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### Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>ADT</td>
<td>average daily traffic</td>
</tr>
<tr>
<td>BAAQMD</td>
<td>Bay Area Air Quality Management District</td>
</tr>
<tr>
<td>Caltrans</td>
<td>California Department of Transportation</td>
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<tr>
<td>CEQA</td>
<td>California Environmental Quality Act</td>
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<td>California Register of Historical Resources</td>
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<td>Draft Environmental Impact Report</td>
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<td>Final EIR</td>
<td>Final Environmental Impact Report</td>
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<tr>
<td>HABS</td>
<td>Historic American Building Survey</td>
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<tr>
<td>NOP</td>
<td>Notice of Preparation</td>
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<tr>
<td>NRHP</td>
<td>National Register of Historic Places</td>
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<td>PRC</td>
<td>Public Resources Code</td>
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<td>proposed project</td>
<td>Caritas Village Project</td>
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1.0 INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Santa Rosa (City), as the lead agency, has evaluated the comments received on the Caritas Village Project Draft Environmental Impact Report (Draft EIR) (State Clearinghouse No. 2019012040). The Draft EIR was circulated for a 46-day public review between November 15, 2019, and December 30, 2019. The responses to the comments and other documents, which are included in this document, together with the Mitigation Monitoring and Reporting Program, comprise the Final Environmental Impact Report (Final EIR) for use by the City of Santa Rosa City Council in its review.

1.1 BACKGROUND AND PURPOSE OF THE EIR

CEQA requires a Lead Agency that has prepared a Draft EIR to provide a copy of the Draft EIR to responsible and trustee agencies that have jurisdiction by law with respect to the proposed Caritas Village Project (proposed project) and to provide the general public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR as a result of the City’s ongoing planning efforts. The Draft EIR and Final EIR will be used to support the City’s decision regarding whether to approve the proposed project.

This Final EIR can also be used by responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the project or that have jurisdiction over portions of the project. The following agencies may serve as responsible and trustee agencies:

- California Department of Transportation (Caltrans), District 4
- California State Office of Historic Preservation
- State Water Resources Control Board
- Regional Water Quality Control Board #1
- Bay Area Air Quality Management District (BAAQMD)
CEQA Public Review Process

The following provides a summary of the environmental review process to date for the proposed project that has resulted in the preparation of this Final EIR.

Notice of Preparation

The Notice of Preparation (NOP) for the Draft EIR was submitted for a 30-day public review period on January 24, 2019. The comment period for the NOP closed on February 22, 2019. A scoping meeting was held on February 6, 2019 to solicit input from interested agencies and the public. The City received oral comments at the scoping meeting and also received several written comment letters during the public comment period. These comments are summarized in Appendix A of the Draft EIR.

Draft EIR

The Draft EIR was released for public and agency review on November 15, 2019, with a 46-day review period ending on December 30, 2019. The Draft EIR contains a description of the proposed project, description of the environmental setting, identification of proposed project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of proposed project alternatives. The Draft EIR was provided to interested public agencies and the public and was made available for review at City offices, the Sonoma County Library, and on the City’s website.

Final EIR

The City received comment letters from the State Clearinghouse and the public regarding the Draft EIR. This document responds to the written comments received as required by CEQA. This document also contains minor edits to the Draft EIR, which are included in Section 3, Minor Revisions to the Draft EIR. This document constitutes the Final EIR.

Certification of the Final EIR/Project Consideration

The City will review and consider the Final EIR. If the City finds that the Final EIR is “adequate and complete,” the City may certify the Final EIR. The rule of adequacy generally holds that the EIR can be certified if it does the following: (1) shows a good faith effort at full disclosure of environmental information; and (2) provides sufficient analysis to allow decisions to be made regarding the proposed project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the City may act to adopt, revise, or reject the proposed project. A decision to approve the proposed project would be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. Public Resources Code Section 21081.6 also requires lead agencies to adopt a mitigation monitoring and reporting program to describe measures that have been adopted or made a condition of the proposed project approval to mitigate or avoid significant impacts on the environment.
1.2 INTENDED USE OF THE EIR

The EIR is intended to evaluate the environmental impacts of the project to the greatest extent possible. This EIR, in accordance with CEQA Guidelines Section 15126, should be used as the primary environmental document to evaluate all planning and permitting actions associated with the proposed project. Please refer to Section 2, Project Description, of the Draft EIR for a detailed discussion of the proposed project.

1.3 ORGANIZATION AND SCOPE OF THE EIR

This document is organized into the following sections:

- **Section 1 – Introduction**
  
  Section 1 provides an overview of the EIR process to date and the requirements of the Final EIR.

- **Section 2 – Responses to Written Comments on the Draft EIR**
  
  Section 3 provides a list of the agencies, organizations, and individuals that commented on the Draft EIR. Copies of all the letters received regarding the Draft EIR and responses thereto are included in this section.

- **Section 3 – Minor Revisions to the Draft EIR**
  
  Section 3 includes an addendum listing refinements and clarifications on the Draft EIR, which have been incorporated as a result of comments or staff-initiated changes.

- **Appendices**
  
  The Traffic Impact Analysis Report was updated to provide clarification on the date that traffic data was obtained to determine proposed project impacts. The revised report is provided under separate cover, while the revisions are noted in Section 3 of the Final EIR.

- **Mitigation Monitoring Reporting Program**
  
  Measures that have been adopted or made a condition of the project approval in order to mitigate or avoid significant impacts on the environment have been included in the Mitigation Monitoring Reporting Program, provided under separate cover.

Because of its length, the text of the Draft EIR is not included with these written responses; however, it is included by reference in this Final EIR. None of the revisions or clarifications to the Draft EIR identified in this document constitute “significant new information” pursuant to CEQA Guidelines Section 15088.5. As a result, recirculation of the Draft EIR is not required.
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2.0 COMMENTS AND RESPONSES TO THE DRAFT EIR

2.1 LIST OF COMMENTERS

A list of public agencies, organizations, and individuals that provided comments on the Draft EIR is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so that comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Table 2-1 List of Commenters

<table>
<thead>
<tr>
<th>Commenter(s)</th>
<th>Comment Date (mm/dd/yyyy)</th>
<th>Commenter Code</th>
</tr>
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<tbody>
<tr>
<td>State Agencies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Governor’s Office of Planning and Research</td>
<td>12/31/2019</td>
<td>SCH</td>
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<tr>
<td>State Clearinghouse and Planning Unit</td>
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<tr>
<td>California Department of Transportation, District 4</td>
<td>12/31/2019</td>
<td>Caltrans</td>
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<tr>
<td>Individuals</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Denise Hill and Joe Lilienthal</td>
<td>12/29/2019</td>
<td>Hill</td>
</tr>
</tbody>
</table>

2.2 COMMENTS AND RESPONSES

Requirements for Responding to Comments on a Draft EIR

State CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issues raised and must be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines Section 15204).

State CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways that the significant effects of the project might be avoided or mitigated. State CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to State CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.
State CEQA Guidelines Section 15088 also recommends that where a response to comments results in revisions to the Draft EIR, those revisions be incorporated as a revision to the Draft EIR or as a separate section of the Final EIR.

**Responses to Comments**

In accordance with the CEQA Guidelines Section 15088, the City of Santa Rosa, as the lead agency, evaluated the comments received on the Draft EIR (State Clearinghouse No. 2019012040) for the Caritas Village Project, and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final EIR for the proposed project in accordance with CEQA Guidelines Section 15132.

The comment letters reproduced in the following pages follow the same organization as used in the List of Commenters.
December 31, 2019

Krisinae Toomians
Santa Rosa, City of
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

Subject: Caritas Village Project
SCH#: 2019012040

Dear Krisinae Toomians:

The State Clearinghouse submitted the above named BIR to selected state agencies for review. The review period closed on 12/30/2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, please visit: https://ceqanet.opr.ca.gov/2019012040/2 for full details about your project.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse
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State Agencies

Governor’s Office of Planning and Research – State Clearinghouse and Planning Unit

Response to SCH-1

The commenter stated that the State Clearinghouse submitted the Caritas Village Project EIR, State Clearinghouse No. 2019012040 to selected state agencies for review and that no state agencies submitted comments by the closing date of December 30, 2019. The commenter states that the City of Santa Rosa has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA.

The comment is noted. No further response is required.

Response to SCH-2

The commenter stated that the City may call the State Clearinghouse if they have any questions regarding the environmental review process and if the City had project-specific questions they should refer to the ten-digit State Clearinghouse number when contacting the office.

The comment is noted. No further response is required.
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Hello Krisinae,

I hope all is well with you. We have reviewed the DEIR and I wanted to bring attention to the following:

- DEIR (pg 3.8-2) states traffic data were collected in December 2018 and January 2018; however, the TIA (pg A.17-20) shows traffic counts were collected on Nov. 28, 2018. We ask that this be reconciled.
- DEIR (pg 3.8-12)- construction traffic would be 10% less than the operational vehicle traffic. What is the method used for this estimation?
- Note that volumes used in Synchro (pg B.9-10 & B.18-19) are higher than traffic counts from Appendix A (pg A.17-20).
- Page 4.16 of the TIA states that roundabouts for intersections 4 and 6 is proposed. Might you know the estimated timeline for this reconfiguration?

I look forward to the responses in the subsequent environmental document. Best regards,

Mark Leong, Branch Chief
Local Development- Intergovernmental Review
Caltrans, District 4  |  510-286-5528
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California Department of Transportation, District 4

Response to Comment Caltrans-1

The commenter provided introductory greetings and stated that the agency had reviewed the Draft EIR.

No response is required.

Response to Comment Caltrans-2

The commenter stated the Draft EIR states that data was collected in December 2018 and January 2019, however the Traffic Impact Analysis page A.17-20 shows the traffic counts were collected on November 28, 2018 and requested that the date be corrected.

The Traffic Impact Analysis will be updated to note the date of November 2018 instead of December 2018. This revision is shown in Section 3, Minor Revisions to the Draft EIR.

Response to Comment Caltrans-3

The commenter restates the Draft EIR statement regarding construction traffic being 10 percent less than the operational traffic and requested the method used for this estimation.

Construction traffic during the time period where the most traffic would be anticipated was determined by converting the total vehicle traffic from construction workers and haul trucks to passenger car equivalents and comparing it the total daily trips generated during operation.

The Draft EIR stated the following:

The number of construction workers will fluctuate between 25 and 100 workers per day, the average number of construction workers onsite during any weekday would be 50. The proposed project would also require the hauling of soil offsite and import of project materials. The worst construction traffic would occur during grading, when up to 4,000 cubic yards of soil would be exported offsite. Total traffic during the grading phase would be equivalent to 1,060 passenger car vehicles, which is less than the operational vehicle trips. Therefore, impacts to intersections during that period of construction would be equivalent. During the remaining construction phases construction traffic would be less than 10 percent of the operational vehicle traffic; accordingly, traffic impacts would be substantially less.

The average number of workers during construction would be 50, resulting in an average of 100 vehicle trips per day. The 100 construction worker trips would be approximately 10 percent of the daily operational trips, which were estimated to be 1,062.

Response to Comment Caltrans-4

The commenter noted that the volumes used in Synchro (pages B.9-10 and B.18-19) are higher than traffic counts from Appendix A (page A.17-20).
The volumes used in the Synchro are higher than the existing traffic counts because a seasonal adjustment of a two percent increase was applied to the November turning movement counts.

The reason for this increase is explained on page 2.4 of the Draft EIR as, “the percent change in ADTs for the study area roadway segments between November 2018 and January 2019 varied from -13 percent to +16 percent with an overall average change of 2 percent. In no case was the absolute magnitude of change substantial. Therefore, to be conservative, a seasonal adjustment of a two percent increase was applied to the November turning movement counts.”

Response to Comment Caltrans-5

The commenter noted that page 4.16 of the Traffic Impact Analysis states that roundabouts for intersections 4 and 6 are proposed and requested the timeline for this reconfiguration.

The timeline for the reconfiguration of intersections 4 and 6, A Street and 7th Street, and A Street and 6th Street/Santa Rosa Plaza, respectively, has not been determined; however, the reconfiguration is anticipated to occur prior to the traffic volumes reaching the General Plan buildout traffic volumes for year 2035.

Response to Comment Caltrans-6

The commenter provided closing remarks to end the agency’s comment letter.

No response is required.
From: Denise Hill <faire@sonic.net>
Sent: Sunday, December 29, 2019 3:29:44 PM
To: Toomians, Kristinae <KToomians@srcity.org>
Cc: Rogers, Chris <CRogers@srcity.org>
Subject: [EXTERNAL] Comments on EIR - Caritas Village Project

Below are excerpts and our comments regarding the EIR for the Caritas Project proposed for the St. Rose Historic District:

The EIR for the Caritas Village project admits that the project will cause a significant and unavoidable impact to historic resources.

**Impact CUL-1** The proposed project would cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. Significant and Unavoidable Impact

However, the EIR also claims no impact to the St. Rose Historic District even though the project proposes to tear down all structures on one entire block of our district and confirms that the majority of the structures are contributors to our historic district.

520 Morgan Street: This property was evaluated in 2016 and determined eligible for historic listing as a district contributor.

608 Morgan Street: This property was evaluated in 2015 and determined eligible for historic listing as a district contributor.

**Indirect Impacts – Adjacent to Project Area:** The proposed project has the potential to indirectly impact nine historical resources. One institutional building and eight single-family residences which are contributors to the St. Rose Historic Preservation District are located in the vicinity of the project area.

In order to be adequate, the EIR must consider alternatives to the project that substantially reduce that impact.

**The EIR considers two alternatives that reduce that impact:**

**Alternative 2**
This alternative would eliminate the demolition of structures adjacent to Morgan Street including the historic four-plex at 608 Morgan and the historic single-family home at 520 Morgan. The structures at 516 and 520 Morgan may continue to be used for transitional housing with constraints placed on the term of occupancy due to cancer risk impacts from air pollutants under long-term occupancy conditions. **Other structures on Morgan may also to be used as site facilities** such as offices or meeting space, but potential long-term occupancy would not be permitted due to the cancer risk from air pollutants. **The site redesign alternative would reduce the significant and unavoidable impact to historical resources.**

**Alternative 3**
The partial preservation alternative would involve the demolition of all structures on the project site except for the historic single-family home at 520 Morgan and the single-family home at 512 Morgan. Residential homes at 520 and 512 Morgan would be relocated to two vacant lots 501 A Street (relocation site for 520 Morgan) and 507 A Street (relocation site for 512 Morgan) that have been used for a garden in the past and are under Catholic Charities' ownership. 507 A Street would be used as a residence, and 501 A Street would be used as administrative offices by Catholic Charities' staff. The partial preservation alternative would reduce the significant and unavoidable impact to historic resources by eliminating the demolition of the historic single-family home at 520 Morgan Street; however, the historic four-plex at 608 Morgan would still be demolished.

However, since the Caritas Village applicant has already stated in meetings that the cost to move these two structures wouldn't be feasible, it appears the Alternative 2 is the only viable alternative proposed by the EIR.
We're not sure what "cancer risks" the historian who did this report is referring to in Alternative 2, but if there are cancer risks beyond living near a freeway, then everyone who lives in a vintage home in our historic district and the city's other historic districts would most certainly be aware of them and exposed to them also. Clearly that's not the case. In reality, homes built prior to the 1950's are more environmentally-friendly as they don't contain synthetic products that off-gas like today's building materials.

So while Alternative 2 protects the majority of structures on this block of our historic district we feel there should be an Alternative 4 that not only eliminates the destruction of the structures on Morgan Street but also includes saving the old General Hospital with the same proposed adaptive reuse process.

Additionally, there is significant historical information missing for some of the addresses analyzed in the Historical Resource Report provided by Brunzell Historical. This includes:

465 A Street – General Hospital (page 23) the report states "is not associated with events that have made a significant contribution", when in fact the hospital was built in response to the 1917 influenza epidemic. Even more significantly, it was the first medical facility women could choose to give birth in as an alternative to home births. Lastly, it was the first true hospital facility built for that purpose (as opposed to the then common practice of doctor's working out of their home and making house calls).

512 Morgan Street (page 25) it is stated that this residence did not have significance to the career of well-known football player Francis "Bud" Toscani when indeed he moved in shortly after traveling around the United States as a player in the National Football League. He was also a coach at the Santa Rosa Junior College during the time he lived at 512 Morgan Street.

Later, 512 Morgan Street was occupied by Elsie Dickerson, one of the first women involved in unionizing the apple canneries in the area.

600 Morgan Street (page 28) the historical report states the house is not associated with the lives of persons important to local history, when in fact, it was built for the Toscani family. Anthony Toscani was an Swiss-Italian immigrant and a prominent baker in the Italian section of town, starting out working at the Pioneer French Bakery and eventually owning it at which time it was renamed the Toscani Bakery. The bakery was located on West 7th Street in what is now the West End Historic District. In addition, Anthony's son Francis "Bud" Toscani (mentioned above) lived at 600 Morgan Street while gaining the skills for his future sports career as a local football star at Santa Rosa High School.

(Supporting documents attached.)

In closing, we'd like to reiterate these goals in the 2035 General Plan adopted by Santa Rosa's city council and on page 6 and 7 of the Historic Resources report:

HP-B Preserve Santa Rosa's historic structures and neighborhoods
HP-B-4 Allow for adaptive reuse of historic structures...to minimize negative impacts on existing neighborhoods to the extent feasible.

We look forward to city staff doing everything possible to ensure these goals are followed, the significance of our historic district is recognized and respected, and that Santa Rosa's cultural history and architectural heritage is preserved for future generations.

Best,

Denise Hill and Joe Lidienthal
317 Tenth Street
Santa Rosa, CA
707-332-1966
Santa Rosa now has a bungalow type hospital with more than 17,000 square feet of floor space with 75 rooms and 50 beds for patients, which has been thoroughly equipped with all modern facilities and conveniences. With its medical and surgical and obstetrical wards it can care for all cases from the city and surrounding country for some time to come. The hospital is owned and operated by H. S. Gutermute, who built up the Burke Sanitarium into a strong establishment in five years and then came into Santa Rosa, where he established the General Hospital in the old Devoto home on Fourth Street. Two years later he was forced out when the war-time demand for houses made it necessary for Mr. Devoto to return to the house to reside. At that time Mr. Gutermute erected the first unit of the bungalow type of hospital to house the General Hospital. This he has improved and added a second unit and completed the exterior with a stucco finish. The new unit in the form of a wing gives 25 additional rooms and has been set apart to include the maternity ward. The hospital, which is in the form of a large letter 'E' facing the East, is located on the old Menihan property at the southwest corner of A and Seventh streets. The lot is 300 by 125 feet, and the building is 220 feet long. With the three wings 104 feet each. The lot is large enough to allow a fourth wing to be added at any time in the future there is a demand for additional rooms. The building is nestled beneath the large live oak trees, giving it a very pleasant and inviting appearance. The main entrance, lobby, reception room, and office are between the north and middle wings. In addition, there are four surgical, three X-ray, two delivery, three utility, and seven staff rooms, besides the dining room, kitchen and store rooms. There are two large utility and numerous private bath rooms throughout the building. The floors of the maternity wing are double and covered with brown battleship linoleum, while the corridor floors are carpeted with sound-proof rubber. The corridors are heated with gas radiators, and there are electric heaters in each room. All rooms have running hot and cold water. The furnishings are all of the best quality. The beds are of the latest adjustably type such as are used in some of the largest and most important eastern hospitals, including that provided by Henry Ford for his hospital at his factory. The maternity wing has been added at the special solicitation of many physicians, who saw the needs of the city in that direction and the requirements of the future. It is expected the ward will be used more and more now that it is available at really less expense than cases ran be cared for at any home.

Mr. Gutermute in speaking of the hospital and its recent enlargement, said he hoped no one would misunderstand and think he was making a mint of money from the Institution, as, in fact, he said, he had been compelled frequently to take money from other enterprises he is engaged in, to meet hospital bills, as the expenses of upkeep and maintenance steadily grow regardless of the amount of business handled. With the enlarged capacity and facilities, it is expected the income will increase accordingly as it becomes more widely used. The Institution is open to all physicians, and already more than a dozen in this city, Sebastopol and other nearby points are using it in serious cases. The management assures all of the best possible care and treatment. The new hospital will be thrown open for public inspection Thursday afternoon and evening when all physicians and the public generally are cordially invited to call and inspect the place. Mr. Gutermute has gathered a very efficient staff of trained workers about him for handling the work of the hospital. Several have been in his employ for five years or more, while all are loyal, experienced workers. Miss Bertha Levy, the matron in charge, is a graduate of Lane hospital, San Francisco, and has had years of practical experience in such work. She was one of the first nurses Mr. Gutermute secured and she is considered the best in her work to be found. She is always pleasant and agreeable to all with whom she comes in contact and has proved herself an admirable executive. Miss Elizabeth Tanner is in charge of the maternity ward. She too is a graduate of Lane’s and has proved her worth by faithful continued service in the institution. Miss Myrna Ewing, who is head of the surgical ward, is a graduate of the Mt. Zion hospital, San Francisco, and is faithful and efficient in her work Miss Marie Behrens, a graduate of the Alameda County hospital, and Miss Marie Darcy, graduate of the Idaho state hospital, have been with the hospital for several years. Mrs. Swisler is the night nurse while the Misses Naoma Piltins and May Mendoca are two undergraduate nurses doing faithful work under instruction. In addition, the staff has a cook who has been there for several years, a maid, porter and yard man to keep the place up in proper condition. It has been well said that a building does not make a hospital any more than a house makes a home. It is the care and treatment afforded by the staff, the kindly and courteous little attentions given patients which goes to make up the hospital as it does the Inane. All of these are afforded at the General Hospital, AS GENERAL HOSTPITAL APPEARS REMODELED
512 and 600 Morgan Street History

600 Morgan Street
Built in 1922 for the Toscani family. Classic example of a California bungalow.

512 Morgan Street – Owned by Bud Toscani
Craftsman Bungalow example with rare local use of clinker bricks.

2003 Final EIR for Route 101 HOV Widening –
- Included in list of historic resources under CEQA as contributors to St. Rose Preservation District.

1989 City of Santa Rosa Historical Properties Inventory
- Listed as contributors

City Map of Contributors and Non-Contributors to Historic Districts
- Listed as contributors
Anthony Toscani was born on March 15, 1880, in Switzerland. His Swiss-Italian family immigrated to the United States in 1892 and settled in New Jersey. By 1906, he had relocated to Santa Rosa, California. He married Angelina Lena Maccario of Petaluma on March 16, 1907. They had two children during their marriage – a son Francis and a daughter Angelina. By 1923 they were living in their newly built bungalow on Washington (now Morgan) Street.

Anthony was a baker and started out delivering bread in a horse-drawn wagon for the Pioneer French Bakery. The bakery was located on West 7th Street in what is now the West End Historic District (the location of Santa Rosa’s early Italian community). Eventually he became a partner in the business and by 1937 is listed as the sole proprietor of the bakery.

The family were members of the St. Rose Church and daughter, Angelina, was the president of the Young Ladies Sodality of the St. Rose parish in 1929.
Anthony’s son, Francis “Bud” Toscani, was a local football star as a student at Santa Rosa High School while living at 600 Morgan Street with his family. Starting in 1927, he went on to make a name for himself playing college football for the Saint Mary’s College football team – the Saint Mary Gaels. In 1931 he was selected by the Newspaper Enterprise Association (NEA) as a second-team halfback on the 1931 College Football All-American Team. He also played professional football in the National Football League in 1932 for the Chicago Cardinals and the Brooklyn Dodgers.

Francis “Bud” Toscani returned to Santa Rosa and in 1933 married his wife, Lenore, moving into a bungalow just down the street from his parents’ house at 512 Morgan Street. He entered the family business and became a supervisor at his parent’s bakery. In 1941, he was hired as Assistant Football Coach for the Santa Rosa Junior College Bear Cub varsity football team. Sadly, Lenore died of polio in 1943 at the young age of 28 leaving their two daughters Carol Lee and Marlene without a mother.

Anthony, his wife Angelina, and son Bud moved to Nevada in 1948. Both Anthony and Bud continued in the bakery business after the move, working for Franco-American Bakery. By 1961, Anthony was the owner of the Franco-American Bakery in Reno. Tragically, Bud died in a car accident in 1966. Anthony died a year later on July 11, 1967, in Sparks, Nevada, at the age of 87, and is buried at Calvary Cemetery in Santa Rosa, California.

Continued~
Elsie Dickerson occupied 512 Morgan Street after inheriting it from her father after his death in 1925. In 1955, while living at 512 Morgan Street, Elsie was part of a group of three women recognized for unionizing the apple canneries in the area.
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Individuals

Denise Hill and Joe Lilienthal

Response to Hill-1

The commenters state that the Draft EIR acknowledges a significant and unavoidable impact to historic resources. This comment is a restatement of the Impact CUL-1, and no further response is warranted.

Response to Hill-2

The commenters state that the Draft EIR claims no impact to the St. Rose Historic District even though the project proposes to tear down all the structures on one entire block of our district and confirms that the majority of the structures are contributors to the historic district. This comment restates the determination of the Bloomfield Survey results with respect to whether the structures were District contributors. The Draft EIR disclosed the status of the structures with respect to contributor or non-contributor, and most of the structures were found to be contributors; however, only two structures, 520 Morgan and 608 Morgan, were deemed eligible for listing as a historic resource as provided in the Draft EIR. No further response is warranted.

Response to Hill-3

This comment restates the requirement regarding project alternatives in EIRs, which is provided starting on page 5-1 of the Draft EIR. No further response to this comment is warranted.

Response to Hill-4

This comment restates, with emphasis, the descriptions of Alternative 2 and Alternative 3, which are described starting on page 5-11 of the Draft EIR. No further response to this comment is warranted.

Response to Hill-5

This comment states that Alternative 2 is the only “viable alternative proposed by the EIR.” The analysis of alternatives in the Draft EIR considered three project alternatives. The Draft EIR considered the required “No Project Alternative,” as Alternative 1, thereby allowing decision makers to compare the impacts of approving the project and not approving the project. Alternative 2, Site Redesign, would eliminate the significant and unavoidable impact to historical resources by preserving two historic properties; however, there would be varying degrees of impacts—from increased to similar and decreased—for the other impact areas, as shown in Table 5-1: Project Alternative Impacts Comparison, on page 5-19 of the Draft EIR. Importantly, Alternative 2 would be built at a much lower density with much fewer affordable housing units, and an important project objective would not be achieved, as shown in Table 5-1: Project Alternatives Comparison to Project Objectives, on pages 5-20 and 5-21 of the Draft EIR. Alternative 3, Partial Preservation, would preserve two historic single-family homes, thereby partially reducing the significant and unavoidable impact to historic resources; however, all other environmental impacts would be similar to the proposed project except for impacts to energy and tribal cultural resources, which would be greater than the proposed project. The Draft EIR concluded that Alternative 3
is considered the environmentally superior alternative, as it has the fewest amount of impacts with the ability to achieve the most project objectives.

Sections 5.1 and 5.2 of the Draft EIR describe applicable provisions of Section 15126.6 of the CEQA Guidelines regarding the requirements for the consideration of project alternatives. The CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the project while still meeting the project objectives. The CEQA Guidelines also set forth the intent and extent of the alternatives analysis to be provided in an EIR. Section 15126.6(a) of the CEQA Guidelines states, "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the native or scope of the alternatives to be discussed other than the rule of reason."

CEQA Guidelines Section 15126.6(b) states, "Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly." Furthermore, the alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of a project while meeting most of the underlying project objectives. Reasons for rejecting project alternatives, such as failure to meet most of the basic project objectives, infeasibility, and inability to avoid significant environmental effects, must also be provided.

As provided on page 5-3 of the Draft EIR, “feasible” is defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors” (CEQA Guidelines Section 15364). CEQA does not require that an EIR determine the ultimate feasibility of a selected alternative, but rather than an alternative be potentially feasible. Section 15126.6(f)(1) of the CEQA Guidelines further explains the factors that may be taken into account when addressing the feasibility of alternatives, including site suitability, economic viability, availability of infrastructure, general plan consistency or other regulatory/jurisdictional limitations, and other real barriers to feasibility, like whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site.

In addition, there are different types of feasibility to consider when determining the suitability of particular alternatives for a project including the following: 1) technological feasibility, 2) legal feasibility, and 3) economic feasibility. These types of feasibility are further defined as follows (page 5-3 of Draft EIR):

- Technological Feasibility: Is the alternative feasible from a technical perspective, considering available technology? Are there any construction, operation, or maintenance constraints that cannot be overcome?
- Legal Feasibility: For example, do legal protections on lands or financing strategies preclude or substantially limit the feasibility of constructing the alternative?

- Economic Feasibility: Is the alternative so costly that its costs would prohibit its implementation?

Section 15126.6(c) of the CEQA Guidelines states, “The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”

The project alternatives must meet most of the proposed project objectives. Accordingly, the Draft EIR identified nine project objectives, providing the reasons for undertaking the proposed project. These objectives were developed by both the applicant and the City as lead agency. These objectives range from broader goals to more specific local needs, providing a number of important factors for the screening of potential project alternatives. Three alternatives were considered but not ultimately selected as a project alternative, and an analysis was provided that explained why they did not meet the basic project objectives or would not be responsive to community concerns. Therefore, the Draft EIR complied with the statutory requirements of CEQA by considering a sufficient range of alternatives for comparison with a comprehensive list of project objectives. No further response to this comment is warranted.

Response to Hill-6

The commenters include a statement regarding what cancer risks the historian who prepared the report is referring to in Alternative 2 and if it is referring to other cancer risks beyond living near a freeway because then everyone living in a vintage home in the City’s historic districts would be aware of them and exposed to them also. The commenters state that homes built prior to the 1950’s are more environmentally-friendly as they do not contain synthetic products that off-gas like today’s building materials.

The commenter’s did not identify an impact that was previously disclosed in their discussion of the cancer risks associated with living in older homes. As discussed on pages 3.2-26 to 3.2-29 of the Draft EIR, the cancer risks are associated with location of the project site adjacent to a freeway and not with off-gassing of building materials. The cancer risks from long-term occupancy of the proposed structures was prepared by an air quality scientist using the methodology and criteria recommended by the BAAQMD. As discussed in the Draft EIR, the structures at 516 and 520 Morgan may continue to be used for transitional housing with constraints placed on the term of occupancy due to cancer risk impacts from air pollutants under long-term occupancy conditions (see Air Quality Impact AQ-3). Other structures on Morgan Street may also to be used as site facilities, such as offices or meeting space, but potential long-term occupancy would not be permitted due to the cancer risk from air pollutants unless the HVAC system is upgraded on
those structures to be able to incorporate high filtration systems with a minimum efficiency reporting value
filter rating of 13 filters be installed in the buildings. No further response to this comment is warranted.

Response to Hill-7

The comment indicates that a fourth project alternative should have been evaluated in the Draft EIR. This
alternative would not include demolition of any structures on Morgan Street or the old General Hospital,
recommending adaptive reuse instead. Sections 5.1 and 5.2 of the Draft EIR, describe applicable
provisions of Section 15126.6 of the CEQA Guidelines regarding the requirements for the consideration of
project alternatives. As described above, in Response to Hill 5, an EIR must evaluate only those
alternatives that are necessary to permit a reasonable choice. Section 15126.6(a) of the CEQA
Guidelines states, “An EIR need not consider every conceivable alternative to a project. Rather it must
consider a reasonable range of project alternatives for examination and must publicly disclose its
reasoning for selecting those alternatives. There is no ironclad rule governing the native or scope of the
alternatives to be discussed other than the rule of reason.” Furthermore, the alternatives shall be limited
to those that would avoid or substantially lessen any of the significant effects of a project while meeting
most of the underlying project objectives. Reasons for rejecting project alternatives, such as failure to
meet most of the basic project objectives, infeasibility, and inability to avoid significant environmental
effects, must also be provided. In addition, there is nothing in the record to indicate that the alternative
suggested by the commenter would reduce environmental impacts beyond those identified in the project
alternatives described in the Draft EIR.

Section 5.4 of the Draft EIR describes project alternatives that were considered and rejected from further
consideration. EIRs should also identify any alternatives that were considered by the lead agency but
were rejected during the planning or scoping process and briefly explain the reasons underlying the lead
agency’s determination. As described in Section 5.5.1 of the Draft EIR, which is the discussion of
Alternative 1, the No Project Alternative, Catholic Charities has undertaken adaptive reuse of all of the
structures on project site for decades. The General Hospital was repurposed and serves as the Family
Service Center. Single-family homes along Morgan Street were repurposed to serve as the Navigation
Center. Adaptive reuse of properties was considered but was not found to be feasible.

The project alternatives must meet most of the project objectives. Accordingly, the Draft EIR identified
nine project objectives, providing the reasons for undertaking the project. These objectives were
developed by both the applicant and the City as lead agency. These objectives range from broader goals
to more specific local needs, providing a number of important factors for the screening of potential project
alternatives. Three alternatives were considered but not ultimately selected as a project alternative, and
an analysis was provided that explained why they did not meet the basic project objectives or would not
be responsive to community concerns.

The Draft EIR complied with the requirements of Section 15126.6, as it considered the required “No
Project Alternative,” as Alternative 1, thereby allowing decision makers to compare the impacts of
approving the project and not approving the project. Alternative 2, Site Redesign, would eliminate the
significant and unavoidable impact to historical resources be preserving two historic properties; however,
there would be varying degrees of impacts—from increased to similar and decreased—for other impact
areas. Importantly, Alternative 2 would be built at a much lower density with much fewer affordable housing units, and an important project objective would not be achieved. Alternative 3, Partial Preservation, would preserve two historic single-family homes, thereby partially reducing the significant and unavoidable impact to historic resources; however, all other environmental impacts would be similar to the proposed project except for impacts to energy and tribal cultural resources, which would be greater than the proposed project. The Draft EIR concluded that Alternative 3 is considered the environmentally superior alternative, as it has the fewest amount of impacts with the ability to achieve the most project objectives.

Therefore, the Draft EIR complied with the statutory requirements of CEQA by considering a sufficient range of alternatives for comparison with a comprehensive list of project objectives. No further response to this comment is warranted.

Response to Hill-8

The commenters state that there is significant historical information missing for some of the addresses analyzed in the Historical Resource Report provided by Brunzell Historical and provided a summary of that information with respect to the following structures:

- 465 A Street – General Hospital
- 512 Morgan Street
- 600 Morgan Street

The commenters provided additional supporting materials with their comment letter.

The following response addresses the comment outlined above by specifically responding to concerns outlined for each of the three properties identified:

1) 465 A Street – General Hospital

First, the comment states that the hospital was built in response to the 1917 influenza epidemic. It is unclear exactly which event this is referring to, but it is assumed that they are referring to the Spanish Influenza, which had several waves that started in January 1918 and continued through 1919. This pandemic was responsible for between 20 and 50 million deaths across the world, of which approximately 675,000 were Americans. While the exact origins of the influenza are unknown, the spread of the disease coincided with the end of World War I, which saw the mass mobilization of troops and healthcare providers around the world. This, coupled with environmental conditions caused by years of warfare, resulted in the catastrophic transmittal of the influenza, which devastated populations and ultimately reshaped health care practices across the world. The influenza made it clear that the majority of communities were ill-equipped to handle such pandemics. The need for numerous hospital beds with constant medical access became evident during this period as medical practitioners were well versed in germ theory and the need for sterilization.

Prior to 1919, the General Hospital operated out of a large residence located at 4th and E Street in Santa Rosa but moved to the collection of buildings at 465 A Street in December 1919 in the waning days of the
flu pandemic. While many contemporary secondary sources state that the hospital was built in reaction to the pandemic, this is true of all hospitals and medical facilities founded during the late 1910s and early 1920s, as there was a general expansion of publicly accessible, modern, sterile hospital facilities across the country. Additionally, the evaluation provided in the Historical Resource Report clearly states that planning for the hospital at its current location occurred in 1916, well in advance of the influenza outbreak. While the influenza and the lessons learned in how to respond to pandemics was undoubtedly a factor in the eventual development of the hospital, no primary sources indicate that this is the reason for the hospital’s relocation to the current facilities. Sources do indicate that the 1919 hospital was constructed with a sprawling wing plan to provide maximum light, ventilation, and ease of access throughout the facility, which are hallmarks of hospital design during this time. However, this does not translate as a direct association with how Santa Rosa handled the Spanish Influenza outbreak. Additionally, the building has undergone extensive alterations and remodels since this initial period, and the hospital no longer appears how it would have in 1919, which would be the period of significance associated with any events related to the Spanish Influenza outbreak. As discussed on pages 3.4-2 to 3.4-5, the General Hospital is ineligible for listing as a historical resource and is not a contributor to the St. Rose Historic Preservation District. Based on the Secretary of Interior’s Standards, the General Hospital buildings do not meet the criteria for listing on the National Register of Historic Places (NRHP) or the California Register of Historic Places (CRHR), or for designation as a Santa Rosa Landmark. The General Hospital lacks historical or architectural significance and is therefore ineligible for listing as a historical resource.

Second, the comment also makes the argument that the construction of the maternity ward at the Santa Rosa General Hospital is significant for the contributions to childbirth and health care in Santa Rosa. While the addition of the maternity ward wing at the general hospital was celebrated at the time that it was constructed in 1922, the hospital had already been serving as a place where women could give birth, as indicated in several birth announcements from 1920 and 1921 referencing deliveries in the hospital. While it is acknowledged that the maternity ward was a modern addition at the time of its construction in 1922, this too is consistent with the general trends of medical development that were occurring during this period, including childbirth. No records indicate that the practices at the maternity ward made significant contributions to the understanding and advancement of childbirth in the medical field. Santa Rosa General Hospital does not rise to a level of significance under the themes presented in the comment.

The building does not retain sufficient integrity to reflect any of the suggested periods of significance. As outlined in the Historical Resources Report, the building has undergone extensive alterations, including the replacement of all windows, substantial changes to the fenestration patterns, the complete remodel of the primary entrance, the construction of several additions, and multiple alterations to the interior spaces. These alterations have resulted in a building that appears to be of the mid-century period rather than the early 20th century, during which the suggested themes of significance occurred. As such, the building does not retain several aspects of integrity, including materials, workmanship, feeling, and association. Therefore, the subject building is not eligible under the NRHP or CRHR, or for designation as a Santa Rosa Landmark, and does not qualify as a historic resource for the purposes of CEQA.
2) 512 Morgan Street

A summary of the historic resources evaluation is provided in Table 3.4-1, Historic Resources Evaluation Results, on pages 3.4-4 and 3.4-5 of the Draft EIR. In response to the overall comment, there appears to be a misunderstanding of what qualifies as significant associations under Criteria B/ii/B for the NRHP and CRHR, and for designation as a Santa Rosa Landmark. According to evaluation guidance prepared by the National Park Service, in order for a property to be significant for associations with an individual, the following criteria must be met: a) the individual must be significant under a specific context, meaning that they must have made significant contributions to their field or community; and b) the property must have direct associations with the significant contributions made by the individual.

In response to the issue raised regarding Francis “Bud” Toscani, the comment argues that the property is significant because he lived at the property following his NFL career. While Toscani appears to have been a local celebrity during this period, this does not qualify as significant under any historical context. Additionally, Toscani did not live at the property during his NFL career, and there is no direct association with 512 Morgan Street. Similarly, his role in the community as a football coach at the Santa Rosa Junior College, while noteworthy, does not rise to a level of significance that would qualify under the relevant criteria, nor does it have any associations with the property at 512 Morgan Street. Therefore, the property does not individually qualify as a historical resource for its associations with Francis “Bud” Toscani.

Regarding Elsie Dickerson, it is noted that the Historical Resources Report does not account for the period during which she lived at 512 Morgan Street, which subsequent research has confirmed. However, the property does not appear to be significant for associations with Elsie Dickerson. The comment suggests that Elsie is significant as one of the first women involved in unionizing the apple canneries in the region, an event that occurred during her residence at the property. Additional research reveals that the comment relies solely on the obituary of Elsie Dickerson, which states she was a strike organizer. Contemporaneous accounts show that Dickerson was one of several women involved in the initial union issues. According to several accounts of the unionization of the apple cannery workers, there were multiple disputes between the Sebastopol Apple Growers Union and the Teamsters Union who were trying to organize across the cannery industry. The events were contentious and turned violent.

Research did not reveal Elsie Dickerson’s precise involvement. Records show that she was one of three women who were fired from a cannery, resulting in a labor court case. The historical record has not identified her specific involvement in unionizing with the Teamsters beyond being identified as a plaintiff in the court case and as an observer of the union elections at select canneries. The broader unionization event involved the layoffs of hundreds of people across multiple cannery facilities. As for the court case that complicated the union dispute, most accounts indicate that Mrs. Orice Storey was the main driver behind the effort, who was fired for allegedly congregating and promoting unionization on the cannery floor. Dickerson was also fired, but for allegedly sabotaging cored apples on the assembly line, potentially as a symbol of protest. Dickerson appears to have been involved with the union in the following years, holding several committee positions, but the complete nature of her involvement in the contexts of workers’ rights and unionization in the cannery industry remains unclear. Additionally, there does not appear to be any associations with this context and the property at 512 Morgan Street (formerly Washington Street); and although Dickerson lived at the property, there is no evidence of a direct
connection between the labor movement and her residence, such as the location of labor dispute
discussions or unionization meetings. Similarly, while the strike itself may qualify as a significant event,
there are no indications of any associations with the subject property. Any and all significance associated
with the strike would be best represented by properties where the arrests, the organization of the union
leadership, and the strike occurred. No records indicate that any of these events occurred at 512 Morgan
Street. Therefore, 512 Morgan Street is not considered significant under these themes, and does not
qualify as a historical resource for the purposes of CEQA.

3) 600 Morgan Street

Similar to the comment regarding 512 Morgan Street, the argument appears to misunderstand what
qualifies as significant associations under Criteria B/ii/B for the NRHP, CRHR, and for designation as a
Santa Rosa Landmark.

The comment proposes that the house is significant for its associations with Anthony Toscani, who
worked at the former Pioneer French Bakery, which he later owned and operated as the Toscani Bakery.
While it appears that the Toscani Bakery was a noteworthy business that operated in Santa Rosa, it was
one of several bakeries operating in the predominantly Italian West End, including the Franco American
Bakery, which was founded by the Bastoni family and has been in continuous operations since 1900.
Specific to Anthony Toscani, research did not uncover any additional endeavor aside from the bakery that
would suggest he made contributions to the commercial development of Santa Rosa beyond the
operation of the bakery. As for the property at 600 Morgan Street, it does not have any associations
with the development of the bakery nor any other commercial endeavor in Santa Rosa, that would rise to
a level of significance.

As for Francis “Bud” Toscani, it is acknowledged that he grew up in the house and was living there while
playing high school football in Santa Rosa. While he did go on to have a career in the NFL, this does not
qualify as a significant contribution to history, nor does it have a direct association with the property at
600 Morgan. Therefore, the property is not individually significant for associations with the Toscani family
and does not qualify as a historical resource for the purposes of CEQA.

Summary:

It is acknowledged that the Historical Resources Report prepared by Brunzell Historical did not address
certain aspects of historical background as it relates to each property. However, upon further investigation
of the issues presented in these comments, none of the aforementioned properties exhibit significance
under the proposed historical themes, and therefore, these properties do not qualify as historical
resources for the purposes of CEQA. No further response to this comment is warranted.

Response to Hill-9

The commenters reiterated the goal and one policy from the City’s 2035 General Plan Historic
Preservation Element, which was detailed in the Historic Resources Report. Specifically, the comment
The City of Santa Rosa 2035 General Plan Historic Preservation Element establishes the goals and policies of identifying and preserving significant historic and prehistoric resources, including buildings and neighborhoods of historic architectural significance and places of special historic interest or other value to the community. Historic Preservation Element HP-B is to “preserve Santa Rosa’s historic structures and neighborhoods.” It includes nine policies listed in the Draft EIR and the Historical Resources Report for the proposed project. These include policies ensuring that the proposed project follow the Secretary of the Interior’s Standards for Rehabilitation (Policy HP-B-1) and encouraging preservation (Policy HP-B-2), as well as other measures which are the City’s responsibility to adopt, including HP-B-4 (Policies HP-B-3 through HB-B-9).

The proposed project currently includes the demolition of two structures which are contributors to the St. Rose Historic Preservation District, namely the historically-eligible single-family residence at 520 Morgan, and a historically-eligible four-plex at 608 Morgan. As such, demolition of these structures would not be consistent with Historical Preservation Element HP-B-2. These properties are both considered contributors to the St. Rose Historic Preservation District; therefore, their demolition would result in a substantial adverse change to the St. Rose Historic Preservation District and is considered a significant and unavoidable impact per Section 15064.5(b)(2)(B) of the CEQA Guidelines.

The Santa Rosa General Hospital building, at 465 A Street, does not meet the criteria for listing as a historical resource, as it lacks historical or architectural significance. Adaptive reuse of the Santa Rosa General Hospital is not feasible; nor is it required for consistency with Historical Preservation Element Policy HP-B-4. Furthermore, Policy HP-B-4 is the City’s responsibility to implement, as it requests the allowance of adaptive reuse. In addition, the Santa Rosa General Hospital Building is not considered a contributor to the St. Rose Historic Preservation District; therefore, its demolition would not constitute a significant and unavoidable impact.

The proposed project would incorporate four mitigation measures to minimize the effects of demolition of the contributing structures at 520 and 608 Morgan. These measures include MM CUL-1 (Salvage Report), MM CUL-2 (Public Report Documentation), MM CUL-3 (Interpretive Materials), and MM CUL-4 (Compatible Design). These measures would reduce the significance of the impact due to the loss of these two contributing structures by requiring comprehensive recordation, documentation, and an onsite interpretative program, and by ensuring that the proposed project would be designed to meet the City’s Design Guidelines for construction within the Historic District. Nevertheless, the loss of these two contributing structures would result in a significant and unavoidable impact. Ultimately, the determination of consistency with City General Plan goals and policies remains with the City. Deference is given to an agency’s finding of consistency unless no reasonable person could have reached the same conclusion on the evidence before it. Additionally, although the City believes that, in this instance, the proposed project is compatible with the character of surrounding neighborhood, a general plan consists of a wide range of competing interests—such as the provision of services and housing to people experiencing homelessness—and a project need not satisfy each and every policy. “It is beyond cavil that no project could completely satisfy every policy stated in [a general plan], and that state law does not impose such a requirement.” (Sequoya Hills Homeowners Association v. City of Oakland (1993) 23 Cal. App. 4th 704, 719.) Finally, inconsistency with general plan or community plan policy does not necessarily equate with a physical impact on the environment, and thus may not result in a significant impact.
“If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency if the project is otherwise permissible under applicable laws and regulations.” (Public Resources Code [PRC] 21002(c).) The administrative record supports and will support the City decision-makers final findings with regards to the at the time they are made with the decision-makers having fully and independently considered all the evidence.

“To provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a Proposed Project, lead agencies shall, in accordance with Section 21000, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant.” (PRC 21002.1(e).)

“The legislature further finds and declares that it is the policy of the state that:...(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward mitigation of actual significant effects on the environment.” (PRC 21003(f)). In addition to the policies declared by the Legislature concerning environmental protection and administration of CEQA in Sections 21000, 21001, 21002, and 21002.1 of the PRC, the courts of this state have declared the following policies to be implicit in CEQA:

- (g) The purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind.

- CEQA does not required technical perfection in an EIR, but rather adequacy, completeness, and a good faith effort at full disclosure. A court does not pass upon the correctness of an EIR’s environmental conclusions, but only determines if the EIR is sufficient as an informational document. (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal. App. 3d 692.)

- (j) CEQA requires that decisions be informed and balanced. It must not be subverted into an instrument for the oppression and delay of social, economic, or recreational development or advancement. (Laurel Heights Improvement Assoc. v. Regents of U.S. (1993) 6 Cal. 4th 1112 and Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal. 3d 553)” See CEQA Guidelines section 15003 ((g), (i) and (j); emphasis added).

Here, the City has provided a good faith effort to analyze the environmental impacts of the proposed project using methodologies approved by the proposed project and with the assistance of experts in environmental analysis. The City is not required to generate paper to perform additional analysis that the commenter would consider technically perfect, or that uses different methodologies of analysis, and different thresholds of significance would subvert CEQA into an instrument of oppression and delay of social and economic advancement by further delaying the proposed project’s contribution to homeless housing, rehabilitation, and construction jobs within the City. Here, the City has properly weighed
comments from all sources and either made appropriate clarifications in the EIR or explained in good faith why it disagrees with the comment. Based on the Draft EIR’s good-faith effort to disclose environmental impacts related to the proposed project, the City would then decide if the benefits of the proposed project outweigh its significant and unavoidable impacts in determining whether or not to adopt a Statement of Overriding Considerations, at their discretion. No further response to this comment is warranted.

Response to Hill 10

The commenter states that they look forward to City staff doing everything possible to ensure that the City’s General Plan goals are followed, that the significance of the St. Rose Historic Preservation District is recognized, and that Santa Rosa cultural history and architectural heritage is preserved. With respect to the City General Plan goals, refer to Response to Hill-10 for more information. In addition, the Draft EIR provides a thorough evaluation of General Plan consistency in Table 3.6-1, General Plan Policy Consistency Analysis, starting on page 3.6-6 of the Draft EIR. Table 3.6-2, Downtown Specific Plan Policy Consistency, starting on page 3.6-14 of the Draft EIR, provides additional policy consistency analysis at the specific plan level. A thorough evaluation of impacts to historic resources was provided in the Draft EIR. No further response to this comment is warranted.
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3.0 MINOR REVISIONS TO THE DRAFT EIR

3.1 INTRODUCTION

This section includes minor edits to the Draft EIR. These modifications resulted from minor clarifications and staff-initiated changes.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis. Changes are provided in revision marks (underline for new text and strikeout for deleted text).

3.2 MINOR CHANGES AND EDITS TO THE DRAFT EIR

Section ES Executive Summary

Table ES-1 is revised on pages ES-9 and ES-10 as follows:

<table>
<thead>
<tr>
<th>Impacts</th>
<th>Mitigation Measures</th>
<th>Level of Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impact CUL-1</strong> The proposed project would cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.</td>
<td><strong>MM CUL-2: Public Report Documentation.</strong> The buildings at 520 and 608 Morgan Streets shall be documented prior to commencement of demolition of those structures and any work associated with the project. This documentation will be consistent with the Historic American Building Survey (HABS) documentation Level II, although will not require submittal to the Library of Congress. The HABS-like documentation shall include large format photographs and a written history of the properties, including historical contexts related to the St. Rose Historic Preservation District. Materials shall be prepared by an architectural historian, historic architect, or historian that meets the Secretary of the Interior’s Professional Qualifications. Produced materials shall be submitted to local repositories, which should include the City of Santa Rosa Public Library and the Museum of Sonoma County. While public documentation is instrumental in understanding and cataloguing alterations to historical resources, it should be noted that Section II.C-Demolition in the Design Guidelines specifically states that public documentation is not sufficient as a stand-alone mitigation measure.</td>
<td>Significant and Unavoidable Impact</td>
</tr>
</tbody>
</table>
Cultural and Historic Resources

Page 3.4-15, Mitigation Measure CUL-2

Mitigation Measure CUL-2 is revised as follows:

MM CUL-2: Public Report Documentation. The buildings at 520 and 608 Morgan Streets shall be documented prior to commencement of demolition of those structures any work associated with the project. This documentation will be consistent with the Historic American Building Survey (HABS) documentation Level II, although will not require submittal to the Library of Congress. The HABS-like documentation shall include large format photographs and a written history of the properties, including historical contexts related to the St. Rose Historic Preservation District. Materials shall be prepared by an architectural historian, historic architect, or historian that meets the Secretary of the Interior's Professional Qualifications. Produced materials shall be submitted to local repositories, which should include the City of Santa Rosa Public Library and the Museum of Sonoma County. While public documentation is instrumental in understanding and cataloging alterations to historical resources, it should be noted that Section II.C-Demolition in the Design Guidelines specifically states that public documentation is not sufficient as a stand-alone mitigation measure.

Greenhouse Gas Emissions and Climate Change

Page 3.5-14, Table 3.5-6: Santa Rosa Climate Action Plan Consistency Analysis

Table 3.5-6: Santa Rosa Climate Action Plan Consistency Analysis is revised as follows:

<table>
<thead>
<tr>
<th>Santa Rosa Climate Action Plan</th>
<th>Project Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Goal 4: Improved Transport Options</strong></td>
<td></td>
</tr>
<tr>
<td>Measure 4.3 Car Sharing and Transportation Demand Management Programs</td>
<td>Consistent. The proposed project would implement mitigation measure GHG-2, which includes the preparation of a prepare a transportation demand management plan that would encourage carpooling and include the provision of subsidized transit passes to employees.</td>
</tr>
<tr>
<td>Action 4.3.5 Encourage new developments with more than 50 on-site employees to provide subsidized or free transit passes to employees.</td>
<td></td>
</tr>
</tbody>
</table>
Transportation

Page 3.8-2, fourth paragraph

Existing Traffic Volumes and Levels of Service

Existing average daily traffic (ADT), AM, and PM peak hour count data were collected in November December 2018, and ADT data were collected again in January 2019 to determine if the holiday season affected the traffic volumes collected in November December. The percent change in ADT for the study area roadway segments between November December 2018 and January 2019 varied from -13 percent to +16 percent, with an overall average change of 2 percent. In no case was the absolute magnitude of change substantial. Therefore, to be conservative, a seasonal adjustment of a 2 percent increase was applied to the December turning movement counts.

Page 3.8-5, fourth paragraph

Data Collection

Existing traffic volumes at the study intersections were obtained in November December 2018 and January 2019.

Page 3.8-18

Table 3.8-2: Intersection Level of Service Summary – Cumulative Conditions (2040) with Improvements

<table>
<thead>
<tr>
<th>Intersection Name</th>
<th>Cumulative without Project</th>
<th>Cumulative with Project with Improvements</th>
<th>Net Change with Improvements Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>AM Peak Hour</td>
<td>PM Peak Hour</td>
<td>AM Peak Hour</td>
</tr>
<tr>
<td></td>
<td>Delay</td>
<td>LOS</td>
<td>Delay</td>
</tr>
<tr>
<td>Morgan Street and 9th Street</td>
<td>40.1</td>
<td>E</td>
<td>38.9</td>
</tr>
<tr>
<td></td>
<td>(19.9)</td>
<td>(B)</td>
<td>(19.5)</td>
</tr>
</tbody>
</table>

Notes:
* LOS E with the partial closure of 7th Street only
Values in parentheses represent conditions with the partial closure of 7th Street
LOS = level of service

Cumulative Impacts, Section 4.5.8 Transportation

The City has considered the project under the cumulative conditions and has reevaluated its goals for circulation in the downtown area and has determined that a fair-share payment would best achieve the City's circulation goals. It is important to note that under CEQA, the proposed project does not have a significant impact and the discussion on signalization was provided for informational purposes. The condition of approval for fair-share payment is outside the realm of CEQA and is clarified in this Final EIR for informational purposes. The clarification does not affect the impact determination that the proposed
project would have a less than significant cumulatively considerable impact to transportation, recirculation of the Draft EIR is not required.

Page 4-9, first paragraph

As a condition of approval to maintain the community integrity and consistency with General Plan and Specific Plan goals and in accordance with the City’s transportation operational guidelines, the project would be conditioned to provide its fair-share payment for the future traffic improvements at Morgan and 9th, which may include a traffic signal or other equally effective traffic measure that would be consistent with the City’s operational guidelines. The proposed project does not have a cumulatively considerable impact to this intersection under CEQA. The fair-share payment that will be a condition of approval is required under the City’s transportation operational guidelines. replace the existing stop signs at the Morgan Street and 9th Street intersection with a traffic signal. A signal warrant analysis was conducted for the intersection, which determined that the traffic volumes met the peak hour warrant criteria for cumulative conditions both without and with the proposed project. Installation of a traffic signal would fully mitigate the significant impact, and the intersection would operate at LOS B under the cumulative conditions.

Page 4-9, second paragraph

As a condition of approval, an in order to maintain community integrity and consistency with the General Plan and Specific plan goals and in accordance with the City’s transportation operational guidelines, the project would be conditioned to provide will be required to pay its fair-share payment for future traffic improvements at 6th Street/Santa Rosa Plaza and A Street, which may include for 80-foot roundabouts mitigate the significant impact under the cumulative conditions.

Page 4-9, third paragraph

However, the project will be conditions conditioned to be responsible for its fair-share of the costs of feasible improvements to be consistent with General Plan and Specific Plan Goals.

Draft EIR Appendix G: Caritas Village Traffic Impact Analysis

Page 1.4, first paragraph

The existing conditions scenario utilizes observed AM and PM peak hour traffic counts for study area intersections and 24-hour mid-block Average Daily Traffic (ADT) counts for key study area roadways. Data was collected in November December 2018 and January 2019.

Page 2.4, first paragraph

Existing average daily traffic (ADT), AM, and PM peak hour count data were collected in November December 2018 and ADTs were collected again in January 2019 to determine if the holiday season affected the traffic volumes collected in November December. As shown in Table 2-1 below, the percent change in ADTs for the study area roadway segments between November December 2018 and January 2019 varied from -13 percent to +16 percent with an overall average change of 2 percent. In no case was
the absolute magnitude of change substantial. Therefore, to be conservative, a seasonal adjustment of a two percent increase was applied to the November December turning movement counts.

Page 2.4, Table 2-1 ADT Comparison is revised as follows:

**Table 2-3 ADT Comparison**

<table>
<thead>
<tr>
<th>Location Name</th>
<th>ADT November December 2018</th>
<th>ADT January 2019</th>
<th>% change</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sixth St between Morgan St &amp; A St</td>
<td>5,227</td>
<td>5,355</td>
<td>2%</td>
</tr>
<tr>
<td>2. A St between Seventh St and Sixth/Santa Rosa Plaza</td>
<td>4,385</td>
<td>4,404</td>
<td>0%</td>
</tr>
<tr>
<td>3. Morgan St between Seventh and Sixth</td>
<td>2,189</td>
<td>1,910</td>
<td>-13%</td>
</tr>
<tr>
<td>4. Seventh St between Morgan St &amp; A St</td>
<td>362</td>
<td>347</td>
<td>-4%</td>
</tr>
<tr>
<td>5. Seventh St between A St &amp; B St</td>
<td>5,299</td>
<td>6,165</td>
<td>16%</td>
</tr>
<tr>
<td>6. A St between Eighth St &amp; Seventh St</td>
<td>3,057</td>
<td>2,799</td>
<td>-8%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>20,519</strong></td>
<td><strong>20,980</strong></td>
<td><strong>2%</strong></td>
</tr>
</tbody>
</table>