

A P P E N D I X E

C O M M E N T S L E T T E R S O N T H E D R A F T E I R

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To: anicholson@srcity.org
Cc: OLRA@DOC; [OPR State Clearinghouse](#); Gomez_DarylAnne@DOC
Subject: Santa Rosa General Plan 2050 EIR
Date: Thursday, October 24, 2024 12:46:55 PM
Attachments: [image001.png](#)

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SCH Number

2023020166

Lead Agency

City of Santa Rosa

Document Title

Santa Rosa General Plan 2050

Document Type

DEIR - Draft EIR

Received

10/21/2024

Amy—

Thank you for providing the City's Draft EIR for the 2050 Santa Rosa General Plan for our review. This email conveys the following recommendations from CGS concerning geologic issues within the General Plan document:

1. Fault Hazards

- The DEIR provides a discussion of earthquake surface fault rupture and CGS' Alquist-Priolo Earthquake Fault Zones (APEFZ) in the region, including a map depicting the locations of APEFZ within the City limits (Figure 4.7-1). However, CGS notes the surfaces traces of the Rodgers Creek Fault Zone and related APEFZ were recently revised in February 2024. The City should update their figure with these new fault traces and zones.
- Current CGS APEFZ maps and GIS data are available here:
 - Alquist-Priolo Fault Zones - <https://cadoc.maps.arcgis.com/home/item.html?id=29d2f0e222924896833b69ff1b6d2ca3>
 - Fault Traces - <https://cadoc.maps.arcgis.com/home/item.html?id=15b355c071ab4ef78831daef25490a70>
 - EQZ App - <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>

GOV1-1

Brian Olson, CEG



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"A team is not a group of people who work together.

A team is a group of people who trust each other." – Simon Sinek

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November 19, 2024

Amy Nicholson, Supervising Planner - Advance Planning
City of Santa Rosa Planning and Economic Development Department
100 Santa Rosa Avenue
Santa Rosa, CA 95404
ANicholson@srcity.org

Subject: Santa Rosa General Plan 2050 Project, Draft Program Environmental Impact Report, SCH No. 2023020166, City of Santa Rosa, Sonoma County

Dear Ms. Nicholson:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of the Draft Program Environmental Impact Report (EIR) from the City of Santa Rosa (City) for the Santa Rosa General Plan 2050 Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ CDFW previously submitted a letter dated March 2, 2023 in response to the EIR Notice to Preparation (NOP) for the Project.

CDFW is submitting comments on the EIR to inform the City, as the Lead Agency, of our concerns regarding potentially significant impacts to biological resources associated with the Project. **The City is a participant in the planned Sonoma County Natural Community Conservation Plan/Habitat Conservation Plan and an adequate Program EIR protective of biological resources, including CDFW's comments presented in this letter, may facilitate this process.**

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CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

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¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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PROJECT DESCRIPTION SUMMARY

Proponent: City of Santa Rosa

Objective: The Project would replace the City’s existing General Plan, which was last comprehensively updated in 2009 and has a buildout horizon of 2035. The proposed Project is intended to guide development and conservation in the City. The proposed General Plan 2050 would build off the current General Plan 2035 and provide a direct framework for the upcoming changes in the City and the expected growth in the coming decades; as well as land use, transportation, and conservation decisions through the horizon year of 2050.

Location: The approximately 49-square-mile planning area, which includes the City of Santa Rosa and its Sphere of Influence, with an approximate center at 38.445699°N, 122.717849°W.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in “take” of plants or animals listed or candidates for listing under CESA, either during construction or over the life of the project. **The Project has the potential to result in take of California tiger salamander (*Ambystoma californiense*), which is CESA listed as threatened, Coho salmon (*Oncorhynchus kisutch*), which is CESA listed as endangered, California freshwater shrimp (*Syncaris pacifica*), which is CESA listed as endangered, Northern Spotted Owl (*Strix occidentalis caurina*), which is CESA listed as threatened, and several plant species listed in the EIR Table 4.4-2 including, but not limited to, Sonoma sunshine (*Blennosperma bakeri*), Sebastopol meadowfoam (*Limnanthes vinculans*), and Burke’s goldfields (*Lasthenia burkei*), which are CESA listed as endangered species, and burrowing owl (*Athene cunicularia*), which is a CESA candidate species, as further described below.** Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC).

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The CEQA Lead Agency’s FOC does not eliminate the project proponent’s obligation to comply with CESA.

Lake and Streambed Alteration

An LSA Notification, pursuant to Fish and Game Code section 1600 et seq., is required for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream. **Project activities may impact streams or lakes, therefore an LSA Notification may be warranted, as further described below.** Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to LSA Notification requirements. CDFW would consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement until it has complied with CEQA as a Responsible Agency.

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Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below and in **Attachment 1** to assist the City in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

I. Project Description and Related Impact Shortcoming

COMMENT 1: Program Environmental Impact Report Subsequent Project Review

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The EIR is a Program EIR but does not include a checklist for subsequent Project review. As described in CDFW’s letter response to the NOP, while Program EIRs have a necessarily broad scope, CDFW recommends providing as much information related to anticipated future activities as possible. CDFW recognizes that, pursuant to CEQA Guidelines section 15152, subdivision (c), if a Lead Agency is using the tiering process in connection with an EIR or large-scale planning approval, the development of detailed, site-specific information may not be feasible and can be

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deferred, in many instances, until such time as the Lead Agency prepares a future environmental document. This future environmental document would cover a Project of a more limited geographical scale and is appropriate if the deferred information does not prevent adequate identification of significant effects of the planning approval at hand. The CEQA Guidelines section 15168, subdivision (c)(4) states, **“Where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.”** Based on CEQA Guidelines section 15183.3 and associated Appendix N Checklist, and consistent with other program EIRs (e.g., California Vegetation Treatment Program Environmental Impact Report and associated checklist at <https://bof.fire.ca.gov/projects-and-programs/calvtp-homepage-and-storymap/#:~:text=The%20CalVTP%20Program%20Environmental%20Impact,with%20the%20CalVTP%20Program%20EIR> and template-psa-checklist-508-compliant.dotx, <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fbof.fire.ca.gov%2Fmedia%2Fuqbpmcuq%2Ftemplate-psa-checklist-508-compliant.dotx&wdOrigin=BROWSELINK>), **CDFW recommends creating a procedure or checklist for evaluating subsequent Project impacts on biological resources to determine if they are within the scope of the Program EIR or if an additional environmental document is warranted.** This checklist should be included as an attachment to the EIR. Future analysis should include all special-status species and sensitive habitat including, but not limited to, species considered rare, threatened, or endangered species pursuant to CEQA Guidelines, section 15380.

When used appropriately, the checklist should be accompanied by enough relevant information and reasonable inferences to support a “within the scope” of the EIR conclusion. For subsequent Project activities that may affect sensitive biological resources, a site-specific analysis should be prepared by a Qualified Biologist to provide the necessary supporting information. In addition, the checklist should cite the specific portions of the EIR, including page and section references, containing the analysis of the subsequent Project activities’ significant effects and indicate whether it incorporates all applicable mitigation measures from the EIR.

II. Environmental Setting and Related Impacts Shortcomings

Mandatory Findings of Significance: Does the Project have the potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

And,

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Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS)?

COMMENT 2: Deferred Mitigation

Issue, specific impacts, why they may occur and be potentially significant: If the Project may result in physical changes in the environment, such as facilitating development, then the Project could: 1) reduce the number or restrict the range of an endangered, rare, or threatened species, or 2) have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special-status species. The EIR documents 69 special-status plant species and 55 special-status animal species either within or in the vicinity of the City (4.4-19 through 4.4-27). The Project area has potential to support special-status species including, but not limited to Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields, CESA listed as endangered, California tiger salamander, a CESA listed as threatened species, and burrowing owl, a CESA candidate species and California Species of Special Concern, in addition to the other species mentioned above and in CDFW's NOP response letter, however, the EIR does not include any mitigation measures for impacts to biological resources.

As described in CDFW's letter response to the NOP, California tiger salamander may be directly or indirectly impacted by the Project resulting in mortality of individuals from direct impacts or indirect impacts from degradation of habitat adjacent to ground disturbance and other factors. Additionally, the Project may result in the permanent and temporary loss of California tiger salamander habitat.

The EIR indicates that wetlands may be present within Project sites. As described in CDFW's letter response to the NOP, wetlands in the Santa Rosa Plain may support Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields, and loss of wetland habitat may result in mortality of individuals and/or indirect impacts from degradation of habitat adjacent to ground disturbance due to altering hydrological conditions or other factors may occur.

The Project could result in burrowing owl injury or mortality of adults, and permanent wintering (i.e., non-nesting) habitat loss. Additionally, the Project may result in a permanent reduction of burrowing owl foraging habitat in Sonoma County. Burrowing owl is a special-status species and was recently approved as a candidate species under CESA because the species' population viability and survival are adversely affected by risk factors such as precipitous declines from habitat loss, fragmentation, and degradation; evictions from wintering sites without habitat mitigation; and human disturbance (Shuford and Gardali 2008; Department of Fish and Game Staff Report

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on Burrowing Owl Mitigation (2012); personal communication, CDFW Statewide Burrowing Owl Coordinator Esther Burkett, May 13, 2022, CDFW Petition for western burrowing owl (*Athene cunicularia hypugaea*), 2024). Based on the foregoing, if burrowing owl are wintering on or within 500 meters (1,640 feet) of the Project site, or if burrowing owl foraging habitat is removed, Project impacts to burrowing owl would be potentially significant.

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The EIR states that projects facilitated by the EIR will follow existing local government policies and applicable protective measures in the *Santa Rosa Plain Conservation Strategy* (SRP CS) (EIR pages 4.4-43 to 4.4-44). However, the SRP CS is a guidance document that was developed several years ago and conditions for some species have deteriorated since it was developed, therefore the SRP CS conservation measures may not adequately mitigate impacts to special-status species to less-than-significant. Additionally, the SRP CS does not cover all special-status species in the Project area. Therefore, while the SRP CS is a useful reference, the EIR should not rely on the SRP CS's measures to mitigate impacts to less-than-significant and should instead conduct a current evaluation of impacts and appropriate mitigation measures. The EIR also states that projects facilitated by the EIR "As part of the permitting project with the [US Army Corps of Engineers, Corps], projects affecting federally regulated waters must demonstrate that they would not have an adverse effect on federally listed species or would be required to provide adequate compensatory mitigation where avoidance is infeasible. For those projects within the boundaries of the SRP CS, including western and southern Santa Rosa, they must comply with the rigorous conditions of the Biological Opinion issued by the [US Fish and Wildlife Service, USFWS] in addressing potential effects on California tiger salamander, Burke's goldfields, Sebastopol meadowfoam, and Sonoma sunshine." (EIR pages 4.4-42). This does not address Projects that may not be subject to Corps and USFWS jurisdiction, where "take" as defined under CESA may occur.

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The EIR states that impacts to biological resources would be less-than-significant in part because of a requirement for "the City to have biological resource assessments prepared that identify potential impacts and mitigation measures for protecting the resources for proposed development on sites that may support special-status species." (See EIR page 4.4-43). **However, the proposed biological resource assessments inappropriately defer formulating mitigation measures and may not appropriately identify special-status species that may be impacted and measures reducing such impacts to less-than-significant.** Further, the proposed biological resource assessments would not be subject to public review under CEQA, thereby circumventing key purposes of CEQA including informing the public and governmental decision makers about the potential, significant environmental effects of a proposed project and identifying ways that environmental damage can be avoided or significantly reduced (CEQA Guidelines, § 15002). CEQA Guidelines

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section 15126.4, subdivision (b) states: "Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after Project approval when it is impractical or infeasible to include those details during the Project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards."

No specific mitigation measures are included in the biological resources section of the EIR, especially relating to take of CESA-listed species. The Lead Agency (the City) has therefore not committed itself to mitigation, nor does the EIR adopt specific performance standards for mitigation goals, nor does it identify types of actions that could meet these standards. In addition, the City of Santa Rosa General Plan 2035 EIR includes Mitigation Measure 4.F-5, which specifically requires that the City "...shall incorporate the avoidance and mitigation measures described in the SRP CS and the USFWS Programmatic Biological Opinion, as conditions of approval for development in or near areas with suitable habitat for California tiger salamander, Burke's goldfields, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia." This mitigation measure should be included in the EIR and recognize the updated 2020 USFWS Programmatic Biological Opinion (2020 PBO).

It is conceivable based on the lack of mitigation measures that California tiger salamander, Coho salmon, California freshwater shrimp, Northern Spotted Owl, Sonoma sunshine, Sebastopol meadowfoam, Burke's goldfields, burrowing owl, and other special-status species would: 1) not be appropriately evaluated in subsequent biological surveys, or 2) that future environmental review pursuant to CEQA would not require appropriate mitigation measures to reduce impacts to less-than-significant.

Therefore, if special-status species occur on or adjacent to Project sites, impacts to special-status species would be potentially significant, and impacts to species considered threatened, endangered, or rare may be considered a mandatory finding of significance (CEQA Guidelines, §§ 15065 & 15380).

Recommended Mitigation Measures: To reduce potential impacts to less-than-significant and comply with CESA, CDFW recommends including mitigation measures in the EIR which evaluate such foreseeable potentially significant impacts. Where future site-specific impacts may not be presently foreseeable based on the

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Project's broad scope, the checklist discussed in Comment 1 above should be used to determine if a future CEQA environmental document is required. CDFW would appreciate the opportunity to review a revised EIR and may have further comments once more specific-species information is provided.

For example, CDFW recommends including the mitigation measures below in this EIR:

MM-BIO-1. Prior to commencing construction-related activities on grassland or wetland habitat suitable to support California tiger salamander, the Project shall obtain a CESA ITP from CDFW for impacts to California tiger salamander and comply with the ITP. Copies of the ITP shall be provided to the City prior to the commencement of construction-related activities. The Project shall obtain authorization from the USFWS for impacts to California tiger salamander and comply with the authorization. The Project shall also provide habitat compensation for California tiger salamander in accordance with the ITP, SRP CS, and 2020 PBO. Please note that the CESA ITP habitat compensation requirements are often consistent with the SRP CS and 2020 PBO but may differ based on site-specific conditions.

MM-BIO-2: Prior to ground disturbance, the Project shall submit a special-status plant habitat assessment and an evaluation of potential direct and indirect impacts to any special-status plant habitat, such as modification of hydrological conditions, to CDFW for review and obtain CDFW's written acceptance of the assessment and evaluation, unless otherwise approved in writing by CDFW.

If direct or indirect impacts to wetlands, which are generally suitable habitat for Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields may occur, the Project shall submit to CDFW two years of completed botanical survey results and obtain CDFW's written approval of the results prior to Project construction. The botanical survey results should follow CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (available here:

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>) and the SRP CS, Appendix D: *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain* (available here: <https://www.fws.gov/media/santa-rosa-plain-conservation-strategy-appendix-c-through-e>). If suitable habitat for other special-status plants may be impacted, the above 2018 *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* shall be conducted and the Project shall obtain CDFW's written approval of the results prior to Project construction. If CDFW is unable to accept the survey results, the Project shall conduct additional surveys prior to initiation of Project activities or may assume

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presence of special-status plants, such as Sonoma sunshine, Burke's goldfields, and Sebastopol meadowfoam. Please be advised that for CDFW to accept the results, they should be completed in conformance with the above survey protocols and guidelines, including, but not limited to conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys conducted during drought conditions may not be acceptable. If the botanical surveys result in the detection of CESA listed plants that may be impacted by the Project, or the presence of these species is assumed, the Project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP including, but not limited to providing habitat compensation. In addition, the Project shall consult with the USFWS for any impacts to suitable habitat for plants listed under the federal Endangered Species Act (e.g., wetlands, ESA) and provide compensatory habitat mitigation as required. Impacts to non-CESA listed special-status plants shall be mitigated through compensatory habitat mitigation at a minimum 3:1 mitigation to impact ratio, including a conservation easement and funding and implementing a long-term management plan, unless otherwise approved in writing by CDFW.

MM-BIO-3: If the Project occurs during the burrowing owl wintering season from September 1 to through January 31, prior to Project activities a Qualified Biologist shall conduct a burrowing owl habitat assessment within 1,640 feet of the Project area pursuant to the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report, available here: <https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds>), unless otherwise approved in writing by CDFW. The Qualified Biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report survey methodology resulting in detections. The habitat assessment shall focus on searching the California Natural Diversity Database (CNDDDB) and potentially other sources for any burrowing owl records on or within one mile of the Project area, vegetation type and height, suitable burrows (with an opening of greater than 11 centimeters [cm] in diameter and a depth of greater than 150 cm), burrow surrogates (culverts, piles of concrete rubble, piles of soil, burrows created along soft banks of ditches and canals, pipes, and similar structures), and presence of burrowing owl sign (tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, and nest burrow decoration material), and the presence of burrowing owl individuals or pairs. If the habitat assessment does not identify suitable habitat and surveys are not conducted as described below, an additional habitat assessment shall be conducted within 14 days prior to construction and if new potentially suitable burrowing owl refugia are present surveys shall be conducted as described below, unless otherwise approved in writing by CDFW. The results of the habitat assessment shall be emailed to the CDFW contact below (see Contact Information section), and the Project shall

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obtain CDFW's written approval of the habitat assessment prior to starting Project activities.

If a suitable burrowing owl habitat is observed, four surveys shall be conducted to detect the presence of burrowing owl pursuant to the CDFW 2012 Staff Report. The site visits shall be spread evenly throughout the non-breeding season. The survey results shall be emailed to the CDFW contact below, or if unavailable another CDFW representative, and the Project shall obtain CDFW's written approval of the survey results prior to starting Project activities. In addition, a take avoidance survey shall be completed within 14 days prior to the start of construction, as described in the CDFW 2012 Staff Report.

If burrowing owl is detected, the Project shall immediately notify CDFW. The Project shall avoid impacts to the burrowing owl and implement a 1,640-foot buffer area around the owl site in which no Project activities shall occur, unless otherwise approved in writing by CDFW. A Qualified Biologist shall monitor any detected owl to ensure it is not disturbed.

If the Project cannot ensure burrowing owl and their burrows are fully avoided, the Project shall consult with CDFW and obtain a take authorization or otherwise demonstrate compliance with CESA. Take is likely to occur and the Project shall obtain an ITP if: 1) burrowing owl surveys of the Project site detect burrowing owl occupancy of burrows or burrow surrogates, or 2) there is sign of burrowing owl occupancy on the Project site within the past three years and habitat has not had any substantial change that would make it no longer suitable within the past three years. Occupancy means a site that is assumed occupied if at least one burrowing owl has been observed occupying a burrow or burrow surrogate within the last three years. Occupancy of suitable burrowing owl habitat may also be indicated by burrowing owl sign including its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site. If burrowing owl, or their burrows or burrow surrogates, are detected within 500 meters (1,640 feet) of the Project site during burrowing owl surveys, but not on the Project site, the Project shall consult with CDFW to determine if avoidance is feasible or an ITP is warranted and shall obtain an ITP if deemed necessary by CDFW.

MM-BIO-4: Project activities shall not occur within 0.25 miles of Northern Spotted Owl nesting habitat from March 15 to July 31, unless Northern Spotted Owl surveys have been completed by a Qualified Biologist following the U.S. Fish and Wildlife Service's (USFWS) *Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls*, dated (revised) January 9, 2012, and the survey report is accepted in writing by CDFW. Surveys shall be conducted in accordance with Section 9 of the survey protocol, *Surveys for*

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Disturbance-Only Projects. If breeding Northern Spotted Owl are detected during surveys, the CDFW Bay Delta Region office shall be immediately notified, and a 0.25-mile construction avoidance buffer zone shall be implemented around the nest. Survey results shall be provided to CDFW and to the Spotted Owl Observations Database (<https://wildlife.ca.gov/Data/CNDDDB/Spotted-Owl-Info>). No project activities shall occur within the buffer zone until the end of breeding season, or a Qualified Biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. If take of Northern spotted owl cannot be avoided by project activities, The Project shall obtain a CESA incidental take permit from CDFW prior to starting project activities, and authorization from USFWS may be required.

Alternate buffer zones may be proposed by a Qualified Biologist after conducting an auditory and visual disturbance analysis following the USFWS guidance, *Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California*, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW.

MM-BIO-5: In water work shall be avoided where Coho salmon or California freshwater shrimp may occur, as determined by a Qualified Biologist based on a review of CNDDDB and consultation with CDFW. If take of Coho salmon cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to commencing project activities and shall comply with the ITP.

III. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS?

COMMENT 3: Riparian Habitat, Wetlands, and Lake and Streambed Alteration Notification

Issue, specific impacts, why they may occur and be potentially significant: If the Project may result in physical changes in the environment, then the Project could result in potentially significant impacts to riparian habitat, wetlands, or other sensitive natural communities.

Recommended Mitigation Measure: If impacts to riparian habitat, wetlands, or other sensitive natural communities may occur, to reduce potential impacts to less-than-significant and comply with Fish and Game Code section 1600 et seq., CDFW recommends including the mitigation measure below.

MM-BIO-6: The Project shall submit an LSA notification for any direct on-site or indirect off-site impacts to streams or lakes. For Project activities that may substantially alter the bed, bank, or channel of any streams (including ephemeral

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or intermittent streams), an LSA Notification shall be submitted to CDFW pursuant to Fish and Game Code section 1602 prior to Project construction. If CDFW determines that an LSA Agreement is warranted, the Project shall comply with all required measures in the LSA Agreement, including, but not limited to requirements to mitigate impacts to the streams and riparian habitat. Permanent impacts to the stream and associated riparian habitat shall be mitigated by restoration of riparian habitat at a 3:1 mitigation to impact ratio based on acreage and linear distance as close to the Project area as possible and within the same watershed and year as the impact, unless otherwise approved in writing by CDFW. Temporary impacts shall be restored on-site in the same year as the impact. The Project shall also consult with the Regional Water Quality Control Board (RWQCB) and Corps to impacts to waters such as streams, lakes, and wetlands, and obtain permits if necessary pursuant to the Clean Water Act and Porter Cologne Water Quality Control Act.

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ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

GOV2-11

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (See Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the EIR to assist the City in identifying and mitigating Project impacts on biological resources.

GOV2-12

Questions regarding this letter or further coordination should be directed to Nick Wagner, Senior Environmental Scientist (Specialist), at (707) 428-2075 or

Amy Nicholson
City of Santa Rosa
November 19, 2024
Page 13

Nicholas.Wagner@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or Melanie.Day@wildlife.ca.gov.

GOV2-12
cont.

Sincerely,

DocuSigned by:

Erin Chappell

B77E9A6211EF486

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Draft Mitigation Monitoring and Reporting Program

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2023020166)
Vincent Griego, U.S. Fish and Wildlife Service, Vincent.Griego@fws.gov

REFERENCES

California Department of Fish and Wildlife (formerly California Department of Fish and Game). 2012. Staff Report on Burrowing Owl Mitigation. Available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline>

California Department of Fish and Wildlife. 2024. Petition Evaluation for Western Burrowing Owl (*Athene cunicularia hypugaea*). Available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=225154&inline>

Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

Amy Nicholson
City of Santa Rosa
November 19, 2024
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ATTACHMENT 1

Draft Mitigation Monitoring and Reporting Program

Biological Resources (BIO)		
Mitigation Measure (MM) Description	Implementation Schedule	Responsible Party
<p>MM-BIO-1. Prior to commencing construction-related activities on grassland or wetland habitat suitable to support California tiger salamander, the Project shall obtain a CESA ITP from CDFW for impacts to California tiger salamander and comply with the ITP. Copies of the ITP shall be provided to the City prior to the commencement of construction-related activities. The Project shall obtain authorization from the USFWS for impacts to California tiger salamander and comply with the authorization. The Project shall also provide habitat compensation for California tiger salamander in accordance with the ITP, SRP CS, and 2020 PBO. Please note that the CESA ITP habitat compensation requirements are often consistent with the SRP CS and 2020 PBO but may differ based on site-specific conditions.</p>	Prior to and during ground disturbance	Project Applicant
<p>MM-BIO-2. Prior to ground disturbance, the Project shall submit a special-status plant habitat assessment and an evaluation of potential direct and indirect impacts to any special-status plant habitat, such as modification of hydrological conditions, to CDFW for review and obtain CDFW's written acceptance of the assessment and evaluation, unless otherwise approved in writing by CDFW.</p> <p>If direct or indirect impacts to wetlands, which are generally suitable habitat for Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields may occur, the Project shall submit to CDFW two years of completed botanical survey results and obtain CDFW's written approval of the results prior to Project construction. The botanical survey results should follow CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (available here: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline) and the SRP CS, Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain (available here: https://www.fws.gov/media/santa-rosa-plain-conservation-strategy-appendix-c-through-e). If suitable habitat for other special-status plants may be impacted, the above 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities shall be conducted and the Project shall obtain CDFW's written approval of the results prior to Project construction. If CDFW is unable to accept the survey results, the Project shall conduct additional surveys prior to initiation of Project activities or may</p>	Prior to and during ground disturbance	Project Applicant

Amy Nicholson
City of Santa Rosa
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<p>assume presence of special-status plants, such as Sonoma sunshine, Burke's goldfields, and Sebastopol meadowfoam. Please be advised that for CDFW to accept the results, they should be completed in conformance with the above survey protocols and guidelines, including, but not limited to conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys conducted during drought conditions may not be acceptable. If the botanical surveys result in the detection of CESA listed plants that may be impacted by the Project, or the presence of these species is assumed, the Project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP including, but not limited to providing habitat compensation. In addition, the Project shall consult with the USFWS for any impacts to suitable habitat for plants listed under the federal ESA (e.g., wetlands) and provide compensatory habitat mitigation as required. Impacts to non-CESA listed special-status plants shall be mitigated through compensatory habitat mitigation at a minimum 3:1 mitigation to impact ratio, including a conservation easement and funding and implementing a long-term management plan, unless otherwise approved in writing by CDFW.</p>		
<p>MM-BIO-3. If the Project occurs during the burrowing owl wintering season from September 1 to through January 31, prior to Project activities a Qualified Biologist shall conduct a burrowing owl habitat assessment within 1,640 feet of the Project area pursuant to the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report, available here: https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds), unless otherwise approved in writing by CDFW. The Qualified Biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report survey methodology resulting in detections. The habitat assessment shall focus on searching the CNDDDB and potentially other sources for any burrowing owl records on or within one mile of the Project area, vegetation type and height, suitable burrows (with an opening of greater than 11 cm in diameter and a depth of greater than 150 cm), burrow surrogates (culverts, piles of concrete rubble, piles of soil, burrows created along soft banks of ditches and canals, pipes, and similar structures), and presence of burrowing owl sign (tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, and nest burrow decoration material), and the presence of burrowing owl individuals or pairs. If the habitat assessment does not identify suitable habitat and surveys are not conducted as described below, an additional habitat assessment shall be conducted within 14 days prior to construction and if new potentially suitable burrowing owl refugia are present surveys shall be conducted as described below, unless otherwise approved in writing by CDFW. The results of the habitat assessment shall be emailed to the CDFW contact below (see Contact Information section), and the</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>

Amy Nicholson
 City of Santa Rosa
 November 19, 2024
 Page 16

<p>Project shall obtain CDFW's written approval of the habitat assessment prior to starting Project activities.</p> <p>If suitable burrowing owl habitat is observed, four surveys shall be conducted to detect the presence of burrowing owl pursuant to the CDFW 2012 Staff Report. The site visits shall be spread evenly throughout the non-breeding season. The survey results shall be emailed to the CDFW contact below, or if unavailable another CDFW representative, and the Project shall obtain CDFW's written approval of the survey results prior to starting Project activities. In addition, a take avoidance survey shall be completed within 14 days prior to the start of construction, as described in the CDFW 2012 Staff Report.</p> <p>If burrowing owl is detected, the Project shall immediately notify CDFW. The Project shall avoid impacts to the burrowing owl and implement a 1,640-foot buffer area around the owl site in which no Project activities shall occur, unless otherwise approved in writing by CDFW. A Qualified Biologist shall monitor any detected owl to ensure it is not disturbed.</p> <p>If the Project cannot ensure burrowing owl and their burrows are fully avoided, the Project shall consult with CDFW and obtain a take authorization or otherwise demonstrate compliance with CESA. Take is likely to occur and the Project shall obtain an ITP if: 1) burrowing owl surveys of the Project site detect burrowing owl occupancy of burrows or burrow surrogates, or 2) there is sign of burrowing owl occupancy on the Project site within the past three years and habitat has not had any substantial change that would make it no longer suitable within the past three years. Occupancy means a site that is assumed occupied if at least one burrowing owl has been observed occupying a burrow or burrow surrogate within the last three years. Occupancy of suitable burrowing owl habitat may also be indicated by burrowing owl sign including its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site. If burrowing owl, or their burrows or burrow surrogates, are detected within 500 meters (1,640 feet) of the Project site during burrowing owl surveys, but not on the Project site, the Project shall consult with CDFW to determine if avoidance is feasible or an ITP is warranted and shall obtain an ITP if deemed necessary by CDFW.</p>		
<p>MM-BIO-4. Northern Spotted Owl Surveys. Project activities shall not occur within 0.25 miles of Northern Spotted Owl nesting habitat from March 15 to July 31, unless Northern Spotted Owl surveys have been completed by a Qualified Biologist following the U.S. Fish and Wildlife Service's (USFWS) <i>Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls</i>, dated (revised) January 9, 2012, and the survey report is accepted in writing by CDFW. Surveys shall be conducted in accordance with Section 9 of the survey protocol, Surveys for Disturbance-Only Projects. If breeding Northern Spotted Owl are detected during</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>

Amy Nicholson
City of Santa Rosa
November 19, 2024
Page 17

<p>surveys, the CDFW Bay Delta Region office shall be immediately notified and a 0.25-mile construction avoidance buffer zone shall be implemented around the nest. Survey results shall be provided to CDFW and to the Spotted Owl Observations Database (https://wildlife.ca.gov/Data/CNDDDB/Spotted-Owl-Info). No project activities shall occur within the buffer zone until the end of breeding season, or a Qualified Biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. If take of Northern Spotted Owl cannot be avoided by project activities, Permittee shall obtain a CESA incidental take permit from CDFW prior to starting project activities, and authorization from USFWS may be required.</p> <p>Alternate buffer zones may be proposed by a Qualified Biologist after conducting an auditory and visual disturbance analysis following the USFWS guidance, <i>Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California</i>, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW.</p>		
<p>MM-BIO-5. In water work shall be avoided where Coho salmon or California freshwater shrimp may occur, as determined by a Qualified Biologist based on a review of CNDDDB and consultation with CDFW. If take of Coho salmon cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to commencing project activities and shall comply with the ITP.</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>
<p>MM-BIO-6. The Project shall submit an LSA notification for any direct on-site or indirect off-site impacts to streams or lakes. For Project activities that may substantially alter the bed, bank, or channel of any streams (including ephemeral or intermittent streams), an LSA Notification shall be submitted to CDFW pursuant to Fish and Game Code section 1602 prior to Project construction. If CDFW determines that an LSA Agreement is warranted, the Project shall comply with all required measures in the LSA Agreement, including, but not limited to requirements to mitigate impacts to the streams and riparian habitat. Permanent impacts to the stream and associated riparian habitat shall be mitigated by restoration of riparian habitat at a 3:1 mitigation to impact ratio based on acreage and linear distance as close to the Project area as possible and within the same watershed and year as the impact, unless otherwise approved in writing by CDFW. Temporary impacts shall be restored on-site in the same year as the impact. The Project shall also consult with the RWQCB and Corps to impacts to waters such as streams, lakes, and wetlands, and obtain permits if necessary pursuant to the Clean Water Act and Porter Cologne Water Quality Control Act.</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



November 20, 2024

SCH #: 2023020166
GTS #: 04-SON-2023-00941
GTS ID: 28882
Co/Rt/Pm: SON/VAR/VAR

Amy Nicholson, Supervising Planner
City of Santa Rosa
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95402

Re: Santa Rosa General Plan 2050 – Draft Environmental Impact Report (DEIR)

Dear Amy Nicholson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Santa Rosa General Plan 2050 Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the October 2024 DEIR.

GOV3-1

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project will include revisions to the policies and land use map of the existing General Plan. The overall purpose is to create a policy framework that articulates a vision for the long-term physical form and development of Santa Rosa, while preserving and enhancing the quality of life for Santa Rosa residents. The proposed project will add new and expanded policy topics to address the current requirements of State law, modernize the City’s policy framework, and address land use mapping issues and inconsistencies. Zoning and/or land use changes supporting additional development capacity will be concentrated in select areas only. Changes to the city’s transportation infrastructure will include new pedestrian and bicycle connections across U.S. 101 and State Route (SR) 12, road diets, and roadway widenings.

GOV3-2

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR, this project is found to have a significant and unavoidable VMT impact. Caltrans acknowledges that the General Plan has identified Action 3-1.1, Action 3-1.2, and Action 3-1.3 to help mitigate future developments' potential VMT impact. We commend the City for working with Sonoma County Transportation Authority (SCTA) and other local and regional partners to explore developing a VMT mitigation bank alternative which would help further reduce VMT.

GOV3-3

Additionally, given that City of Santa Rosa is a large growing city that may see substantial developments in the future, the City should continue to research and explore funding opportunities for investing the appropriate local transit system based on the City's future needs, particularly for the east-west axis. A strong reliance on U.S. 101 and Sonoma-Marin Area Rail Transit (SMART) would concentrate growth and investments in the north-south direction, which might result in increased VMT compared to a similar-sized city with various axes of importance. We encourage the City to consider strategies to further improve east-west connections that would create a complete, interconnected transportation network that helps advance the General Plan's goals.

GOV3-4

Multimodal Transportation Planning

Please review and include the reference to the *Caltrans District 4 Pedestrian Plan* (2021) in the DEIR. This plan studies existing conditions for walking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 ([link](#)) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

GOV3-5

Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel.

GOV3-6

Amy Nicholson, Supervising Planner
November 20, 2024
Page 3

Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

GOV3-6
cont.

Caltrans encourages the City to foster meaningful, equitable and ongoing public engagement in the General Plan development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner, via LDR-D4@dot.ca.gov.

GOV3-7

For future early coordination opportunities or project referrals, please visit Caltrans LDR website (link) or contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse



2550 Ventura Avenue
Santa Rosa, CA 95403

p: (707) 565-1900
f: (707) 565-1017

Tennis Wick
Director

Scott Orr
Assistant Director

Michelle Arellano
Administration

Nathan Quarles
Engineering and Construction

Tyra Harrington
Code Enforcement

Genevieve Bertone
Communications

Steve Mosiurchak
Fire Marshal

John Mack
Natural Resources

Brian Keefer
Ombudsperson

Via Email

20 November 2024

Amy Nicholson
Supervising Planner, Advance Planning
Santa Rosa Community Development Department
100 Santa Rosa Avenue, Room 3
Santa Rosa California 95404

RE: NOTICE OF AVAILABILITY OF DEIR FOR SANTA ROSA GENERAL PLAN

Ms. Nicholson:

Thank you for providing the Notice of Availability for the Draft Environmental Impact Report (DEIR) for the City of Santa Rosa's General Plan Update as issued on 7 October 2024. We appreciate the opportunity to review the DEIR and the Project.

GOV4-1

As neighboring jurisdictions striving to support a sustainable future, we share many common issues and challenges. The development of a new General Plan is a unique and valuable opportunity to address these challenges. With Santa Rosa moving toward completion of Santa Rosa Forward and the County of Sonoma beginning the visioning process for General Plan Sonoma, we have an opportunity to not only address local issues, but to recognize local issues of regional significance, and identify opportunities for collaboration to achieve mutual benefits.

Santa Rosa and the unincorporated County have the largest populations in the county (first and second, respectively). Santa Rosa is the fifth largest city in the Bay Area. Land-use policies within these jurisdictions have far-reaching effects on land-use throughout the region. Santa Rosa Forward includes multiple goals and policies that acknowledge this relationship and call for coordination between our jurisdictions.

GOV4-2

Natural resource conservation within the city, like transportation, housing, and other land use issues, has significant implications for local ecosystems. Ongoing commitment to initiatives such as the Citywide Creek Master Plan can enhance waterways, regional trails, and active transportation networks, while also promoting equitable access to parks throughout the city. Projects like the Southeast Greenway offer promising opportunities to improve access to city, county, and state parks.

City-centered growth is fundamental to Santa Rosa Forward and General Plan Sonoma. The unincorporated County and all nine cities share a compact built upon city-centered growth around transit nodes, contained within urban growth boundaries, buttressed by community separators and agricultural preservation and open space acquisitions. These interrelated measures protect our identity, agricultural economy, and open space.

Residents and businesses within multiple unincorporated areas surrounded by or close to city limits are part of the Santa Rosa community. I appreciate Santa Rosa's Vision represented in the 13 ideals of Santa Rosa Forward, recognizing the impact of land use policies on communities throughout the region, and welcoming the input from all members of the public in the general plan process.

Looking forward to the upcoming Regional Housing Needs Allocation (RHNA) cycle, we recognize the importance of ensuring a fair and equitable housing allocation for all residents of Sonoma County. Instead of relying on the Association of Bay Area Governments (ABAG) to determine the regional fair share of housing, the County is committed to supporting and promoting the formation of a RHNA subregion, as allowed by state law. This approach offers the opportunity for a more equitable and tailored allocation process, benefiting all cities within the subregion. I invite the City to join us in future discussions to further this effort and to work collaboratively with the other cities for a fairer distribution of housing.

GOV4-2
cont.

Thank you for the opportunity to review the DEIR and Project. I look forward to more opportunities to connect as Santa Rosa and the County of Sonoma continue advance our new General Plans.

GOV4-3

Tennis Wick
Digitally signed by Tennis Wick
Date: 2024.11.20 15:25:24 -08'00'

Tennis Wick, AICP
Director

EC:
File PPR24-0019
Scott Orr, Assistant Director
Ross Markey, Division Manager
Katrina Braehmer, Supervising Planner
Doug Bush, Project Planner

November 19, 2024

Amy Nicholson, Supervising Planner – Advance Planning
Planning & Economic Development Department
City of Santa Rosa
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

Dear Ms. Nicholson:

We are writing on behalf of the groups listed below to provide feedback on the Draft Environmental Impact Report (EIR) for the proposed General Plan 2050. In particular, we are concerned about the findings of the Transportation chapter of the Draft EIR, which states that the proposed General Plan would result in 57.9 million additional vehicle miles traveled (VMT) per year, or approximately 158,630 daily VMT. We recognize that calculating average projected VMT per capita is complex, and roadway VMT is just one part of the equation. Nevertheless, we are concerned that this additional VMT represents an unnecessary undermining of city and state goals.

ORG1-1

As you no doubt understand, an increase in VMT is undesirable, contributing to a host of negative consequences for cities including increased air and noise pollution, greenhouse gas emissions, traffic congestion, traffic violence, high infrastructure costs, and more. For these reasons, the State of California has made it clear that cities should be doing everything in their power to [reduce VMT](#) – a goal that is repeatedly and forcefully endorsed by the General Plan itself. And yet the Draft EIR not only finds that the proposed General Plan will result in the opposite, but that that outcome is supposedly *unavoidable*. We disagree. We can and must do better.

ORG1-2

We understand that the General Plan calls for many positive VMT reduction strategies, which we applaud. We are concerned that these steps are being negated by continued allegiance to car-centric growth. Specifically, we learned from the analysis and from discussion at the November 14 meeting of the Planning Commission, that the projected growth in VMT is driven primarily by the proposed increase in arterial lane miles and the expected increase in vehicle travel this will induce. On that basis, we believe it is in the best interest of the city and its residents to remove many (if not all) of the projects that would increase road capacity from the proposed General Plan. This is not only desirable as a strategy to limit vehicle miles traveled and their many externalities, but also as a matter of fiscal responsibility. New road infrastructure is expensive to build and even more expensive to maintain over time. As we currently struggle to maintain the roads we already have, we should not build costly and counter-productive infrastructure liabilities into our general plan.

ORG1-3

As a final note, in preparing this letter, we found it very easy to access the information and documents available on the General Plan website. We appreciate your continued efforts to keep the site updated for the benefit of the public.

ORG1-4

Sincerely,

Alexa Forrester & Chris Guenther, Co-Leads, [Bikeable Santa Rosa](#)

Eris Weaver, Executive Director, [Sonoma County Bicycle Coalition](#)

Adrian Covert & Lauren Fuhry, Co-leads, [Santa Rosa YIMBY](#)

Kevin Conway, Friends of the Santa Rosa Climate Action Plan ([FOCAP](#))

Shirley Johnson, [Sierra Club Sonoma Group](#)

Steve Birdlebough, [Sonoma County Transportation and Land Use Coalition](#)

Woody Hastings & Jenny Blaker, Co-coordinators, Coalition Opposing New Gas Stations ([CONGAS](#))

Ann Hamilton, North Bay Resilience Manager, [Greenbelt Alliance](#)

From: Andrew Smith <a.asmith@comcast.net>

Sent: Sunday, October 20, 2024 9:50 AM

To: Nicholson, Amy <anicholson@srcity.org>

Subject: [EXTERNAL] Draft Environmental Impact Report General Plan 2050

Amy,

Greetings. Wanted to give some comments on this huge report and process going on for a few years.

The city of Santa Rosa has housing obligations to meet under state requirements and overall doing a good job especially for affordable housing.

My biggest criticism for the city council is the focus on making downtown an urban area and restricting of housing being built on the westside where there seems to be plenty of open spaces to build for all types of housing. The two should not be mutually exclusive. Santa Rosa is a suburban-rural city and while density is increasing naturally over time for housing and where people live, it is not an urban area. Wanting to get people out of their cars to use public transportation, bicycles and walking are good ideas but you can't transform Santa Rosa to be more urban.

In fact, one of the biggest issues to get people to use public transportation is an outdated bus model in Sonoma County with 3 transit systems. Merging Santa Rosa's Transit system with Sonoma County Transit means better integration of bus schedules and with SMART train. Right now, the focus is to do a better job of connecting buses and SMART trains but is it happening which the Metro Transportation Commission has recommended doing?

Answer seems to be no! Worse, we don't know the future of the SMART train as it needs to renew its sales tax by 2029 in a 2/3 vote in Sonoma County where there was failure to do that a few years. The hiring of bus personnel for Santa Rosa Transit means competing with Sonoma County Transit. A story in the Press Democrat earlier this year on the inability to hire bus drivers and other important personnel leaving buses not being used. Not a good way to ensure that those people wanting this urban environment will want to live downtown.

In fact, one area that Santa Rosa should focus on is making it easier to use public transportation a policy to go to the three hospitals in our city and related offices for medical appointments. Healthcare is a huge sector in our city. It is used not just by people in Santa Rosa but those in Northern and Southern Sonoma County and probably in Mendocino and Lake Counties. If SMART survives and at least gets to Healdsburg, people in Mendocino and Lake Counties could drive down to the SMART station in Healdsburg and take the train

PUB1-1

PUB1-2

to one of the three hospitals and medical offices as long as there are shuttles or buses available.

One area for home ownership that is lacking in Santa Rosa and I have written the city council on it is building condominiums for first time buyers. A way for home ownership and to build equity. Seems like the focus is just on single family homes and townhouses in Santa Rosa. Condominiums are a good use of land for higher density housing and brings in more needed property taxes and other fees for Santa Rosa. This could help the middle class to stay in Santa Rosa who have to deal with rising costs to live here.

The city council has allowed housing to be built in the downtown area without at least one parking place per unit. Supposedly that forces some tenants to pay for parking at a city lot. But what happens if that tenant parks on the street in front of homeowner's housing? Next thing you have is Santa Rosa implementing Permit Fee parking to park in front of their own houses. That is wrong! If Santa Rosa wants to allow this type of housing built in the downtown area without the minimum one parking place per unit, then a restriction should be made that no one can rent an apartment if they have a vehicle and no parking places in the building are available.

I am not sure if this part of the EIR includes Santa Rosa annexing properties inside the city limit. There was a Press Democrat story in 2023 on this issue and 30 islands of Sonoma County property located inside the city limits. Why not annex them which would bring in extra property taxes and other fees needed by Santa Rosa government. And some other areas as well that are within the city's boundary. There will not be a problem for police and fire services as they just drive by these areas all the time. As long as the annexation is within city limits, a good policy for more property tax revenue and other city fees without stressing important city services.

Andrew Smith

Santa Rosa

PUB1-2
cont.

PUB1-3

Woltering, Nancy

From: garayllc@pacbell.net
Sent: Tuesday, November 5, 2024 2:48 PM
To: Woltering, Nancy
Cc: garayllc@pacbell.net
Subject: RE: [EXTERNAL] RE: General Plan EIR Table
Attachments: 20241105_142652.jpg

Hi Nancy,

Where should we direct any comments regarding the GPU for consideration by Planning Commission.

The Acacia sites which we have been exchanging emails about are part of a combined rezoning application PRJ24-019. They are the proposed as the No Net Loss component of the downzoning of the 3150 Dutton Ave site. We would request that those parcels be footnoted in the EIR to reflect these parcels as being a part of this joint application. Please see attached Notice Of Application.

Sincerely,

Mark M. Garay, Esq.
Law Offices Of Mark M. Garay
430 Ridge Road
Tiburon CA 94920

Mobile 415 722-0100
Office 415 435-5100
Fax 415 399-1616
garayllc@pacbell.net

PUB2-1

PUB2-2

Woltering, Nancy

From: garayllc@pacbell.net
Sent: Wednesday, November 6, 2024 4:10 PM
To: Woltering, Nancy
Cc: Nicholson, Amy
Subject: [EXTERNAL] RE: Santa Rosa General Plan 2050 Draft EIR - Comments
Attachments: 20241105_142652.jpg

Thank you very much for forwarding my request to Amy Nicholson.

Amy, please submit this request to the Planning Commission and make them part of the comments file.

As stated, The Acacia sites which we have been exchanging emails about are part of a combined rezoning application with 3150 Dutton Ave. The two parcels are proposed as the upzoning to satisfy the No Net Loss component of the downzoning of the 3150 Dutton Ave site. We would request that those parcels 615 & 625 Acacia Lane, APNs 182-520-098 & 182-520-099 be footnoted in the EIR to reflect the nexus that these parcels as being a part of this current joint application PRJ24-019 . Please see attached Notice Of Application. We want the Council to be aware that this application is in process and may in fact come to them shortly after their approval of the GPU, so they may be fully informed and anticipate this land use change.

Sincerely,

Mark M. Garay, President
 Paladin Funding, Inc.
 430 Ridge Road
 Tiburon CA 94920

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 Office 415 435-5100
 Fax 415 399-1616
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Mark@paladinfunding.com

PUB3-1

PUB3-2

From: Kelsey Cody <kelsey.cody@gmail.com>
Sent: Friday, November 8, 2024 1:25 PM
To: Nicholson, Amy <anicholson@srcity.org>
Subject: [EXTERNAL] Santa Rosa General Plan 2050 EIR

Hi Allison,

I notice that Figure 4-4.3, Special-Status Animals and Critical Habitats, from the Biological Resources chapter does not have a legend indicating what species correspond to the abbreviations. It would be helpful if the map was revised to include that legend, or if a separate legend could be provided in an errata.

PUB4-1

Thank you.

-Kelsey

Kelsey C. Cody, Ph.D.
(707) 333-3776
kelsey.cody@gmail.com



November 12, 2024

Ms. Karen Weeks, Chair
 City of Santa Rosa Planning Commission
 100 Santa Rosa Avenue
 Santa Rosa, CA 95404

RE: Comments on Draft EIR for the Santa Rosa 2050 General Plan

Dear Ms. Weeks:

Thank you for the opportunity to provide comments on the Draft EIR for the Santa Rosa 2050 General Plan. This letter is being submitted on behalf of property owners in the Todd Creek area of unincorporated southeast Santa Rosa, who have had a long-standing interest in annexing and developing their land with needed housing. Our comments on the Draft EIR and Draft 2050 General Plan document are summarized below followed by a more detailed statement.

PUB5-1

The Draft Santa Rosa 2050 General Plan and corresponding Draft EIR do not recognize that a major planning study is underway for the 1,900-acre south Santa Rosa area (South Santa Rosa Specific Plan). Both the 2050 General Plan and Draft EIR should acknowledge this effort and anticipate that large areas of land within the south Santa Rosa area will be annexed over the next 25 years. More specifically, the Draft EIR should be revised to: (1) note the potential for large annexations to occur in the south Santa Rosa area; and (2) consider any potential impacts that may be associated with future annexation of land within the south Santa Rosa area.

PUB5-2

The Todd Creek area presents the single greatest opportunity for the City to secure its housing future. Its development will accommodate a variety of housing types at all income levels that will meet the needs of Santa Rosa residents, including young adults, families, empty nesters and seniors. Annexation and development of the Todd Creek area will also create a new neighborhood with amenities that are currently lacking for residents of the 1,300 existing homes along the south Santa Rosa Avenue corridor. This new neighborhood will feature a community park, neighborhood-serving stores, and access to open space areas. Future development will also help to support and sustain the operation of transit service along Santa Rosa Avenue by bringing hundreds of new homes in close proximity to bus routes serving the downtown area.

PUB5-3

The City has recognized the opportunities presented by the Todd Creek area and has included it as part of the South Santa Rosa Specific Plan study area. The South Santa Rosa Specific Plan is a major planning effort that includes the City's Santa Rosa Ave Corridor Priority Development Area (PDA), the County of Sonoma's South Santa Rosa Ave PDA, and the Moorland Avenue and Industry West areas on the west side of Highway 101. In total, the South Santa Rosa Specific Plan encompasses approximately 1,900 acres – the largest of any Specific Plan prepared by the City.

PUB5-3
cont.

It was surprising to find that there is no recognition of the South Santa Rosa Specific Plan planning effort in the current draft of the 2050 General Plan document or the Draft EIR for the 2050 General Plan. The City has been in discussions with representatives of the County of Sonoma about possible annexation of the south Santa Rosa area and is also aware of the development interests of property owners in the Todd Creek area. Large-scale annexations of land within the 1,900-acre South Santa Rosa Specific Plan area – whether City-initiated or developer initiated – are likely to occur within the time frame of the 2050 General Plan. Both the 2050 General Plan and Draft EIR should acknowledge this. The 2050 General Plan should provide guidance on the overarching planning interests to be addressed or achieved by the Specific Plan process and how future annexations in the south Santa Rosa area will be integrated into the City's long-range plan for growth and development. The Draft EIR should note the potential for future large-scale annexations in the south Santa Rosa area as part of the project description and consider potential impacts as appropriate.

PUB5-4

Thank you for your consideration of these comments.

PUB5-5

Respectfully,



Ken MacNab
KMac Advising, LLC
ken@kmacadvising.com

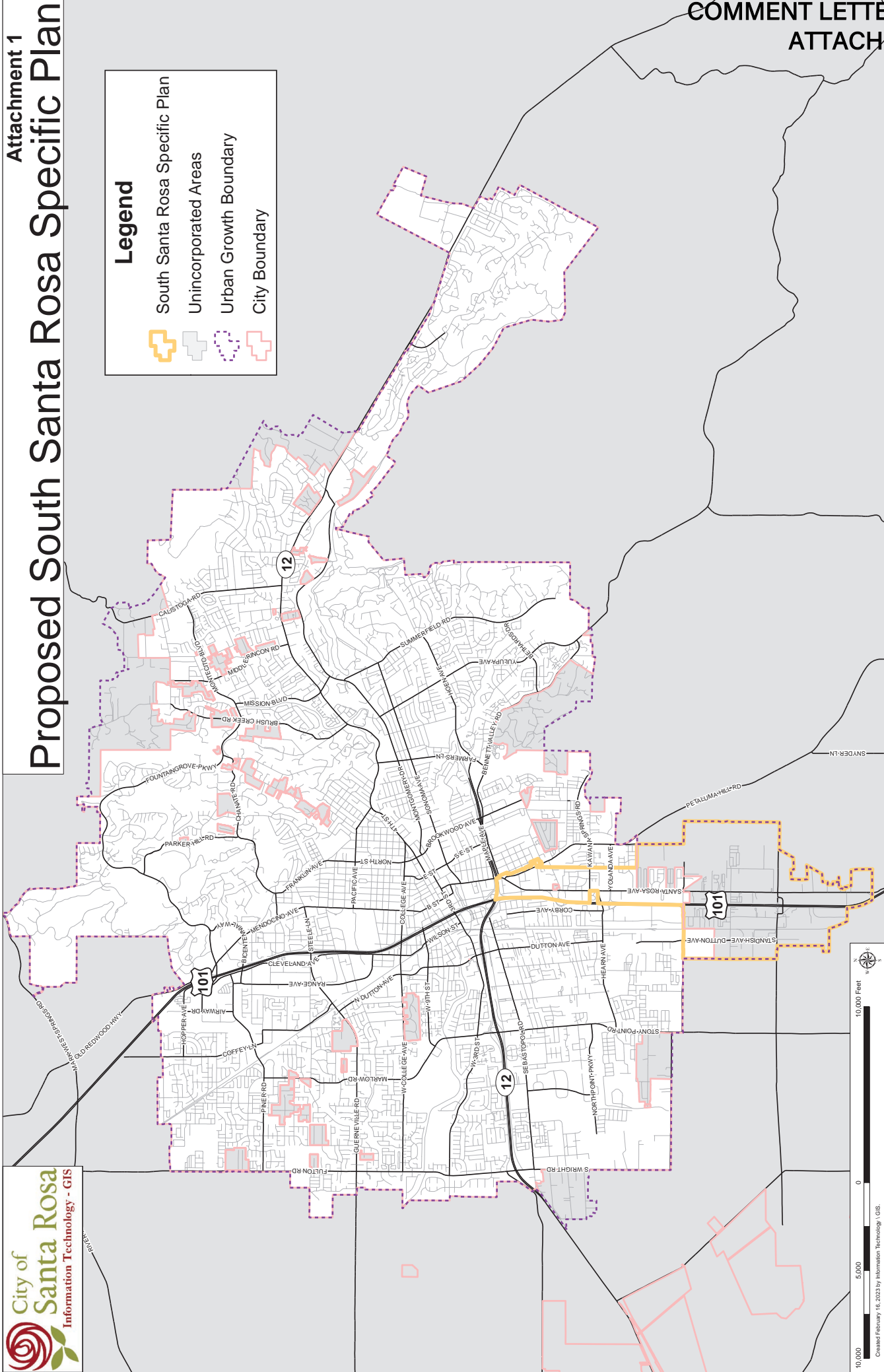
cc: Amy Nicholson, Supervising Planner

Attachments:

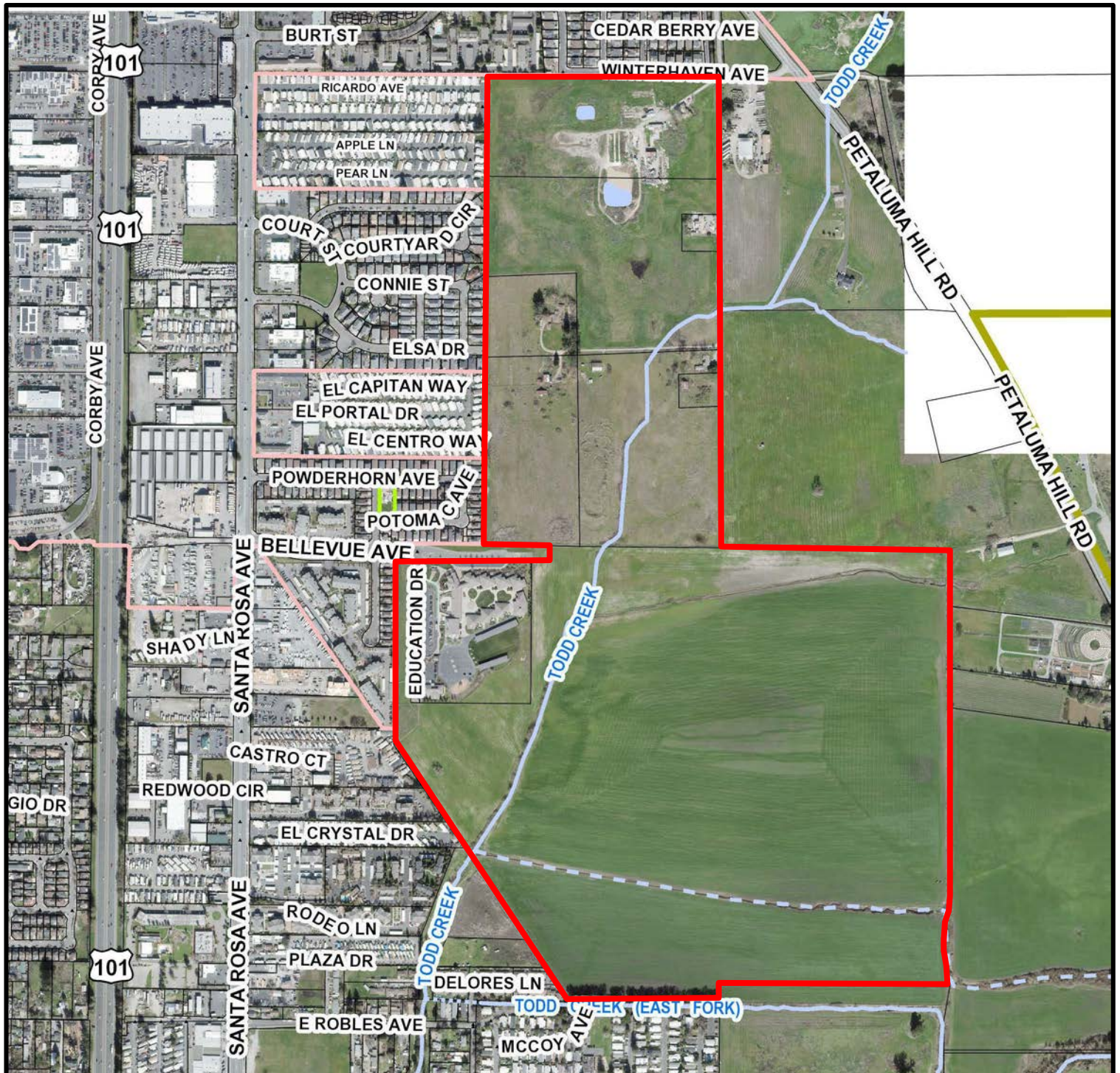
Map of South Santa Rosa Specific Plan Area
Map of Todd Creek area

Legend

- South Santa Rosa Specific Plan
- Unincorporated Areas
- Urban Growth Boundary
- City Boundary





TODD CREEK AREA



SOURCE: City of Santa Rosa GIS

LEGEND

-  City Limits
-  Todd Creek Area



1" = 9,600'

Sonia E. Taylor
 306 Lomitas Lane
 Santa Rosa, CA 95404
 707-579-8875
Great6@sonic.net

20 November 2024

Nancy Woltering
 Amy Nicholson
 City of Santa Rosa

Via Email

Re: Comments to the Draft Environmental Impact Report for the
 Proposed Santa Rosa General Plan 2050

Dear Ms. Woltering and Ms. Nicholson:

Below are my comments to the Draft Environmental Impact Report for the proposed Santa Rosa General Plan 2050 (SR GP DEIR).

PUB6-1

I appreciate the opportunity comment on this SR GP DEIR, and will be happy to answer any questions you might have.

1. The SR GP DEIR Relies on Discretionary Laws/Regulations/Rules, and Proposes Discretionary Actions

As a result of California's housing crisis, over the past years the California Legislature has passed, and the Governor has signed into effect, multiple laws which streamline housing projects, including laws which allow projects to entirely bypass the California Environmental Quality Act (CEQA). While at least some of these laws don't go into effect unless a jurisdiction such as Santa Rosa doesn't have a Certified Housing Element, or when a jurisdiction is determined not to have met their Regional Housing Needs Assessment numbers (RHNA), some of the laws, such as this year's AB 2243, eliminate the ability of a jurisdiction to use CEQA at all in project approvals.¹

PUB6-2

Many, if not all, of these laws eliminate the ability of a jurisdiction to make any discretionary findings – only objective findings are permitted.

And, of course, in spite of Santa Rosa's diligent efforts, it is probable that at some point during the duration of General Plan 2050 Santa Rosa will not meet RHNA and therefore will lose all ability to use any discretion in considering many housing project approvals.

¹ Given the continued erosion of the ability to use CEQA to evaluate projects, I believe it is necessary for Santa Rosa to establish their own local thresholds of significance, which are specific environmental thresholds Santa Rosa would use to determine whether a proposed project's effects on what would normally be CEQA impacts would be considered significant in Santa Rosa.

Unfortunately, the SR GP DEIR in multiple instances impermissibly relies on ability of Santa Rosa to use discretion and/or CEQA before approving projects which will have environmental impacts. Further, the SR GP DEIR then reaches conclusions about whether impacts will be significant or less than significant (either with or without mitigation) based on its erroneous reliance on Santa Rosa's continued ability to use discretion when evaluating projects.

PUB6-2
cont.

Without being exhaustive, a few examples of this error in the SR GP DEIR are:

4.12 Noise

Table 4.12-4, Conditionally Acceptable "note"

New construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

PUB6-3

As is obvious, this is not objective – "should." In the case of ministerial housing projects Santa Rosa will have no ability to require any analysis of noise reduction, because this is not objective. This is unacceptable.

4.17 Utilities Services Systems

Sewer Design Standards

More stringent requirements may be imposed by the Director of Santa Rosa Water based on specific project conditions.

PUB6-4

As is obvious, this is not objective – "may." In the case of ministerial housing projects Santa Rosa will have no ability to require any more stringent requirements that would be appropriate, because this is not objective. This is unacceptable.

Additionally, the SR GP DEIR also has required Action items which are proposed to mitigate environmental impacts. Unfortunately, some of those Action items themselves are discretionary, assuming that Santa Rosa will continue to have any ability to use that discretion, which is unacceptable, and may result in inaccurate assessment of the environmental impacts, actual mitigation measures required, and determination of levels of significance of housing development in the SR GP DEIR.

Without being exhaustive, some examples of this error in the SR GP DEIR are:

4.10 Hydrology/Water Quality:

PUB6-5

Action 3.5-5: Explore options that help to conserve wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species, such as:

- Avoidance of sensitive habitat.
- Clustered development.
- Transfer of development rights.

- Compensatory mitigation, such as habitat restoration or creation.

This Action item is neither required nor objective, and requires the use of discretion that will be prohibited in many instances of ministerial housing development. Either this Action item must be amended to be objective, or it cannot be relied upon as mitigation.

Action 5-1.9: Identify enhanced erosion-control measures for properties that exhibit high erosion potential, are in areas of steep slopes, or have experienced past erosion problems.

This Action item is neither required nor objective, and requires the use of discretion that will be prohibited in many instances of ministerial housing development. Either this Action item must be amended to be objective, or it cannot be relied upon as mitigation.

4.12 Noise

Action 5-7.9: Use conditions of approval to achieve measures to reduce noise and vibration impacts primarily through site planning, and avoid engineering solutions for noise and vibration mitigation, such as sound walls, if possible.

This Action item appears to be neither required nor objective, and requires the use of discretion that will be prohibited in many instances of ministerial housing development. Either this Action item must be amended to be objective, or it cannot be relied upon as mitigation.

4.18 Wildfire

Action 5-3.1: Consider ways that new development can incorporate greenbelt zones into the design to reduce wildfire risk and enhance climate resilience.

Action 5-3.2: Work with land use applicants to locate development relative to landscape features that can act as buffers from oncoming wildfires (like agricultural lands and maintained parks and greenbelts).

Neither of these Action items are required nor objective, and require the use of discretion that will be prohibited in many instances of ministerial housing development. Either these Action items must be amended to be objective, or it cannot be relied upon as mitigation.

4.18 Wildfire

Action 5-3.5: Continue to require new development, redevelopment, and remodels to comply with adopted codes and standards and promote implementation of recommendations for fire-safe design in the Community Wildfire Protection Plan.

The second half of this action is neither required nor objective – “promote,” and requires the use of discretion that will be prohibited in many instances of ministerial housing development. Either this Action item must be amended to be objective, or it cannot be relied upon as mitigation.

For the SR GP DEIR to be accurate, every instance when said SR GP DEIR relies on any discretionary rule/law/regulation in determining environmental impacts and/or mitigations that may be necessary,

PUB6-5
cont.

PUB6-6

PUB6-7

PUB6-8

including when the SR GP DEIR itself relies on a discretionary Action as mitigation, must be reevaluated to ensure accurate conclusions.

PUB6-8
cont.

2. The SR GP DEIR Relies on the Payment of Impact and Other Fees by Development Projects

On Tuesday, November 19, 2024, the Santa Rosa City Council voted to waive some fees for affordable housing to help Santa Rosa meet RHNA. It is possible that there will be future fee reductions and/or waivers required by state law and/or implemented by the City Council. Given that in multiple locations in the SR GP DEIR reliance on those fees is used as mitigation to offset the environmental impacts of development, how will that be affected by this fee waiver, as well as by any future fee reductions/fee waivers?

Some examples include:

4.14 Public Services, Parks and Recreation

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

At page 16 of the PDF, the following is stated:

Potential future development that may occur due to implementation of the proposed project would be required to comply with SRCC Chapter 21-014, which requires new development in Santa Rosa to pay a fee that will be used on certain public infrastructure facilities required to serve the new development.

PUB6-9

4.17 Utilities and Service System

Storm Water Assessment Funding

The Storm Water Assessment is a charge placed on each city parcel and is used to fund such projects as mapping and evaluating the storm drain system, flood control improvements, responses to flooding issues and creek restoration.

And

Action 5-2.13: Identify and collect development impact fees needed to pay for mitigation of stormwater management impacts for new development.

The SR GP DEIR must reevaluate its conclusions about fees acting to mitigate environmental impacts and reach new conclusions about what those impacts will be when fees are waived, as they now are for some housing projects.

3. Project Description Specific Comments

Section 3.6, paragraph 6 calls out a “range of housing,” including Missing Middle housing, but makes no mention of legally affordable housing. Why not?

PUB6-10

Section 3.7.1.5, Table 3-4, Chanate Rd is called out for improvements, as a “Resiliency corridor,” with reference to the 2021 Moving Forward 2050 Sonoma County Comprehensive Transportation Plan (hereinafter “the Plan”). That Plan does list Chanate Road as a “project,” with no definition of “resiliency”² with a 2021 cost of \$13 million, but contains no details of either what resiliency means, or what is planned, other than: “The scope of this project includes: Fire evacuation route (Mendocino Avenue to Parker Hill Road) includes roundabout @Parker Hill Rd and Chanate Rd and modifying existing median.”

The same problem exists a few items down in Table 3-4, where “Evacuation Routes” are called out for improvements, listed as “Primarily on arterials within wildland-urban interface including Fountaingrove Parkway and Montgomery Drive.” The 2021 Moving Forward 2050 Sonoma County Transportation Plan lists this as a project, with the sum of the details being ““This project would modify existing roadways to enhance evacuation strategies in the event of a disaster primarily on arterials associated with wildland urban interface (WUI) areas. This project could also include intersection improvements.” As is obvious, the last sentence, where intersection improvements “could” be included, is confirmation that nothing contained in that Plan is an actual planned project.

PUB6-11

All this Plan appears to be is a list of loosely defined possible projects that will become, by being listed, eligible for future funding. There is no indication either in the SR GP DEIR or in Section 4.15 Transportation how mere reference in the Plan actually reflects any real new and improved traffic circulation that can be relied upon as a mitigation in the SR GP DEIR. In fact, it cannot be relied upon in that way, as it is meaningless.

Finally, in 4.18 Wildfire, the SR GP DEIR impermissibly relies on these alleged “projects” for “new or expanded roadways in the WUIFA areas of Santa Rosa, to facilitate access of emergency responders.” The following statement in the 4.18 Wildfire section of the SR GP DEIR is wholly unacceptable:

Specifically, improvements include evacuation route upgrades primarily on arterials in the WUIFA, including Fountaingrove Parkway and Montgomery Drive, and on the Farmers Lane Extension from Bennett Valley Road to Petaluma Hill Road, including sidewalks, bike lanes, and transit route. Accordingly, proposed circulation improvements would not substantially impair the implementation of the Santa Rosa EOP.

PUB6-12

As already stated, reliance on these illusory projects to reach conclusions regarding environmental impacts and their significance is unacceptable. The SR GP DEIR must be amended to eliminate its reliance on these alleged projects contained in the Plan, and must thereafter reassess the environmental impacts, mitigation measures needed and levels of significance.

Section 3.7.3.2 calls for the creation of a new zoning district for Missing Middle Housing. The SR GP DEIR states that Missing Middle Housing “could be combined with any residential or mixed-use

PUB6-13

² This undefined term is used with abandon throughout that Plan, including for conventional road-bed repair, to improve LOS, to add lanes to a conventional freeway interchange, to add lanes to Highway 37, etc.

district....” This is unacceptable. The SR GP 2050 itself states clearly that “In Santa Rosa, Missing Middle Housing is compatible in medium-intensity residential zones (R-2, R 3, TV), mixed-use zones, and some planned development areas.” It is impermissible for the SR GP DEIR to change the General Plan itself by stating that Missing Middle Housing could be in any residential [zoning] district, and this must be corrected.³

PUB6-13
cont.

Thank you for your consideration. Please do not hesitate to contact me if you have any questions.

PUB6-14

Very truly yours,

Sonia E. Taylor

³ Interestingly, in 4.11 Land Use Planning, the SR GP DEIR in Action 2-1.14 merely states “Create development standards for Missing Middle Housing types.” Nonetheless, the SR GP DEIR is the sum of the whole of its parts, and it’s clear that the General Plan 2050’s intention is for Missing Middle Housing to be limited to only some residential zoning districts.

