Mitigated Negative Declaration, Response to Public Comments, and Mitigation Monitoring Program

West College Lift Station Relocation Project (Fulton Road Lift Station)

City of Santa Rosa

Prepared for:
City of Santa Rosa Public Works Department
69 Stony Circle
Santa Rosa, California 95401
Phone (707) 543-4200

March 2009

Prepared by:

WINZLER & KELLY

Winzler & Kelly
495 Tesconi Circle
Santa Rosa, CA 95401
(707) 523-1010

CITY OF SANTA ROSA
P.O. Box 1678
Santa Rosa, CA 95402

MAR 26 2009

DEPARTMENT OF COMMUNITY DEVELOPMENT
# TABLE OF CONTENTS

**Mitigated Negative Declaration**

- Lead Agency and Project Proponent ................................................. 1
- Contact Person .............................................................................. 1
- Project Location ........................................................................... 1
- Project Sponsor ........................................................................... 1
- Description of Project .................................................................. 1
- Finding of No Significant Effect on the Environment ....................... 3
- Initial Study .................................................................................. 4
- Response to Comments on the Initial Study ..................................... 4
- Location of the Documents ............................................................. 4
- Mitigation Measures ...................................................................... 4

**Response to Comments** ................................................................ 11

*Comment Letter 1: Cheri Kendrick, Senior Air Quality Engineer, Lake County Air Quality Management District* .......................................................... 12

*Comment Letter 2: Sandy Hesnard, Aviation Environmental Specialist, California Department of Transportation Division of Aeronautics* ........................................ 16

*Comment Letter 3: Nick Tipon, Sacred Sites Protection Committee Chairman, Federated Indians of Graton Rancheria* ............................................... 21

*Comment Letter 4: Brenda L. Tomaras, Attorney, Lytton Rancheria of California* ................................................................. 24

*Verbal Comments Received During the Public and Agency Comment Period* ................................................................. 28

*Lead Agency Changes* ................................................................... 32

**Final Mitigation Monitoring Program** ............................................ 33
Mitigated Negative Declaration

City of Santa Rosa
West College Lift Station Relocation Project
(Fulton Lift Station)

Project Title

West College Lift Station Relocation Project (Fulton Road Lift Station)

Lead Agency Name and Address

City of Santa Rosa
69 Stony Circle
Santa Rosa, California 95401

Contact Person

Norman Amidon, Associate Civil Engineer
City of Santa Rosa Public Works Department
Phone: (707) 543-3449
namidon@ssrcity.org

Project Location

The project is located in the City of Santa Rosa, located approximately 55 miles north of San Francisco along U.S. Highway 101 in Sonoma County (see Figure 1, Vicinity and Location Map). As illustrated on Figure 1, the new Fulton Road Lift Station would be constructed near the northeast corner of Fulton Road and West Third Street. The project would also include installation of a new trunk sewer extension along Fulton Road between West Third Street and West College Avenue. A force main pipeline would be abandoned in place between the existing West College Lift Station at the intersection of West College Avenue and Fulton Road to Stony Point Road

Project Sponsor's Name and Address

City of Santa Rosa
69 Stony Circle
Santa Rosa, California 95401

Description of the Project

Purpose of Project

The project is intended to correct operational and wet well deficiencies at the West College Lift Station. The fundamental problems related to the wet well design have existed since the facility was constructed in the mid 1960’s. The City recognizes that the existing pumps may have
adequate hydraulic capacity; however, the pump station has other existing deficiencies that significantly compromise system reliability. Most notably, the wet well is undersized and the small volume in the wet well causes the pumps to cycle on and off excessively which significantly decreases motor life. The wet well configuration and incoming pipes cause backup in the pipeline which results in clean up and maintenance problems in the upstream distribution system.

**Project Description**

The project includes construction of the Fulton Road Lift Station and a new gravity sewer line from the intersection of West College and Fulton Road to the new Fulton Road Lift Station. The proposed project includes the following elements:

- **Acquisition of up to 1.05 acres of privately-owned land at the northeast corner of Fulton Road and West Third Street.** The City would purchase one parcel to construct and operate the lift station and stormwater treatment facilities. The City will attempt to secure an easement across the adjacent parcel for the proposed South Fulton trunk sewer.

- **Construction of a new lift station (approximately 5-MGD) near the northeast corner of Fulton Road and West Third Street.** The pump station site would also include a single-story control building to house an emergency generator and a PG&E transformer. Security fencing would be installed around the perimeter of the new lift station. Two new driveways would be added to access the Fulton Road Lift Station, one from Fulton Road and the other from Echo Lake Court. The Fulton Road driveway access would be limited to right turn in and right turn out only.

- **Installation of approximately 2,700 feet of 24- to 30-inch diameter gravity trunk sewer from the existing lift station on the southeast corner of Fulton Road and West College Avenue to the new Fulton Road Lift Station.** This new pipeline would be an extension of the South Fulton Trunk.

- **Demolition of the existing West College Lift Station and abandonment of the existing 18-inch sewer line and force main.**

A detailed Project Description is included in the Draft Initial Study/Proposed Mitigated Negative Declaration.

**Finding Of No Significant Effect on the Environment**

The existing lift station has operational deficiencies which result in excessive pump cycling and result in backups in the existing distribution system. The project will improve conditions where sewer backups have been problematic through installation of new pumps and reduced pipeline lengths. With the recommended mitigation measures, no significant adverse effects to the environment are expected from the project. This project will not have a detrimental effect upon either short-term or long-term environmental goals. This project will not have impacts which are individually limited but cumulatively considerable. This project will not have environmental impacts which will cause substantial adverse effects upon human beings, either directly or indirectly.
The City anticipates an approximate 50% decrease in energy use with operation of the new lift station. The decrease in energy use will result in a beneficial reduction in greenhouse gas emissions.

Mitigation measures have been added to the project to reduce potentially significant impacts to less than significant levels.

**Initial Study**

An Initial Study was prepared for the project and sent to the State Clearinghouse and interested agencies on October 3, 2008 for a 30-day public review period. The City extended the comment period an additional 14 days until November 20, 2008. The City also held a neighborhood meeting on November 17th to discuss the project and present the preliminary conceptual drawings. Letters were received from two agencies and two organizations during the 45-day comment period: Native American Heritage Commission, the State Water Resources Control Board Division of Loans and Grants, the Federation Indians of Graton Rancheria.

**Response to Comments on the Initial Study**

The City of Santa Rosa Board of Public Utilities must consider the comments received during the comment period prior to adopting a Mitigated Negative Declaration. Responses to the comments received are included below. The comments did not require changes in the Initial Study or in the project, and no significant effects were identified.

**Location of Documents**

Copies of the document are available for review at the following City of Santa Rosa offices: Public Works, 69 Stony Circle, Santa Rosa, CA 95401, and Community Development, 100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404. The document is also available online at: http://ci.santa-rosa.ca.us/departments/communitydev/development/Pages/ReportsandEIR's.aspx.

**Mitigation Measures**

The mitigation measures below are compiled from the Initial Study. These mitigation measures have been added to the project and have been found to reduce potentially significant impacts of the proposed project to less than significant. A Mitigation Monitoring Program has been prepared and is attached as Appendix A to the Initial Study, and it is included in this document beginning on page 21.

**Mitigation Measure AES-1: Landscaping**

The City shall implement a landscaping plan designed to revegetate portions of the demolished West College Lift Station, the new Fulton Road Lift Station, construction staging areas and other construction-related ground disturbance.

The City shall ensure that suitable landscaping is included in the plans and specifications for the area around the new lift station and control building to blend the facility into the surrounding area to the maximum extent feasible.
Mitigation Measure AES-2: Lighting

The City shall specify installation of shielded low-intensity outdoor lighting per City of Santa Rosa Lighting Standards.

Mitigation Measure AIR-1: Dust Control

The City of Santa Rosa shall control fugitive dust generated by project construction activities, including at construction staging areas. These measures shall include:

- Apply [clean] water or other approved suppressants to exposed dirt surfaces, as needed.
- Apply non-toxic soil stabilizers to inactive construction areas (i.e., disturbed surfaces that are left unused for at least four consecutive days, soil stockpiles).
- Cover haul trucks or maintain at least two feet of freeboard.
- Limit vehicle speed to 15 mph on any unpaved surfaces.
- Install wheel washers for exiting trucks or wash-off the tires or tracks of all trucks and equipment leaving any unpaved areas of the work area.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph and visible dust emissions cannot be prevented from leaving the construction site.
- Restore and stabilize exposed surfaces at the conclusion of earth moving activities.

Mitigation Measure AIR-2: Equipment Exhaust Control

The City of Santa Rosa shall control equipment emissions when heavy construction equipment is operating, including at construction staging areas. These measures shall include:

- Reduce unnecessary idling of construction equipment (i.e., limit idling time to 10 minutes or less) and avoid staging equipment within 200 feet of sensitive receptors.
- Where possible, use newer, cleaner-burning diesel-powered construction equipment.
- Properly maintain construction equipment per manufacturer specifications.
- Designate a Disturbance Coordinator responsible for ensuring that mitigation measures to reduce air quality impacts from construction are properly implemented.

Mitigation Measure AIR-3: Asbestos-containing and Lead-containing Materials

The City of Santa Rosa shall complete a hazardous materials investigation of the West College Lift Station prior to demolition to determine the presence of asbestos- or lead-containing materials. If the site contains asbestos or lead, the City shall use a Cal/OSHA registered and State licensed asbestos abatement contractor to remove asbestos-containing material. The City shall also remove deteriorated lead-based and lead-containing paint and stabilize building materials that have lead paint and coatings prior to demolition activities.
The City shall ensure that contractors perform all work in compliance with the most recent edition of all applicable federal, state, and local regulations, standards, ordinances, laws and codes including, but not limited to abatement transportation, and disposal of asbestos-containing and lead-containing materials.

Mitigation Measure BIO-1: Implement Compensatory Mitigation for CTS if Required by USFWS

The City of Santa Rosa shall implement CTS mitigation if required by the USFWS. Mitigation may include purchase of CTS preservation credits, contribution of an endowment to a foundation or contribution of funds to a mitigation bank managed by the California Department of Fish and Game. In the event that USFWS does not require mitigation for CTS then the City of Santa Rosa would not complete additional CTS mitigation.

Mitigation Measure BIO-2: Pre-construction Nest Surveys and Construction Exclusion Zones

In order to avoid nesting birds, construction work shall be timed for the period August 15 through February 28/29 when breeding activities will have been completed and next year’s breeding activities have not yet started. Preconstruction surveys will not be required for construction work carried out in the non-breeding season. If construction work is scheduled during the breeding season (prior to August 15), a qualified wildlife biologist shall conduct a pre-construction survey to determine if nesting birds are present in or in the vicinity of vegetation to be removed. The pre-construction survey shall be conducted within 15 days prior to the start of work from March 1 through May 31 (since there is higher potential for birds to initiate nesting during this period), and within 30 days prior to the start of work from June 1 through August 15. If active nests are found in the work area, the biologist shall determine an appropriately sized buffer around the nest in which no work will be allowed until the young have successfully fledged. The size of the nest buffer will be determined by the biologist in consultation with the CDFG, and will be based on the nesting species, its sensitivity to disturbance, and the expected types of disturbance.

Mitigation Measure BIO-3: Compliance with the Santa Rosa Public Tree Care Measures

The City shall retain an arborist to evaluate the health of the trees that have drip lines within construction zones prior to construction, formulate site-specific recommendations to maintain the health of these trees during and after construction, and monitor construction near the trees at appropriate intervals. The City shall comply with the arborist’s recommendations which may include, but not be limited to, the accurate placement of trees on plans, specific root cutting techniques, protective fencing, and proper pruning or limbing. Tree health shall be monitored for one year after the completion of construction and, if trees have not fully recovered, monitoring may be extended. If impacts to protected trees occur for any reason, on-site mitigation – including replacement of native species – shall be implemented in accordance with the City of Santa Rosa code.
Mitigation Measure CR-1: Protection and Preservation Archaeological and Paleontological Data

Should concentrations of archaeological materials or paleontological resources be encountered during construction, ground-disturbing work shall be halted in that vicinity of the find. Work near such finds shall not be resumed until a qualified professional and a representative of the appropriate culturally affiliated tribe have evaluated the materials and offered recommendations for further action. Project personnel shall not collect cultural or paleontological resources. Prehistoric resources include chert or obsidian flakes or tools, projectile points, mortars and pestles, groundstone artifacts, deposits of shell, dietary bone, locally darkened midden (dark friable soil containing shell and bone dietary debris), heat-affected rock or human burials. Historic resources may include, but not be limited to, stone or adobe foundations or walls, structures and remains with square nails, and refuse deposits, found often in old wells and privies. Paleontological resources include fossil specimens, fossil sites, and fossil-bearing rock units.

The City shall have a Native American monitor and a qualified professional archaeologist on site to monitor excavation of the wet well portion of the project, and these monitors shall be on site during the first 25 feet of soil excavation. The City shall also develop a monitoring and treatment plan before construction begins. The plan shall detail the appropriate steps to follow in the event that cultural resources are encountered during excavation.

Mitigation Measure CR-2: Construction Staging Area Surveys

Prior to use, the City shall ensure that any potential staging areas selected for the project will be subjected to the same level of cultural resource survey as the rest of the project area. The Contractor shall not use any potential staging area found to contain an identified cultural resource.

Mitigation Measure CR-3: Encountering Human Remains

If human remains are encountered within the construction or staging areas, all work should be halted in the immediate vicinity of the find and the project superintendent and Sonoma County Sheriff/Coroner must be notified. At the same time, an archaeologist should be contacted to evaluate the find. If the remains are found to be of Native American origin, the Native American Heritage Commission must be notified within 24 hours of the identification. The procedures to be followed at this point are prescribed by law.

The City shall have a Native American monitor and a qualified professional archaeologist on site to monitor excavation of the wet well portion of the project, and these monitors shall be on site during the first 25 feet of soil excavation. If human remains are encountered during excavation of the wet well then the procedures listed above shall be followed.
Mitigation Measure HAZ-1: Contaminated Materials Handling and Disposal

The City shall require the contractor to employ Hazardous Waste Operations and Emergency Response (HAZWOPER) trained (29 CFR 1910.120/8 CCR 5192) workers to screen soils and groundwater for contamination; treat contaminated groundwater; stockpile and characterize soil; and properly dispose of all contaminated materials in accordance with all State and local laws. The City shall require the contractor to perform trench construction, as necessary and in accordance with construction specifications, to prevent migration of potentially contaminated groundwater within the trenches constructed for the project. These requirements shall be adhered to via construction specifications which would detail the hazardous material handling and disposal requirements necessary if contaminated materials are encountered.

If contaminated soils or groundwater are encountered during construction, the Contractor’s HAZWOPER-trained personnel shall handle them in the following manner:

- Excavate contaminated materials in the construction zone and stockpile on plastic and contain pumped groundwater in temporary water storage tanks to avoid exposure to the public.
- Field screen soils in areas of suspected contamination with an organic vapor meter or equivalent air monitoring device to determine if contamination is still present and ensure that the public would not be exposed to contaminants and odors.
- Provide and maintain a sediment and granular activated carbon filtration system, as needed for treatment of contaminated groundwater.
- Contain all groundwater removed in temporary storage tanks. After precharacterization and City approval, discharge treated water to the sanitary sewer system. Treat as necessary to meet sewer discharge requirements. If the discharge does not meet these requirements, the groundwater would be treated and disposed of according to all applicable laws and regulations.
- Characterize material for proper disposal and negotiate a pre-approved disposal location in accordance with their disposal requirements.
- After City and landfill approval, load, transport, and dispose of all soil.

Mitigation Measure HAZ-2: Construction Staging Area Surveys

Prior to use, the City shall ensure that any potential staging areas selected for the project would be subjected to the same level of hazardous material survey as the rest of the project area. The Contractor shall not use any potential staging area found to contain a hazardous material concern.

Mitigation Measure HAZ-3: Standard Traffic Safety Control Procedures

The City or its contractor shall ensure that standard traffic safety control procedures are included in the Traffic Control Plan being prepared as part of the project. Construction flagging and signage, use of plates, and other safety measures shall be in conformance with the CALTRANS Manual of Traffic Controls for Construction and Maintenance of Work Zones (CALTRANS 2006). If temporary lane or road closures are required, the City shall contact emergency response providers (hospitals, police, fire, and ambulance)
and inventory the locations of their primary routes that may be affected by the construction.

- Where construction necessitates lane or road closures along emergency response routes, the City shall recommend and obtain approval for alternate routes or other means from the affected service providers, at a minimum of one week prior to construction.
- During construction, the City shall notify the service providers on a weekly basis of the timing, location, and duration of construction activities.

**Mitigation Measure HAZ-4: Clear Fueling Areas and Require Equipment Controls**

The City or its contractor shall clear dry vegetation or other fire fuels near staging areas or any other area where equipment would be operated, prior to the start of construction in that area. The City shall require contractors to use equipment with spark arresters in good working order.

**Mitigation Measure NOI-1: Limit Noise Generating Construction Activities**

The City of Santa Rosa shall limit noise generating construction activities. Noise-generating construction activities, including truck traffic coming to and from the site for any purpose would be limited to daytime, weekday, non-holiday hours (8:00 a.m. to 5:00 p.m.). Any special circumstances which necessitate performance of construction work outside the hours and days specified would require that the contractor request and the City’s project manager approve such work.

**Mitigation Measure NOI-2: Equipment Noise Control**

The City of Santa Rosa and its contractor shall control equipment noise. Construction equipment shall be properly outfitted and maintained with noise reduction devices to minimize construction-generated noise. Measures may include, but not be limited to:

- Construction equipment shall be properly outfitted and maintained with noise reduction devices to minimize construction-generated noise.
- Newer equipment with improved noise muffling would be used and manufacturers’ recommended noise abatement measures, such as mufflers, engine covers, and engine vibration isolators would be intact and operational.
- Construction equipment may require weekly inspection to ensure proper maintenance and presence of noise control devices (e.g., mufflers and shrouding, etc.).
- Wherever possible hydraulic tools would be used instead of pneumatic impact tools.
- Unnecessary idling of internal combustion engines shall be prohibited.

**Mitigation Measure NOI-3: Implement Public Outreach Program**

The City shall prepare and implement a Public Outreach Program. The Program would include identification of sensitive noise receptors along the project alignment and construction staging areas and would provide information about the project to affected.
individuals during both project design and project construction. Sensitive noise receptors would be notified in advance to keep windows and doors closed during peak construction activity. The City shall contact residences within 100 feet of the pipeline route when the construction schedule is available. The City shall establish a phone number that may be called if questions or complaints about construction impacts arise to contact a qualified noise control engineer to ensure that noise mitigation measures are being conducted.
October 8, 2008

David Guhin
City of Santa Rosa
69 Stony Circle
Santa Rosa, CA 95401

RE: SCH# 2008102016 West College Lift Station Relocation Project (Fulton Road Lift Station); Sonoma County:

Dear Mr. Guhin:

The Native American Heritage Commission has reviewed the Notice of Completion (NOC) regarding the above referenced project. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

1-1

✓ Contact the appropriate information Center for a record search to determine:

1-2

✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

1-3

✓ Contact the Native American Heritage Commission for:

1-4

✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

1-5

Sincerely,

Katy Sanchez
Program Analyst
(916) 653-4040

CC: State Clearinghouse
Native American Contacts
Sonoma County
October 8, 2008

The Federated Indians of Graton Rancheria
Gene Buvelot
6400 Redwood Drive, Ste 300  Coat Miwok
Rohnert Park, CA 94928  Southern Pomo
coastmiwok@aol.com
(415) 883-9215 Home

Kathleen Smith
1778 Sunnyvale Avenue  Pomo
Walnut Creek, CA 94596  Coast Miwok
(925) 938-6323

Lytton Rancheria Band of Pomo Indians
Margie Mejia, Chairperson
1300 N. Dutton, Suite A  Pomo
Santa Rosa, CA 95401
lytonband@aol.com
(707) 575-5917
(707) 575-6974 - Fax

Mishe-wal-Wappo Tribe of Alexander Valley
Earl Couey, Cultural Resources Manager
P.O. Box 5676  Wappo
Santa Rosa, CA 95402
ecouey1@netzero.net
707-478-7895.

Ya-Ka-Ama
6215 Eastside Road  Pomo
Forestville, CA 95436  Coast Miwok

(707) 887-1541

Dawn S. Getchell
P.O. Box 53  Coast Miwok
Jenner, CA 95450  Pomo
(707) 865-2248

The Federated Indians of Graton Rancheria
Greg Sarris, Chairperson
6400 Redwood Drive, Ste 300  Coat Miwok
Rohnert Park, CA 94928  Southern Pomo
coastmiwok@aol.com
707-566-2288
707-566-2291 - fax

Lyton Band of Pomo Indians
Lisa Miller, Tribal Administrator
1300 N. Dutton, Suite A  Pomo
Santa Rosa, CA 95401
lytonband@aol.com
(707) 575-5917
(707) 575-6974 FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.36 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2009102016 West College Lift Station Relocation Project (Fulton Road Lift Station); Sonoma County.
Native American Contacts
Sonoma County
October 8, 2008

Lytton Band of Pomo Indians
Vice Chairperson
1300 N. Dutton, Suite A Pomo
Santa Rosa, CA 95401
(707) 575-5917
Fax: (707) 575-6974

dcathylopez@aol.com

Lytton Band of Pomo Indians
Environmental Planner
1300 N. Dutton, Suite A Pomo
Santa Rosa, CA 95401
(707) 575-5917
(707) 575-6974 FAX

The Federated Indians of Graton Rancheria
Frank Ross
440 Apt. N. Alameda del Prado Coast Miwok
Novato, CA 94949 Southern Pomo
miwokone@yahoo.com
(415) 269-6075

Mishewal-Wappo Tribe of Alexander Valley
Scott Gabaldon, Chairperson
PO Box 1794 Wappo
Middletown, CA 95461
sgdcinc@sbcglobal.net
707-494-9159

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7059.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2008102016 West College Lift Station Relocation Project (Fulton Road Lift Station); Sonoma County.
Responses to Comment Letter 1: Katy Sanchez, Program Analyst, Native American Heritage

Response to Comment 1-1

The City appreciates the time and effort to review the Notice of Completion for the project. The Initial Study/Proposed Mitigated Negative Declaration addresses potential impacts to cultural and archaeological resources (refer to section V beginning on page 32). Mitigation measures are included in the CEQA document, and no significant impacts to archaeological resources were identified. The City has completed the recommendations provided by the Commission and are addressed below.

Response to Comment 1-2

The City contacted the Northwest Information Center for a record search of a ½-mile radius of the project area. Results indicated that no cultural resource was recorded in the area. There were two prehistoric sites noted in the ½-mile radius but none were noted in the project area. Because the two sites were identified in the record search, an on-foot surface survey of exposed and unpaved areas was completed to determine the presence or absence of cultural resources. No resources were identified during the survey.

Response to Comment 1-3

The Anthropological Study Center and Sonoma State University completed the field survey and professional report for the project – Cultural Resources Survey Report for the Santa Rosa West College Lift Station Project Santa Rosa, Sonoma County, California, September 2007.

Response to Comment 1-4

The Sacred Lands File check was completed and no sites were identified. The City has contacted Federated Indians of Graton Rancheria and the Lytton Rancheria regarding the project. The City received comment letters from both organizations.

Response to Comment 1-5

The Mitigation Monitoring Program includes two mitigation measures which detail the course of events should the City discover archaeological resources or human remains during construction of the lift station or during installation of the pipeline. Mitigation Measure CR-1, Protection and Preservation of Archaeological and Paleontological Data, Mitigation Measure CR-2, Construction Staging Area Surveys, and Mitigation Measure CR-3, Encountering Human Remains are all included in the Mitigation Monitoring Plan.

Response to Comment 1-6

The City appreciates the contact list provided by the Commission.
State Water Resources Control Board

Division of Financial Assistance
1001 I Street • Sacramento, California 95814 • (916) 341-5700 FAX (916) 341-5707
Mailing Address: P.O. Box 94212 • Sacramento, California 94244-2120
Internet Address: http://www.waterboards.ca.gov

NOV 4 2008

Mr. David Guhin
City of Santa Rosa
69 Stony Circle
Santa Rosa, CA 95401

Dear Mr. Guhin,

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR THE CITY OF SANTA ROSA (CITY); WEST COLLEGE LIFT STATION RELocation PROJECT (PROJECT); SONOMA COUNTY; STATE CLEARINGHOUSE (SCH NO. 2008102016)

We understand the City may be pursuing Clean Water State Revolving Fund (CWSRF) financing for this Project. As a funding agency and a State agency with jurisdiction by law to preserve, enhance, and restore the quality of California’s water resources, the State Water Resources Control Board (State Water Board) is providing the following information for the environmental document prepared for the Project.

Please provide us with the following documents applicable to the proposed Project if seeking CWSRF funding: (1) 2 copies of the draft and final IS/MND, (2) the resolution adopting the MND making California Environmental Quality Act (CEQA) findings, (3) all comments received during the review period and your response to those comments, (4) the adopted Mitigation Monitoring and Reporting Plan, and (5) the Notice of Determination filed with the Governor’s Office of Planning and Research State Clearinghouse. In addition, we would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board.

The CWSRF Program is partially funded by the U.S. Environmental Protection Agency and requires additional “CEQA-Plus” environmental documentation and review. The State Water Board is required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Any environmental issues raised by federal agencies or their representatives will need to be resolved prior to State Water Board approval of a CWSRF funding commitment for the proposed Project. For further information on the CWSRF program please contact Ms. Michelle L. Jones at (916) 341-5893.

It is important to note that prior to a CWSRF funding commitment, projects are subject to provisions of the Federal Endangered Species Act, and must obtain Section 7 clearance from the U.S. Fish and Wildlife Service (USFWS), and/or National Marine Fisheries Service (NMFS) for any potential effects to special status species. Please be advised that the State Water Board will consult with USFWS, and/or NMFS regarding all federal special status species the Project has the potential to impact if the Project is to be funded under the CWSRF Program.

In addition, CWSRF projects must comply with federal laws pertaining to cultural resources, specifically Section 106 of the National Historic Preservation Act. The State Water Board has responsibility for ensuring compliance with Section 106 and the State Water Board’s Cultural Resources Officer (CRO) must consult directly with the California State Historic Preservation Officer (SHPO). SHPO consultation is initiated when sufficient information is provided by the CWSRF applicant. Please contact the CRO, Ms. Cookie Hirt, at (916) 341-5890, to find out more about the requirements, and to initiate the Section 106 process if the City decides to pursue CWSRF financing.
Please provide the CRO with a copy of a current records search for the Project area including maps that show all recorded sites and surveys in relation to the Area of Potential Effects (APE) for the Project. The APE is three-dimensional and includes all areas that may be affected by the Project. The APE includes the surface area and extends below ground to the depth of any project excavations. The records search request should be made for an area larger than the APE. The appropriate area varies for different projects but should be drawn large enough to provide information on what types of sites may exist in the vicinity.

Other federal requirements pertinent to the Project under the CWSRF Program include the following:

A. Compliance with the Wild and Scenic Rivers Act: Identify whether or not any Wild or Scenic Rivers would be potentially impacted by the Project and include conservation measures to minimize such impacts.

B. Compliance with the Farmland Protection Act: Identify whether or not the proposed project will impact any important farmland or land under Williamson Act control.

C. Compliance with the Coastal Zone Management Act: Identify whether or not the proposed project is in the Coastal Zone.

D. Compliance with the Floodplain Management Act: Identify whether or not the project is in a Flood Management Zone and a copy of the Federal Emergency Management Agency flood zone maps for the project area.

The following are specific comments on the IS/MND:

1. Page 23 of the IS/MND states: "The Bay Area, including Sonoma County, is considered a non-attainment area for ground level ozone under both the Federal Clean Air Act and the California Clean Air Act." A quantification of expected construction and operational emissions for criteria pollutants will be required if the City is seeking CWSRF funding.

2. Page B-21 of the IS/MND states: "Based on the species identified in the CNDDB records; the range of habitats present; and the geographical range of the various sensitive species, there are special-status fish and wildlife species that are likely to be affected in the vicinity of the project area that are shown in Table 2. These special-status fish and wildlife species are evaluated in relation to the microtunneling and jack and bore method of construction at the creek crossing." If special status species have the potential to be adversely affected by Project construction in the vicinity of creek crossings, a Section 7 formal consultation with the USFWS and/or NMFS will be required prior to any funding commitment.

3. Page 30 of the IS/MND states: "Pre-construction surveys would identify nesting birds in and around the project alignment so that construction exclusion zones or other mitigation in consultation with CDFG can be developed to protect nesting species from potential impacts due to construction." The use of the word "can" must be changed to "will" if nesting birds are confirmed in and around the proposed Project area.
4. Native American and Interested Party Consultation is required for Section 106 compliance:
   - A Project description and map should be sent to the Native American Heritage Commission (NAHC). The NAHC will provide a list of Native American tribes and individuals that are culturally affiliated with your Project area and recommend that they all be contacted.
   - A project description and map should be sent to everyone on the list provided by the NAHC, asking for information on the Project area.
   - Similar letters should be sent to local historical organizations.
   - Follow-up contact should be made by phone if possible, and a phone log should be included.
   - Comments from the NAHC, local tribes and historical organizations affiliated with the Project area, as well as the City's response to these comments should be included in the final MND.

5. Page 32 states that "Cultural resource studies, including records searches and field surveys, were conducted in September, 2007, by the Anthropological Studies Center at Sonoma State University (ASC)." Please provide the State Water Board CRO with a copy of the record search and a copy of the ASC, 2007 cultural resources report.

6. Page 32 states "construction staging areas have not yet been selected for the project. Therefore, any potential staging areas situated outside the project area would not have been surveyed for cultural resources." Record searches and site surveys should be made for an area larger than the APE, allowing for any potential construction staging areas to be included in the records and survey results and evaluated for potential impacts.

7. Page 33 states that "Mitigation Measures CR-1 and CR-2 would provide the means to find and recover archaeological and paleontological resources potentially present at the project site and identify the need for further mitigation." Please be aware that according to CEQA guidelines §15064.5, subsection (b), "a project with an effect that may cause a substantial adverse change in the significance of an historical resource," as defined under subsection (a), "is a project that may have a significant effect on the environment." Subsections (1) and (2) of CEQA guidelines §15064.5 describe the actions that lead to a historical resource being impaired by project activity. Impairment of a historical resource is a significant impact that cannot be mitigated; as the negative effects upon such a resource cannot be repaired. Careful mitigation prior to the discovery of archaeological and paleontological resources is suggested to ensure that significant impacts on cultural resources do not occur as a result of construction activities. Therefore, the need for further mitigation should be addressed prior to Project construction.
8. Page 33 states that Mitigation Measure CR-3 "procedures are in accordance with regulatory requirements for the treatment of human remains, and adherence to these procedures would reduce the potential impact to less than significant." Compliance with the law, statutes and regulations is not mitigation. Mitigation must include specific, feasible actions that will improve adverse environmental conditions, be measurable to allow monitoring, and must be enforceable. Mitigation Measure CR-3 should include specific, feasible actions that will minimize the impact to the cultural resources, substantiate the effectiveness of this mitigation, and show how the mitigation is enforceable.

Thank you once again for the opportunity to review the City's environmental document. If you have any questions or concerns, please feel free to contact me at (916) 341-5696, or email me at jhockenberry@waterboards.ca.gov.

Sincerely,

James Hockenberry
Environmental Scientist

Enclosures (3)

cc: State Clearinghouse w/o enclosures
(Re: SCH# 20080102015)
P. O. Box 3044
Sacramento, CA 95812-3044
Comment Letter 2: James Hockenberry, Environmental Scientist, State Water Resources Control Board, Division of Financial Assistance

Response to Comment 2-1

The City appreciates the time taken to review and comment on the document. The City is not pursuing Clean Water State Revolving Fund (CWSRF) financing for this project.

Response to Comment 2-2

The documents and clearances listed in the letter will not be supplied to the Board, because the City is not seeking CWSRF funding.
January 5, 2009

Michael Newland  
Anthropological Studies Center  
1801 East Cotati Avenue  
Rohnert Park, CA, 94928

RE: West College Lift Station, Santa Rosa

Dear Mr. Newland:

The Federated Indians of Graton Rancheria (FIGR), a sovereign government, has received your correspondence of December 14, 2008. The correspondence was regarding a project for a Lift Station on Fulton Road, between West Third and College Ave., in Santa Rosa, CA. The Tribe appreciates your notification to us of this project.

The project may be located on prehistoric sites containing important and sacred cultural resources. The Tribe requests consultation with the lead agency and your agency regarding the depth and location new soil disturbance, grading or soil excavation activities for this project.

We are concerned about the possibility of buried cultural resources in the project area. We feel it may require a sub surface archaeological survey and consultation with the Tribe prior to our comments during the CEQA process. Please have their representatives contact me to schedule a meeting.

Respectfully,

[Signature]

Nick Tipon  
Chairman, Sacred Sites Protection Committee  
707-478-1737
Comment Letter 3: Nick Tipon, Chairman, Sacred Sites Protection Committee, Federated Indians of Graton Rancheria

Response to Comment 3-1
The City appreciates the time taken to review and comment on the document.

Response to Comment 3-2
The City of Santa Rosa contacted Mr. Tipon to discuss the potential for prehistoric sites which may contain important and sacred cultural resources. The City has agreed to have a Native American monitor and a qualified professional archaeologist on site to monitor excavation of the wet well portion of the project. The monitors would be on site during the first 25 feet of excavation. The City will also complete a monitoring plan which will detail the approach should cultural resources are encountered during soil excavation.

Mitigation Measures CR-1 and CR-3 are revised as follows:

Mitigation Measure CR-1: Protection and Preservation Archaeological and Paleontological Data
Should concentrations of archaeological materials or paleontological resources be encountered during construction, ground-disturbing work shall be halted in that vicinity of the find. Work near such finds shall not be resumed until a qualified professional has evaluated the materials and offered recommendations for further action. Project personnel shall not collect cultural or paleontological resources. Prehistoric resources include chert or obsidian flakes or tools, projectile points, mortars and pestles, groundstone artifacts, deposits of shell, dietary bone, locally darkened midden (dark friable soil containing shell and bone dietary debris), heat-affected rock or human burials. Historic resources may include, but not be limited to, stone or adobe foundations or walls, structures and remains with square nails, and refuse deposits, found often in old wells and privies. Paleontological resources include fossil specimens, fossil sites, and fossil-bearing rock units.

The City shall have a Native American monitor and a qualified professional archaeologist on site to monitor excavation of the wet well portion of the project, and these monitors shall be on site during the first 25 feet of soil excavation. The City shall also develop a monitoring and treatment plan before construction begins. The plan shall detail the appropriate steps to follow in the event that cultural resources are encountered during excavation.

Mitigation Measure CR-3: Encountering Human Remains
If human remains are encountered within the construction or staging areas, all work should be halted in the immediate vicinity of the find and the project superintendent and Sonoma County Sheriff/Coroner must be notified. At the same time, an archaeologist should be contacted to evaluate the find. If the remains are found to be of Native American origin, the Native American Heritage Commission must be notified within 24
hours of the identification. The procedures to be followed at this point are prescribed by law.

The City shall have a Native American monitor and a qualified professional archaeologist on site to monitor excavation of the wet well portion of the project, and these monitors shall be on site during the first 25 feet of soil excavation. If human remains are encountered during excavation of the wet well then the procedures listed above shall be followed.

Response to Comment 3-3

The City conducted a cultural resource survey which included a records and literature review and an on-foot field survey. No historic-period archaeological resources, buildings, or structures were located within ½ mile of the project area. Two prehistoric archaeological sites had been previously identified within a roughly 1/3-mile of the project area. No additional pre-construction field surveys or pre-construction sub surface archaeological surveys are necessary. Mitigation Measures CR-1 and CR-3 include the necessary measures to protect previously undiscovered cultural resources.
January 5, 2009

Michael Newland, M.A.
Staff Archaeologist
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, CA 94928

Re: Santa Rosa West Collector Lift Station Project, Santa Rosa, California

Dear Mr. Newland:

Our firm represents the Lytton Rancheria of California with respect to cultural resources matters. Thank you for your correspondence and the copy of the cultural resource evaluation for the above-referenced Project. The Lytton Tribe appreciates the opportunity to review and comment on this evaluation. It appears that the Project falls within an area which was occupied predominantly by the Southern Pomo. The Lytton Tribe is interested in the protection and preservation of Pomo artifacts and sites, and to the extent that any previously unknown sites or artifacts encountered are Pomo sites, the Tribe would request special care be taken to assure the protection of any such previously undiscovered resources.

**PROJECT IMPACTS TO CULTURAL RESOURCES**

The Lytton Tribe’s primary concerns stem from the Projects’ likely impacts on Native American cultural resources. The Lytton Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Pomo village sites, and archaeological items which would be displaced by ground-disturbing work on the Projects, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

Further, the Tribe believes that if human remains are discovered, State law would apply and the mitigation measures and conditions of approval for the Projects must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage commission must name a “most likely descendant,” who shall be consulted as to the appropriate disposition of the remains.
Based upon a review of the archaeological report, it appears the Project area falls within the Southern Pomo territory. While the report indicates that there are no known cultural resources on the Project site itself, there are at least two sites in the vicinity. Because there are sites near the Project area, the Tribe believes that there is still a potential for the discovery of previously unknown subsurface resources, and possibly additional unknown sites. As such, we would request that your recommendations include the following mitigation measures/conditions for the Project approvals:

1. If cultural resources are discovered during the Project construction (inadvertent discoveries), all work in the area of the find shall cease, and a qualified archaeologist and representatives of the appropriate culturally affiliated tribe shall be retained by the Project sponsor to investigate the find, and make recommendations as to treatment and mitigation of any impacts to those resources.

2. If human remains are encountered, all activity shall stop and the County Coroner must be notified immediately. All activity must cease until the County Coroner has determined the origin and disposition of said remains. The Coroner shall determine if the remains are prehistoric, and shall notify the State Native American Heritage Commission if applicable. Further actions shall be determined by the desires of the Most Likely Descendant.

The Lytton Tribe appreciates the opportunity to provide comments on the cultural resources evaluations, and looks forward to working further with you to assure the protection of the resources.

Very Truly Yours,

TOMARAS & OGAS, LLP

Brenda L. Tomaras
Attorneys for the Lytton Rancheria of California
Comment Letter 4: Brenda L. Tomaras, Attorney for Lytton Rancheria of California

Response to Comment 4-1

The City appreciates the time taken to review and comment on the document. The City agrees that the project area appears to fall within an area which was occupied by Southern Pomo, and the City understands the need to protect Pomo artifacts and sites. The project includes three mitigation measures designed to identify and protect previously unknown sites or artifacts from potential construction-related impacts.

Response to Comment 4-2

The City understands the tribes concern about protection of cultural resources. The project includes three mitigation measures designed to identify and protect previously unknown sites or artifacts from potential construction-related impacts. The measures detail the steps to properly treat cultural items discovered during construction activities. The City will also have an on-site monitor during construction as described in Mitigation Measures CR-1 and CR-3.

Response to Comment 4-3

The project includes Mitigation Measure CR-3 which details the process to follow should human remains be encountered during construction activities, including the necessary steps if the remains are found to be of Native American origin. The measure meets the requirements included in California Public Resources Code §5097.98 as requested in the comment.

Response to Comment 4-4

The City agrees that the project area appears to fall within an area which was occupied by Southern Pomo, and the City understands the need to protect Pomo artifacts and sites.

Response to Comment 4-5

The City conducted a cultural resource survey which included a records and literature review and an on-foot field survey. No historic-period archaeological resources, buildings, or structures were located within ½-mile of the project area. Two prehistoric archaeological sites were previously identified within a roughly ½-mile of the project area.

Response to Comment 4-6

The City conducted a cultural resource survey which included a records and literature review and an on-foot field survey. No historic-period archaeological resources, buildings, or structures were located within ½-mile of the project area. Two prehistoric archaeological sites were previously identified within a roughly ½-mile of the project area.

The City recognizes the possibility that previously unknown sites may be discovered during construction activities. As such, the City developed Mitigation Measure CR-1 to protect and preserve resources. The City agrees to have a representative of the culturally affiliated tribe
along with a qualified archaeologist evaluate materials and recommend further action should concentrations of archaeological material be encountered during construction.

Mitigation Measure CR-1 is revised as follows:

*Mitigation Measure CR-1: Protection and Preservation Archaeological and Paleontological Data*

Should concentrations of archaeological materials or paleontological resources be encountered during construction, ground-disturbing work shall be halted in that vicinity of the find. Work near such finds shall not be resumed until a qualified professional and a representative of the appropriate culturally affiliated tribe have evaluated the materials and offered recommendations for further action. Project personnel shall not collect cultural or paleontological resources.

**Response to Comment 4-7**

The project includes Mitigation Measure CR-3 which details the process to follow should human remains be encountered during construction activities, including the necessary steps if the remains are found to be of Native American origin.
Verbal Comments Received During the Public and Agency Comment Period

Nanette Bubrick

Comment: The commentor expressed concern about the amount of parking being considered at the site, and the potential visual impacts associated with the lift station. There was also concern expressed about property values.

Response to Comment: The City has determined the maximum size parking and paved area to accommodate the turning radius of maintenance vehicles needed to maintain and repair equipment in the lift station. The size evaluated in the Initial Study represents the maximum necessary. The City may reduce the size of the paved area during project design; however the paved amount would not increase during design. Maintenance vehicles would park at the site while conducting maintenance or repair equipment in the lift station.

The economic or social effects of a project are not treated as significant effects on the environment (CEQA Guidelines §15131). The focus of the analysis in CEQA is on the physical changes to the environment; therefore no property values analysis is provided.

Ina Medred

Comment: The commentor wondered why the City could not locate the lift station at Place to Play.

Response to Comment: All available space at Place to Play (located on West Third Street in Santa Rosa) is fully allocated to recreational facilities. Placement of a lift station at Place to Play would require significant site modification to accommodate the lift station and its appurtenances. Placement of the lift station at the Place to Play would have required approximately 1,100 lineal feet of additional pipeline using microtunnel installation methods.

Robert and Esperanza Myers

Comment: The commentors wanted to know what a lift station is and what it does.

Response to Comment: A wastewater lift station is necessary at this site to transport (lift) liquid wastewater from a sewer deeper pipeline in Fulton Road to a shallower pipeline at West Third Street. The existing lift station has operational deficiencies which result in excessive pump cycling and result in backups in the distribution system. The new lift station would greatly improve system access by eliminating use of one gravity trunk pipeline and reducing the length of the required force main pipeline. The City anticipates an approximate 50% decrease in energy use with operation of the new lift station.

Sheila McQuillen

Comment: The commentor wanted to know what the lift station building would look like, and whether it would look like the buildings at Place to Play.
Response to Comment: The lift station building would look similar to those at Place to Play and other City of Santa Rosa buildings lift stations and well buildings. The City has 14 lift stations within the city limits. The new Fulton Road Lift Station would include a control building constructed of natural, earth tone masonry block. The building would be approximately 80-foot long by 30-foot wide and approximately 18 feet tall and it would include an exhaust system to provide ventilation for an emergency generator housed inside. The building would also include noise attenuation features, such as ventilation louvers, sound attenuation panels and other sound insulation barriers.

Comment: The commentor wondered why the City could not construct the lift station at Place to Play.

Response to Comment: All available space at Place to Play is fully allocated to recreational facilities. Placement of a lift station at this facility would require significant site modification to accommodate the lift station, access requirements and its appurtenances. Additionally, placement of the lift station at Place to Play would require an additional 1,100 feet of 27-inch pipeline and would also require a sewer force main from the pump station to connect to the existing Llano trunk sewer. Construction of the lift station at Place to Play would require filling a portion of the ponds to accommodate construction and operation at the site. The City estimates that construction of the lift station at Place to Play would cost as much as an additional $1,000,000 more than the proposed location.

Comment: The commentor asked why the existing lift station could not be rebuilt.

Response to Comment: There are operational deficiencies with the existing lift station. The City recognizes that the existing pumps may have adequate hydraulic capacity; however, the pump station has other existing deficiencies that significantly compromise system reliability. Most notably, the wet well is undersized and the small volume in the wet well causes the pumps to cycle on and off excessively and occasionally resulting in sewer backups in the distribution system.

Construction of the lift station at the Fulton Road and West Third site would reduce the length of gravity sewer pipeline and reduce the length of force main pipeline required. Because the pipelines are shorter, the City expects a 50% reduction in annual energy use by the new lift station as the Fulton and West Third Street location.

Comment: The commentor wanted to know why the building would have a metal roof.

Response to Comment: The roof would be constructed using standing seam, low maintenance metal. A metal roof requires less maintenance and is the most cost-effective roofing material to use. The City uses metal roofing material at their lift stations and well stations around the city.

Comment: The commentor wanted to know if the existing lift station could be converted into a dog park.

Response to Comment: The City will demolish the existing lift station. There are no plans to convert the area to a dog park. It may be possible in the future, but conversion to a dog park is not part of this project.
Comment: The commentor wanted to know why the project includes the large paved area.

Response to Comment: The City has determined the maximum size parking and paved area to accommodate the turning radius of maintenance vehicles needed to maintain and repair equipment in the lift station. The size evaluated in the Initial Study represents the maximum necessary. The City may reduce the size of the paved area during project design; however the paved amount would not increase during design.

Comment: The commentor asked if City staff would want the lift station in their neighborhood.

Response to Comment: This is not a comment on the adequacy of the environmental document, and it does not identify an environmental issue or question to answer.

Comment: The commentor wanted to know if the project would decrease property values.

Response to Comment: The economic or social effects of a project are not treated as significant effects on the environment (CEQA Guidelines §15131). The focus of the analysis in CEQA is on the physical changes to the environment; therefore no property values analysis is provided.

Comment: The commentor wanted to know when she would receive notification of the project.

Response to Comment: The City added to commentor’s name to the mailing list for direct mailings of notifications regarding the project.

Verbal Comments received during the Neighborhood Meeting

The City received the following comments during the November 17th Neighborhood Meeting. The response to comment follows each comment.

Comment: Several commentors were concerned about the operation noise of the lift station.

Response to Comment: The lift station’s pumps will be located below ground, inside a dry well, which will keep operational noise from the pumps to a minimum. The lift station includes a backup emergency generator which will be housed in a noise attenuating structure to reduce noise during use. The operational noise will not exceed City noise standards as discussed in the Noise Section of the IS/MND beginning on page 47.

Comment: Several commentors were concerned about the building aesthetics and building design characteristics.

Response to Comment: The lift station is described in the Project Description on page 6 of the IS/MND, and the potential visual impacts and mitigation measures are included beginning on page 17 of the document. The project includes landscaping and building design features to minimize visual impacts and to develop a facility which matches the character of the surrounding community to the maximum extent possible. No significant visual issues were identified.

Comment: One commentor was concerned that the lift station parcel may contain buried hazardous materials.
Response to Comment: The City preformed a hazardous materials evaluation during development of the IS/MND, and no hazardous sites were identified. Discussion of the study results can be found beginning on page 36 of the IS/MND.

Comment: Several commentors asked about the potential for sewer backups and the impact these backups might have in the area.

Response to Comment: The existing lift station has operational deficiencies which result in excessive pump cycling and result in backups in the existing distribution system. The project is designed to improve conditions where sewer backups have been problematic through installation of new pumps, through elimination of a gravity trunk pipeline, and through a reduction in the length of the force main pipeline.

Comment: A commentor asked about the potential for increased traffic resulting from operation of the lift station.

Response to Comment: Traffic was evaluated during development of the IS/MND and results are presented in the Transportation/Traffic section beginning on page 54. No significant traffic issues were identified with the minor increase in vehicle trips to and from the site each year.

Comment: A commentor asked for clarification about City plans regarding parking at the site.

Response to Comment: The City plans to allow maintenance vehicles to park at the lift station site only when maintenance or repair activities occur.

Comment: A commentor was concerned about a decrease in property values resulting from the project.

Response to Comment: The economic or social effects of a project are not treated as significant effects on the environment (CEQA Guidelines §15131). The focus of the analysis in CEQA is on the physical changes to the environment; therefore no property values analysis is provided.

Comment: One commentor wanted to know which trees would be removed to construct the lift station.

Response to Comment: Trees would not be affected at the lift station site. The pipeline construction zone may affect the roots of mature trees along the alignment, and the IS/MND includes a mitigation measure to help protect these trees from damage caused by construction. The tree analysis begins on page 30 of the IS/MND.

Comment: Several commentors wanted to know if the lift station could be placed at Place to Play rather than the proposed site.

Response to Comment: All available space at Place to Play is fully allocated to recreational facilities. Placement of a lift station at this facility would require significant site modification to accommodate the lift station, access requirements and its appurtenances. Additionally, placement of the lift station at Place to Play would require an additional 1,100 feet of 27-inch pipeline and would also require a sewer force main from the pump station to connect to the
existing Llano trunk sewer. Construction of the lift station at Place to Play would require filling a portion of the ponds to accommodate construction and operation at the site. The City estimates that construction of the lift station at Place to Play would cost as much as an additional $1,000,000 more than the proposed location.

**LEAD AGENCY CHANGES TO THE PROJECT DESCRIPTION**

The City of Santa Rosa has included some minor changes to the project description to clarify the amount of property and easement acquisition.

The City would construction stormwater facilities on the proposed lift station parcel rather than on the adjacent privately-owned parcel. The City would acquire up to 1.05 acres of privately-owned property for the lift station and stormwater treatment facilities, rather than up to 1.2 acres as previously anticipated. The City would also attempt to secure an easement across the adjacent parcel for construction of the South Fulton trunk sewer.

No new impacts would occur from the minor changes to the project description.
Mitigation Monitoring Plan – City of Santa Rosa West College Lift Station Relocation Project

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Verify Compliance</th>
<th>Timing of Initial Action</th>
<th>Monitoring Frequency and Duration</th>
<th>Action Items</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mitigation Measure AES-1: Landscaping</strong>&lt;br&gt;The City shall implement a landscaping plan designed to revegetate portions of the demolished West College Lift Station, the new Fulton Road Lift Station, construction staging areas and other construction-related ground disturbance.&lt;br&gt;• The City shall ensure that suitable landscaping is included in the plans and specifications for the area around the new lift station and control building to blend the facility into the surrounding area to the maximum extent feasible.</td>
<td>City of Santa Rosa</td>
<td>Project Design and Specifications</td>
<td>At end of first growing season following construction</td>
<td>Implement landscaping</td>
</tr>
<tr>
<td><strong>Mitigation Measure AES-2: Lighting</strong>&lt;br&gt;The City shall specify installation of shielded low-intensity outdoor lighting per City of Santa Rosa Lighting Standards.</td>
<td>City of Santa Rosa</td>
<td>Project Design and Specifications</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Mitigation Measure AIR-1: Dust Control</strong>&lt;br&gt;The City of Santa Rosa shall control fugitive dust generated by project construction activities, including at construction staging areas. These measures shall include:&lt;br&gt;• Apply [clean] water or other approved suppressants to exposed dirt surfaces, as needed.&lt;br&gt;• Apply non-toxic soil stabilizers to inactive construction areas (i.e., disturbed surfaces that are left unused for at least four consecutive days, soil stockpiles).&lt;br&gt;• Cover haul trucks or maintain at least two feet of freeboard.&lt;br&gt;• Limit vehicle speed to 15 mph on any unpaved surfaces.&lt;br&gt;• Install wheel washers for exiting trucks or wash-off the tires or tracks of all trucks and equipment leaving any unpaved areas of the work area.&lt;br&gt;• Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph and visible dust emissions cannot be prevented from leaving the construction site.&lt;br&gt;• Restore and stabilize exposed surfaces at the conclusion of earth moving activities.</td>
<td>City of Santa Rosa</td>
<td>During construction</td>
<td>Ongoing during construction</td>
<td>Implementation of BMPs</td>
</tr>
</tbody>
</table>
# Mitigation Monitoring Plan – City of Santa Rosa West College Lift Station Relocation Project

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Verify Compliance</th>
<th>Timing of Initial Action</th>
<th>Monitoring Frequency and Duration</th>
<th>Action Items</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mitigation Measure AIR-2. Equipment Exhaust Control</strong></td>
<td>City of Santa Rosa</td>
<td>During construction</td>
<td>Ongoing through construction</td>
<td>Implementation of BMPs</td>
</tr>
<tr>
<td>The City of Santa Rosa shall control equipment emissions when heavy construction equipment is operating, including at construction staging areas. These measures shall include:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Reduce unnecessary idling of construction equipment (i.e., limit idling time to 10 minutes or less) and avoid staging equipment within 200 feet of sensitive receptors.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Where possible, use newer, cleaner-burning diesel-powered construction equipment.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Properly maintain construction equipment per manufacturer specifications.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Designate a Disturbance Coordinator responsible for ensuring that mitigation measures to reduce air quality impacts from construction are properly implemented.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Mitigation Measure AIR-3: Asbestos-containing and Lead-containing Materials</strong></td>
<td>City of Santa Rosa</td>
<td>Prior to demolition</td>
<td>Ongoing through demolition</td>
<td>Implement measures</td>
</tr>
<tr>
<td>The City of Santa Rosa shall implement the complete a hazardous materials investigation of the West College Lift Station prior to demolition to determine the presence of asbestos- or lead-containing materials. If the site contains asbestos or lead then the City shall use a Cal/OSHA registered and State licensed asbestos abatement contractor to remove asbestos-containing material. The City shall also remove deteriorated lead-based and lead-containing paint and stabilize building materials that have lead paint and coatings prior to demolition activities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Mitigation Measure BIO-1: Implement Compensatory Mitigation for CTS if Required by USFWS</strong></td>
<td>City of Santa Rosa</td>
<td>Prior to construction</td>
<td>Per USFWS Guidelines</td>
<td>Per USFWS Guidelines</td>
</tr>
<tr>
<td>The City of Santa Rosa shall implement CTS mitigation if required by the USFWS. Mitigation may include purchase of CTS preservation credits, contribution of an endowment to a foundation or contribution of funds to a mitigation bank managed by the California Department of Fish and Game. In the event that USFWS does not require mitigation for CTS then the City of Santa Rosa will not complete additional CTS mitigation.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Mitigation Monitoring Plan – City of Santa Rosa West College Lift Station Relocation Project

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Verify Compliance</th>
<th>Timing of Initial Action</th>
<th>Monitoring Frequency and Duration</th>
<th>Action Items</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mitigation Measure BIO-2: Pre-construction Nest Surveys and Construction Exclusion Zones</strong>&lt;br&gt;In order to avoid nesting birds, construction work shall be timed for the period August 15 through February 28/29 when breeding activities will have been completed and next year's breeding activities not yet have started. Preconstruction surveys will not be required for construction work carried out in the non-breeding season. If construction work is scheduled during the breeding season (prior to August 15), a qualified wildlife biologist shall conduct a pre-construction survey to determine if nesting birds are present in or in the vicinity of vegetation to be removed. The pre-construction survey shall be conducted within 15 days prior to the start of work from March 1 through May 31 (since there is higher potential for birds to initiate nesting during this period), and within 30 days prior to the start of work from June 1 through August 15. If active nests are found in the work area, the biologist shall determine an appropriately sized buffer around the nest in which no work will be allowed until the young have successfully fledged. The size of the nest buffer will be determined by the biologist in consultation with the CDFG, and will be based on the nesting species, its sensitivity to disturbance, and the expected types of disturbance.</td>
<td>City of Santa Rosa</td>
<td>Prior to construction</td>
<td>Prior to construction</td>
<td>Complete surveys&lt;br&gt;Establish a construction exclusion zone if necessary</td>
</tr>
<tr>
<td><strong>Mitigation Measure BIO-3: Compliance with the Santa Rosa Public Tree Care Measures</strong>&lt;br&gt;The City shall retain an arborist to evaluate the health of the trees that have drip lines within construction zones prior to construction, formulate site-specific recommendations to maintain the health of these trees during and after construction, and monitor construction near the trees at appropriate intervals. The City shall comply with the arborist’s recommendations which may include, but not be limited to, the accurate placement of trees on plans, specific root cutting techniques, protective fencing, and proper pruning or limbing. Tree health shall be monitored for one year after the completion of construction and, if trees have not fully recovered, monitoring may be extended. If impacts to protected trees occur for any reason, on-site mitigation – including replacement of native species – shall be implemented in accordance with the City of Santa Rosa code.</td>
<td>City of Santa Rosa</td>
<td>Prior to construction</td>
<td>Prior to, during, and after construction</td>
<td>Design planting plan.&lt;br&gt;Evaluate and monitor trees</td>
</tr>
</tbody>
</table>
# Mitigation Monitoring Plan – City of Santa Rosa West College Lift Station Relocation Project

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Verify Compliance</th>
<th>Timing of Initial Action</th>
<th>Monitoring Frequency and Duration</th>
<th>Action Items</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mitigation Measure CR-1: Protection and Preservation Archaeological and Paleontological Data</strong></td>
<td>City of Santa Rosa</td>
<td>During construction</td>
<td>Ongoing through construction</td>
<td>Cease work and report findings, as needed</td>
</tr>
</tbody>
</table>

Should concentrations of archaeological materials or paleontological resources be encountered during construction, ground-disturbing work shall be halted in that vicinity of the find. Work near such finds shall not be resumed until a qualified professional and a representative of the appropriate culturally affiliated tribe has evaluated the materials and offered recommendations for further action. Project personnel shall not collect cultural or paleontological resources. Prehistoric resources include chert or obsidian flakes or tools, projectile points, mortars and pestles, groundstone artifacts, deposits of shell, dietary bone, locally darkened midden (dark friable soil containing shell and bone dietary debris), heat-affected rock or human burials. Historic resources may include, but not be limited to, stone or adobe foundations or walls, structures and remains with square nails, and refuse deposits, found often in old wells and privies. Paleontological resources include fossil specimens, fossil sites, and fossil-bearing rock units.

The City shall have a Native American monitor and a qualified professional archaeologist on site to monitor excavation of the wet well portion of the project, and these monitors shall be on site during the first 25 feet of soil excavation. The City shall also develop a monitoring and treatment plan before construction begins. The plan shall detail the appropriate steps to follow in the event that cultural resources are encountered during excavation.

<table>
<thead>
<tr>
<th><strong>Mitigation Measure CR-2: Construction Staging Area Surveys</strong></th>
<th>City of Santa Rosa</th>
<th>Prior to construction</th>
<th>Prior to construction</th>
<th>Conduct Cultural Resource Survey</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior to use; the City shall ensure that any potential staging areas selected for the project will be subjected to the same level of cultural resource survey as the rest of the project area. The Contractor shall not use any potential staging area found to contain an identified cultural resource.</td>
<td>City of Santa Rosa</td>
<td>Prior to construction</td>
<td>Prior to construction</td>
<td>Conduct Cultural Resource Survey</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Do not use site if cultural resources found</td>
<td></td>
</tr>
</tbody>
</table>
Mitigation Monitoring Plan – City of Santa Rosa West College Lift Station Relocation Project

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Verify Compliance</th>
<th>Timing of Initial Action</th>
<th>Monitoring Frequency and Duration</th>
<th>Action Items</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mitigation Measure CR-3: Encountering Human Remains</strong>&lt;br&gt; If human remains are encountered within the construction or staging areas, all work should be halted in the immediate vicinity of the find and the project superintendent and Sonoma County Sheriff/Coroner must be notified. At the same time, an archaeologist should be contacted to evaluate the find. If the remains are found to be of Native American origin, the Native American Heritage Commission must be notified within 24 hours of the identification. The procedures to be followed at this point are prescribed by law.&lt;br&gt;The City shall have a Native American monitor and a qualified professional archaeologist on site to monitor excavation of the wet well portion of the project, and these monitors shall be on site during the first 25 feet of soil excavation. If human remains are encountered during excavation of the wet well then the procedures listed above shall be followed.</td>
<td>City of Santa Rosa</td>
<td>During construction</td>
<td>Ongoing through construction</td>
<td>Cease work and report findings, as needed</td>
</tr>
<tr>
<td><strong>Mitigation Measure HAZ-1: Contaminated Materials Handling and Disposal</strong>&lt;br&gt;The City shall require the contractor to employ Hazardous Waste Operations and Emergency Response (HAZWOPER) trained (29 CFR 1910.120/8 CCR 5192) workers to screen soils and groundwater for contamination; treat contaminated groundwater; stockpile and characterize soil; and properly dispose of all contaminated materials in accordance with all State and local laws. The City shall require the contractor to perform trench construction, as necessary and in accordance with construction specifications, to prevent migration of potentially contaminated groundwater within the trenches constructed for the project. These requirements shall be adhered to via construction specifications which would detail the hazardous material handling and disposal requirements necessary if contaminated materials are encountered.&lt;br&gt;If contaminated soils or groundwater are encountered during construction, the Contractor's HAZWOPER-trained personnel shall handle them in the following manner:&lt;br&gt;• Excavate contaminated materials in the construction zone and stockpile on plastic and contain pumped groundwater in temporary water storage</td>
<td>City of Santa Rosa</td>
<td>During construction</td>
<td>Ongoing through construction</td>
<td>Screen soil and groundwater Implement BMPs as necessary</td>
</tr>
</tbody>
</table>
Mitigation Monitoring Plan – City of Santa Rosa West College Lift Station Relocation Project

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Verify Compliance</th>
<th>Timing of Initial Action</th>
<th>Monitoring Frequency and Duration</th>
<th>Action Items</th>
</tr>
</thead>
</table>
| tanks to avoid exposure to the public.  
- Field screen soils in areas of suspected contamination with an organic vapor meter or equivalent air monitoring device to determine if contamination is still present and ensure that the public will not be exposed to contaminants and odors.  
- Provide and maintain a sediment and granular activated carbon filtration system, as needed for treatment of contaminated groundwater.  
- Contain all groundwater removed in temporary storage tanks. After precharacterization and City approval, discharge treated water to the sanitary sewer system. Treat as necessary to meet sewer discharge requirements. If the discharge does not meet these requirements, the groundwater will be treated and disposed of according to all applicable laws and regulations.  
- Characterize material for proper disposal and negotiate a pre-approved disposal location in accordance with their disposal requirements.  
- After City and landfill approval, load, transport, and dispose of all soil. | | | | |

**Mitigation Measure HAZ-2: Construction Staging Area Surveys**
Prior to use, the City shall ensure that any potential staging areas selected for the project will be subjected to the same level of hazardous material survey as the rest of the project area. The Contractor shall not use any potential staging area found to contain a hazardous material concern.

| City of Santa Rosa | Prior to construction | Prior to construction | Conduct hazardous materials study  
Do not use site if hazardous materials found |
|--------------------|-----------------------|-----------------------|----------------------------------|

**Mitigation Measure HAZ-3: Standard Traffic Safety Control Procedures**
The City or its contractor shall ensure that standard traffic safety control procedures be included in the Traffic Control Plan being prepared as part of the project. Construction flagging and signage, use of plates, and other safety measures shall be in conformance with the CALTRANS Manual of Traffic Controls for Construction and Maintenance of Work Zones (CALTRANS 2006). If temporary lane or road closures are required, the City shall contact emergency response providers (hospitals, police, fire, and ambulance) and inventory the locations of their primary routes that may be affected by the construction.

<table>
<thead>
<tr>
<th>City of Santa Rosa</th>
<th>During construction</th>
<th>Ongoing through construction</th>
<th>Implement BMPs into Traffic Control Plan</th>
</tr>
</thead>
</table>
Mitigation Monitoring Plan – City of Santa Rosa West College Lift Station Relocation Project

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Verify Compliance</th>
<th>Timing of Initial Action</th>
<th>Monitoring Frequency and Duration</th>
<th>Action Items</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where construction necessitates lane or road closures along emergency response routes, the City shall recommend and obtain approval for alternate routes or other means from the affected service providers, at a minimum of one week prior to construction.</td>
<td>City of Santa Rosa</td>
<td>Prior to construction</td>
<td>Ongoing through construction</td>
<td>Clear dry vegetation near staging areas Use spark arresters</td>
</tr>
<tr>
<td>During construction, the City shall notify the service providers on a weekly basis of the timing, location, and duration of construction activities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Mitigation Measure HAZ-4: Clear Fueling Areas and Require Equipment Controls</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The City or its contractor shall clear dry vegetation or other fire fuels near staging areas or any other area where equipment will be operated, prior to the start of construction in that area. The City shall require contractors to use equipment with spark arresters in good working order.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Mitigation Measure NOI-1: Limit Noise Generating Construction Activities</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The City of Santa Rosa shall limit noise generating construction activities. Noise-generating construction activities, including truck traffic coming to and from the site for any purpose would be limited to daytime, weekday, non-holiday hours (8:00 a.m. to 5:00 p.m.). Any special circumstances which necessitate performance of construction work outside the hours and days specified would require that the contractor request and the City’s project manager approve such work.</td>
<td>City of Santa Rosa</td>
<td>Prior to construction</td>
<td>Ongoing through construction</td>
<td>Limit Construction Hours</td>
</tr>
<tr>
<td><strong>Mitigation Measure NOI-2: Equipment Noise Control</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The City of Santa Rosa and its contractor shall control equipment noise. Construction equipment shall be properly outfitted and maintained with noise reduction devices to minimize construction-generated noise. Measures may include, but not be limited to:</td>
<td>City of Santa Rosa</td>
<td>Prior to construction</td>
<td>Ongoing through construction</td>
<td>Control equipment noise</td>
</tr>
<tr>
<td>- Construction equipment shall be properly outfitted and maintained with noise reduction devices to minimize construction-generated noise.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Newer equipment with improved noise muffling would be used and manufacturers’ recommended noise abatement measures, such as mufflers, engine covers, and engine vibration isolators would be intact</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

City of Santa Rosa
West College Lift Station Relocation Project
March 2009
Mitigation Monitoring Plan – City of Santa Rosa West College Lift Station Relocation Project

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Verify Compliance</th>
<th>Timing of Initial Action</th>
<th>Monitoring Frequency and Duration</th>
<th>Action Items</th>
</tr>
</thead>
<tbody>
<tr>
<td>and operational.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction equipment may require weekly inspection to ensure proper maintenance and presence of noise control devices (e.g., mufflers and shrouding, etc.).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wherever possible hydraulic tools would be used instead of pneumatic impact tools.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unnecessary idling of internal combustion engines shall be prohibited</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Mitigation Measure NOI-3: Implement Public Outreach Program**
The City shall prepare and implement a Public Outreach Program. The Program will include identification of sensitive noise receptors along the project alignment and construction staging areas and will provide information about the project to affected individuals during both project design and project construction. Sensitive noise receptors will be notified in advance to keep windows and doors closed during peak construction activity. The City shall contact residences within 100 feet of the pipeline route when the construction schedule is available. The City shall establish a hot-line phone number that may be called if questions or complaints about construction impacts arise to contact a qualified noise control engineer to ensure that noise mitigation measures are conducted.

City of Santa Rosa
Prior to construction
Ongoing through construction
Implement Program