosa Creek, particularly where development could encroach upon the top of the creek bank. The 2007 DSASP EIR therefore identified a potentially significant impact associated with new development adjacent to Santa Rosa Creek where structures or other improvements could affect creek-bank stability. The 2020 DSASP Subsequent EIR determined that no new conditions or information had emerged requiring additional analysis of geology and soils.

The proposed Project would involve the potential demolition of existing buildings and associated improvements. Potential demolition would not involve a new creek crossing or development within Santa Rosa Creek and would not increase the potential for seismically induced landslides or slope

instability identified in the 2007 DSASP EIR. No site-specific development application is currently proposed in connection with the Development Agreement. Future site-specific development contemplated by the Development Agreement would remain subject to applicable DSASP, geotechnical, slope-stability, and City review requirements. Therefore, impacts related to landslides would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

b) Result in soil erosion or the loss of topsoil?

Less Than Significant Impact. The proposed Project would involve the potential demolition of existing buildings and associated improvements. Demolition and associated ground-disturbing activities could temporarily expose or loosen soil, which could increase the potential for erosion by wind or stormwater runoff.

The 2007 DSASP EIR determined that redevelopment within the Specific Plan Area could involve removal of existing structures and pavement, exposing soils during demolition, land clearing, and grading activities and potentially increasing erosion and sediment runoff. However, the 2007 DSASP EIR determined that the generally level terrain of the Specific Plan Area, together with compliance with the City of Santa Rosa's applicable grading and erosion-control requirements and stormwater management requirements, would reduce erosion and loss of topsoil to a less than significant level. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged that would require further analysis of geology and soils beyond that provided in the 2007 DSASP EIR.

The proposed Project would be subject to applicable City grading, erosion-control, and stormwater requirements during demolition and ground-disturbing activities. These existing regulatory requirements would minimize erosion and sedimentation associated with temporary soil disturbance during Project activities. Therefore, impacts related to soil erosion and loss of topsoil would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. The 2007 DSASP EIR determined that the Specific Plan Area is underlain by alluvial soils and that deep, fine-grained soils within the area may be subject to compression and settlement when loaded by fill or structural foundations. The EIR also determined that soils within the Specific Plan Area generally are suitable for development and can be engineered to provide adequate support for structures.

As discussed above under seismic-related ground failure, including liquefaction, the 2007 DSASP EIR identified moderate susceptibility to liquefaction within the Specific Plan Area. As discussed above under landslides, the 2007 DSASP EIR determined that the potential for slope failure throughout most of the Specific Plan Area is low because the area is generally flat, although localized potential for slope instability was identified along Santa Rosa Creek where development could occur adjacent to the creek bank. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had

emerged that would require further analysis of geology and soils beyond that provided in the 2007 DSASP EIR.

The proposed Project would involve the potential demolition of existing buildings and associated improvements. Potential demolition itself would not introduce new structural loads or foundations that could be adversely affected by settlement, lateral spreading, subsidence, liquefaction, or collapse. Although demolition and associated ground disturbance could temporarily disturb existing soils, potential demolition would not substantially alter underlying geologic or soil conditions in a manner that would cause those soils to become unstable. No site-specific development application is currently proposed in connection with the Development Agreement. Future site-specific development contemplated by the Development Agreement would remain subject to applicable site-specific geotechnical investigation, engineering, building, and development requirements and subsequent City review. Therefore, impacts related to unstable geologic units or soils would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

d) Be located on expansive soil, as defined in in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or otherwise damage structures built on such soils.

The 2007 DSASP EIR determined that soils within the Specific Plan Area are generally moderately plastic and have at least moderate expansion potential. The EIR noted that expansive soils could cause damage to foundations, concrete slabs, and other improvements associated with new development. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged that would require further analysis of geology and soils beyond that provided in the 2007 DSASP EIR.

The proposed Project would involve the potential demolition of existing buildings and associated improvements. Demolition and associated ground disturbance would not substantially alter the expansive characteristics of underlying soils or itself create new long-term exposure of structures or occupants to expansive-soil hazards. No site-specific development application is currently proposed in connection with the Development Agreement. Future site-specific development contemplated by the Development Agreement would remain subject to applicable site-specific geotechnical, foundation-design, building, and development requirements and subsequent City review. Therefore, the Project would not create substantial direct or indirect risks to life or property associated with expansive soils. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The 2007 DSASP EIR determined that development within the Specific Plan Area would be served by the City of Santa Rosa's municipal sewer system and concluded that no impact related to septic tanks or alternative wastewater disposal systems would occur. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged that would require further analysis of geology and soils beyond that provided in the 2007 DSASP EIR.

The proposed Project would involve the potential demolition of existing buildings and associated improvements and would not include the installation or use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support such systems, and this topic will not be further analyzed in the Supplemental EIR.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. Paleontological resources, or fossils, are the remains or traces of prehistoric plants and animals that can provide scientifically important information regarding the history of life and past environmental conditions.

The 2007 DSASP EIR determined that no paleontological resources had been identified within the Specific Plan Area. Although the EIR recognized that ground-disturbing activities associated with development or redevelopment could inadvertently encounter an unknown paleontological resource, it determined that the likelihood of such an occurrence was low due to the highly developed condition of the Specific Plan Area. The 2007 DSASP EIR therefore concluded that potential impacts to unique paleontological resources, sites, or unique geologic features would be less than significant.

The 2020 DSASP environmental review did not identify paleontological resources as an impact requiring additional analysis in the Subsequent EIR. The Initial Study prepared for the 2020 DSASP update was used to identify those environmental topics requiring further analysis, and paleontological resources were not among the topics carried forward for analysis in the Subsequent EIR.

The proposed Project would involve the potential demolition of existing buildings and associated improvements within an already developed urban area. Demolition may result in localized ground disturbance associated with removal of existing foundations and other improvements. Consistent with the conditions evaluated in the 2007 DSASP EIR, no known paleontological resource or unique geologic feature has been identified within the Project site, and the developed condition of the site reduces the potential for disturbance of previously undisturbed subsurface deposits. Therefore, the potential for Project activities to directly or indirectly destroy a unique paleontological resource or unique geologic feature would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.8. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. Greenhouse gas (GHG) emissions are generated by both direct and indirect sources and contribute cumulatively to global climate change. Construction-related GHG emissions typically result from the operation of construction equipment, haul trucks, material delivery vehicles, and worker vehicle trips, while operational GHG emissions may result from vehicle trips, building energy use, water consumption, and waste generation.

The 2020 DSASP Subsequent EIR evaluated GHG emissions associated with future development and redevelopment throughout the Specific Plan Area, including both construction and operational emissions. For construction, the 2020 DSASP Subsequent EIR recognized that individual development projects would generate GHG emissions from construction activities but determined that construction-related GHG emissions associated with development under the DSASP would be less than significant. The 2020 DSASP Subsequent EIR also quantified operational GHG emissions associated with buildout of the DSASP and determined that operational emissions would decrease compared to existing conditions on both a total and per-service-population basis. The 2020 DSASP Subsequent EIR concluded that implementation of the DSASP would be consistent with statewide GHG reduction goals and that operational GHG impacts would be less than significant, with no mitigation required.

The proposed Project would involve the potential demolition of existing buildings and associated improvements. Demolition activities would generate temporary GHG emissions from the operation of construction equipment, haul trucks, material transport, and worker vehicle trips. The relocation of existing City Hall functions to the existing Museum on the Square building would similarly relocate existing governmental and administrative activities within downtown Santa Rosa rather than introduce a substantial new operational land use. No site-specific development application is currently proposed in connection with the Development Agreement. The Development Agreement requires future development to be consistent with the DSASP. Construction and operational GHG emissions associated with development under the DSASP were evaluated at a programmatic level in the 2020 DSASP Subsequent EIR, and future site-specific development would remain subject to applicable GHG-reduction requirements and subsequent City review.

Accordingly, GHG emissions associated with potential demolition would be temporary, while emissions associated with future DSASP-consistent development have been addressed at a programmatic level in the prior DSASP environmental review. Consistent with the prior DSASP analysis, the Project would not generate GHG emissions, either directly or indirectly, that would result in a significant impact on the environment. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. The 2020 DSASP Subsequent EIR evaluated whether implementation of the DSASP would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. At that time, the analysis considered the City of Santa Rosa Climate Action Plan, Plan Bay Area 2040, the California Air Resources Board (CARB) 2017 Scoping Plan, and applicable State GHG reduction requirements. The 2020 DSASP Subsequent EIR determined that implementation of the DSASP would be consistent with applicable GHG reduction plans and policies and concluded that impacts would be less than significant, with no mitigation required.

Since certification of the 2020 DSASP Subsequent EIR, the applicable GHG planning framework has been updated. The City adopted General Plan 2050 in June 2025, which includes a Greenhouse Gas Reduction Strategy as Appendix A and policies addressing GHG reduction in Chapter 3. At the regional and State levels, Plan Bay Area 2050+ was adopted in March 2026 as the Bay Area's current long-range regional plan, and CARB's 2022 Scoping Plan establishes the State's current framework for achieving long-term GHG reduction and carbon-neutrality objectives (Association of Bay Area Governments and Metropolitan Transportation Commission, 2026; CARB, 2022).

The proposed Project would involve the potential demolition of existing buildings and associated improvements and relocation of existing City Hall functions to the existing Museum on the Square building. Although demolition activities would generate temporary GHG emissions, the Project would not alter the land use or transportation framework established by the DSASP or otherwise impede implementation of applicable local, regional, or State GHG reduction strategies beyond what was evaluated in the 2020 DSASP Subsequent EIR. Accordingly, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A hazardous material is a substance or combination of substances that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may pose a substantial present or potential hazard to human health and safety or the environment if improperly treated, stored, transported, or disposed of.

The 2007 DSASP EIR evaluated the routine transport, use, storage, and disposal of hazardous materials associated with development and redevelopment within the Specific Plan Area. The EIR determined that proposed residential, commercial, and retail uses could involve the use, storage, and disposal of potentially hazardous materials, but not in quantities sufficient to pose a significant hazard to the public

or environment. The EIR further determined that the reduction in industrial land uses anticipated under the DSASP would reduce risks associated with industrial accidents and chemical spills and concluded that impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged requiring further environmental analysis of hazards and hazardous materials.

Construction

The proposed Project would involve the potential demolition of existing buildings and associated improvements. Demolition activities could involve the routine transport and use of limited quantities of fuels, lubricants, oils, paints, solvents, and other materials associated with construction equipment and demolition activities. The transport, handling, use, storage, and disposal of such materials would be subject to applicable federal, State, and local hazardous materials regulations. The Project would not involve the routine transport, use, or storage of substantial quantities of hazardous materials beyond those ordinarily associated with demolition activities. Therefore, routine use and handling of hazardous materials during demolition would not create a significant hazard to the public or the environment.

Operation

The Project would relocate existing City Hall governmental and administrative functions to the existing Museum on the Square building. The relocation would not introduce an industrial, manufacturing, hazardous waste disposal, or other use involving substantial quantities of hazardous materials. Materials associated with normal office building operation and maintenance would be limited to typical cleaning, maintenance, and similar products and would remain subject to applicable hazardous materials requirements. Accordingly, Project operation would not create a significant hazard through the routine transport, use, or disposal of hazardous materials.

Therefore, impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. The 2007 DSASP EIR evaluated the potential for development within the Specific Plan Area to result in accidental releases of hazardous materials. The EIR determined that implementation of the DSASP would increase the population and amount of development within the Specific Plan Area and, consequently, increase the use of common household, commercial, landscaping, vehicle-maintenance, and other potentially hazardous materials. Although the 2007 DSASP EIR identified then-applicable General Plan policies intended to reduce risks associated with accidental releases of hazardous materials, it determined that the projected increase of approximately 3,250 residential units and additional employment uses would nevertheless increase the potential for spills, fires, or other hazardous-material accidents to a significant level. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged requiring further environmental analysis of hazards and hazardous materials.

The proposed Project would involve the potential demolition of existing buildings and associated improvements and relocation of existing City Hall governmental and administrative functions to the existing Museum on the Square building. Demolition activities could involve the use of fuels, lubricants,

oils, and other materials associated with construction equipment and vehicles, which could be released in the event of an accidental spill. However, the quantities and types of hazardous materials used during demolition would be limited to those ordinarily associated with construction activities and would be temporary in nature. The plan-wide growth that could occur under the DSASP was evaluated in the 2007 DSASP EIR. The Development Agreement requires future development to be consistent with the DSASP. Future site-specific development would remain subject to applicable hazardous-material regulations, DSASP requirements, and subsequent City review. Accordingly, the Project would not result in the substantial long-term increase in hazardous-material use that formed the basis of the significant impact identified in the 2007 DSASP EIR.

In addition, the transport, handling, storage, and disposal of hazardous materials used during demolition would be subject to applicable federal, State, and local requirements governing hazardous materials and spill response. Accordingly, the limited and temporary use of hazardous materials during demolition, together with the prior programmatic evaluation of development under the DSASP and compliance with applicable hazardous-material requirements, would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions. Impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

c) Emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. Matilda's Home Daycare & Preschool is located approximately 0.123 mile southeast of the Project site and is therefore within one-quarter mile of the Project site. For purposes of this analysis, the daycare and preschool facility is conservatively considered a school receptor. The Development Agreement also identifies a charter school as a potential future use at 100 Santa Rosa Avenue; however, no site-specific school development is currently proposed.

The 2007 DSASP EIR recognized that schools were located within the Specific Plan Area and determined that hazardous emissions or the handling of hazardous materials near schools could represent a potential impact. However, the EIR determined that the DSASP would not introduce factories or other major hazardous-material emitters and would reduce industrial uses most likely to involve the handling of large quantities of hazardous materials. With implementation of applicable requirements, the 2007 DSASP EIR concluded that impacts would be less than significant. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged requiring further environmental analysis of hazards and hazardous materials.

The proposed Project would involve the potential demolition of existing buildings and associated improvements but would not establish an industrial, manufacturing, hazardous waste disposal, or other use involving the routine emission or handling of substantial quantities of hazardous or acutely hazardous materials. Demolition activities could involve limited quantities of fuels, lubricants, and other materials typically associated with construction equipment. In addition, because the existing buildings were constructed between 1969 and 1973, demolition could encounter hazardous building materials such as asbestos-containing materials or lead-containing paint. The 2007 DSASP EIR similarly identified asbestos and lead as potential hazards associated with demolition of older structures.

Potential demolition activities would be subject to PPP HAZ-1, which requires compliance with BAAQMD Regulation 11, Rule 2 governing asbestos associated with demolition and renovation activities, and PPP

HAZ-2, which requires compliance with California Code of Regulations, Title 8, Section 1532.1 governing occupational exposure to lead during construction and demolition activities (BAAQMD, 2018; Cal/OSHA, 2025). BAAQMD Regulation 11, Rule 2 governs asbestos demolition and renovation activities, while Title 8, Section 1532.1 expressly applies to demolition or salvage where lead or lead-containing materials are present.

Accordingly, although a daycare and preschool facility is located within one-quarter mile of the Project site, and the Development Agreement identifies a potential future school use within the City Hall Campus, the Project would not introduce a hazardous material-intensive use or a substantial new source of hazardous emissions. Potential asbestos-containing or lead-containing materials encountered during demolition would be handled in accordance with PPP HAZ-1 and PPP HAZ-2. Any future site-specific school use would remain subject to applicable hazardous-material requirements and subsequent City review. Therefore, impacts would be less than significant and this topic will not be further analyzed in the Supplemental EIR.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant with Mitigation Incorporated. The 2007 DSASP EIR identified several properties within the Specific Plan Area with known or potential soil and groundwater contamination and determined that redevelopment of sites identified on hazardous materials lists could expose construction workers or the environment to contaminated soil, groundwater, or debris. The EIR determined that the greatest potential for exposure would occur during site redevelopment, when demolition, excavation, or other ground-disturbing activities could encounter or spread contaminated materials through surface runoff, windblown dust, or groundwater seepage. The 2007 DSASP EIR therefore determined that development of sites identified on hazardous materials lists would result in a significant impact.

The Project site includes 90 Santa Rosa Avenue, which is currently included on a hazardous materials site list compiled pursuant to Government Code Section 65962.5. The current listing identifies the property under leaking underground storage tank (LUST) cleanup case #T0609700658 and indicates that cleanup has been completed and the case is closed (SWRCB, 2026a). The 2007 DSASP EIR likewise identified 90 Santa Rosa Avenue as a hazardous materials site associated with a historic diesel release and reported that contaminated soil associated with the release had been excavated and disposed of. Although the regulatory case has been closed, the 2007 DSASP EIR recognized that sites with documented contamination that had previously been remediated could require reevaluation when subsequently redeveloped because demolition, excavation, or other ground disturbance could encounter residual or previously unidentified contamination.

The Museum on the Square property at 520 3rd Street, where existing City Hall functions would be relocated, is also currently identified on the hazardous materials site list under LUST cleanup case T0609700729. The listing indicates that cleanup has been completed and the case is closed (SWRCB, 2026b). The 2007 DSASP EIR similarly identified the AT&T Communications property at 520 East 3rd Street and reported a minor gasoline release for which no further remedial action was required. However, the Project would involve occupancy of the existing Museum on the Square building and would not include demolition, grading, excavation, or other ground-disturbing activities at this property. Accordingly, the

closed LUST listing at 520 3rd Street would not result in a significant hazard associated with Project implementation.

The proposed Project would involve the potential demolition of existing buildings and associated improvements at the City-owned properties proposed for conveyance, including ground-disturbing activities associated with removal of foundations and other site improvements. Accordingly, Project activities at 90 Santa Rosa Avenue could encounter residual or previously unidentified contamination. Mitigation Measure HAZ-2a from the 2007 DSASP EIR requires completion of a Phase I Environmental Site Assessment (Phase I ESA) for properties proposed for redevelopment and, where warranted, additional soil and groundwater sampling and testing. If contamination is identified at potentially harmful levels, remediation is required pursuant to Mitigation Measure HAZ-2b. Mitigation Measure HAZ-2b further requires appropriate worker protection, investigation of previously unidentified hazardous materials, management of contaminated soil and groundwater, and other site-specific measures necessary to reduce exposure during and after Project activities.

Therefore, because 90 Santa Rosa Avenue is currently included on a hazardous materials site list and Project demolition could involve ground disturbance at that property, impacts would be potentially significant without mitigation. The closed LUST listing at 520 3rd Street would not result in a significant impact because no ground-disturbing activities are proposed at that property. With implementation of Mitigation Measures HAZ-2a and HAZ-2b, potential contamination associated with demolition and ground disturbance would be appropriately evaluated and, if necessary, remediated prior to or during Project activities. Impacts would therefore be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

e) For a project within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The 2007 DSASP EIR identified Charles M. Schulz–Sonoma County Airport as the nearest public airport to the Specific Plan Area, located approximately 6.5 miles northwest. The 2007 DSASP EIR further determined that the Outer Safety Zone established by the applicable airport land use plan ends at Guerneville Road, north of the Specific Plan Area. The airport remains located at 2200 Airport Boulevard, north of Santa Rosa.

The 2007 DSASP EIR determined that, given the distance between the Specific Plan Area and the airport, development within the Specific Plan Area would not interfere with air traffic or increase aviation-related safety risks, and impacts associated with public aviation would be less than significant. The 2019 Initial Study prepared for the 2020 DSASP Subsequent EIR separately determined that no impact related to airport noise would occur. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged requiring further environmental analysis of hazards and hazardous materials.

The proposed Project would involve the potential demolition of existing buildings and associated improvements and relocation of existing City Hall functions to the existing Museum on the Square building. The Project site is located outside the Outer Safety Zone identified in the 2007 DSASP EIR and is more than two miles from the nearest public or public-use airport. Therefore, no impact related to airport

safety or excessive airport noise would occur, and this topic will not be further analyzed in the Supplemental EIR.

f) Impair implementation of an adopted emergency response plan or emergency evacuation plan?

Less Than Significant with Mitigation Incorporated.

Construction

The 2007 DSASP EIR determined that potential interference with emergency access or an evacuation plan during development within the Specific Plan Area would constitute a significant impact. The EIR adopted Mitigation Measure HAZ-3a, which requires the Santa Rosa Fire Department to review construction plans involving roadway modifications and establish temporary alternative emergency routes where necessary, and requires roads and driveways to meet applicable emergency-access requirements. With implementation of HAZ-3a and HAZ-3b, the 2007 DSASP EIR concluded that impacts would be less than significant. The 2019 Initial Study prepared for the 2020 DSASP Subsequent EIR did not identify emergency-response or evacuation impacts as requiring further analysis in the Subsequent EIR.

The proposed Project would involve demolition of existing buildings and associated improvements within the developed downtown area. Construction access, designated haul routes, staging areas, and any temporary street, lane, sidewalk, or pedestrian-path closures have not yet been finalized. Although the Project would not permanently alter the downtown roadway network or an identified evacuation route, demolition activities could temporarily affect access or circulation if roadway modifications, lane closures, or similar activities are required. Accordingly, Mitigation Measure HAZ-3a would apply to Project construction to ensure that any temporary effects on emergency access are reviewed by the Santa Rosa Fire Department and that alternative emergency access is maintained where necessary.

Operation

The Project would relocate existing City Hall functions to the existing Museum on the Square building at 520 3rd Street/521 2nd Street and would not permanently modify the surrounding public street network or create a new roadway condition that would interfere with emergency response or evacuation. It is possible that some, or all, of the existing City Hall Campus could be demolished.

Mitigation Measure HAZ-3b from the 2007 DSASP EIR required revision of the then-existing emergency services plan to account for new development anticipated under the DSASP. Future development contemplated by the Development Agreement would be required to be consistent with the DSASP and would remain subject to applicable emergency-access and emergency-response requirements and subsequent City review. HAZ-3b addressed plan-wide emergency-service planning associated with DSASP buildout; the temporary demolition activities evaluated in this Initial Study would instead be subject to HAZ-3a, as discussed above.

Therefore, with implementation of Mitigation Measure HAZ-3a during Project construction, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The 2007 DSASP EIR determined that the Specific Plan Area is within and surrounded by a highly urbanized area and is not threatened by wildland fires. The 2019 Initial Study prepared for the 2020 DSASP Subsequent EIR similarly determined that the Specific Plan Area is urbanized, does not border wildlands, is not located near a State Responsibility Area, and is not located within a State-designated Very High Fire Hazard Severity Zone or the City's Wildland-Urban Interface Fire Area.

Since certification of the 2020 DSASP Subsequent EIR, CAL FIRE has updated its Fire Hazard Severity Zone mapping. Current mapping identifies the Project site as outside a mapped Fire Hazard Severity Zone (CAL FIRE, 2025). The City's current mapping also places the Project site outside the Wildland-Urban Interface Fire Area.

The Project site is currently developed with governmental, office, parking, and associated urban uses and is located within the developed downtown area of Santa Rosa. The proposed Project would involve demolition of existing buildings and associated improvements and relocation of existing City Hall functions to the existing Museum on the Square building. The Project would not expand development into wildland areas or mapped wildfire hazard areas. Therefore, the Project would result in no impact related to the exposure of people or structures to a significant risk of loss, injury, or death involving a wildland fire, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

PPP HAZ-1 Bay Area Air Quality Management District Regulation 11, Rule 2, Asbestos Demolition, Renovation, and Manufacturing. Prior to demolition, the Project shall comply with applicable requirements of Bay Area Air Quality Management District Regulation 11, Rule 2. The Air District requires notification at least 10 business days prior to every demolition, regardless of asbestos content. Where asbestos-containing materials are present, removal, handling, transport, and disposal shall be conducted in accordance with applicable Air District requirements.

PPP HAZ-2 Lead-Containing Materials. Demolition activities involving lead or lead-containing materials shall comply with California Code of Regulations, Title 8, Section 1532.1. Section 1532.1 establishes requirements for occupational exposure to lead during construction activities, including demolition or salvage of structures where lead or lead-containing materials are present, and includes requirements for exposure assessment, engineering and work-practice controls, respiratory protection, protective clothing and equipment, training, and other applicable worker-protection measures.

Mitigation Measures

MM HAZ-2a: Developers shall be required to complete a Phase 1 environmental site assessment for each property to be redeveloped. Should the Phase 1 ESA determine a need for additional sampling and testing to determine the extent of any contamination then a Phase 2 shall be completed with sampling and testing of soil and groundwater if applicable. Should contamination be found at potentially harmful levels the developer shall complete site remediation in accordance with Mitigation Measure HAZ-2B.

MM HAZ-2b: Developers shall complete site remediation in accordance with OSHA Standards, Santa Rosa Fire Department, Sonoma County Environmental Health Department and State Water Resources Control Board Guidelines. The Department of Toxic Substances Control (DTSC) may become involved wherever toxic levels of contamination are found that pose an immediate hazard. Remediation shall reduce human exposure risk and environmental hazards both during and after construction. The remediation plan shall be prepared in accordance with recommendations of the environmental consultant and established procedures for safe remediation. Specific mitigation measures designed to protect human health and the environment will be provided in the plan. Requirements shall include, but not be limited to the following:

1. Documentation of the extent of previous environmental investigation and remediation at the site, including closure reports for Underground Storage Tanks (UST's) and contaminant concentrations.
2. A site specific Health and Safety Plan (HASP) to be prepared by all contractors at the project site, where applicable. This includes a HASP for all demolition, grading and excavation on the site, as well as for future subsurface maintenance work. The HASP shall include appropriate training, any required personal protective equipment, and monitoring of contaminants to determine exposure. The HASP will be reviewed and approved by a Certified Industrial Hygienist.
3. Description of protocols for the investigation and evaluation of previously unidentified hazardous materials that could be encountered during project development, including engineering controls that may be required to reduce exposure to construction workers and future users of the site.
4. Requirements for site-specific construction techniques that would minimize exposure to any subsurface contamination, where applicable. This shall include treatment and disposal measures for any contaminated groundwater removed from excavations, trenches, and dewatering systems in accordance with local and Regional Water Quality Control Board guidelines.
5. Sampling and testing plan for excavated soils to determine suitability for reuse or acceptability for disposal at a State licensed landfill facility.
6. Restrictions limiting future excavation or development of the subsurface by residents and visitors to the proposed development, and prohibition of groundwater development should it be determined from test results.
7. Completion of an approved remediation plan should land use restrictions be insufficient to allow development to proceed safely. Remediation measures may include excavation and replacement of contaminated soil with clean fill, pumping and treatment of groundwater, thermal treatment, etc.

MM HAZ-3a: The Fire Department shall review construction plans for roadway modifications, and establish temporary alternative emergency routes necessary for the duration of the construction project. During design review the City shall ensure that roads and driveways are established that meet ordinance and uniform building code requirements for emergency access. The Fire Department shall also review building plans for compliance with the Fire Code and establish future inspection schedule for continuing compliance.

5.10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?	☐	☒	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☒	☐	☐
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?	☐	☐	☒	☐
g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☒	☐	☐
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a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant with Mitigation Incorporated.

Construction

The Project site is located within the Santa Rosa Creek and Laguna de Santa Rosa sub-watersheds of the greater Russian River watershed. Santa Rosa Creek passes through the southern portion of the Specific Plan Area and ultimately drains through the Laguna de Santa Rosa and Russian River to the Pacific Ocean. The Project site is within the jurisdiction of the North Coast Regional Water Quality Control Board (North Coast RWQCB).

The 2007 DSASP EIR determined that demolition and construction associated with development and redevelopment within the Specific Plan Area could adversely affect water quality. During grading and other ground-disturbing activities, stormwater runoff could mobilize sediment from exposed soils, while fuels, oils, concrete, paint, and other construction materials could enter surface water through runoff or affect groundwater through seepage. The 2007 DSASP EIR determined that these effects could violate water quality standards or waste discharge requirements and would constitute a significant impact.

The proposed Project would involve demolition of existing buildings and associated improvements, including potential removal of foundations, parking areas, and other site improvements. These activities could expose soil and generate sediment that could be transported in stormwater runoff. Demolition activities would also involve construction equipment and materials such as fuels, lubricants, oils, concrete, and other substances that, if accidentally released, could enter the storm drain system or otherwise affect surface or groundwater quality.

The State Water Resources Control Board (SWRCB) Construction Stormwater General Permit applies to qualifying construction activities that disturb one acre or more, as well as certain smaller projects that are part of a larger common plan of development or sale (SWRCB, 2022). Under the conservative demolition scenario evaluated in this Initial Study, the Project would involve demolition of all identified buildings and associated improvements within the Project disturbance area and would therefore be subject to applicable Construction General Permit requirements, including preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

Mitigation Measure HYDRO-1 from the 2007 DSASP EIR would apply to Project demolition. MM HYDRO-1 requires preparation and implementation of a SWPPP for individual development or redevelopment sites and requires erosion control, soil stabilization, and construction BMPs to prevent sediment and other construction-related pollutants from entering downstream waters. With implementation of MM HYDRO-1 and compliance with applicable construction stormwater requirements, potential water-quality impacts associated with demolition and ground disturbance would be reduced to a less-than-significant level.

Operation

The Project would relocate existing City Hall governmental and administrative functions to the existing Museum on the Square building at 520 3rd Street/521 2nd Street. Because the relocation would involve occupancy of an existing building rather than construction of a new development, it would not substantially alter existing drainage conditions or introduce a new land use associated with substantial additional stormwater pollutants. It is possible that some or all of the buildings on the City Hall Campus will be demolished if the Development Agreement is approved. Demolition of the buildings on the City Hall Campus would not introduce new long-term operational pollutant sources. Future site-specific development contemplated by the Development Agreement would be required to be consistent with the DSASP and would remain subject to applicable water-quality requirements, previously adopted mitigation measures, including Mitigation Measure HYDRO-1 as applicable, and subsequent City review when a definitive development proposal is submitted.

Therefore, with implementation of Mitigation Measure HYDRO-1, the Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR identified the Specific Plan Area as being within the Santa Rosa Plain Sub-basin of the greater Santa Rosa Valley Groundwater Basin. The 2020 DSASP Subsequent EIR evaluated potential groundwater demand and interference with groundwater recharge associated with buildout of the DSASP and concluded that impacts would be less than significant.

The relocation of existing City Hall governmental and administrative functions to the existing Museum on the Square building would relocate an existing use rather than introduce substantial new water demand. No site-specific development application is currently proposed in connection with the Development Agreement. Groundwater demand and recharge effects associated with buildout of the DSASP were evaluated at a programmatic level in the 2020 DSASP Subsequent EIR. Future site-specific development contemplated by the Development Agreement would remain subject to applicable water-supply and groundwater-management requirements and subsequent City review. Accordingly, the Project would not substantially decrease groundwater supplies beyond what was evaluated in the 2020 DSASP Subsequent EIR.

The properties proposed for demolition are currently developed with buildings, parking areas, and other impervious improvements. Under the conservative scenario evaluated in this Initial Study, the Project would demolish the existing buildings and associated improvements. Therefore, the Project would not result in a substantial reduction in the area available for groundwater recharge compared to existing conditions. The 2007 DSASP EIR similarly determined that redevelopment of previously developed sites within the Specific Plan Area would not significantly alter the area available for groundwater recharge.

The Santa Rosa Plain Subbasin is managed pursuant to the Santa Rosa Plain Groundwater Sustainability Plan (GSP), which was submitted to the California Department of Water Resources in 2022 and approved in 2023 (Santa Rosa Plain GSA, 2022). Because the Project would not extract groundwater, substantially increase water demand, or reduce groundwater recharge relative to existing conditions, it would not

impede implementation of the GSP or sustainable groundwater management of the Santa Rosa Plain Subbasin.

Therefore, impacts related to groundwater supplies and groundwater recharge would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?

Less Than Significant with Mitigation Incorporated. The 2007 DSASP EIR determined that development and redevelopment within the Specific Plan Area would generally occur on previously developed, relatively level sites and would not be expected to substantially alter existing drainage patterns in a manner that would result in substantial erosion or siltation. The EIR recognized that Santa Rosa Creek passes through the Specific Plan Area and that uncontrolled grading, placement of fill, or discharge of water could potentially alter drainage patterns and contribute to erosion or siltation. Upon compliance with applicable regulatory and permitting requirements, the 2007 DSASP EIR concluded that impacts would be less than significant.

Construction

The proposed Project would involve demolition of existing buildings and associated improvements, including foundations, parking areas, and other improvements. Demolition and associated ground-disturbing activities could temporarily expose soil and loosen sediment that could be transported by stormwater runoff, potentially resulting in erosion or siltation on- or off-site.

As discussed above under water quality, Mitigation Measure HYDRO-1 from the 2007 DSASP EIR would require preparation and implementation of a SWPPP and implementation of erosion-control, soil-stabilization, and other construction BMPs to prevent sediment and construction-related pollutants from entering the storm drain system or downstream waters. The Project does not propose alteration of the course of Santa Rosa Creek or other natural waterways. With implementation of MM HYDRO-1, potential construction-related erosion and siltation would be reduced to a less-than-significant level.

Operation

Potential demolition itself would not increase impervious surface area or substantially alter existing drainage patterns in a manner that would increase erosion or siltation. No site-specific development application is currently proposed in connection with the Development Agreement. Future site-specific development contemplated by the Development Agreement would be required to be consistent with the DSASP and would remain subject to applicable drainage, grading, erosion-control, and stormwater requirements. Relocation of existing City Hall functions to the existing Museum on the Square building would involve occupancy of an existing developed property and would not alter the existing drainage pattern at that property.

Therefore, with implementation of Mitigation Measure HYDRO-1 during demolition, the Project would not substantially alter existing drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Less Than Significant Impact. The 2007 DSASP EIR determined that buildout of the Specific Plan could increase runoff to the municipal storm drain system as a result of new paving, changes to storm drain inlets, and other modifications associated with new development. The EIR determined that increased runoff could affect downstream storm drain capacity and adopted Mitigation Measure HYDRO-3 to address increased runoff associated with future development. The 2019 Initial Study prepared for the 2020 DSASP Subsequent EIR identified groundwater resources for further analysis in the Subsequent EIR; other hydrology effects were not identified for further analysis.

Construction

The proposed Project would involve demolition of existing buildings and associated improvements. Demolition, excavation, and removal of foundations and other improvements could temporarily modify surface drainage within active construction areas. However, these activities would not add new impervious surfaces or permanently increase the amount of stormwater runoff generated by the Project site beyond what was evaluated in the 2020 DSASP Subsequent EIR.

As discussed above, Project demolition would be subject to applicable Construction General Permit requirements and implementation of a SWPPP, and Mitigation Measure HYDRO-1 would require erosion-control, soil-stabilization, and other construction BMPs. These requirements would also maintain appropriate control of stormwater during demolition and reduce the potential for temporary drainage obstructions or uncontrolled runoff. Accordingly, construction activities would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Construction impacts would be less than significant.

Operation

Under the conservative scenario evaluated in this Initial Study, potential demolition of existing buildings and associated improvements is assumed. Potential demolition itself would not result in an increase in impervious surface area or the development-related runoff that formed the basis of the runoff impact identified in the 2007 DSASP EIR. Therefore, Mitigation Measure HYDRO-3 would not be applicable to the potential demolition activities evaluated in this Initial Study. Future site-specific development contemplated by the Development Agreement would remain subject to applicable stormwater requirements and previously adopted mitigation measures, including Mitigation Measure HYDRO-3, as applicable.

Relocation of existing City Hall functions to the existing Museum on the Square building would involve occupancy of an existing developed property and would not alter the existing drainage system or add new impervious surfaces at that property.

Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

- e) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Less Than Significant with Mitigation Incorporated. The 2007 DSASP EIR determined that development and redevelopment within the Specific Plan Area could increase runoff to the municipal storm drain system and could introduce non-point source pollutants to storm drains and ultimately Santa Rosa Creek. The EIR determined that increased pollutant loads and increased runoff could result in significant impacts and included stormwater management measures to reduce these effects.

Construction

The proposed Project would involve demolition of existing buildings and associated improvements, including potential removal of foundations, parking areas, and other improvements. Demolition and associated ground-disturbing activities could temporarily alter drainage within active construction areas and could generate sediment or other construction-related pollutants that could enter the existing storm drain system if not properly controlled.

As discussed above, Mitigation Measure HYDRO-1 would require preparation and implementation of a SWPPP and implementation of erosion control, soil stabilization, and other BMPs to control sediment and construction-related pollutants. The 2007 DSASP EIR specifically requires BMPs to prevent discharge of construction-related pollutants such as sediment, paint, and concrete to downstream waters. With implementation of MM HYDRO-1 and applicable Construction General Permit requirements, demolition would not provide substantial additional sources of polluted runoff or result in uncontrolled runoff that could adversely affect the existing storm drain system. Construction impacts would be less than significant with mitigation incorporated.

Operation

Potential demolition itself would not result in a long-term increase in impervious surface area or stormwater runoff. No site-specific development application is currently proposed in connection with the Development Agreement. Stormwater effects associated with development under the DSASP were previously evaluated at a programmatic level, and future site-specific development contemplated by the Development Agreement would remain subject to applicable stormwater requirements and previously adopted mitigation measures, as applicable.

Relocation of existing City Hall functions to the existing Museum on the Square building would involve occupancy of an existing developed property and would not substantially alter drainage conditions or introduce new impervious surfaces at that property.

Therefore, the Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. With implementation of Mitigation Measure HYDRO-1 during demolition, impacts would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Less Than Significant Impact. The 2007 DSASP EIR determined that the Specific Plan Area was not located within a designated FEMA floodplain and that there was little or no increased risk associated with development impeding or redirecting flood flows. The EIR nevertheless recognized that new development could increase runoff to the municipal storm drain system through new paving, surfacing, or modifications to drainage facilities.

The proposed Project would involve demolition of existing buildings and associated improvements. The Project also does not propose modification of Santa Rosa Creek or the existing channel and culvert infrastructure that conveys creek flows through the downtown area. Accordingly, demolition would not introduce new structures or improvements that could obstruct, impede, or redirect flood flows.

Relocation of existing City Hall functions to the existing Museum on the Square building would involve occupancy of an existing developed property and would not modify existing drainage facilities or introduce new structures that could affect flood flows. No site-specific redevelopment plan is currently proposed in connection with the Development Agreement. Future site-specific development contemplated by the Development Agreement would be required to be consistent with the DSASP and would remain subject to applicable drainage and flood-control requirements and subsequent City review.

Therefore, the Project would not substantially alter existing drainage patterns in a manner that would impede or redirect flood flows. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The Project properties are classified as FEMA Zone X under current effective FEMA flood mapping. Zone X is outside the Special Flood Hazard Area associated with the 1-percent-annual-chance flood. Consistent with this designation, the City of Santa Rosa General Plan 2050 Flood Hazard Zones map does not identify the Project properties within a mapped FEMA 100-year or 500-year flood hazard zone (FEMA, n.d.).

The Project properties are also not located within a tsunami hazard area. Current California Geological Survey tsunami hazard mapping for Sonoma County identifies tsunami hazard areas along the County's coastal areas and does not extend inland to Santa Rosa (California Geological Survey, 2022). Additionally, the Project properties are not located adjacent to a large enclosed or restricted body of water that could subject the sites to inundation from a seiche.

Therefore, the Project would not be subject to inundation from a flood hazard, tsunami, or seiche that could result in the release of pollutants. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant With Mitigation Incorporated. The Project site is within the jurisdiction of the North Coast Regional Water Quality Control Board (North Coast RWQCB) and is subject to the Water Quality

Control Plan for the North Coast Region (Basin Plan). The Basin Plan establishes beneficial uses, water quality objectives, and programs for protecting surface water and groundwater quality within the North Coast Region (North Coast RWQCB, 2026).

As discussed above, demolition and associated ground-disturbing activities could temporarily generate sediment and other construction-related pollutants. The Project would be subject to applicable requirements of the State Water Resources Control Board's 2022 Construction Stormwater General Permit, and Mitigation Measure HYDRO-1 would require preparation and implementation of a SWPPP and construction BMPs to control erosion, sediment, and other construction-related pollutants. With implementation of MM HYDRO-1 and compliance with applicable Construction General Permit requirements, demolition activities would not conflict with or obstruct implementation of the Basin Plan.

Relocation of existing City Hall governmental and administrative functions to the existing Museum on the Square building would involve occupancy of an existing developed property and would not introduce substantial new operational sources of polluted runoff. Accordingly, Project operation would not conflict with or obstruct implementation of the Basin Plan.

The 2020 DSASP Subsequent EIR identified the Project area as overlying the Santa Rosa Plain Subbasin and recognized the City's participation in the Santa Rosa Plain Groundwater Sustainability Agency. The Santa Rosa Plain Groundwater Sustainability Plan (GSP) was submitted to the California Department of Water Resources in January 2022 and approved in January 2023. The GSP establishes the framework for achieving and maintaining sustainable groundwater management within the Santa Rosa Plain Subbasin (Santa Rosa Plain GSA, 2022). As discussed above, the Project would not extract groundwater, install groundwater wells, substantially increase water demand, or substantially reduce groundwater recharge. Therefore, the Project would not conflict with or obstruct implementation of the Santa Rosa Plain GSP.

With implementation of Mitigation Measure HYDRO-1, impacts related to conflict with or obstruction of a water quality control plan or sustainable groundwater management plan would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

PPP HYD-1 State Water Resources Control Board Construction Stormwater General Permit. The Project shall comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order WQ 2022-0057-DWQ, NPDES No. CAS000002. The Construction General Permit requires permit coverage for qualifying construction activities that disturb one acre or more of soil, or less than one acre when part of a larger common plan of development or sale that disturbs one acre or more. Applicable requirements include preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs) to control erosion, sediment, and other construction-related pollutants in stormwater discharges (SWRCB, 2022). The 2022 Construction General Permit is the currently effective statewide permit.

Mitigation Measures

MM HYDRO-1: Pursuant to the City of Santa Rosa Stormwater Management Plan (SWMP); grading, erosion control and stormwater ordinances; and National Pollutant Discharge Elimination System (NPDES) requirements, each developer shall develop and implement a Storm Water Pollution Prevention Plan(s) (SWPPP) for each individual development or redevelopment project site to protect water quality during and after construction. The Project SWPPP shall include the following mitigation measures for the construction period:

- Erosion control/soil stabilization techniques such as straw mulching, erosion control blankets, erosion control matting, and hydro-seeding, shall be utilized, in accordance with the regulations and recommendations outlined in the Santa Rosa Area Standard Urban Storm Water Mitigation Plan (SUSMP) adopted by the City of Santa Rosa, Sonoma County, and the Sonoma County Water Agency. Silt fences used in combination with fiber rolls shall be installed down slope of all graded slopes. Fiber rolls shall be installed in the flow path of graded areas receiving concentrated flows and around storm drain inlets.
- “Best management practices” (BMPs) shall be implemented for preventing the discharge of other construction-related NPDES pollutants beside sediment (i.e. paint, concrete, etc.) to downstream waters.
- After construction is completed, all drainage facilities shall be inspected for accumulated sediment, and these drainage structures shall be cleared of debris and sediment.

Long-term mitigation measures to be included in the Project SWPPP shall include, but are not limited to, the following:

- Description of potential sources of erosion and sediment at the proposed project site. Industrial activities and significant materials and chemicals that could be used at the project site should be described. This will include a thorough assessment of existing and potential pollutant sources.
- Identification of BMPs to be implemented at the project site based on identified industrial activities and potential pollutant sources. Emphasis shall be placed on source control BMPs, with treatment controls used as needed.
- Development of a monitoring and implementation plan. Maintenance requirements and frequency shall be carefully described including vector control, clearing of clogged or obstructed inlet or outlet structures, vegetation/landscape maintenance, replacement of media filters, regular sweeping of parking lots and other paved areas, etc. Wastes removed from BMPs may be hazardous, therefore, maintenance costs should be budgeted to include disposal at a proper site. Parking lot areas shall be cleared of debris that may enter the storm drain system on a daily basis.
- The monitoring and maintenance program shall be conducted at the frequency agreed upon by the RWQCB and/or City of Santa Rosa. Monitoring and maintenance shall be recorded and submitted annually to the SWRCB. The SWPPP shall be adjusted, as necessary, to address any inadequacies of the BMPs.

- The applicant shall prepare informational literature and guidance on industrial and commercial BMPs to minimize pollutant contributions from the proposed development. This information shall be distributed to all employees at the project site. At a minimum the information shall cover: a) proper disposal of commercial cleaning chemicals; b) proper use of landscaping chemicals; c) clean-up and appropriate disposal of hazardous materials and chemicals; and d) prohibition of any washing and dumping of materials and chemicals into storm drains.

5.11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Physically divide an established community?

No Impact. The 2007 DSASP EIR identified Highway 101, the railroad tracks, Highway 12, and Santa Rosa Creek as existing physical features that divide portions of the Specific Plan Area. The 2007 DSASP EIR determined that implementation of the DSASP would not introduce additional physical barriers that would divide an established community and would instead support improved connectivity throughout the Specific Plan Area. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged requiring further analysis of land use impacts.

The proposed Project would relocate existing City Hall governmental and administrative functions to the existing Museum on the Square building and, under the conservative demolition scenario evaluated in this Initial Study, would include potential demolition of 13 existing buildings totaling approximately 97,811 square feet of gross building area, together with associated site improvements, on the properties proposed for conveyance. The Project would not construct a new roadway, wall, railroad, or other linear physical feature that could divide or separate an established neighborhood or community. Demolition of the existing buildings and associated improvements would not sever existing public streets, pedestrian connections, or other established connections between surrounding uses.

The relocation of existing City Hall functions to an existing building within downtown Santa Rosa would similarly not introduce a physical barrier or otherwise divide an established community. No site-specific development application is currently proposed in connection with the Development Agreement. Future site-specific development contemplated by the Development Agreement would be required to be consistent with the DSASP and would remain subject to applicable City development and circulation requirements and subsequent City review.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. The 2007 DSASP EIR evaluated the Specific Plan for consistency with applicable land use plans, policies, and regulations. Although implementation of the 2007 DSASP required certain General Plan amendments, the EIR determined that the Specific Plan was consistent with and

implemented the overall intent of the City's General Plan and concluded that impacts related to consistency with adopted plans would be less than significant.

The 2020 DSASP Subsequent EIR did not substantively reanalyze land use because the City determined that no new conditions or information had emerged that would require further environmental analysis of land use impacts. The 2020 DSASP update continued to promote infill, redevelopment, and intensification within downtown Santa Rosa and identified vacant, underutilized, and City-owned properties as opportunity areas for redevelopment. City-owned sites were specifically recognized as having potential for redevelopment, including through public-private partnerships.

The proposed Project would relocate existing City Hall governmental and administrative functions from the existing City-owned properties to the existing Museum on the Square building within the DSASP Plan Area. Under the conservative demolition scenario evaluated in this Initial Study, the Project would also include potential demolition of 13 existing buildings totaling approximately 97,811 square feet of gross building area and associated improvements on the properties proposed for conveyance. The Project would not amend the DSASP, alter the land use framework established for the Plan Area, or introduce a land use that would be inconsistent with the downtown land use pattern evaluated in the prior DSASP EIRs. Rather, the conveyance and potential demolition of existing improvements would occur on properties within an area where redevelopment of underutilized and City-owned sites was contemplated by the 2020 DSASP. The Development Agreement identifies potential adaptive reuse and redevelopment of the City Hall Campus within this established land use framework but does not establish a fixed site-specific development program. The Development Agreement requires future development to be consistent with the DSASP, and future site-specific development would remain subject to applicable DSASP requirements and subsequent City review.

Therefore, the Project would not cause a significant environmental impact due to a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.12. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The 2007 DSASP EIR evaluated mineral resources within the Specific Plan Area and determined that no significant mineral resources were identified within the Specific Plan Area. Accordingly, the 2007 DSASP EIR concluded that implementation of the DSASP would not result in the loss of availability of a known mineral resource of regional or statewide value.

The 2020 DSASP Subsequent EIR subsequently confirmed that no mineral resources were identified within the Planning Area and therefore determined that there was no potential for impacts to mineral resources. The 2020 DSASP Subsequent EIR also noted that no active oil wells appeared to be located in the vicinity of proposed development or redevelopment.

The Project properties are located within the DSASP Plan Area and are developed with existing urban uses and improvements. The proposed relocation of City Hall functions and demolition of existing buildings and associated improvements would not interfere with access to or result in the loss of availability of a known mineral resource because no such resources have been identified within the DSASP Plan Area. Therefore, the Project would result in no impact to a known mineral resource of regional or statewide value, and this topic will not be further analyzed in the Supplemental EIR.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on the general plan, specific plan, or other land use plan?

No Impact. The 2007 DSASP EIR determined that no mineral resources were identified within the Specific Plan Area and concluded that implementation of the DSASP would not result in the loss of availability of a locally important mineral resource recovery site. The 2020 DSASP Subsequent EIR subsequently confirmed that no mineral resources were identified within the Planning Area and that no additional environmental analysis of mineral resources was warranted.

The Project properties are located within the same DSASP Plan Area and are not identified as mineral resource recovery sites. The Project would therefore not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

5.13. NOISE

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated. The 2007 DSASP EIR evaluated temporary construction and long-term operational noise associated with development throughout the Specific Plan Area. The 2007 DSASP EIR determined that construction activities, including removal of existing pavement and structures, grading, excavation, building construction, paving, and landscaping, could intermittently expose nearby businesses and residences to elevated noise levels. Construction noise was determined to be a significant impact prior to mitigation. The 2007 DSASP EIR adopted MM NOI-1, which requires implementation of construction noise-reduction measures, including proper equipment maintenance and muffling, use of quieter equipment where available, locating stationary noise-generating equipment away from sensitive receptors, limiting unnecessary idling, use of temporary noise barriers where necessary, routing construction traffic away from sensitive receptors where feasible, limiting construction hours, and establishing procedures for responding to construction noise complaints. Implementation of MM NOI-1 reduced construction noise impacts to a less-than-significant level.

The 2020 DSASP Subsequent EIR subsequently reevaluated substantial temporary and permanent increases in ambient noise. The 2020 analysis recognized that removal of existing pavement and structures and other construction activities could generate elevated short-term noise levels. The 2020 DSASP Subsequent EIR incorporated previously adopted MM NOI-1 from the 2007 DSASP EIR and concluded that construction-related noise impacts would remain less than significant with implementation of the measure.

Under the conservative demolition scenario evaluated in this Initial Study, the Project assumes potential demolition of 13 existing buildings totaling approximately 97,811 square feet of gross building area,

together with associated site improvements. Demolition activities would temporarily generate noise from heavy equipment, haul trucks, material removal, and related activities and could increase ambient noise levels at nearby uses. Therefore, MM NOI-1 would remain applicable to Project demolition activities and would reduce temporary construction noise impacts to a less-than-significant level.

Relocation of existing City Hall governmental and administrative functions to the existing Museum on the Square building would relocate an existing governmental use within downtown Santa Rosa and is not anticipated to introduce substantial new stationary or traffic-related noise sources. Operational noise associated with development under the DSASP was evaluated at a programmatic level in the prior DSASP environmental review, and future site-specific development contemplated by the Development Agreement would remain subject to applicable noise requirements and subsequent City review. Accordingly, permanent operational noise impacts would be less than significant.

Therefore, with implementation of MM NOI-1, impacts associated with temporary or permanent increases in ambient noise would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant With Mitigation Incorporated. The 2007 DSASP EIR evaluated groundborne vibration associated with construction activities within the Specific Plan Area and determined that excavation, foundation work, pile driving, vibratory compaction, and other vibration-generating construction activities could expose nearby structures to excessive vibration. The 2007 DSASP EIR determined that construction-related vibration would be significant prior to mitigation and adopted MM NOI-3a and MM NOI-3b to reduce vibration associated with construction activities. MM NOI-3a requires avoidance of impact pile driving where feasible and limits use of vibratory rollers and tampers near sensitive areas, while MM NOI-3b requires additional evaluation, monitoring, and construction contingencies where vibration-generating activities could occur in close proximity to existing structures. The 2007 DSASP EIR concluded that implementation of these measures would reduce vibration impacts to a less-than-significant level.

Potential demolition of existing buildings and associated improvements would involve operation of heavy construction equipment capable of generating temporary groundborne vibration. Because existing structures are located within and adjacent to the Project area, applicable provisions of MM NOI-3a and MM NOI-3b would reduce potential construction-related vibration through equipment restrictions, monitoring, and contingency measures, as applicable. Notably, MM NOI-3b specifically identifies initial demolition activities as an activity for which vibration monitoring may be required. Future site-specific development contemplated by the Development Agreement would remain subject to applicable vibration requirements and MM NOI-3a and MM NOI-3b, as applicable.

Operation of the relocated City Hall functions within the existing Museum on the Square building would not involve a substantial source of groundborne vibration. Therefore, with implementation of MM NOI-3a and MM NOI-3b, impacts associated with excessive groundborne vibration or groundborne noise would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

No Impact. The 2007 DSASP EIR determined that the Specific Plan Area is not located within an airport land use plan, within two miles of a public or public-use airport, or within the vicinity of a private airstrip and therefore did not identify the potential for aircraft noise impacts. The 2020 DSASP environmental review did not identify airport-related noise as an issue requiring further analysis; substantial increases in ambient noise were the noise issue carried forward for analysis in the 2020 Subsequent EIR.

The Project properties and the Museum on the Square property are located within the DSASP Plan Area evaluated in the prior EIRs. The Project would not introduce development within the vicinity of a private airstrip or within an area previously identified as subject to airport-related noise exposure. Therefore, the Project would not expose people residing or working in the Project area to excessive airport or airstrip noise levels. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

MM NOI-1: Developers shall ensure that construction equipment be well maintained and used judiciously to be as quiet as practical. The following measures, when applicable, will be required from developers to reduce noise from construction activities:

- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment.
- Utilize “quiet” models of air compressors and other stationary noise sources where technology exists.
- Locate stationary noise-generating equipment as far as feasible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.
- Prohibit unnecessary idling of internal combustion engines.
- Pre-drill foundation pile holes to minimize the number of impacts required to seat the pile.
- Construct solid plywood fences around construction sites adjacent to operational business, residences or noise-sensitive land uses.
- A temporary noise control blanket barrier shall be erected, if necessary, along building facades facing construction sites. This mitigation would only be necessary if conflicts occurred which were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected.
- Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.

- Ensure that construction activities (including the loading and unloading of materials and truck movements) are limited to the hours of 7:00 a.m. to 7:00 p.m.
- Businesses, residences or noise-sensitive land uses adjacent to construction sites shall be notified of the construction schedule in writing. Designate a “construction liaison” that will be responsible for responding to any local complaints about construction noise. The liaison would determine the cause of the noise complaints and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the liaison at the construction site.

MM NOI-3a: Developers shall reduce vibration from construction activities by implementing the following during construction:

- Avoid impact pile driving where possible and use drilled piles when possible since drilled piles causes lower vibration levels where geological conditions permit their use.
- Avoid using vibratory rollers and tampers near sensitive areas.

MM NOI-3b: In areas where project construction is anticipated to include vibration-generating activities, such as pile driving, in close proximity to existing structures, site-specific vibration studies shall be conducted to determine the area of impact and to present appropriate mitigation measures that may include the following:

- Identification of sites which would include vibration compaction activities, such as pile driving, and have the potential to generate groundborne vibration, while considering the sensitivity of nearby structures to groundborne vibration. Vibration limits shall be applied to all vibration-sensitive structures located within 200 feet of the project. This task shall be conducted by a qualified structural engineer.
- Development of a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits and address the need to conduct photo, elevation and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approached the limits.
- At a minimum, vibration monitoring shall be conducted during initial demolition activities and during pile driving activities. Monitoring results may indicate the need for more or less intensive measurements.
- When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures.
- Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.

5.14. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Induce substantial unplanned population growth in an area, either directly or indirectly?

No Impact. The 2007 DSASP EIR evaluated population growth associated with implementation of the Specific Plan and determined that the planned increase in residential and nonresidential development would result in population and employment growth within the Specific Plan Area. However, because the DSASP was intended to accommodate anticipated growth within an already urbanized area and focus development within the City's Urban Growth Boundary, the 2007 DSASP EIR concluded that impacts related to population growth would be less than significant.

The 2020 DSASP Subsequent EIR did not substantively reanalyze Population and Housing because the City determined that no new conditions or information had emerged requiring further environmental analysis of this topic. The 2020 DSASP Subsequent EIR nevertheless updated the growth projections for the Planning Area and identified substantial increases in population, housing, and employment anticipated under buildout of the updated DSASP. The EIR determined that this growth would primarily accommodate existing and projected demand within the City and region.

The proposed Project would relocate existing City Hall governmental and administrative functions to the existing Museum on the Square building and, under the conservative demolition scenario evaluated in this Initial Study, would include potential demolition of 13 existing buildings totaling approximately 97,811 square feet of gross building area and associated improvements on the properties proposed for conveyance. Relocation of existing City Hall functions would shift existing governmental and administrative activities within downtown Santa Rosa rather than induce new population or employment growth. No site-specific development application is currently proposed in connection with the Development Agreement. The Development Agreement contemplates future development consistent with the DSASP, including residential and nonresidential uses. Population, housing, and employment growth associated with buildout of the DSASP was previously accounted for in the prior DSASP environmental review and represents planned growth within the Specific Plan Area.

Therefore, the Project would not directly or indirectly induce substantial unplanned population growth. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The 2007 DSASP EIR recognized that implementation of the broader Specific Plan could result in redevelopment of developed properties and therefore evaluated the potential displacement of existing housing and residents. The 2007 DSASP EIR concluded that impacts related to displacement of housing and people would be less than significant. The 2020 DSASP Subsequent EIR subsequently determined that no new conditions or information had emerged requiring additional analysis of population and housing impacts.

The Project does not include demolition or removal of residential units. The properties proposed for demolition and conveyance are developed with governmental, administrative, and associated uses rather than residential housing. Relocation of existing City Hall functions to the existing Museum on the Square building would likewise not require the demolition or removal of housing. Accordingly, implementation of the Project would not displace existing housing or residents or necessitate construction of replacement housing elsewhere. Therefore, no impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.15. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

- a) **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:**

i. **Fire Protection and Emergency Services**

Less Than Significant Impact. The 2007 DSASP EIR evaluated increased demand for fire protection and emergency services associated with development throughout the Specific Plan Area. Although anticipated population and development growth was expected to increase demand for fire personnel and equipment, the EIR determined that planned fire facilities could accommodate the additional personnel anticipated to serve Specific Plan buildout. Accordingly, impacts associated with the need for new or expanded fire protection facilities were determined to be less than significant, and no mitigation measures were required.

As part of the 2020 DSASP update, fire protection and emergency services were not identified as requiring further analysis in the Subsequent EIR, while parks and recreation were carried forward for additional evaluation. Therefore, the prior conclusion regarding fire protection and emergency services remained adequate for the updated DSASP.

The Project would relocate existing City Hall governmental and administrative functions within downtown Santa Rosa. Demolition activities could temporarily require fire or emergency response; however, this temporary activity would not result in a substantial permanent increase in service demand. Following relocation, existing City Hall functions would continue to generate fire and emergency service demand within the same downtown area. Future development contemplated by the Development Agreement would be required to be consistent with the DSASP. Fire and emergency-service demand associated with development under the DSASP was evaluated in the prior DSASP

environmental review, and future site-specific development would remain subject to applicable fire protection and emergency-service requirements and subsequent City review.

Therefore, the Project would not result in the need for new or physically altered fire protection or emergency service facilities, the construction of which could cause significant environmental impacts. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

ii. Police Protection

Less Than Significant Impact. The 2007 DSASP EIR evaluated increased demand for police protection associated with development within the Specific Plan Area. Although implementation of the Specific Plan was anticipated to increase the number of residents, employees, and visitors and could require additional police personnel, planned increases in personnel and improvements to existing police facilities were anticipated to accommodate this demand. The EIR therefore concluded that implementation of the Specific Plan would not require police facilities beyond those already planned and that impacts would be less than significant. No mitigation measures were required. Police protection was not identified as requiring further analysis as part of the 2020 DSASP Subsequent EIR.

The Project would relocate existing City Hall functions within downtown Santa Rosa. No site-specific development application is currently proposed in connection with the Development Agreement. The Development Agreement contemplates future DSASP-consistent development, including residential and nonresidential uses. Police-service demand associated with development under the DSASP was evaluated in the prior DSASP environmental review, and future site-specific development would remain subject to applicable City requirements and subsequent review. Demolition activities could temporarily generate demand for police services associated with construction, traffic, security, or other incidents; however, such temporary demand would not require construction or expansion of a police facility. Following relocation, City Hall operations would continue to generate police service demand within the same downtown area rather than create substantial new demand.

Therefore, the Project would not result in the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

iii. School Services

No Impact. The 2007 DSASP EIR evaluated the potential for population growth associated with Specific Plan implementation to increase student enrollment and demand for school facilities. Although the Specific Plan was anticipated to generate approximately 1,300 additional students, the EIR determined that anticipated student growth could be accommodated by planned educational facilities and that new, unplanned school facilities would not be required. No mitigation measures were required. School services were not identified as requiring further analysis as part of the 2020 DSASP Subsequent EIR.

Relocation of existing City Hall functions within downtown Santa Rosa and potential demolition of the existing buildings and associated improvements would not increase student enrollment or demand for school facilities. The Development Agreement also identifies a charter school as a potential future use at 100 Santa Rosa Avenue; however, no site-specific school development is currently proposed.

Future residential development contemplated by the Development Agreement would be required to be consistent with the DSASP. Student generation and school-service demand associated with development under the DSASP were evaluated in the prior DSASP environmental review, which determined that anticipated student growth could be accommodated by planned educational facilities. Future site-specific development would remain subject to applicable school-related requirements and subsequent City review. Any future school use would likewise remain subject to applicable requirements and subsequent City review.

Therefore, the Project would not result in the need for new or physically altered school facilities beyond those contemplated under the DSASP, and this topic will not be further analyzed in the Supplemental EIR.

iv. Parks

No Impact. The 2007 DSASP EIR evaluated increased demand for parks and recreational facilities associated with population growth under the Specific Plan. Parks and recreation were subsequently reevaluated in the 2020 DSASP Subsequent EIR because the updated DSASP was anticipated to accommodate substantial additional population growth. The 2020 analysis determined that this growth would increase demand for park and recreational facilities and could require additional park facilities to maintain applicable service standards.

The Project could generate population and associated park demand through future DSASP-consistent development contemplated by the Development Agreement. Park and recreational demand associated with growth under the DSASP was evaluated at a programmatic level in the prior DSASP environmental review. Future site-specific development would remain subject to applicable DSASP parkland, funding, and recreational requirements and subsequent City review. In addition, approximately 1.61 acres at 100 Santa Rosa Avenue would be retained by the City for potential open space, park, recreational use, public access, flood control and/or other public purposes.

Therefore, the Project would not result in the need for new or physically altered park facilities beyond those addressed through the DSASP framework and applicable requirements, the construction of which could cause significant environmental impacts. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

v. Other Public Facilities

No Impact. The 2007 DSASP EIR evaluated the potential for population growth associated with Specific Plan implementation to increase demand for other public facilities, including libraries. Although the Specific Plan was anticipated to increase the population served by existing libraries, the EIR determined that it would not require additional library facilities beyond those already planned. Impacts were therefore less than significant, and no mitigation measures were required. Other public facilities were not identified as requiring further analysis as part of the 2020 DSASP Subsequent EIR.

Relocation of existing City Hall functions within downtown Santa Rosa would shift existing governmental activities rather than generate additional demand for such facilities. Future development contemplated by the Development Agreement would be required to be consistent with the DSASP. Demand for other public facilities associated with development under the DSASP was

evaluated in the prior DSASP environmental review, and future site-specific development would remain subject to applicable requirements and subsequent City review.

Therefore, the Project would not result in the need for new or physically altered libraries or other public facilities beyond those contemplated under the DSASP, the construction of which could cause significant environmental impacts. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?

No Impact. The 2007 DSASP EIR evaluated increased use of parks and recreational facilities associated with population growth anticipated under the Specific Plan. The EIR determined that anticipated residential growth would increase demand for parkland and recreational facilities; however, planned park improvements and applicable parkland dedication and funding requirements would provide additional recreational opportunities and reduce impacts to a less-than-significant level. No mitigation measures were required.

The 2020 DSASP Subsequent EIR subsequently reevaluated parks and recreation because the updated DSASP was anticipated to accommodate substantially greater population growth. The 2020 analysis likewise identified increased population as the primary factor that could increase demand for and use of existing parks and recreational facilities.

Relocation of existing City Hall governmental and administrative functions within downtown Santa Rosa would shift existing activities rather than generate substantial new demand for recreational facilities. Future DSASP-consistent development contemplated by the Development Agreement could generate additional recreational demand; however, population growth and associated recreational demand under the DSASP were evaluated at a programmatic level in the prior DSASP environmental review. Future site-specific development would remain subject to applicable DSASP parkland and recreational requirements and subsequent City review. In addition, the City would retain approximately 1.61 acres at 100 Santa Rosa Avenue for potential open space, park, recreational use, public access, flood control and/or other public purposes.

Accordingly, the Project would not increase use of existing neighborhood or regional parks or other recreational facilities beyond the demand addressed through the DSASP framework such that substantial

physical deterioration would occur or be accelerated. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

b) Require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The 2007 DSASP EIR evaluated the potential need for new or expanded park and recreational facilities associated with population growth anticipated under the Specific Plan. The EIR determined that the planned provision of new parks and recreational opportunities would not result in significant environmental effects beyond those otherwise evaluated for development within the Specific Plan Area. No recreation-specific mitigation measures were required.

The 2020 DSASP Subsequent EIR subsequently reevaluated parks and recreation because the updated DSASP was anticipated to accommodate substantially greater population growth and associated demand for recreational facilities. The 2020 analysis continued to identify population growth as the primary factor affecting the need for additional park and recreational facilities.

The City would also retain approximately 1.61 acres at 100 Santa Rosa Avenue for potential open space, park, recreational use, public access, flood control and/or other public purposes. Future recreational-facility demand associated with DSASP-consistent development contemplated by the Development Agreement was addressed at a programmatic level through the prior DSASP environmental review, and future site-specific development would remain subject to applicable DSASP requirements and subsequent City review. Accordingly, the Project would not require construction or expansion of recreational facilities beyond those contemplated through the DSASP framework to accommodate Project-generated demand.

Therefore, the Project would not require the construction or expansion of recreational facilities that could result in an adverse physical effect on the environment. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.17. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☒	☐	☐

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR evaluated consistency with programs, plans, and policies addressing roadway, transit, bicycle, and pedestrian circulation. The analysis determined that implementation of the updated DSASP would support and expand the existing multimodal transportation network and would not conflict with applicable transportation programs, policies, or plans. Accordingly, the 2020 DSASP Subsequent EIR concluded that impacts would be less than significant, and no mitigation measures were required.

The Project would relocate existing City Hall governmental and administrative functions to the existing Museum on the Square building and would involve the potential demolition of existing buildings and associated improvements on the City-owned properties proposed for conveyance. The Project would not permanently modify the surrounding roadway network, transit system, or planned bicycle and pedestrian circulation system. Relocation of City Hall would shift an existing governmental use within downtown Santa Rosa rather than introduce a new use that would substantially alter travel patterns or conflict with the multimodal circulation framework evaluated in the 2020 DSASP Subsequent EIR. No site-specific development application is currently proposed in connection with the Development Agreement. Transportation effects associated with development under the DSASP were evaluated at a programmatic level in the prior DSASP environmental review, and future site-specific development contemplated by the Development Agreement would remain subject to applicable transportation requirements and subsequent City review.

Demolition activities would temporarily generate construction worker, haul truck, and equipment trips and could require temporary changes to access or circulation. However, these temporary activities would not constitute a permanent conflict with an adopted transportation program, plan, ordinance, or policy. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the

circulation system. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR evaluated vehicle miles traveled (VMT) in accordance with CEQA Guidelines Section 15064.3. The analysis found that residential VMT per capita, employment VMT per employee, and total VMT per service population within the DSASP Planning Area would each be below the applicable significance thresholds. The 2020 DSASP Subsequent EIR therefore concluded that VMT impacts would be less than significant, and no mitigation measures were required.

As part of the proposed Project, existing City Hall governmental and administrative functions would be relocated from existing City-owned properties to an existing building within downtown Santa Rosa. The Project would therefore primarily shift existing trips within the same downtown area rather than generate substantial new residential or employment-related travel from the relocation itself. Demolition would generate temporary construction-related vehicle trips, including worker and haul truck trips, but these trips would cease upon completion of demolition. The Development Agreement also contemplates future DSASP-consistent development. VMT associated with residential and employment growth under the DSASP was evaluated at a programmatic level in the 2020 DSASP Subsequent EIR and determined to be less than significant. Future site-specific development would remain subject to applicable VMT requirements and subsequent City review.

Given the prior programmatic evaluation of VMT associated with development under the DSASP and the temporary nature of demolition-related trips, the Project would not result in VMT effects inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR evaluated potential transportation hazards associated with geometric design features and incompatible uses. Because the DSASP Plan Area is predominantly developed, future projects were anticipated to use the existing street network, with any new access points or transportation improvements subject to City safety and design review. The EIR also evaluated freeway off-ramp queuing and determined that projected queues would remain within available storage and would not extend onto the mainline freeway. Accordingly, the 2020 DSASP Subsequent EIR concluded that transportation safety impacts associated with geometric design features or incompatible uses would be less than significant, and no mitigation measures were required.

The 2007 DSASP EIR similarly concluded that emergency access and design-hazard impacts would be less than significant because transportation improvements and future development would be subject to applicable City design and safety requirements.

The proposed Project would not construct new public roadways, intersections, or other permanent transportation facilities that would introduce a hazardous geometric design feature. Demolition-related trucks and equipment would temporarily use the existing downtown street network, but such temporary construction traffic would not constitute a permanent incompatible transportation use or create a new geometric roadway hazard.

Therefore, the Project would not substantially increase transportation hazards due to a geometric design feature or incompatible use. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

d) Result in inadequate emergency access?

Less Than Significant With Mitigation Incorporated. The 2007 DSASP EIR evaluated emergency access within the Specific Plan Area and determined that the interconnected street network and applicable development standards would provide multiple emergency response routes and maintain adequate access. The 2020 DSASP Subsequent EIR subsequently evaluated emergency access under Impact 3.7-4 and concluded that implementation of the updated DSASP would not result in inadequate emergency access. The 2020 analysis noted that future development would be subject to applicable emergency-access requirements and that the interconnected roadway network would provide multiple routes for emergency responders and evacuation.

The proposed Project would not permanently modify the surrounding public roadway network or eliminate existing emergency access routes. Relocation of City Hall functions to the existing Museum on the Square building would likewise not create a permanent roadway condition that would impede emergency response.

Demolition activities, however, would involve construction vehicles, haul trucks, equipment staging, and other temporary activity within the developed downtown area. Construction access, haul routes, staging areas, and any temporary roadway, lane, or pedestrian closures have not yet been finalized. As discussed under Hazards and Hazardous Materials, MM HAZ-3a would apply to Project construction and would require Fire Department review of construction plans involving roadway modifications and establishment of temporary alternative emergency routes where necessary.

Therefore, with implementation of MM HAZ-3a, the Project would maintain adequate emergency access during demolition and would not result in a permanent reduction in emergency access following completion of Project activities. Impacts would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

MM HAZ-3a: As previously described in Section 5.9, *Hazards and Hazardous Materials*.

5.18. TRIBAL CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☒	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**
- ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Less than Significant Impact. The 2007 DSASP EIR evaluated archaeological and Native American cultural resources within the Specific Plan Area and identified several known archaeological resources, including prehistoric resources and Pomo village sites. The 2007 analysis recognized that ground-disturbing activities could affect known or previously unidentified archaeological or Native American resources and established procedures for their identification and protection.

The 2020 DSASP Subsequent EIR subsequently updated the cultural and tribal cultural resources analysis to specifically address tribal cultural resources pursuant to Public Resources Code Section 21074. The 2020 analysis included an updated records search, a Native American Heritage Commission Sacred Lands File search, and consultation with California Native American tribes pursuant to SB 18 and AB 52. The Sacred Lands File search produced negative results, and no tribal

cultural resources were identified through the tribal consultation process. Nevertheless, the 2020 DSASP Subsequent EIR recognized that ground-disturbing activities could result in the discovery of previously unrecorded tribal cultural resources and concluded that impacts would be less than significant upon compliance with applicable State law and City requirements. No mitigation measures were required.

The proposed Project would occur within the previously developed DSASP Plan Area and would primarily involve relocation of existing City Hall functions and demolition of existing buildings and associated improvements. Although demolition and removal of foundations and other improvements could involve ground disturbance, no tribal cultural resource has been identified at the Project site based on the prior DSASP environmental record. The historical resources associated with the existing City Hall properties are addressed separately in the Supplemental EIR; their status as historical resources does not, by itself, establish that they constitute tribal cultural resources under Public Resources Code Section 21074.

The City would comply with applicable tribal consultation requirements and the current General Plan 2050 provisions governing tribal cultural resources. General Plan 2050 requires evaluation of development sites for known or potentially present tribal cultural resources and requires that, if tribal cultural resources are encountered during ground disturbance, work be halted to avoid altering the materials or their context until the resource has been evaluated by a qualified consulting archaeologist and Native American representative and appropriate treatment measures have been determined.

Accordingly, while previously unidentified tribal cultural resources could potentially be encountered during ground-disturbing demolition activities, the Project would not be expected to cause a substantial adverse change in the significance of a known tribal cultural resource, and applicable consultation and resource-protection requirements would address resources encountered during Project activities. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

PPP TCR-1 Santa Rosa General Plan 2050 Action 4-2.1. The City shall continue to review proposed developments in accordance with federal and State laws and utilize the California Historical Resources Information System, Northwest Information Center, at Sonoma State University as a resource to determine whether project areas contain known subsurface archaeological resources, both prehistoric and/or historic-era, and Tribal cultural resources, or if they have the potential to hold such resources.

PPP TCR-2 Santa Rosa General Plan 2050 Action 4-2.4. During ground disturbance for development projects, if Tribal cultural resources are encountered work shall be halted to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative have evaluated the situation and recorded identified Tribal cultural resources which may include sites, features, places, cultural and other landscapes, sacred places, objects, animals, structures, or plants with cultural value to the tribe(s) and determined suitable mitigation measures. If human remains are inadvertently discovered, the County coroner shall be notified immediately. If the coroner determines

that the remains are those of a Native American, the coroner must contact the NAHC by phone within 24 hours of making that determination (Health and Safety Code § 7050[c]). The City and the professional archaeologist shall contact the Most Likely Descendent, as determined by the NAHC, regarding the remains.

Mitigation Measures (MM)

None.

5.19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR evaluated whether development anticipated under the updated DSASP would require new or expanded water, wastewater, stormwater, solid waste, electric power, natural gas, or telecommunications facilities. Although the updated DSASP contemplated substantial residential and nonresidential growth, the analysis determined that existing and planned utility infrastructure, together with planned system improvements, could accommodate anticipated development without significant environmental effects associated with utility facilities. Impacts were determined to be less than significant, and no mitigation measures were required.

The proposed Project would involve the potential demolition of existing buildings and associated improvements on the City-owned properties proposed for conveyance and relocate existing City Hall governmental and administrative functions to the existing Museum on the Square building. Existing utility connections serving the buildings proposed for demolition may require disconnection, abandonment, or removal as part of demolition; however, these activities would not require construction or expansion of

regional water, wastewater, stormwater, electric power, natural gas, or telecommunications facilities. No site-specific development application is currently proposed in connection with the Development Agreement. Utility infrastructure needs associated with development under the DSASP were evaluated at a programmatic level in the 2020 DSASP Subsequent EIR, and future site-specific development contemplated by the Development Agreement would remain subject to applicable utility requirements and subsequent City review.

Therefore, the Project would not result in substantial environmental effects associated with construction or relocation of utility facilities beyond those addressed through the DSASP framework. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR prepared an updated water supply analysis for the substantially greater level of development anticipated under the updated DSASP. The analysis determined that sufficient water supplies would be available to serve the Planning Area and reasonably foreseeable development through 2040 during normal, single-dry, and multiple-dry year conditions.

Relocation of existing City Hall functions to the existing Museum on the Square building would shift existing water demand within downtown Santa Rosa rather than create substantial new long-term demand associated with the relocation itself. Demolition activities would require limited temporary water use, such as for dust control, but would not result in substantial permanent water demand. Future development contemplated by the Development Agreement would be required to be consistent with the DSASP. Water demand associated with DSASP buildout was evaluated in the 2020 DSASP Subsequent EIR, which determined that sufficient water supplies would be available for the Planning Area and reasonably foreseeable development through 2040 under normal, single-dry, and multiple-dry year conditions.

Accordingly, the Project would not adversely affect the availability of sufficient water supplies during normal, dry, or multiple-dry years. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR reevaluated wastewater treatment capacity based on the increased development anticipated under the updated DSASP. The analysis noted that the Laguna wastewater treatment plant had substantially greater capacity than assumed in the 2007 DSASP EIR and determined that the additional wastewater flows associated with DSASP buildout would not necessitate expansion of wastewater treatment capacity. The impact was determined to be less than significant.

No site-specific development application is currently proposed in connection with the Development Agreement. Existing City Hall functions would be relocated to an existing building already located within the downtown service area, while demolition of the existing City Hall buildings would eliminate wastewater generation from those buildings. Future development contemplated by the Development Agreement would be required to be consistent with the DSASP. Wastewater demand associated with

DSASP buildout was evaluated in the 2020 DSASP Subsequent EIR, which determined that additional wastewater flows would not necessitate expansion of wastewater treatment capacity. Future site-specific development would remain subject to applicable wastewater requirements and subsequent City review.

Accordingly, the wastewater treatment system would have adequate capacity to accommodate Project-related demand in addition to existing commitments. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The 2020 DSASP Subsequent EIR evaluated solid waste associated with the substantially greater development anticipated under the updated DSASP and determined that the resulting increase would represent only a small portion of permitted disposal capacity and would not require expansion of existing disposal facilities. The analysis also considered the City's waste reduction and diversion programs and concluded that impacts related to solid waste capacity and disposal would be less than significant.

The proposed Project would generate solid waste during potential demolition of 13 existing buildings totaling approximately 97,811 square feet of gross building area and associated improvements. Demolition debris would be temporary and would be recycled, diverted, or disposed of in accordance with applicable waste-management requirements. Future development contemplated by the Development Agreement would be required to be consistent with the DSASP. Operational solid waste associated with development under the DSASP was evaluated at a programmatic level in the 2020 DSASP Subsequent EIR, which determined that anticipated development would not exceed available disposal capacity.

Therefore, the Project would not generate solid waste in excess of applicable standards or disposal capacity or impair attainment of solid waste reduction goals. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The 2007 DSASP EIR determined that development within the Specific Plan Area would be required to comply with applicable local, regional, and State solid waste requirements and concluded that impacts related to compliance with solid waste regulations would be less than significant. The 2020 DSASP Subsequent EIR subsequently evaluated the updated DSASP in light of the City's waste diversion and reduction programs and likewise concluded that solid waste impacts would be less than significant.

The Project would generate demolition debris associated with potential demolition activities. Demolition waste would be managed, recycled, diverted, and disposed of in accordance with applicable federal, State, and local solid waste requirements. Future DSASP-consistent development contemplated by the Development Agreement would likewise remain subject to applicable federal, State, and local solid waste management and reduction requirements.

Therefore, the Project would not conflict with applicable solid waste management or reduction statutes or regulations. Impacts would be less than significant, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Programs, or Policies (PPP)

None.

Mitigation Measures (MM)

None.

5.20. WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project properties and the Museum on the Square property are located within the developed downtown area of Santa Rosa. General Plan 2050 Figure 5-8, Fire Hazard Severity Zones, shows that the Project area is outside mapped Fire Hazard Severity Zones in both Local and State Responsibility Areas.

The Project would relocate existing City Hall functions within downtown Santa Rosa and demolish existing buildings and associated improvements. Because the Project is not located within or near a mapped wildfire hazard area, it would not substantially impair an adopted emergency response or evacuation plan as a result of wildfire conditions. Potential temporary construction-related effects on emergency access are addressed separately in Section 5.9, Hazards and Hazardous Materials, and Section 5.17,

Transportation. Therefore, no impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As shown on General Plan 2050 Figure 5-8, the Project area is outside mapped Fire Hazard Severity Zones and is located within the developed downtown area. The Project would not introduce development into a wildland area or other location identified as having elevated wildfire hazard.

Accordingly, the Project would not exacerbate wildfire risks due to slope, prevailing winds, or other factors or expose Project occupants to the uncontrolled spread of wildfire. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project would not involve development within a mapped wildfire hazard area and would not require installation or maintenance of wildfire-related infrastructure such as fuel breaks, emergency water sources, or new access roads serving a wildland area. Any utility work associated with demolition or relocation of City Hall functions would occur within the existing developed urban area.

Therefore, the Project would not require infrastructure that could exacerbate wildfire risk or result in environmental effects associated with wildfire protection. No impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project area is outside mapped Fire Hazard Severity Zones and is located within the developed downtown area. Because the Project would not place people or structures within or near an area subject to substantial wildfire hazard, it would not expose people or structures to flooding, landslides, or other hazards resulting from post-fire slope instability, runoff, or drainage changes. Therefore, no impact would occur, and this topic will not be further analyzed in the Supplemental EIR.

Plans, Policies, and Programs (PPP)

None.

Mitigation Measures (MM)

None.

5.21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	☐	☐	☒	☐
c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. The proposed Project would occur within the developed downtown area and would involve relocation of existing City Hall governmental and administrative functions to the existing Museum on the Square building and potential demolition of 13 existing buildings totaling approximately 97,811 square feet, together with associated improvements, at 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631 1st Street, and 655 1st Street.

As discussed in Section 5.4, *Biological Resources*, the Project properties are developed with existing buildings, paved areas, ornamental landscaping, and other urban improvements and do not contain substantial native habitat. Potential effects on nesting birds, bats, Santa Rosa Creek, and associated riparian resources would be reduced to less-than-significant levels through implementation of applicable previously adopted mitigation measures and compliance with existing regulatory requirements. The Project would not substantially reduce the habitat or population of a fish or wildlife species, threaten to

eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered species.

As discussed in Section 5.5, *Cultural Resources*, demolition, foundation removal, utility disconnection, and other ground-disturbing activities could encounter previously unidentified archaeological resources. Implementation of Mitigation Measures CULT-1a through CULT-1c would reduce potential impacts to archaeological resources to a less-than-significant level. Potential impacts to paleontological and tribal cultural resources would also be less than significant based on the analysis presented in Sections 5.7, *Geology and Soils*, and 5.18, *Tribal Cultural Resources*.

However, the buildings proposed for potential demolition include the Santa Rosa City Hall complex at 100 Santa Rosa Avenue and the Chamber Plaza complex at 631–637 1st Street, which have been identified as individually significant historical resources. The 2023 Downtown Station Area Historic Resources Survey Report also identifies 100 Santa Rosa Avenue, 90 Santa Rosa Avenue, 631–637 1st Street, and 655 1st Street as contributors to the survey-identified potential Civic Center Historic District. Potential demolition affecting these historical resources or contributing properties could permanently remove or materially impair the physical characteristics that convey the historical significance or integrity of the affected resource or potential historic district. Accordingly, the Project could eliminate important examples of a major period of California history. This impact is potentially significant and will be further analyzed in the Supplemental EIR.

b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Less Than Significant Impact. The proposed Project would involve consideration of the Development Agreement, relocation of existing City Hall governmental and administrative functions to the existing Museum on the Square building, and the potential demolition of existing buildings and associated improvements on the City owned properties proposed for conveyance. Potential demolition activities would result in temporary environmental effects associated with construction emissions, noise and vibration, hazardous materials, stormwater, transportation, biological resources, and other ground-disturbing activities. As discussed throughout this Initial Study, these effects would be avoided or reduced through compliance with applicable federal, State, and local regulatory requirements and implementation of applicable plans, programs, policies, and previously adopted mitigation measures.

No site-specific development application is currently proposed in connection with the Development Agreement. The Development Agreement contemplates future development of the City Hall Campus consistent with uses permitted by the DSASP. The environmental effects associated with development under the DSASP were previously evaluated at a programmatic level in the 2007 DSASP EIR and 2020 DSASP Subsequent EIR, and future site-specific development would remain subject to applicable DSASP requirements and subsequent City review.

The Project would not achieve a short-term environmental goal by foregoing or compromising a long-term environmental objective. Potential demolition activities would be temporary, while future DSASP-consistent development contemplated by the Development Agreement would remain subject to applicable long-term land use, environmental, and development requirements. Potential effects associated with the permanent loss of identified historical resources are addressed separately in Section 5.5, *Cultural Resources*, and will be further analyzed in the focused Supplemental EIR. Therefore, the

Project would result in a less than significant impact related to achieving short-term environmental goals to the disadvantage of long-term environmental goals, and this topic will not be further analyzed in the Supplemental EIR.

- c) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Potentially Significant Impact. Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. A cumulative impact is the change in the environment that results from the incremental impact of a proposed project when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. CEQA Guidelines Section 15130(a) and (b) requires cumulative impacts to be discussed when a project's incremental effect is cumulatively considerable and requires the discussion to reflect the severity and likelihood of the cumulative impact.

The 2007 DSASP EIR and 2020 DSASP Subsequent EIR evaluated the cumulative effects of development within and surrounding the DSASP Plan Area. The 2020 DSASP Subsequent EIR determined that implementation of applicable regulations, DSASP policies, and previously adopted mitigation measures would generally prevent development under the DSASP from making cumulatively considerable contributions to environmental impacts.

As presented in this Initial Study, Project-related impacts associated with aesthetics, agriculture and forestry resources, air quality, biological resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire would be less than significant, less than significant with mitigation incorporated, or would result in no impact. Given that the Project's impacts in these topic areas would be limited, temporary, avoided through compliance with applicable requirements, or reduced to less-than-significant levels through implementation of applicable mitigation measures, the Project would not make a cumulatively considerable contribution to impacts in these areas.

However, the Project could involve complete demolition of individually significant historical resources and properties contributing to the survey-identified potential Civic Center Historic District, including the Santa Rosa City Hall complex at 100 Santa Rosa Avenue and the Chamber Plaza complex at 631–637 1st Street, as well as contributing properties at 90 Santa Rosa Avenue and 655 1st Street. When considered together with the past, present, and reasonably foreseeable loss or alteration of other historical resources within downtown Santa Rosa and the surrounding area, the Project's incremental contribution to the cumulative loss of historical resources could be cumulatively considerable. Therefore, the Project could result in a

potentially significant cumulative impact related to historical resources, and this topic will be further analyzed in the Supplemental EIR.

d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant with Mitigation Incorporated. Potential direct or indirect adverse effects on human beings are generally associated with air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, transportation, wildfire, and other environmental conditions that could affect public health or safety.

As discussed in the applicable sections of this Initial Study, the Project would involve temporary demolition activities. Demolition activities would be subject to applicable federal, State, and local requirements governing construction emissions, asbestos- and lead-containing materials, worker and public safety, stormwater, hazardous materials, and emergency access.

Potential effects associated with contaminated soil or groundwater, construction-related emergency access, construction noise and vibration, and other temporary demolition activities would be reduced to less-than-significant levels through implementation of applicable plans, programs, policies, and previously adopted mitigation measures identified in this Initial Study. No site-specific development application is currently proposed in connection with the Development Agreement. Future DSASP-consistent development contemplated by the Development Agreement would remain subject to applicable regulatory requirements, DSASP provisions, previously adopted mitigation measures, and subsequent City review, as applicable. Accordingly, the Project would not cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be less than significant with mitigation incorporated, and this topic will not be further analyzed in the Supplemental EIR.

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End of document.

Appendix A Site Photos



Photo A: View of old bank building from 1st Street facing north.



Photo B: View of west corner of old bank building facing east.



Photo C: View of old bank building from D Street facing west.



Photo A: City Hall Annex Entrance off Santa Rosa Avenue.



Photo B: Northwest Corner of Annex facing southeast.



Photo C: North Corner of Annex facing southwest.



Photo D: East area of Annex facing west.



Photo E: View of 1st Street facing south.



Photo F: View of northwest corner of City Hall facing southeast.



Photo G: View of East Parking Lot facing west.



Photo A: View facing south towards City Council Chambers.



Photo B: View of Center of plaza facing northwest.



Photo C: View of Center of plaza facing north.



Photo D: View of West Parking Lot facing east.



Photo A: View of northwest corner of Chamber Building facing southeast.



Photo B: View of Chamber Building from 1st Street facing north.



Photo C: View of Chamber Building from 1st Street facing northwest.