Memo

2024 University Ave, Suite 400
Berkeley, CA 94704
510.217.5000

Date: November 5, 2025

To: Emily Ander, Assistant Parks Planner
Scott Wilkinson, Park Planner

From: Kari Zajac, Project Manager
Mike Parker, Principal

Subject: Martin Luther King Jr. Neighborhood Park and Newhall Trail Project CEQA Categorical Exemption

Background

Martin Luther King Jr. Park (Park) is an existing neighborhood park located within the South Park Neighborhood in the southeastern portion of the City of Santa Rosa. The Park was created in 1887, and the City has owned and maintained the Park since 1965. The existing Park contains basketball courts; a soccer field; a restroom building; a playground; picnic areas; and amenities such as concrete paved paths, benches, waste receptacles, and limited safety lighting. There are two buildings and an enclosed playground at the Park that are owned, maintained, and utilized by Sonoma Community Action Network (Sonoma CAN) to operate the Head Start preschool and Early Head Start programs. The City leases the land to Sonoma CAN.

Newhall Pedestrian and Bike Trail are a trail park that extend for approximately 0.25 mile from the southeast corner of the Park westward to Petaluma Hill Road, with several access points to the adjacent neighborhood. The trail park was acquired by the City prior to 1887 and was originally intended as a public street. It was instead constructed as a paved pathway with minimal lighting joining the Park and the north-south arterial of Petaluma Hill Road. The trail has fallen into disrepair with illegal dumping and graffiti activity occurring regularly.

The Park Master Plan was adopted in 1973 and amended in 2004. The Park is built out consistent with the existing 2004 plan. However, the Park is used heavily by the community and many facilities require replacement or renovation. Additionally, renovations are needed for compliance with the Americans with Disabilities Act (ADA). Through a community engagement process the City has developed an amended Master Plan based on the feedback received from the community to revitalize the Park. The Master Plan would modernize and expand the Park's amenities while revitalizing the adjacent Newhall Trail, enhancing its utility and safety.

Project Location

The project site is the Park located in the City of Santa Rosa at 1208 Hendley Street and connecting Newhall Bike and Pedestrian Trail (Newhall Trail) (Figure 1). The site encompasses approximately 6.4 acres and is comprised of two parcels (Assessor's Parcel Numbers 038-196-001 and -004 [Newhall Trail is a right-of-way and does not have an assessors parcel number]) (Figure 2). The project site has a General Plan designation of Parks/Recreation and is zoned as Planned Development. The Park is surrounded by the South Park Neighborhood (low and medium density residential) on the north, south, and west. The Sonoma County Fairgrounds are east of the Park across Hendley Street. The Park connects to Petaluma Hill Road via the Newhall Bike and Pedestrian Trail.



Source: Adapted by Ascent in 2025.

Figure 1 Regional Location



Source: Adapted by Ascent in 2025.

Figure 2 **Project Site**

Project Purpose and Need

The Park is heavily used, and amenities in the Park, such as the basketball courts, play equipment, restroom, and picnic areas, need to be replaced or renovated to continue to meet the needs of the community. In addition, several amenities need to be updated for compliance with current ADA building codes. These amenities include access to the play equipment, access to park entrances, and undulations at the northern end of the Park. Newhall Trail is in a state of disrepair and needs to be widened with new paving, lighting added for safety, and improved connections with the Park and Petaluma Hill Road.

Project Description

The City of Santa Rosa proposes to renovate the approximately 6.4-acre Park consistent with the proposed Park Master Plan. The Park would be rehabilitated to meet the needs of the community providing upgrades to existing features, adding new amenities, and improving trail connections as shown in Figure 3.

PARK IMPROVEMENTS

The project would include renovations of the existing sidewalks and internal pathways, security lighting, and reconstruction of the Class I - shared use path that runs along the Park's eastern and southern boundaries and connects with Newhall Trail at Temple Avenue. Renovations to the shared use path would include concrete flatwork, lighting, planted trees with irrigation, removable bollards at Hendley and Temple, and a seamless transition between Newhall Trail and the Park. New pathways adjacent to the existing Head Start preschool at the Park would include Martin Luther King Jr. interpretive elements.

New features at the Park would include relocating the basketball courts to the northern portion of the site and adding a new sports court. The new sport courts would include one futsal court and one basketball court with lighting, player seating, and sloped spectator seating to the west of the futsal court. Fitness equipment and a small picnic area would be located between the two courts. A new tot play area and youth play area would be designated in the center of the Park south of the existing preschool. The play area would be visible from the fields and serve as the central feature of the Park. Picnic tables and porch swings, would be included to the south of the play areas along the Park's central promenade. A central shade structure and trees would provide a large, shaded picnic zone for Park users along Hendley Street. This area would include picnic tables, barbeques, and waste receptacles. The central shade structure would overhang the central lawn providing space for a stage and connection of the picnic area to the central lawn to provide a flexible gathering space for daily uses as well as for small and large community events. The new location for the basketball court would provide additional space to expand into for larger events. New site furnishings such as waste receptacles, water fountains, bike racks, and benches would be placed throughout the Park. In addition to new features and site furnishings, the northern end of the Park would be graded and flattened to remove the undulations. Grading would result in improved visibility and usability to make the northern portion of the Park accessible.

The existing natural turf soccer field would be redesigned as a single 70-yard by 110-yard artificial turf soccer field with PFAS-free fiber and a natural infill material. Player seating would be provided at the east end of the field and spectator seating in the form of small bleachers would be provided at the west end of the field. Equipment storage would be provided at the southeastern corner of the field. The field would include 4 new light poles to allow for use during the evening. Light poles would be 70 feet tall with light shielded downward to limit light spilling into adjacent parcels. The lights would increase the hours of use at the field in the winter with extended evening hours. The light poles would be located near each corner of the proposed field. Each light pole would have a load of 6.16 kilo watts (kW) with 104,000 lumens. The lighting would be designed to provide uniform light distribution across the field and would include "aimable" lights that would be adjusted to minimize light spill in areas surrounding the field. The

maximum glare from the four lighting poles would be 7,848 candelas at residential property lines, which is under the 10,000 candela max recommendation by the Illuminating Engineering Society (IES) (Musco Lighting 2025). The max light spill from the four light poles would be 0.6 foot candles at residential property lines.

Landscaping would be drought tolerant shrub and groundcover species. Approximately 50 trees would be planted throughout the Park to provide shade and greenery. A new irrigation system would be installed at the Park to accommodate proposed landscaping, maintain the soccer field, and to improve efficiency.

A new prefabricated restroom would be installed at the Park to replace the existing restroom building. The restroom would require replacement of the sewer line and would connect to existing City utilities. Bioretention areas would be placed between the soccer field and Temple Avenue, between Hendley Street and the basketball court and large picnic area, and between Temple Avenue and the school aged play area for stormwater retention.

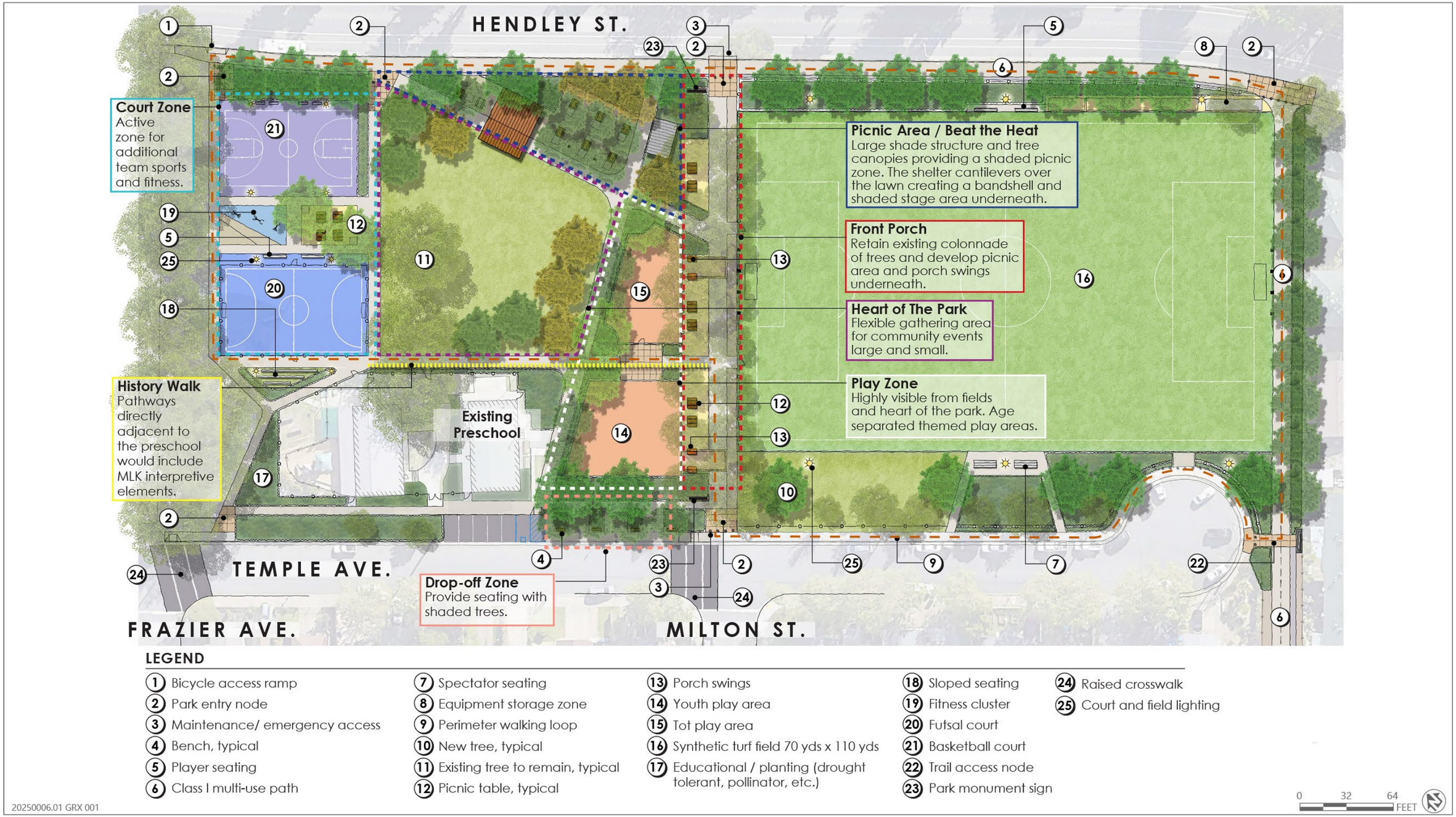
The Park would include six designated entry nodes around the perimeter. Monument signs would be provided at the eastern and western entrances. A new designated drop-off zone would be added to the western portion of the site and would include seating with trees to provide shade. Street parking would be retained along the drop-off zone. Existing 90-degree parking stalls on Temple Avenue would be removed and replaced to meet ADA building codes. Maintenance and emergency access to the Park would be provided at the cross section of Temple Avenue and Milton Street and at Petaluma Hill Road and Hendley Street where they intersect with Newhall Trail. Two raised crosswalks with access to the Park would be installed, one in this same cross section and one across Temple Avenue at Frazier Avenue. Low fencing with gates would be added around the Sonoma CAN preschool campus to delineate Head Start's space from the public park space.

NEWHALL TRAIL IMPROVEMENTS

Improvements to Newhall Trail would include new concrete paving, upgraded and additional pathway lighting throughout the trail corridor, bollards at the three cul-de-sacs that meet the trail, and improved fencing as shown in Figure 4. The trail would be upgraded to approximately 12 feet of concrete for the standard width with a 4-foot gravel shoulder on each side of the trail. Decorative pavement would be added at trail entrances and freestanding mural walls would be added at the connection to Temple, DeTurk, Rutledge, and Grand Avenues. The trail entrance at Petaluma Hill Road would include waste receptacles, benches, public artwork, removable bollards, thematic fencing, and a vertical gateway feature.

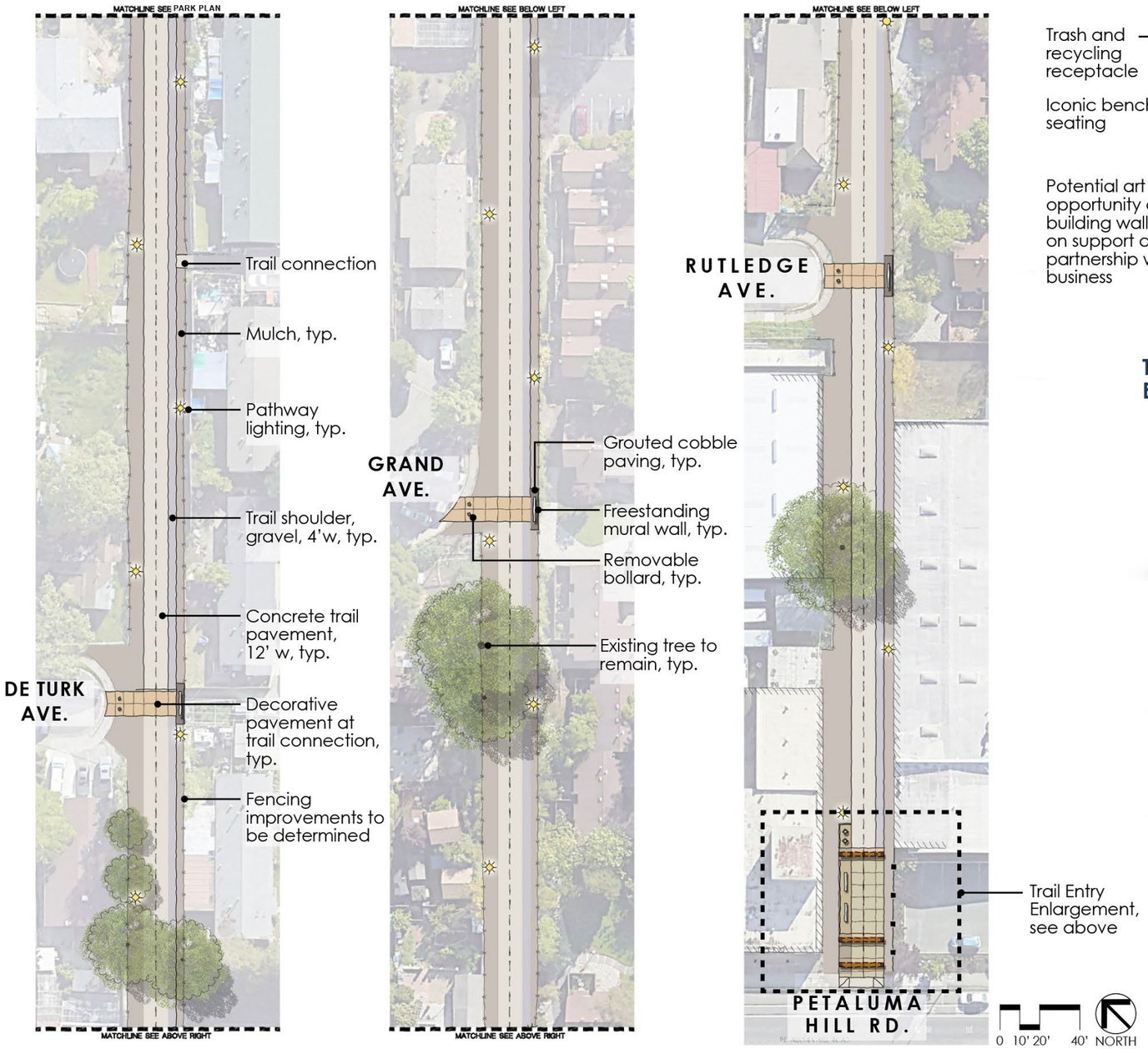
CONSTRUCTION

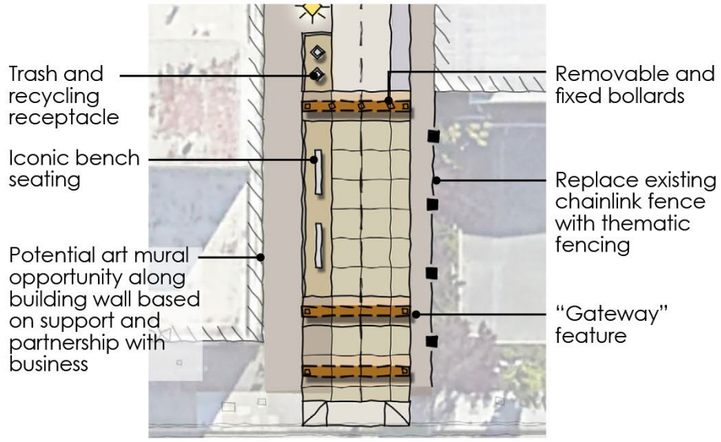
Project construction is expected to commence during the 2026/2027 fiscal year and conclude approximately nine months later. Construction of the proposed raised crosswalks across Temple Avenue at Milton Street and Frazier Avenue would require portions of Temple Avenue to be closed. Road closures along Temple Avenue and Hendley Street may also be required to replace sidewalk and install the new sewer line. Several trees may need to be removed during project construction; however, new trees would be planted to replace any trees removed, and removal would be consistent with City Tree Ordinance, Chapter 17-24 of the Municipal Code. The project is over 1 acre and would be subject to a National Pollutant Discharge Elimination System (NPDES) General Construction Permit. If construction commences during the avian nesting season, nesting bird and bat surveys would be conducted prior to the start of project construction.



Source: Image produced and provided by the City of Santa Rosa in 2025; adapted by Ascent in 2025.

Figure 3 MLK Jr. Neighborhood Park and Trail Proposed Master Plan





TRAIL ENTRY ENLARGEMENT

0 5' 10' 20' NORTH



Iconic Bench Seating



"Gateway" Feature

Source: Image produced and provided by the City of Santa Rosa in 2025; adapted by Ascent in 2025.

Figure 4 Proposed Newhall Trail Improvements

Environmental Commitments

The following standard environmental commitments have been incorporated into the proposed project. These measures are required project elements that will be integrated into the treatments to protect environmental resources during implementation. Best management practices (BMPs) will be implemented to protect wildlife and water quality including:

CULTURAL RESOURCES:

Wildlife:

- If demolition, construction, ground disturbing, or tree removal/pruning activities occur during the nesting season (February 1 through August 31), a qualified ornithologist or biologist approved by the City shall conduct preconstruction surveys prior to construction activities. The City shall avoid bird nests or nesting habitat during construction and ground-disturbing activities that may affect nests and habitat of native birds when the nest is in active use by implementing protection measures specified by a qualified ornithologist or biologist to ensure compliance with the California Fish and Game Code and federal Migratory Bird Treaty Act.
- If construction activities using loud construction equipment (e.g., rotor hammer, compactor/roller, excavator) are scheduled to occur during the maternity season for special-status bats (April 1 through August 31), no more than 14 days prior to use of this equipment, a qualified biologist will conduct preconstruction surveys for special-status bat roosts within 250 feet of the project site. If any occupied special-status bat roosts are located during preconstruction surveys, no work using loud construction equipment will be performed within a 250-foot buffer around the roosts during the period when the maternity roost is potentially active (April 1 through August 31).

Stormwater

- A Stormwater Pollution Prevention Plan (SWPPP) in accordance with State Water Resources Control Board standards shall be prepared prior to commencing project construction. The SWPPP shall include best management practices (BMPs) from the most current edition of the California Stormwater Quality Association (CASQA) Best Management Practices Handbook for Construction to prevent or minimize stormwater pollution during construction activities, as well as addressing post construction stormwater management and permanent erosion control if necessary. The SWPPP shall be included in the project's construction documents and implemented by the construction contractor for the project throughout the duration of construction.

Applicable CEQA Exemptions

California Environmental Quality Act (CEQA) review is required for projects that are discretionary and that have the potential to have an impact on the environment. However, the CEQA statutes and implementing guidelines contain a list of exempt actions that have been deemed to not have a significant effect on the environment. CEQA exemptions are addressed in Article 18 (Statutory Exemptions) and Article 19 (Categorical Exemptions) of the CEQA Guidelines. All projects that meet one or more of the descriptions of the statutory exemptions are exempt from CEQA. Projects meeting the descriptions of the categorical exemptions are generally exempt from the provisions of CEQA, unless exceptional circumstances occur.

Based on the project purpose and project description described above, the project qualifies as categorically exempt from the provisions of CEQA pursuant to CEQA Guidelines Sections 15301, 15302, 15303, and 15304. The categorical exemptions are described as follows:

CEQA GUIDELINES SECTION 15301: EXISTING FACILITIES (CLASS 1)

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.

Why CEQA Guidelines Section 15301 Exemption Applies to the Project:

The proposed project qualifies for a Class 1 exemption because the project involves improvements and renovations to the existing facilities in the Park, including existing sidewalks and internal pathways, security lighting, and reconstruction of the Class I - shared use path that runs along the Park's eastern and southern boundaries and connects with Newhall Trail at Temple Avenue. The project would also include minor grading within the Park to support alteration of existing facilities and new facilities. Additionally, the project would result in the conversion of the existing basketball courts to one basketball and one futsal court. Although the courts would be relocated from the center of the park to the northeast corner, this would represent a negligible expansion of use, as it would involve minor alterations to an existing recreational facility. Both basketball and futsal are compatible outdoor sports activities,. The existing playground on the site would be updated with a new tot play area and youth play area that would be designated in the center of the Park south of the existing preschool. The new playground would have the same purpose as the existing play area. The existing picnic tables would be replaced with a shaded picnic zone for Park users along Hendley Street. The picnic area will provide a flexible gathering space for daily uses, similar to existing uses at the Park. Existing 90-degree parking stalls would be removed and replaced to meet ADA building codes and a new prefabricated restroom would be installed at the Park to replace the existing restroom building. The restroom would require replacement of the existing sewer line with a new sewer line that would connect to existing City utilities, but would not result in a substantial increase in wastewater from the Park. The project would include replacement of the existing Newhall Trail with new concrete paving along the trail alignment, upgraded and additional pathway lighting throughout the trail corridor, bollards at the three cul-de-sacs that meet the trail, and improved fencing. The trail would be reconstructed to approximately 12 feet of concrete for the standard width with a 4-foot gravel shoulder on each side of the trail. All improvements and renovations would occur within the existing footprint and would not result in a change in land use or intensity.

The existing natural turf soccer fields at the Park would be replaced with a single 70-yard by 110-yard artificial turf soccer field with PFAS-free fiber and a natural infill material. Although the fields would be replaced with a single larger field, the field capacity would remain the same because the proposed turf field would be used as several smaller fields or a single large soccer field; therefore, the expansion of existing use would be negligible. The field would include 4 new light poles to allow for use during the evening, which represents an operational enhancement of the existing amenity and would result in increased use, particularly during winter months and evening hours as the lights could be on until 10:00 p.m. However, the seasonal increase in use at the field would be considered a minor change, as it remains consistent with the Park's recreational purpose and overall hours of the Park would not change. In addition, the maximum light spill from the four light poles would be 0.6-foot candles (a unit of luminous intensity) at residential property lines. The light spill is a measure of intensity of light as it rises above the ground surface. As a reference, typical safety lighting on building exteriors ranges from 0.5-to-2.0-foot candles and typical urban parking lot lighting ranges from 0.4-to-1.6-foot candles (IES 1947). Therefore, the maximum light spill from the 4 new light poles at nearby residences would be similar to typical parking lot lighting, which already exists at the 90-degree parking stalls at Temple Avenue. Because the proposed improvements are limited to repair, maintenance, and minor upgrades of existing structures and facilities with negligible expansion of use, the project meets the criteria for a Class 1 exemption under CEQA Guidelines Section 15301.

CEQA GUIDELINES SECTION 15302: REPLACEMENT AND RECONSTRUCTION (CLASS 2)

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the replaced structure and will have substantially the same purpose and capacity as the structure replaced.

Why CEQA Guidelines Section 15302 Exemption Applies to the Project:

The Class 2 exemption applies to the proposed project because project would include renovations to the existing sidewalks and internal pathways, security lighting, and reconstruction of the Class I - shared use path that runs along the Park's eastern and southern boundaries and connects with Newhall Trail at Temple Avenue. The existing natural turf soccer fields would be replaced with a single 70-yard by 110-yard artificial turf soccer field with PFAS-free fiber and a natural infill material. Although the fields would be replaced with a single larger field the field capacity would remain the same because the proposed turf field would be used as several smaller fields or a single large soccer field. Additionally, the project would include replacement of the basketball courts, play areas, and picnic areas in new locations within the Park, as shown in Figure 3. These facilities would be replaced consistent with the project Master Plan. Existing parking would be removed and replaced to meet ADA building codes and a new prefabricated restroom would be installed at the Park to replace the existing restroom building. The restroom would require a new sewer line that would connect to existing City utilities to replace the existing line. Additionally, the project would include replacement of the existing Newhall Trail with new concrete paving along the trail alignment, upgraded and additional pathway lighting throughout the trail corridor, bollards at the three cul-de-sacs that meet the trail, and improved fencing. The trail would be reconstructed to approximately 12 feet of concrete for the standard width with a 4-foot gravel shoulder on each side of the trail. All replaced and reconstructed features proposed as part of the project would have the same purpose and similar capacity as the structure replaced. Because the proposed improvements would constitute replacement and reconstruction of existing structures and facilities, the project meets the criteria for a Class 2 exemption under CEQA Guidelines Section 15302.

CEQA GUIDELINES SECTION 15303: NEW CONSTRUCTION OR CONVERSION OF SMALL STRUCTURES (CLASS 3)

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel.

Why CEQA Guidelines Section 15303 Exemption Applies to the Project:

The Class 3 exemption applies to the proposed project because the project would replace several existing structures and facilities at the Park as well as add new small facilities and structures. Structures and facilities to be replaced include: existing sidewalks and internal pathways, security lighting, Newhall Trail, picnic tables, existing restroom, basketball courts, and redesign and replacement of the existing field. Minor modifications would be made to these structures and facilities such as moving the location of the basketball court, concrete flatwork for upgraded pathways, upgraded picnic tables and security lighting, and renovation of the existing restroom. New structures and features at the Park would include a field equipment storage facility, a futsal court, spectator seating, tot play area, shade structures, and central picnic zone. These structures and features would be small and have been designed to provide upgrades to meet community needs at the Park.

The exiting natural turf soccer fields would be replaced with a single 70-yard by 110-yard artificial turf soccer field with PFAS-free fiber and a natural infill material. Player seating would be provided at the east end of the field and spectator seating in the form of small bleachers would be provided at the west end of the field. The field would include 4 new light poles to allow for use during the evening. Light poles would be 70 feet tall with light shielded downward to limit

light spilling into adjacent parcels. Although the new 70-foot lights would be added to the field only four lights would be added and there are existing lights around the Park. Existing lights include security lighting approximately 20 to 30 feet tall on electrical/telephone poles. Additionally, there is approximately 40-foot-high street lighting along Hendley Street and taller lights at the far side of the fairgrounds located east of the Park. The proposed lighting would be at a height that would allow for better uniform light distribution across the field and aiming of the lights to reduce spill in areas surrounding the field (Musco Lighting 2025). The maximum glare from the four lighting poles would be 7,848 candelas at residential property lines, which is under the 10,000-candela max recommendation by the Illuminating Engineering Society (IES) (Musco Lighting 2025). Additionally, the maximum light spill from the four light poles would be 0.6-foot candles (a unit of luminous intensity) at residential property lines. As a reference, typical safety lighting on building exteriors ranges from 0.5-to-2.0-foot candles and typical urban parking lot lighting ranges from 0.4-to-1.6-foot candles (IES 1947). Therefore, the maximum light spill at nearby residences would be at the dimmest end of the range of typical parking lot lighting. Parking lot lighting already exists at the 90-degree parking stalls along Temple Avenue in the Park. Because the proposed improvements would constitute new construction and conversion of small structures, the project meets the criteria for a Class 3 exemption under CEQA Guidelines Section 15303.

CEQA GUIDELINES SECTION 15304: MINOR ALTERNATIONS TO LAND (CLASS 4)

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes.

Why CEQA Guidelines Section 15304 Exemption Applies to the Project:

The Class 4 exemption applies to the proposed project because the project site is an existing park that would be redeveloped consistent with the Master Plan. Minor alterations to the land would occur including renovations to the existing sidewalks and internal pathways, security lighting, and reconstruction of the Class I - shared use path that runs along the Park's eastern and southern boundaries and connects with Newhall Trail at Temple Avenue. Renovations would include concrete flatwork, lighting, planted trees with irrigation, removable bollards at Hendley and Temple, and a seamless transition between Newhall Trail and the Park. Minor alternations to vegetation would include removing the existing natural turf soccer fields and replacing with an artificial turf field with PFAS-free fiber and natural infill material and new landscaping with drought tolerant shrub and groundcover species. Although trees would be removed near the new basketball and futsal courts and a few mature trees would be removed to accommodate the soccer field, approximately 50 new trees would be planted throughout the Park resulting in a greater number of trees on the site overall as compared to existing conditions. Removal would be consistent with the City Tree Ordinance, Chapter 17-24 of the Santa Rosa City Code. As discussed below under "Biological Resources," there are no waterways or water bodies in or around the Park. Therefore, the project would not result in alterations to the condition of water on the site. Because the proposed improvements would constitute a minor alteration to the existing Park, the project meets the criteria for a Class 4 exemption under CEQA Guidelines Section 15304.

CEQA GUIDELINES SECTION 15311: ACCESSORY STRUCTURES (CLASS 11)

Class 11 consists of construction, or placement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities.

Why CEQA Guidelines Section 153011 Exemption Applies to the Project:

The Class 11 exemption applies to the proposed project because the project would include construction of a new facility for field equipment storage. The equipment storage facility would be metal and used year-round to store equipment to support use of the new artificial turf field. The storage facility would be small and located near the field. Because the proposed improvements would include a new field equipment storage facility at the Park as an accessory structure, the project meets the criteria for a Class 1 exemption under CEQA Guidelines Section 153011.

Exceptions to the Use of a Categorical Exemption

Categorical exemptions are subject to exceptions defined in CEQA Guidelines Section 15300.2; if any of these exceptions occur, a categorical exemption cannot be used. The exceptions include:

a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Table 1 provides a brief discussion of why each exception does not apply to the project.

Table 1 Exceptions to the Use of a Categorical Exemption (CEQA Guidelines Section 15300.2)

Exception	Applicability
(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may result in an impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.	As documented in the impact analysis below, the proposed project would not impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. The site is currently developed as a park. Therefore, this exception does not apply to the project.
(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.	The project would improve the existing trail and Park in Santa Rosa through the addition of new park features and renovation of existing features consistent with the Master Plan. There are no successive projects of the same type proposed in the vicinity of the Park. Therefore, the project would not contribute to any cumulative environmental impacts in relation to other projects in the region.
(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.	The project would not have a significant effect on the environment due to unusual circumstances. As documented in the impact analyses below, the project would not result in any significant effects on the environment.

Exception	Applicability
(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.	There are no highways officially designated as a State Scenic Highway within or in the vicinity of the project site (Caltrans 2019). The nearest State Scenic Highway is State Route 12 located approximately 7 miles west of the Park. Therefore, this exception does not apply to the project.
(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.	The project site is an existing park where there are no structures with potential to have stored or disposed of hazardous waste on-site. There are no open hazardous waste sites located within or immediately adjacent to the project area (SWRCB 2025). Therefore, this exception does not apply to the project.
(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.	The Park has no structures or objects older than 50 years. The project would renovate or replace existing park facilities, which were constructed in the last 20 years. Adjacent buildings would not be subject to any updates or development. Therefore, the project would not cause a substantial adverse change in the significance of historical or archaeological resources or substantially disturb human remains.

Environmental Analysis

The following discussion evaluates the potential environmental impacts associated with the construction and operation of the project.

AESTHETICS

Setting

The Park is located in an urban area of Santa Rosa and is surrounded by the South Park Neighborhood (low and medium density residential) on the north, south, and west. The Sonoma County Fairgrounds are east of the Park across Hendley Street. The Park connects to Petaluma Hill Road via the Newhall Bike and Pedestrian Trail, which is surrounded by single and multi-family residences. The project site contains park facilities including basketball courts, soccer fields, a restroom, and playground. Existing on-site lighting is located along Newhall Trail as overhead lighting from tall poles and street lamps within the Park. Existing off-site lighting consists of standard street lighting along adjacent roadways (Hendley Street and Temple Avenue) providing basic visibility for pedestrians and vehicles in the surrounding area. Views of the Park are available from adjacent roads (Hendley Street) and the adjacent Sonoma County Fairgrounds. No designated scenic vistas or scenic resources are located within or in the vicinity of the project site. Additionally, there are no highways officially designated as a State Scenic Highway within or in the vicinity of the project site (Caltrans 2019).

Impact Analysis

The Park is located within a relatively flat urbanized area and does not contain designated public viewpoints. There are no officially recognized scenic vistas within or adjacent to the project site, and the proposed improvements would not obstruct or alter views from a scenic vista. There are no designated State Scenic Highways within or adjacent to the project site (Caltrans 2019). The nearest State Scenic Highway is State Route 12, located approximately 7 miles west of the Park. Although a few mature trees would be removed, approximately 50 new trees would be planted throughout the Park resulting in a greater number of trees on the site as compared to existing conditions. Additionally, tree removal would adhere to the requirements of Title 17-24 of the Santa Rosa City Code for the appropriate permits. Therefore, the project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.

Many of the existing facilities in the Park, including Newhall Trail, are aging and in need of replacement or renovation. The proposed project would renovate the Park to meet the evolving needs of the community by upgrading existing recreational features, adding new amenities, and improving trail connections. The project would maintain the Park's existing land use while enhancing recreational opportunities. Structures and facilities to be replaced include: existing sidewalks and internal pathways, security lighting, Newhall Trail, picnic areas, existing restroom, basketball courts, play equipment, and redesign and replacement of the existing soccer field. Minor modifications would be made to these structures and facilities such as moving the location of the basketball court, concrete flatwork for upgraded pathways, upgraded picnic areas and security lighting, and replacement of the existing restroom. No enclosed or built structures of excessive height or massing are proposed. The new structures and features at the Park would include an equipment storage facility, futsal court, spectator seating, tot play area, shade structures, and central picnic zone. These structures and features would be small and are designed to renovate the Park to provide upgrades to meet community needs and would not result in substantial visual changes at the site. The existing natural turf soccer fields would be renovated with artificial turf to improve playability and durability. Therefore, the proposed improvements are designed to enhance the visual character of the Park while maintaining its role as a well-used community recreational area. No elements of the project would conflict with the existing character of the neighborhood or degrade the visual quality of the site. Instead, the improvements would revitalize underutilized areas and enhance the Park's appearance and functionality.

Short-term construction-related light and glare impacts would be minor, temporary, and intermittent, consisting primarily of equipment staging, fencing, and material stockpiling typical of park renovation projects. These activities would occur during daylight hours and cease upon project completion, with no lasting effect on the visual character of the site or surrounding neighborhood.

Long-term operational impacts from the proposed improvements would not generate excessive glare during daytime hours. No new enclosed structures or reflective materials are proposed. The proposed architectural materials that would be used for the shade structure, gathering areas, restroom, and other project elements would not cause glare. The roof of the shade structure and restroom would be constructed using architectural materials which would not cause glare due to their natural matte finish and non-reflective surface.

The proposed lighting improvements include lighting for security, pathway illumination, and recreational use, specifically lighting for the basketball and futsal courts and the 4 new light poles at the soccer field, to enhance safety and to allow for soccer field use during the evening. Light 4 new light poles proposed at the soccer field would be 70 feet tall with light shielded downward to limit light spilling into adjacent parcels. Although the new 70-foot light poles would be added to the field only four lights would be added and there are existing lights around the Park. Existing lights include security lighting approximately 20 to 30 feet tall on electrical/telephone poles. Additionally, there is approximately 40-foot-high street lighting along Hendley Street and taller lights at the far side of the fairground located east of the Park. The proposed field lighting would be at a height that would allow for better uniform light distribution across the field and aiming of the lights to reduce spill in areas surrounding the field (Musco Lighting 2025). The maximum glare from the four field lighting poles would be 7,848 candelas at residential property lines, which is under the 10,000-candela max recommendation by the Illuminating Engineering Society (IES) (Musco Lighting 2025). Additionally, the maximum light spill from the four field light poles would be 0.6-foot candles (a unit of luminous intensity) at residential property lines. The light spill is a measure of intensity of light as it rises above the ground surface. As a reference, typical safety lighting on building exteriors ranges from 0.5-to-2.0-foot candles and typical urban parking lot lighting ranges from 0.4-to-1.6-foot candles (IES 1947). Therefore, the maximum light spill from the 4 new light poles at nearby residences would be similar to typical parking lot lighting, which already exists at the 90-degree parking stalls on Temple Avenue in the Park. Thus, while the new field lights would be taller than existing fixtures within and around the Park, they are limited in number and purposefully directed to reduce glare and off-site illumination. Therefore, the addition of 4 shielded light poles would be consistent with the surrounding lighting environment, and the project would not introduce a substantial new source of light or glare which would adversely affect day or nighttime views in the area.

BIOLOGICAL RESOURCES

Setting

The project site is a developed park in the City of Santa Rosa and thus does not provide suitable habitat for any special status species. The Park does not contain any wetlands or listed water bodies (USFWS 2025). Santa Rosa City Code Title 17-24, Environmental Protection, includes directives to minimize adverse impacts to trees. A permit is required to remove or alter heritage trees, protected trees, and street trees.

Impact Analysis

The Park is entirely developed and habitat for native plants and wildlife species is limited on the site. The Park includes existing facilities typical of a park, such as basketball courts, and associated hardscape, paving, paths, and parking. Vegetation on the site consists of a grass sports field, small, landscaped areas, and ornamental trees and shrubs. Therefore, there is limited suitable habitat for special status species in the Park. The project would not result in a significant change in the surrounding environment because an existing park would be redeveloped. However, there is potential for migratory birds and special status bat species that could occur in the trees on the project site to be impacted by project construction. Implementation of the environmental protection measures for migratory birds and special status bat species identified as part of the project would avoid or substantially reduce potential adverse impacts to special status wildlife species. BMPs would include preconstruction surveys for bird and bats and avoidance measures if the species are found in the Park. Although the project would include removal of trees, tree removal would adhere to the requirements of Title 17-24 of the Santa Rosa City Code for the appropriate permits. Additionally, the project includes planting of approximately 50 new trees and landscaping on the site that would result in an overall higher number of trees and vegetation at the Park compared to existing conditions. Therefore, the project would not result in a significant effect related to biological resources.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Setting

Cultural resources include districts, sites, buildings, structures, or objects generally older than 50 years and considered to be important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include pre-historic resources, historic-era resources, and "tribal cultural resources" (the latter as defined by Assembly Bill 52, Statutes of 2014, in PRC Section 21074). Archaeological resources are locations where human activity has measurably altered the earth or left deposits of pre-contact or historic-era physical remains (e.g., stone tools, bottles, former roads, house foundations). Built environment historical resources include standing buildings (e.g., houses, barns, outbuildings, cabins) and intact structures (e.g., dams, bridges, roads, districts) or landscapes.

Impact Analysis

The proposed project includes renovations and replacements of the existing facilities and structures in the Park. There are no existing structures or objects older than 50 years on the project site. The Park and Newhall Trail have been fully developed and there is a low likelihood of archaeological resources on the project site. Therefore, the project would not result in any adverse changes to existing historical or archaeological resources. In addition, if any human remains are discovered during construction compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 would provide an opportunity to avoid or minimize the disturbance of human remains and to appropriately treat any remains that are discovered. Therefore, the project would not result in a significant effect related to cultural resources.

GEOLOGY, SOILS, AND SEISMICITY

Setting

This section summarizes the geotechnical report prepared by RGH Consultants (2024) for the project site. The terrain on the project site ranges from level to slightly sloping. Therefore, the Park is not at risk for landslides. The soil composition consists of approximately 3 feet of weak, porous, and compressible soils from the surface down. The surface soil is heterogenous fill with varying soil characteristics. Under the surface soil are layers of clay, silt, sand, and gravel. Underneath lays alluvial fan and fluvial terrace deposits composed of gravel, sand, and silt. The project site is not located in an Alquist-Priolo Earthquake Fault Zone and has a minimal risk of ruptures. There is low potential for seismic activity due to history of the fault and because the Park is approximately 1 mile west of the Rodgers Creek Fault. The liquefaction risk at the site is negligible under current groundwater conditions, with limited potential in isolated soil layers. There is no potential for elevated ground shaking and cracking risk from seismic conditions.

Impact Analysis

The project site is within a seismically active area, located near the Rodgers Creek Fault. However, the project would redevelop the Park with similar uses as those existing on the site. The project would not result in the risk of loss, injury, or death from fault rupture or strong seismic ground shaking because it would not change the use of the Park in a way that would exacerbate the risk of fault rupture or magnitude of grounds shaking, or the placement of structures that could be damaged or collapse, causing loss, injury, or death, in the event of fault rupture or ground shaking. Soil units within the project vicinity do not exhibit properties that would lead to unstable or hazardous soil conditions for proposed project features (RGH 2024). The geotechnical report provides design and grading recommendations such as excavating weak, porous soil, using select fill, supporting tall structures with drilled piers, and creating spread footings for support to address potential hazards that would be implemented for the project. Therefore, the project would not have potential substantial adverse effects involving fault rupture, seismic ground shaking, erosion, or soil degradation.

HAZARDS AND HAZARDOUS MATERIALS

Setting

Land uses in the City of Santa Rosa that have the potential to result in hazardous material site contamination include burn sites, airports, landfills, defense sites, agriculture, petroleum storage, manufacturing, service industries, various small businesses, agriculture, medical uses, schools, and household uses. The Charles M. Schulz Sonoma County Airport is located in the City of Santa Rosa, approximately 9 miles northwest of the project site. Northern and eastern parts of the City fall under the Wildland-Urban Interface Fire Area which is a geological area in city boundaries that face risk from wildfires as defined by California Fire Code (City of Santa Rosa 2025a). The Wildland-Urban Interface Fire Area map shows the project site does not fall under this designation. Additionally, the project site is not in a wildfire hazard zone (CALFIRE 2025). The State Water Resources Control Board's (SWRCB) GeoTracker website provides data relating to leaking underground storage tanks and other types of soil and groundwater contamination, along with associated cleanup activities. In addition, there are no open hazardous waste sites located within or immediately adjacent to the project area (SWRCB 2025). The California Department of Toxic Substances Control's (DTSC) EnviroStor website provides data related to hazardous materials spills and clean ups. No hazardous material spills or clean ups are recorded within 1,000 feet of the project site (DTSC 2025). Temporary road closures along Temple Avenue and Hendley Street may hinder existing emergency response in the area but would not interfere with any existing emergency response plans (City of Santa Rosa 2025).

Impact Analysis

The Park is adjacent to residential and commercial structures and as an active park and trail does not contain stored hazardous waste on-site. The project would not require the use of any hazardous materials during operation, such as explosives or toxic materials. Fuels, oils, and lubricants would be required to operate vehicles and machinery during construction. Construction activities would comply with the California Environmental Protection Agency's Unified Program, which requires that any significant vehicle oil spills be reported to the local Certified Unified Program Agency for Marin County and be properly cleaned up. The use of these types of common hazardous materials is routine and would not result in a substantial risk to human health or the environment. The Park is not located in a wildfire hazard zone (CALFIRE 2025 and City of Santa Rosa 2025). Therefore, the project would not result in a significant effect related to hazards and hazardous materials.

HYDROLOGY AND WATER QUALITY

Setting

The project site is located within a developed area with existing storm drain infrastructure. Surface runoff from the site moves as sheet flow that concentrates into man-made and natural drainage elements (RGH 2024). Groundwater was not encountered during the site borings from 4 to 16.5 feet below the surface. There are no creeks, wetlands, or natural waterways located on the site (USFWS 2025). The City of Santa Rosa receives its water from the Russian River through the Sonoma County Water Agency and stores it in 22 high-elevation reservoirs within the city. The project site is designated within Zone "X" in the FEMA Flood Zone Map for Sonoma County, which lies outside of the 500-year floodplain (RGH 2024).

Impact Analysis

The project would comply with the applicable State, federal, and local water quality regulations. As a project site over 1 acre the project would be subject to the National Pollutant Discharge Elimination System (NPDES) permit and required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with State Water Resources Control Board standards. The SWPPP would include BMPs to prevent or minimize stormwater pollution during construction activities. Additionally, the Park has been previously graded to accommodate the existing facilities, and the project would not involve large-scale grading that would generate substantial runoff. The project would not alter local drainage patterns, affect stormwater discharges, and/or alter the potential for flooding within or adjacent to the project site. The project would be constructed to drain into existing or renovated stormwater drainage systems around the site. Bioretention areas would be placed between the soccer field and Temple Avenue for stormwater retention, between Hendley Street and the basketball court and large picnic area, and between Temple Avenue and the school aged play area. Therefore, the project would not result in a significant effect related to hydrological resources.

NOISE

Setting

The predominant noise source influencing noise levels on and near the project site includes vehicle traffic on the surrounding roadway network. Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as schools, transient lodging, historic sites, cemeteries, and places of worship are also generally considered sensitive to increases in noise levels. The nearest sensitive receptors to the Park are students and teachers at the Head Start preschool, residents along Template Avenue, the northern and southern borders of the Park, and on each side of the Newhall Trail.

Impact Analysis

The City's standard practice is to limit construction noise from 7:00 a.m. to 6:00 p.m. Monday through Friday, 9:00 a.m. to 5:00 p.m. on Saturdays, and construction is prohibited on Sundays and all City-recognized holidays. Construction would occur in phases throughout the 6.4-acre park and linearly along Newhall Trail. Therefore, elevated noise levels would only occur temporarily in the location where construction occurs. Construction of the Park would include minor grading and excavation and construction of new and renovated features such as the basketball courts, soccer field, and restroom. Construction activities typically involve the simultaneous operation of several pieces of equipment on a project site. Therefore, a representative construction scenario, including two of the loudest pieces of construction equipment that could be used simultaneously during construction (i.e., a bulldozer and an excavator), was modeled. A bulldozer and excavator generate noise levels of approximately 81 A-weighted decibels (dBA) equivalent continuous sound level (L_{eq}) and 85 dBA maximum sound level (L_{max}) at 50 feet. For this analysis, short-term temporary noise levels generated by construction of the project were evaluated against the Federal Transit Administration (FTA) recommended daytime construction noise level threshold of 90 dB L_{eq} at the property line of nearby sensitive land uses. Construction noise could exceed the FTA recommended daytime (i.e., 90 dBA L_{eq}) noise standard for noise-sensitive receptors within approximately 22 feet of construction activity. There are no noise-sensitive receptors located within this distance, except the existing Head Start preschool on the project site. Construction may periodically occur 22 feet from the preschool and could be as loud as loud as 90 dBA. However, preschool classes occur indoors and students could be impacted by construction noise inside the preschool buildings. Typical structures provide at least a 20 dBA exterior-to-interior noise reduction (Caltrans 2013: 7-17). Therefore, interior noise levels at the preschool could be as loud as 70 dBA. This noise level is roughly equivalent to normal speech at 3 feet (City of Santa Rosa 2025b). Therefore, construction noise would not substantially affect learning with the classrooms. Additionally, construction may occur during summer break to prevent construction noise at the preschool. The project would also be required to adhere to Section 17.16-120, Machinery and Equipment, of the Santa Rosa City Code that requires that machinery and equipment, such as construction equipment, not to exceed the ambient base noise level by more than 5 dBA at receiving properties.

Operation of the project would include noise from park activities, such as soccer games, basketball, picnics, playgrounds, use of Newhall Trail, and parking. These noise sources already occur at the Park and proposed renovations and new features proposed by the project would be similar to noise sources that currently occur on the site and are typical noise sources from parks. Hours of operation for the Park would remain the same as existing conditions with the Park open from dawn to dusk seven days a week, 365 days a year. Although the proposed lighting for the soccer field would allow for evening games during winter months, lighting would be powered down by 10:00 p.m., and the overall hours of the Park would remain the same. Nearby receptors would not be exposed to game noise later in the evening because the existing fields are currently used for evening games during the summer. Operational noise sources would not be substantially greater than existing conditions. Therefore, the project would not result in a significant effect related to noise.

UTILITIES AND SERVICE SYSTEMS

Setting

Water supply in the City is provided by a combination of water districts and groundwater (City of Santa Rosa n.d.). The City of Santa Rosa has multiple water providers including City of Santa Rosa Water, Sonoma County Water Agency, and California American Water. The City has an agreement with Recology Sonoma Marin for the collection of solid waste, organic waste, and recyclable materials. City staff with the Water Operations division maintain the water distribution, wastewater collection, and urban water reuse system for Santa Rosa.

Impact Analysis

Santa Rosa Water currently provides water to the Park and would continue to serve the Park as part of the project. The Park would have a minimal increase in water supply. Water would be used for drinking fountains, irrigation, and restrooms, similar to existing conditions. Replacement of the existing restroom building would require a new sewer line replacing the current line and connecting to existing City utilities, which have sufficient capacity to continue to serve the Park. The artificial turf field would require water for cleaning and cooling, however total water demand for the field would be reduced as compared to existing conditions. Therefore, there would be sufficient water supply to serve the site. Temporary disruptions to utilities or services during construction would be minimized through project phasing and coordination with providers. The Park is currently served by Recology Sonoma Marin, which would continue to provide services to the project site. The proposed project would not substantially increase the generation of solid waste beyond existing conditions. No new or expanded solid waste facilities would be required to serve the project. Therefore, the project would not result in a significant effect related to utilities.

Conclusion

Based on the analysis presented above, the proposed project would not result in any potentially significant environmental effects, and the project qualifies for Class 1, 2, 3, 4, and 11 Categorical Exemptions pursuant to CEQA requirements. Moreover, as indicated in Table 1, no exceptions to the categorical exemption would occur.

References

CALFIRE. *See* California Department of Forestry and Fire Protection.

California Department of Forestry and Fire Protection. 2025. Fire Hazard Severity Zones. Available: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones. Accessed September 2025.

California Department of Toxic Substances Control. 2025. EnviroStor Database. Available: https://www.envirostor.dtsc.ca.gov/public/. Accessed July 2025.

California Department of Transportation. 2013 (September). *Technical Noise Supplement. California Department of Transportation Division of Environmental Analysis*. Sacramento, CA. Prepared by ICF Jones & Stokes.

_____. 2019. Caltrans State Scenic Highway Web App Viewer. Available: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed September 2025.

Caltrans. *See* California Department of Transportation.

City of Santa Rosa. n.d. Groundwater. Available: Groundwater | Santa Rosa, CA. Accessed October 2025.

_____. 2025a. Wildland-Urban Interface Fire Area. Available: https://www.srcity.org/596/Wildland-Urban-Interface. Accessed October 2025.

_____. 2025b. City of Santa Rosa General Plan. Available: https://www.srcity.org/DocumentCenter/View/46649/Santa-Rosa-General-Plan-2050---Full-Document---June-2025. Accessed October 2025

DTSC. *See* California Department of Toxic Substances Control.

IES. *See* Illuminating Engineering Society.

Illuminating Engineering Society. 1947. IES Lighting Handbook. Available: https://reader.library.cornell.edu/docviewer/digital?id=chla3133714#page/2/mode/1up. Accessed September 2025.

Musco Lighting. 2025 (August). MLK Park, Santa Rosa, CA.

RGH Consultants. 2024 (December). *Geotechnical Study Report for Martin Luther King Jr. Memorial Park Enhancement*.

State Water Resources Control Board. 2025. GeoTracker Database. Available: https://geotracker.waterboards.ca.gov/. Accessed July 2025.

SWRCB. *See* State Water Resources Control Board.

US Fish and Wildlife Service. 2025. National Wetlands Inventory. MLK Jr. Park. Available: https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper. Accessed September 2025.

USFWS. *See* US Fish and Wildlife Service.