Response to Comments Document

SONOMA STATE UNIVERSITY MASTER PLAN REVISION

Environmental Impact Report

SCH # 93013045

March 20, 2000

Prepared for

Sonoma State University
Facilities Services Department

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SONOMA STATE UNIVERSITY MASTER PLAN REVISION FINAL ENVIRONMENTAL IMPACT REPORT RESPONSE TO COMMENTS DOCUMENT

CHAPTER I
INTRODUCTION

A. CEQA PROCESS

On November 1, 1999, Sonoma State University (herein referred to as the University), representing the California State University (CSU) Trustrees (the Lead Agency), released for public review a Draft Environmental Impact Report (Draft EIR or DEIR) on the proposed Sonoma State University Master Plan Revision. A 45-day public review and comment period on the Draft EIR began on November 1, 1999, and closed on December 15, 1999. The University held public hearings on the Draft EIR on November 29 and December 2, 1999. The public review and comment period for the DEIR was subsequently extended for an additional 45 days between January 2, 2000, and February 15, 2000.

The Draft EIR for the proposed Sonoma State University Master Plan Revision, together with this Final EIR Response to Comments Document, constitute the Final EIR for the proposed project. The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision-makers before approving the proposed project (CEQA *Guidelines,* Section 15090). California Environmental Quality Act (CEQA) *Guidelines* (Section 15132) specify the following:

> "The Final EIR shall consist of:
>
> (a) The Draft EIR or a revision of that draft.
>
> (b) Comments and recommendations received on the Draft EIR either verbatim or in a summary.
>
> (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
>
> (d) The responses of the Lead Agency to significant environmental points raised in review and consultation process.
>
> (e) Any other information added by the Lead Agency."

This document has been prepared pursuant to CEQA and in conformance with the CEQA *Guidelines*. This Final EIR Response to Comments Document incorporates comments from public agencies and the general public, and contains appropriate responses by the Lead Agency to those comments.

B. METHOD OF ORGANIZATION

This Final EIR Addendum for the proposed Sonoma State University Master Plan Revision contains information in response to comments raised during the public comment period.

Following this introductory Chapter I, Chapter II of this document contains text changes to the EIR (initiated by the University, and those resulting from comments on the Draft EIR) and errata to the Draft EIR.

Chapter III contains a list of all persons and organizations that submitted written comments on the Draft EIR and that testified at the public hearings held at the University on November 29 and December 2, 1999.

Chapter IV contains comment letters received during the comment period and the responses to each comment. Each comment is labeled with a number in the margin and the response to each comment is presented immediately after the comment letter.

Chapter V contains a summary of the public comments received during the public hearings held at the University on November 29 and December 2, 1999, and the responses to the comments received during the public hearings.

CHAPTER II
REVISIONS TO THE DRAFT EIR

The following corrections and changes are made to the Draft EIR and are incorporated as part of the Final EIR. Revised or new language is underlined. Deleted language is indicated by ~~strikethrough~~ text.

Where a change is made as part of a response to a comment on the Draft EIR, the comment number is noted in brackets at the end of the text change. Where no comment number is given, the change is initiated by the University.

A. STAFF-INITIATED CHANGES

Page II-3 of the DEIR, fourth paragraph, last sentence, the sentence is revised as follows:

> "Correspondingly, the CSU does not exact financial contributions from local governments or developers for construction of University facilities."

Page IV.D-28 of the DEIR, third paragraph, is revised as follows:

> "Significance After Mitigation: Significant. Mitigation Measures D.4a-c~~E.2a-c~~ would lessen the significant traffic impacts associated with these events, but not to a less than significant level. Although significant traffic impacts associated with these special events impacts would occur at the campus entrance intersections, the special events would be infrequent, and traffic impacts would be of limited duration and occur during off-peak traffic periods."

Page IV.H-3 of the DEIR, Table IV.H-1, is amended. Under "Species that are Candidates for Listing or of State or Federal Concern," the Tomales isopod *(Caecidotea tomalensis)* is deleted. (See revised Table IV.H-3, below.)

Page VII-1 of the DEIR, under EIR Consultants, the address should read:

> "Environmental Science Associates
> 225 Bush Street, Suite 1700
> San Francisco~~Oakland~~, California 94104"

B. CHANGES TO THE DRAFT EIR IN RESPONSE TO COMMENTS

Page II-13 of the DEIR, Mitigation Measure F.1a, the following language is added following the measure:

> "Where residential uses would be affected, the construction schedule should be limited to 8:00 a.m. to 6:00 p.m. A different time restriction may be appropriate where other uses, such as classrooms or libraries, would be affected."

Page III-17 of the DEIR, last paragraph, fifth sentence, is revised as follows:

> "Since neither the University nor an affiliated entity ~~does not~~ currently own the northwest acquisition area~~proposed University housing site~~, the proposed development is not illustrated on the University Master Plan."

The following text is added to page III-24 of Chapter III, Project Description, of the DEIR, preceding the references:

> **"H. APPROVAL PROCESS**
>
> This EIR is intended to provide the information and environmental analysis necessary to assist public agency decision-makers in considering all of the approvals necessary for the planning, development, construction, operation, and maintenance of the proposed project.
>
> The CSU Trustees serves as Lead Agency for the proposed project under CEQA. As Lead Agency, the CSU Trustees are responsible for reviewing and certifying the adequacy of this EIR. The CSU Board of Trustees will use the EIR in its decisionmaking for approving the Master Plan revision.
>
> When specific plans for each proposed construction project under the Master Plan revision have been developed, those plans will be reviewed by the University in the context of this EIR to determine whether those individual construction projects have in fact been adequately addressed in this EIR. (An exception would be the proposed Center for the Musical Arts, for which a site plan already exists and for which sufficient information is available for the development to be assessed on a site-specific level of detail in this DEIR.) If the University's review determines that implementation of the specific plans would have no potentially significant environmental effects that are not addressed in this EIR, then no additional environmental documentation would be required. If the review determines that the plans could have a significant environmental effect that is not adequately addressed in this EIR, then supplemental environmental documentation would be required at that time.
>
> Prior to construction of any individual building projects identified under the Master Plan revision, building plans will require approval by the Division of the State Architect, State Fire Marshall, and the CSU Seismic Review Board. Specific permits that will be

required to implement the specific developments under the Master Plan revision, may include:

- Section 404 of the Clean Water Act (Nationwide Permit(s)) from the U.S. Army Corps of Engineers;
- Section 7 of the federal Endangered Species Act (Biological Opinion) from U.S. Fish and Wildlife Service / National Marine Fisheries Service;
- Section 401 of the Clean Water Act and the Maceeter Petris Act (Water Quality Certification or Waiver) from the Regional Water Quality Control Board;
- General Stormwater Permit (SWPPP – Notice of Intent) from the State Water Resources Control Board;
- 1600-1607 of the California Fish and Game Code (Streambed Alteration Agreement);
- Section 2081 of the California Fish and Game Code (2081 agreement for state listed Threatened, Rare, or Endangered Species) from CDFG."
- Revocable License from the Sonoma County Water Agency for access and construction within the SCWA easement along Copeland Creek."

Page IV.A-3 of the DEIR, third full paragraph, second sentence is revised as follows:

"The parcels west of the tributary to HinebaughCopeland Creek are still currently managed for oat hay production."

Page IV.C-6 of the DEIR, last sentence, is revised as follows:

"Proposed bridges over the Creek shall be designed so as not to encroach on the floodway as defined by the Army Corps of Engineers, and to also provide a minimum of 1 ½ foot of freeboard between the design 100-year water surface and the minimum low-chord elevation of the bridge structures."

Pages IV.C-9 and II-5 of the DEIR, Mitigation Measure C.4a is revised as follows:

"**Mitigation Measure C.4a: New drainage structures, curb inlets and drop inlets shall be equipped with filters that have the ability to separate out oil and grease from storm water runoff prior to its entering the drainage system, and/or the drainage system shall be equipped with a device capable of intercepting and trapping such pollutants offline along the storm drain system. Periodic maintenance of these filters and/or offline debris traps would be incorporated into the maintenance routine normally associated with the University facilities.**"

Page IV.D-6 of the DEIR, last paragraph, the following sentence is added:

"The Draft City of Rohnert Park General Plan Update establishes LOS C as the minimum standard for all arterial and collector roadway segments and intersections,

except for specific locations where LOS D is established, including, among other locations, the intersection of Rohnert Park Expressway and Snyder Lane."

Page IV.D-13 of the DEIR, last paragraph, second sentence is revised as follows:

"The proposed on-campus housing would result in a net decrease in off-site vehicle trips associated those new students living on-site, when compared to off-site vehicle trips that would be generated under the existing approved Master Plan."

Page IV.D-14 of the DEIR, Table IV.D-4, the outbound vehicle trips associated with Total Buildout of the University during the a.m. peak hour is revised as follows:

Condition	A.M. Peak Hour				PM Peak Hour			
	Trip Rate	Vehicle Trips			Trip Rate	Vehicle Trips		
		Total	In	Out		Total	In	Out
Existing University (1999)	0.180	1,055	970	86	0.230	1,348	485	863
Additional New Proposed Under Master Plan Revision[a]	0.155	642	591	51	0.203	839	302	537
Total Buildout of University[b]	0.159	1,594	1,466	128 ~~152~~	0.207	2,073	746	1,327

Page IV.D-19, Table IV.D-6 of the DEIR, last row, the delay for East Cotati Avenue / Snyder Lane-Maurice Avenue under Cumulative (Future With Project) conditions is revised as follows:

Intersection	Cumulative Base (Future Without Project)				Cumulative (Future With Project)			
	A.M. Peak		P.M. Peak		A.M. Peak		P.M. Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
E. Cotati Ave. / Snyder Lane-Maurice Avenue	20.8	C	28.8	D	20.3	C	36.8	D

Page IV.D-24, the fourth paragraph is revised for clarification as follows:

"A supply of 1,368 Residential parking spaces is proposed for the 2,200 beds expected on the main campus at build-out (this estimate does not include~~ing~~ potential additional Residential parking spaces ~~and beds~~ associated with the proposed University housing in the northwest acquisition area).[12] This yields a ratio of approximately 0.62 spaces per bed, compared to the recommended 0.60 spaces per bed ratio, ~~and would provide~~ a surplus of approximately 48 Residential spaces on the main campus at build-out.

Provided that any housing in the northwest acquisition area were also provided with at least 0.6 parking spaces per bed, as proposed, the project would have no significant impacts related to Residential parking."

---

[12] As discussed in the Project Description, since neither the University nor an affiliated entity ~~does not~~ currently own the northwest acquisition area~~proposed University housing site~~, a range of housing scenarios is~~are~~ considered for that site in the EIR."

Page IV.D-25 of the DEIR, last paragraph, is revised as follows:

"**Significance After Mitigation:** Significant. As discussed in Chapter II, Summary, the University is prohibited by law from committing project funds for off-site transportation improvements. The roadway segments requiring mitigation are currently located within Sonoma County and proposed to be annexed by the City of Rohnert Park under the *Draft City of Rohnert Park General Plan Update*. Transportation improvements that are proposed under the *Draft City of Rohnert Park General Plan Update* include the widening of Petaluma Hill Road and East Cotati Avenue to four lanes and would likely eliminate on-street parking along these segments. The implementing agency for Mitigation Measures D.3a-b would be Sonoma County, or Rohnert Park (if these roadways are annexed as anticipated under *the Draft Rohnert Park General Plan Update*). However, the widening of these roadway segments (including potential prohibition of parking along these roadway segments and/or provision for buffer improvements) are not identified as approved or funded improvements by either agency. Since there is no assurance that these mitigation measures would be implemented, this impact is considered to remain significant."

Pages IV.D-29 and II-9 of the DEIR, the following mitigation is added following Mitigation Measure D.5c:

"Mitigation Measure D.5d: For events projected to draw more attendance than can be accommodated by parking in the northern acquisition area (approximately 2,600 attendees), provide adequate traffic control personnel to direct event patrons to other available on-campus parking facilities."

Pages IV.F-9 and II-14 in the DEIR, Impact F.4 is revised as follows:

"**Impact F.4: Outdoor sound amplification systems at the Center for the Musical Arts could result in nuisance-type impacts if residential uses were to be developed north of Rohnert Park Expressway. This would be a potentially significant, cumulative impact.**"

Page IV.H-3 to IV.H-4 of the DEIR, Table IV.H-1, is amended. Under "Species Listed or Proposed for Listing," the Central California coast steelhead (*Oncorhynchus mykiss*) is added. Under Species that are Candidates for Listing or of State or Federal Concern," the Tri-colored blackbird *(Agelaius tricolcor)*, the Yellow warbler *(Dendroica petechia brewsteri)*, and nesting raptors are added. See revised Table IV.H-1, below.

TABLE IV.H-1
SPECIAL STATUS SPECIES WITH MODERATE TO HIGH POTENTIAL FOR OCCURRING WITHIN PROJECT AREA[a]

Scientific Name Common Name	Status USFWS/CDFG/ CNPS	General Habitat	CNDDB and Other Reported Occurrence	Presence within the Project Area
SPECIES LISTED OR PROPOSED FOR LISTING				
Amphibians				
Rana aurora draytonii California red-legged frog	FT/--	Lowlands and foothill in or near ponding water that lasts until the end of Aug. with small mammal burrows adjacent	Reported within ~4 mi of project site (CNDDB 1997)	**High Potential** – Suitable habitat occurs in Copeland Creek
Fish				
Oncorhynchus mykiss Central California coast steelhead	FT/--	Coastal rivers and creeks with permanent water for spawning and rearing; other habitats may serve as migration routes	Reported	**High Potential** – Species migrates through project site
SPECIES THAT ARE CANDIDATES FOR LISTING OR OF STATE OR FEDERAL CONCERN				
~~**Crustaceans**~~				
~~*Caecidotea tomalensis* Tomales isopod~~	~~FSC/--~~	~~Localized freshwater ponds and streams with still or near-still water~~	~~Artesian spring on Roth property (CNDDB 1983)~~	~~**High Potential** – found on site in previous studies~~
Invertebrates				
Hydrochara ricksecker Rickescker's water scavenger beetle	FSC/--	Freshwater ponds	Found along Lichau Road, 6.5 mi NE of Penngrove (CNDDB 1969)	**High Potential** – surveys for this species are not routinely conducted
Amphibians *Ambystoma californiense* California tiger salamander	FC/--/SC	Annual grasslands and grassy understory of valley foothill hardwood habitats with small mammal burrows for aestivation and vernal pools for breeding	Reported within ~3.5 mi of project site (CNDDB 1992)	**Medium Potential** – Habitat is present although no tiger salamanders have been reported east of Hwy 101
Rana boylii Foothill yellow-legged frog	FSC/--/SC	Partially shaded, shallow streams and riffles with a rocky substrate in a variety of habitats with water running till at least the end of June.	Copeland Creek at Lichau Road Bridge (CNDDB 1993); at Petaluma Hill Road Bridge and 0.6 mi downstream (1996); Fairfield –Osborn Preserve (CNDDB 1996)	**High Potential** – Copeland Creek is known habitat

TABLE IV.H-1 (Continued)
SPECIAL STATUS SPECIES WITH MODERATE TO HIGH POTENTIAL FOR OCCURRING WITHIN PROJECT AREA[a]

Scientific Name Common Name	Status USFWS/CDFG/ CNPS	General Habitat	CNDDB and Other Reported Occurrence	Presence within the Project Area
SPECIES THAT ARE CANDIDATES FOR LISTING OR OF STATE OR FEDERAL CONCERN (Continued)				
Reptiles				
Clemmys marmorata marmorata Northwestern pond turtle	FSC/--	Slow moving streams with basking sites and sandy shores within 0.5 mi for laying eggs.	Observed on SSU property in 1996 in ornamental ponds (Biosearch 1998)	**High Potential** – Copeland Creek and artesian seep may provide habitat
Birds				
Agelaius tricolor Tricolored blackbird	FSC/ SC	Nests in areas of ponded water that can support a colony of a minimum of 50 pairs	Observed in Copeland Creek (CNDDB 1976) within blackberries, willows and thistles.	**Low-Moderate Potential** – habitat features still present, but no individuals were observed during the spring 1999 surveys
Elanus leucurus White-tailed kite	--/3511	Nests in tall trees adjacent to open grasslands	No reported occurrences	**High Potential** – the trees along the artesian seep and Copeland Creek provide excellent nesting habitat for this species
Lanius ludovicianus Loggerhead shrike	/SC	Nests in trees and shrubs adjacent to open grasslands	No reported occurrences	**High Potential** - the trees along the artesian seep and Copeland Creek provide excellent nesting habitat for this species
Dendroica petechia brewsteri Yellow warbler	/SC	Nests in cottonwood, willow and alder riparian forests	Reported by SSU faculty	**Present** – reported as occurring along Copeland Creek
Nesting raptors	3503.5	Most species nest in woodland, forest, or isolated trees	Reported by SSU faculty	**Present** – reported as occurring along Copeland Creek

TABLE IV.H-1 (Continued)
SPECIAL STATUS SPECIES WITH MODERATE TO HIGH POTENTIAL FOR OCCURRING WITHIN PROJECT AREA[a]

STATUS CODES:

FEDERAL: (U.S. Fish and Wildlife Service)
FE = Listed as Endangered by the Federal Government
FT = Listed as Threatened by the Federal Government
FPE = Proposed for Listing as Endangered
FPT = Proposed for Listing as Threatened
FC = Candidate for Federal listing
FSC = Federal Species of Concern (former Category 2 Candidate)

CALIFORNIA NATIVE PLANT SOCIETY
List 1A = Plants presumed extinct in California
List 1B = Plants rare, threatened, or endangered in California
List 2 = Plants rare, threatened, or endangered in California
List 3 = Plants about which more information is needed
List 4 = Plants of limited distribution

STATE: (California Department of Fish and Game)
SE = Listed as Endangered by the State of California
ST = Listed as Threatened by the State of California
SR = Listed as Rare by the State of California (plants only)
SC = State Species of Special Concern
3503.5 = Protection for nesting species of Falconiformes (hawks) and Strigiformes (owls)
3511 = Fully protected bird species under Fish and Game Code.

a Please see Table D-1 in Appendix D for a list of the special status species, and their habitat requirements, with low potential for occurring within the project area.
High Potential = Species expected to occur and meets all habitats as defined in list.
Moderate Potential = Habitat only marginally suitable or suitable but not within species geographic range.
-- = No listing status

SOURCES: CDFG, 1999; Biosearch Wildlife Surveys 1998; USFWS 1999.

Page IV.H-7, third heading is revised as follows:

"Swale along Tributary to Hinebaugh ~~Copeland~~ Creek"

Page IV.H-7, last paragraph, first two sentences are revised as follows:

"The area mapped as fresh emergent wetland/meadow is located along the tributary to Hinebaugh~~Copeland~~ Creek. This drainage flows ~~from~~ north ~~to south~~ and is underlain by clay soils."

Page IV.H-8, first paragraph, first sentence is revised as follows:

"The wetland/meadow habitat in the swale tributary to Hinebaugh ~~Copeland~~ Creek occupies about 1.9 acres (Golden Bear Biostudies, unpubl.)."

Page IV.H-8, first paragraph, second heading is revised as follows:

"Copeland Creek and Tributary to Hinebaugh Creek – Riparian Forest"

Page IV.H-9, third full paragraph, first sentence is revised as follows:

"The swale along the tributary to Hinebaugh~~Copeland~~ Creek is also an example of an uncommon natural community in California and Sonoma County."

Pages IV.H-10 to IV.H-11, and page II-15 of the DEIR, Mitigation Measure H.1a and supporting text is revised as follows:

"Mitigation Measure H.1a: A verified wetland delineation for the portion of the project site north of Copeland Creek will be completed and made available prior to any final site planning and construction of facilities within or adjacent to potential jurisdictional wetlands, which includes seasonal ponding areas, permanent ponded areas, drainage ditches, and relict streams and creeks.

A COE permit, Regional Water Quality Control Board Section 401 water quality certification or waiver, and State of California Stream Alteration Agreement will be required for temporary or permanent construction within any wetlands or waters of the U.S or areas under state jurisdiction. In addition, the following will be required after the ~~COE and/or the CDFG~~ permits haves been obtained.

- Prior to construction, the aquatic structure of areas to be disturbed will be photo-documented and measurements of width, length, and depth will be taken no more than four weeks before construction begins. After construction the aquatic structure will be photo-documented and measured to ensure that the channel has been restored to its original condition to the extent practicable.

- During construction, a biological monitor will be on site at all times when construction takes place in aquatic habitat. Any activity within ordinary high water will be photo-documented by the site monitor. In addition, a biologist with the appropriate permits to relocate animals will be available for consultation as

needed. The monitor and biologist will provide an environmental protection workshop for workers prior to construction activities.

- All construction adjacent to wetland vegetation will be regularly monitored to ensure that impacts do not exceed those included in the project description. Work within 100 feet of wetlands during ponding periods will be monitored by qualified staff who will document pre-project and post-project conditions to ensure adequate restoration of disturbed aquatic habitat.

- The applicant shall implement a noxious weed abatement plan Standard measures could include the following elements: ensure construction related equipment arrives on-site free of mud or seed bearing material, certify all seeds and straw material as weed free, identify areas of noxious weeds pre-construction, treat noxious weeds or noxious weed topsoil prior to construction (e.g., topsoil segregation, storage, herbicide treatment), and revegetate with appropriate species.

The applicant shall implement Best Management Practices related to stormwater management and spill prevention and pollution control. The wetland construction boundary will be fenced to control siltation and disturbance to wetland habitat and to prevent the movement of animals into the construction area. Following installation of fencing, its proper location will be verified by a biologist. The monitor will ensure that at no time during construction is vegetation removed outside of the fenced area. If variance in construction requires removal of vegetation outside the fence, the monitor will determine if additional mitigation is warranted. The permitting agencies will also be contacted in the event of any significant deviation from permitting conditions."

Page IV.H-12 of the DEIR, the following text is inserted following the first paragraph:

"The applicant shall develop and implement a wetland mitigation, monitoring, and compensation program to mitigate adverse effects to wetland and water-associated habitats. The program shall be acceptable to the aforementioned agencies and made available to the public upon request. A mitigation plan is required prior to the initiation of any ground clearing, grading, construction, or other activities that could directly impact wetlands. The mitigation plan shall provide for no net loss of wetlands values or functions. The plan shall be submitted as part of the CWA 404 Permit Application Pre-Construction Notification (PCN) process and incorporated into a Streambed Alteration Agreement with CDFG. The determination of adequacy of proposed mitigation will be made as part of the permit application review process; preliminary plan designs are consistent with prevailing practices and have been discussed with the COE in early, informal consultation. Modifications of the final plan may be required as a result of permit requirements imposed by the COE, RWQCB, and/or CDFG, and all permit conditions shall be implemented. The plan shall contain, but not be limited to the following measures:

- Implement on-site restoration and compensation as negotiated with the agencies. At a minimum, this shall include revegetation of disturbed portions of the creek with native species.

- The planting plan should include specific species composition, arrangement and density of plantings, specifications for use of a plant pallet comprised of locally indigenous species, planting and implementation plans, irrigation, and long-term monitoring (five-year minimum following construction, with implementation of additional measures, as warranted to ensure success).

- Mitigation for permanent effects shall be at a ratio of 3:1 (or a ratio determined adequate by the resource agencies) and shall be in-kind. This could include purchase of mitigation credits at an agency-approved mitigation bank or enhancement of stream or wetland habitats elsewhere on-site or in close proximity. In either case, a specific plan shall be developed and submitted to the agencies as part of the permitting process (and made available to the public upon request).

- As is feasible, the existing intermittent drainage in the northeast corner of the project site shall be rerouted within the University property.

- Treated runoff may be used to augment rainfall ponding in the wetland mitigation area, if average rainfall proves insufficient to maintain hydrophytic (wetland) vegetation.

- All mitigation contained herein and that included by resource agencies as part of the permitting process shall be incorporated into the project's CEQA Mitigation, Monitoring, and Reporting Program."

Page IV.H-12 of the DEIR, the following discussion is added to the end of the second full paragraph:

> "The loss of farmed and previously farmed ruderal habitats, especially situated adjacent to the riparian and wetland habitats, represents an adverse impact to wildlife species that use these habitats for breeding and foraging."

Pages IV.H-12 and II-16 of the DEIR, the following mitigation measure is added, following Mitigation Measure H.2b:

> "**Mitigation Measure H.2c: All plantings within the proposed Creek Buffer Zone shall consist of locally indigenous native species. Elsewhere within the northern acquisition area, at least 50 percent of the upland areas proposed as "Sonoma landscaping" shall be vegetated with locally indigenous plant species in assemblages resembling natural communities, such as oak woodland, oak savanna and grassland. Non-native species, such as wine grapes, may be used elsewhere in the areas proposed as "Sonoma landscaping." Invasive non-native species (including tree-of-heaven, mayten tree, broom, giant reed, and pampas grass) will not be used in the landscaping of the proposed project (an exception would be eucalyptus, which could be planted in the courtyard proposed Center for the Musical Arts).**"

Pages IV.H-12 and II-16 of the DEIR, Impact H.3, is amended as follows (Note: For clarification, Impact and Mitigation Measure H.4 has been incorporated into Impact and Mitigation Measure H.3 below):

"Impact H.3: Development of project facilities could adversely impact habitat for sensitive animal species. This would be a significant impact.

All of the species with a moderate to high potential to occur on the project area are associated with riparian vegetation and/or the aquatic habitat of Copeland Creek. Such species include central California coast steelhead, foothill yellow-legged frog, the western pond turtle, the California tiger salamander, Ricksecker's water scavenger beetle, yellow warbler, and several raptor and passerine bird species. Construction and operation of facilities in or near the tributary to Hinebaugh ~~Copeland~~ Creek, or to Copeland Creek itself, could adversely impact these species.

Mitigation Measure H.3a: To avoid potential impacts to migrating nesting birds near Copeland Creek, construction within the Copeland Creek Preservation and Buffer Zones shall be limited to the period between August 1 and October 31. Alternatively, the applicant could (1) remove potential nesting trees within the construction disturbance zone prior to the nesting period (February-August) or (2) conduct pre-construction nesting surveys of the project area and restrict construction-related activities within 500-feet of any active nests until after the young have fledged.

Mitigation Measure H.3b: To protect sensitive fish (including steelhead), amphibians, reptiles or insects that may be present, preconstruction surveys in areas of suitable habitat for these species shall be carried out, and if such species are found they shall be relocated out of the construction zone.

The following conservation and protection measures would reduce or eliminate potential taking of special status amphibians and aquatic species. These measures were abstracted from the USFWS Programmatic Biological Opinion for projects that may affect California red-legged frog (USFWS 1999), though the Biological Opinion does not specifically apply to this project because no California red-legged frog take is anticipated. Provisions listed below are considered reasonable and prudent for actions located within 100 feet of aquatic habitats:

- To reduce impacts to the foothill yellow-legged frog, complete avoidance of the freshwater marsh/meadow shall be implemented.

- Construction activity within the Copeland Creek Protection Area shall be minimized, and will be carried out to minimize potential impact.

- Work activities within potential special status aquatic species habitat should be completed between April 1 and November 1, or during low-flow conditions.

- A qualified biologist shall survey the site two weeks before the onset of activities. If special status aquatic species, tadpoles, or eggs are found, the biologist will contact the appropriate agency(ies) to determine if moving any of these life-stages is appropriate.

- A qualified biologist shall conduct training sessions for all construction personnel before activities begin.

- Within the Copeland Creek Protection Area, the construction boundary shall be fenced with silt fencing to prevent the movement of animals into the construction area and control siltation and disturbance to wetland habitat. Following installation of fencing, its proper location shall be verified by a biologist. The monitor shall ensure that at no time during construction is vegetation removed outside of the fenced area. If variance in construction requires removal of vegetation outside the fence, the monitor shall determine if additional mitigation is warranted. The permitting agencies shall also be contacted in the event of any significant deviation from permitting conditions.

- All construction adjacent to or within aquatic habitats shall be regularly monitored, Any activity within ordinary high water shall be photo-documented by the site monitor. In addition, a biologist with the appropriate permits to relocate animals shall be available for consultation as needed. The monitor and biologist shall provide an environmental protection workshop for workers prior to construction activities.

- Vehicles shall be confined to existing roads and areas that do not provide upland aestivation habitat, when possible.

- All trash that may attract predators shall be contained and regularly removed. Following construction, all trash and construction debris shall be removed from work areas.

- All fueling and maintenance of vehicles and equipment shall occur at least 20 meters (65 feet) from any aquatic habitat.

- The spread or introduction of invasive exotic plant species shall be avoided. When practicable, invasive exotic plants in the project areas will be removed.

- The number and size of access routes, staging areas, and total area of activity shall be limited to the minimum necessary to achieve the project goal.

- Best management practices shall be implemented to control erosion.

- During dewatering, intakes shall be completely screened with wire mesh not larger than five millimeters (mm) to prevent aquatic species from entering the pump system. Water would be released or pumped downstream at an appropriate rate to maintain downstream flows during construction. Upon completion of construction activities, any barriers to flow shall be removed in a manner that allows flow to resume with the least disturbance to the substrate.

- Where practicable, qualified biologists shall permanently remove, from within the project area, any individuals of exotic species to the maximum extent feasible.

- The downstream construction boundary shall be fenced to prohibit the movement of aquatic species into the construction area and to control creek siltation and disturbance to downstream riparian habitat. An exclosure fence should be installed in the creek channel both upstream and downstream of construction activities as appropriate. Fences should be installed at least six weeks prior to the commencement of any construction activities.

- Immediately after installation of the exclosure fence, a qualified biologist shall inspect all areas within the fence for aquatic species and relocate species to suitable habitat as warranted.

Mitigation Measure H.3c: Implement Mitigation Measures C.4 and C.5 discussed in Section IV.C, Hydrology and Water Quality, of the DEIR." ~~**Carry out preconstruction surveys in areas of suitable habitat to ascertain the presence or absence of sensitive species, and either relocate them out of the construction zone (amphibians, reptiles and insects) or delay construction until nesting activity is completed (i.e., construct during the period July through February).**~~

Significance After Mitigation: Less than significant."

Pages IV.H-13 to IV.H-14, and II-16 to II-18 of the DEIR, Impact H.3, are amended as follows (Note: For clarification, Impact and Mitigation Measure H.4 has been incorporated into Impact and Mitigation Measure H.3, above):

"~~**Impact H.4: Construction within the project area may reduce potential upland refugia for adult and breeding pools for tadpoles of foothill yellow-legged frog (FHYLF), a state and federal species of concern. This would be a significant impact.**~~

~~Although little is known about the movement of this species it is known to congregate around breeding pools in April, May and June. Late summer dispersal of the young has been recorded (Jennings and Hayes, 1994). It is thought that adults move into vegetation, move up tributaries or stream and/or reduce diurnal activity. Therefore, the marsh/meadow along the tributary to Copeland Creek may provide an upland refugium.~~

~~**Mitigation Measure H.4a: To reduce impacts to the FHYLF, complete avoidance of the freshwater marsh/meadow shall be implemented. (Identified By This Report)**~~

~~**Mitigation Measure H.4b: Construction activity within the Copeland Creek Protection Area shall be minimized, and will be carried out to minimize potential impact to the FHYLF.**~~

~~If avoidance of impact to Copeland Creek is infeasible, the following mitigation guidelines prior to and during construction will reduce impacts to both species.~~

- ~~Within the Copeland Creek Protection Area, the construction boundary will be fenced with silt fencing to prohibit the movement of animals into the construction area and control siltation and disturbance to wetland habitat. Following installation~~

~~of fencing, its proper location will be verified by a biologist. The monitor will ensure that at no time during construction is vegetation removed outside of the fenced area. If variance in construction requires removal of vegetation outside the fence, the monitor will determine if additional mitigation is warranted. The permitting agencies will also be contacted in the event of any significant deviation from permitting conditions.~~

- ~~Pre-construction surveys within the construction zone will be conducted by a qualified biologist. If no animals are detected during these surveys then construction related activities will proceed. If adult special-status animals are found within the construction disturbance zone they will immediately be moved passively, or captured and moved, to suitable upstream sites by the project biologist.~~

- ~~All construction adjacent to wetland vegetation will be regularly monitored to ensure that impacts do not exceed those included in the project description. Work within 100 feet of wetlands during ponding will be monitored by qualified staff who will document pre-project and post-project conditions to ensure adequate restoration of disturbed aquatic habitat.~~

- ~~During construction, a biological monitor will be on site at all times when construction takes place in aquatic habitat. Any activity within ordinary high water will be photo-documented by the site monitor. In addition, a biologist with the appropriate permits to relocate animals will be available for consultation as needed. The monitor and biologist will provide an environmental protection workshop for workers prior to construction activities.~~

- ~~Vehicles will be confined to existing roads and areas that do not provide upland aestivation habitat, when possible.~~

~~Significance After Mitigation:~~ ~~Less than significant.~~"

Page V-7 of the DEIR, the following paragraph is inserted following the fourth paragraph:

"Section 15126.6(e)(2) of the CEQA Guidelines state that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. In comparing Alternatives 2 and 3 to the proposed project, Alternative 2 would be considered the environmentally superior alternative. Both Alternatives 2 and 3 would avoid direct (albeit mitigable) environmental impacts to the northwest acquisition area (e.g., agricultural land, hydrology, biological, visual, cultural) that would occur under the project. Alternative 3 would provide more on-site housing than Alternative 2, in an amount similar to the low-density scenario of the proposed project, but less than the medium- and high-density scenarios of the proposed project. Alternative 3 would therefore generate less off-site traffic than Alternative 2. Consequently, significant impacts to peak-hour intersection levels of service and contributions to air pollutant emissions under Alternative 3 would be similar to, or somewhat greater than those of the proposed project, but less than those that would occur Alternative 2. However, since Alternative 3 would provide more on-site housing than Alternative 2, it would create a greater demand for utilities (including wastewater treatment) than Alternative 2.

Moreover, Alternative 3 would introduce a potentially new significant visual impact associated with the seven-story residential building on the main campus that would not occur under the proposed project or Alternative 2."

Appendix D.1, page D-2 of the DEIR, Table D-1 is amended. Under Species Listed or Proposed For Listing, the Central California coho salmon (Oncorhynchus kisutsch) is added, and the Central California coast steelhead (*Oncorhynchus mykiss*) is deleted from the Low Potential category. (The Central California coast steelhead has been added to the High Potential Category; see revised Table IV.H-1).

Appendix D.2, page D-4 of the DEIR, the fifth and sixth paragraphs are revised as follows:

"**Central California coast steelhead (*Oncorhynchus mykiss*), federally listed as a threatened species,** exhibit one of the most complex life histories of any salmonid species. The resident rainbow trout form spends its entire life in freshwater environments while the anadromous steelhead form migrates between their natal streams and the ocean. Steelhead typically migrate to marine waters after spending one to four years in freshwater. They typically reside in marine waters 2-3 years prior to returning to their natal stream to spawn as 4- or 5- year olds between the months of December and May. Unlike salmon, steelhead are iteroparous, meaning they can spawn more than once before they die.

Central California coast steelhead are known to occur in Copeland Creek, Willow Brook, Lichau Creek, and the Petaluma River. ~~The last reported occurrence of steelhead in Copeland Creek dates back to the late 1800's (SCWA, 1999). Although the species has not been observed within or adjacent to the project area since that time, a small run of steelhead may persist in Copeland Creek. Furthermore,~~ Although the species has not been observed within the proposed project site, CDFG personnel identified juvenile steelhead upstream of the campus in 1999. Steelhead spawn upstream of Lichau Road and therefore must traverse the project area during adult in-migration during the winter and smolt out-migration during the spring. ~~t~~The Sonoma County Water Agency is currently implementing a creek restoration project immediately upstream of the project site. This restoration is aimed at improving habitat conditions for salmonids and other aquatic species, and may result in greater use of the watershed by steelhead in the future."

Appendix D.2, page D-4 of the DEIR, add the following paragraph to the end:

"**Central California coho salmon** (*O. kisutsch*), federally threatened and State endangered (the State listing is limited to coho salmon south of San Francisco Bay). In central California, adult coho generally enter freshwater systems in late December or January and spawn immediately afterwards. Coho generally spawn in smaller streams than chinook salmon. Coho also spawn only once before they die, but may remain alive for several months after spawning. Juveniles typically emerge from the gravel in late April or May, after which they spend one to two years in freshwater before migrating to the ocean. Coho return to freshwater after two to five years."

TABLE D-1
SPECIAL STATUS SPECIES WITH LOW POTENTIAL FOR OCCURING WITHIN PROJECT AREA

Scientific Name Common Name	Status USFWS/CDFG/ CNPS	General Habitat	CNDDB and Other Reported Occurrence	Presence within the Project Area
SPECIES LISTED OR PROPOSED FOR LISTING				
PLANTS				
Alopecurus aequalis var. sonomensis Sonoma alopecurus	FE/--/List 1B	Freshwater marshes and swamps with riparian scrub	Reported within ~4 mi of project site (CNDDB 1974)	**Low potential** - Rare plant surveys did not reveal any individuals (Golden Bear, 1997).
Blennosperma bakeri Sonoma sunshine	FE/SE/List 1B	Vernal pools and valley and foothill grassland	Reported within ~3 mi of project site (CNDDB 1990)	**Low Potential** - Rare plant surveys did not reveal any individuals (Golden Bear, 1997).
Lasthenia burkei *Burke's goldfields*	FE/SE/List 1B	Vernal pools, meadows and seeps	Reported within 4 mi of project site (CNDDB 1994)	**Low Potential** – Rare plant surveys did not reveal any individuals (Golden Bear, 1997).
Limnanthes vinculans Sebastopol meadowfoam	FE/SE/List 1B	Mesic meadows, vernal pools and valley and foothill grassland in valley oak savannah on poorly drained soils of clay and sandy loam	Reported ~3 mi of project site (CNDDB 1990)	**Low Potential** - Rare plant surveys did not reveal any individuals (Golden Bear, 1997).
ANIMALS				
Crustaceans				
Syncaris pacifica California freshwater shrimp	FE/SE	Freshwater streams and creeks with undercut banks and moderate to heavy riparian cover	Not Reported Within five mi of project site	**Low Potential** – outside species range
Fish				
Oncorhynchus kisutsch Central California coho salmon	FT/SE	Cool, clear, well-oxygenated freshwater streams and rivers are used for spawning and rearing	Known to occur in the Russian River and some of its tributaries	**Low Potential** – there are no known records of the species occurring in Copeland Creek
~~*Oncorhynchus mykiss* -Central California -coast steelhead~~	~~FT/--~~	~~Cool, clear, well-oxygenated freshwater streams and rivers are used for spawning and rearing~~	~~Known to occur in Willow Brook, Lichau Creek, and Petaluma River. Reported to occur in Copeland Creek during the late 1800's, but not since (SCWA 1999)~~	~~**Low Potential** – species appears to no longer utilize Copeland Creek~~

TABLE D-1 (Continued)
SPECIAL STATUS SPECIES WITH LOW POTENTIAL FOR OCCURING WITHIN PROJECT AREA

Scientific Name Common Name	Status USFWS/CDFG/ CNPS	General Habitat	CNDDB and Other Reported Occurrence	Presence within the Project Area
SPECIES LISTED OR PROPOSED FOR LISTING (Continued)				
Birds				
Coccyzus americanus occidentalis Yellow-billed cuckoo	--/SE	Riparian forest nester, along the broad, lower flood bottoms of larger river systems in willows, cottonwoods with understory of blackberry, nettles or wildgrape	Copeland Creek east of Lichau Road near Sonoma State College, ~1.5 mi (CNDDB 1975)	**Low Potential** – sighting more than 10 years old and habitat has degraded
SPECIES THAT ARE CANDIDATES FOR LISTING OR OF STATE OR FEDERAL CONCERN (Continued)				
Plants				
Legenere limosa Legenere	FSC/--/List 1B	Vernal pools	Vernal pool ~2 mi NE of project site (CNDDB 1976)	**Low Potential** – sighting more than 10 years old; not observed during more recent surveys
~~Birds~~				
~~*Agelaius tricolor* Tricolored blackbird~~	~~FSC/SC~~	~~Nests in areas of ponded water that can support a colony of a minimum of 50 pairs~~	~~Observed in Copeland Creek (CNDDB 1976) within blackberries, willows and thistles.~~	~~**Low Potential** – no individuals were observed during the spring surveys~~
Mammals				
Antrozous pallidus Pallid bat	--/SC	Roost in small to large colonies (5 to 200) and co-habitate with *Tadarida brazilliensis*	No reported occurrences	**Low Potential** – no roosting habitat on site

STATUS CODES:

FEDERAL: (U.S. Fish and Wildlife Service)
FE = Listed as Endangered by the Federal Government
FT = Listed as Threatened by the Federal Government
FPE = Proposed for Listing as Endangered
FPT = Proposed for Listing as Threatened
FC = Candidate for Federal listing
FSC = Federal Species of Concern (former Category 2 Candidate)

CALIFORNIA NATIVE PLANT SOCIETY
List 1A = Plants presumed extinct in California
List 1B = Plants rare, threatened, or endangered in California
List 2 = Plants rare, threatened, or endangered in California
List 3 = Plants about which more information is needed
List 4 = Plants of limited distribution

STATE: (California Department of Fish and Game)
SE = Listed as Endangered by the State of California
ST = Listed as Threatened by the State of California
SR = Listed as Rare by the State of California (plants only)
SC = State Species of Special Concern
3503.5 = Protection for nesting species of Falconiformes (hawks) and Strigiformes (owls)
3511 = Fully protected bird species under Fish and Game Code.

Low Potential = Habitat does not meet species requirements as currently understood in the scientific community.
-- = No listing status

SOURCES: CDFG, 1999; Biosearch Wildlife Surveys 1998; USFWS 1999.

CHAPTER III

PERSONS AND ORGANIZATIONS COMMENTING ON THE DRAFT EIR

A. PERSONS AND ORGANIZATIONS COMMENTING IN WRITING

The following agencies, organizations and individuals submitted written comments on the Draft EIR during the Draft EIR initial review period (November 1 through December 15, 1999).

	Person/Agency/Organization and Signatory	Date
A.	State of California Governor's Office of Planning and Research, State Clearinghouse (Terry Roberts, Senior Planner)	12/16/99
B.	Sonoma County Permit and Resource Management Department (Robert Gaiser, Planner III)	12/15/99
C.	Anthropological Studies Center (Adrian Praetzellis, Ph.D., Director)	11/24/99
D.	California Department of Fish and Game (Brian Hunter, Regional Manager, Central Coast Region)	11/24/99
E.	City of Rohnert Park (Wendie Schulenburg, Planning and Community Development Director)	12/13/99
F.	California Department of Transportation (Harry Y. Yahata, District Director)	12/14/99
G.	California Regional Water Quality Control Board (John Short, P.E., Senior Water Resource Control Engineer)	12/15/99
H.	City of Cotati (Marsha Sue Lustig, Associate Planner)	12/13/99
I.	David L Stokes, Ph.D., Assistant Professor, Department of Environmental Studies and Planning, Sonoma State University	12/15/99
J.	Philip T. Northen, Chair, Department of Biology, Sonoma State University	12/15/99
K.	Steven C. Orlick, Ph.D., Professor, Department of Environmental Studies and Planning, Sonoma State University	12/13/99
L.	M. Thomas Jacobson, JD, MCP, AICP, Associate Professor, Department of Environmental Studies and Planning, Sonoma State University	12/14/99

Person/Agency/Organization and Signatory (cont.)		Date
M.	James C. Stewart, Professor, Department of Environmental Studies and Planning, Sonoma State University	12/13/99
N.	Dr. Steven A. Norwick, Professor of Geology, Department of Environmental Studies and Planning, Sonoma State University	received 12/15/99
O.	W.J. Rohwedder, Professor, Department of Environmental Studies and Planning, Sonoma State University	12/15/99
P.	Scott L. Miller, Director, Sonoma State University Writing Center	12/14/99
Q.	Mary E. Gomes, Associate Professor, Department of Psychology, Sonoma State University	received 12/15/99
R.	Elizabeth Herron, Hutchins School of Liberal Studies	12/13/99
S.	Rebecca Olsen	12/15/99
T.	Carolyn Dixon	12/14/99
U.	Theresa C. Rosamo	12/14/99
V.	Julie Bright	12/15/99
W.	Cathy Chen	12/15/99
X.	Mary Licht	12/15/99
Y.	Margot Larsen Henderson	12/15/99
Z.	Brian Turner	received 12/15/99
AA.	Fred Euphrat, Ph.D.	12/14/99
BB.	Wendy Losee	12/13/99
CC.	Rick Savel (Vice-Chairman, ad hoc Penngrove Area Plan Advisory Committee)	12/14/99

The following agencies, organizations and individuals submitted written comments on the Draft EIR during the extended Draft EIR review period (January 2, 2000 through February 15, 2000).

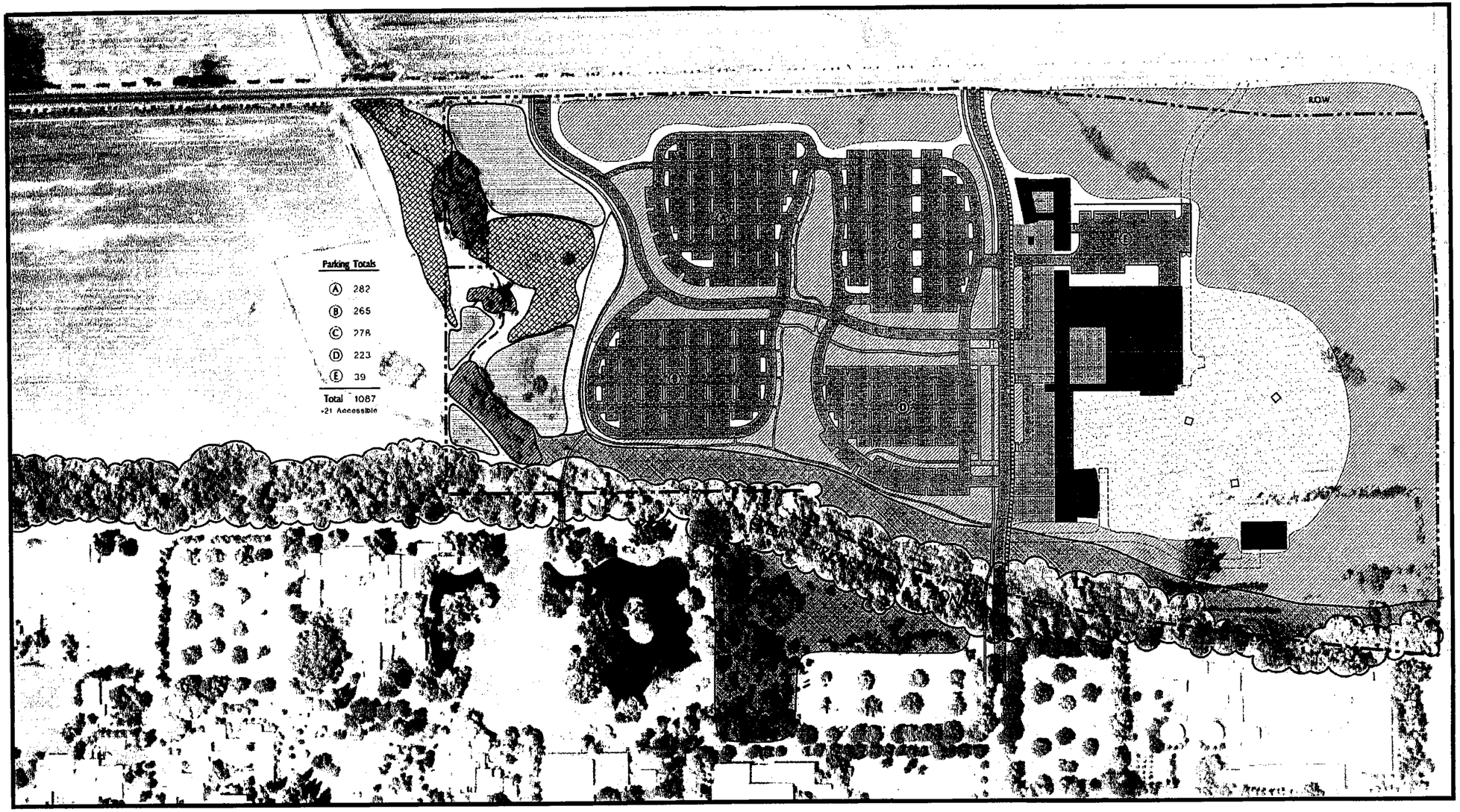
Person/Agency/Organization and Signatory (cont.)		Date
DD.	Sonoma County Water Agency (David Cook, Environmental Specialist)	1/10/00
EE.	City of Cotati (Dennis A. Dorch, Director of Planning)	2/15/00

Person/Agency/Organization and Signatory (cont.)		Date
FF.	Citizens United for Real Boundaries (David B. Hardy, AICP, Chair)	2/14/00
GG.	David B Hardy, AICP	2/15/00
HH.	Kristen Montgomery, Coordinator, Women's Resource Center, Sonoma State University	2/15/00
II.	Associated Students, Inc. (Crystal Shrouf, AS President; Megan Solomon, AS Vice-President, Internal Affairs)	2/15/00
JJ.	Brian Talbot, Joe Latiluppe, Crystal Shrouf	2/15/00
KK.	Cross & Crown Lutheran School (The Sixth Grade)	2/8/00
LL.	Janice Gilligan	2/12/00
MM.	Robert B. Amend	no date

B. PERSONS COMMENTING AT THE PUBLIC HEARINGS

Public hearings on the Draft EIR were held by the University on November 29 and December 2, 1999. The following individuals provided spoken comments at those hearings:

- Steven A. Norwick
- David L Stokes
- Brian Turner
- Jill Fitterer
- Steve Hernandez
- Richard Gale
- Margot Larsen Henderson
- Cathy Chen
- Mary Gomes
- Justin Stoddard
- Leita Allen



SOURCE: Quadriga Landscape Architecture & Planning, Inc.

Figure 1
Revised Plan for Center for Musical Arts, Parking and Circulation, and Biological Resource Protection Areas

Bridge Crossings of Copeland Creek: In an effort to further minimize potential environmental impacts, reduce the mass and scale of the bridges, promote an aesthetic compatibility with the proposed Center for the Musical Arts, and to separate pedestrian/bicycle and vehicular travel, a number of changes to the number and type of bridges was made.

The number of bridge crossings of Copeland Creek is reduced from four (one combined vehicular/pedestrian crossing and three pedestrian-only crossings) assessed in the DEIR to three (one vehicular-only crossing and two pedestrian-only crossings). The proposed bridges would all be clear-span, and of prefabricated construction. The proposed vehicular bridge would be 26 feet in width (reduced from the 48-foot bridge originally proposed), and would provide two travel lanes. Two six- to eight-foot wide pedestrian bridges are proposed, one of which would be in proximity to the vehicular bridge. The bridges would be constructed of steel and timber (previous bridges included concrete construction). The vehicular bridge would have an asphalt paving overlay; the pedestrian bridge would likely have a wooden-plank walking surface. The bridge footings, headwalls, and foundation piling systems would be designed to Caltrans standards for pre-fabricated and/or cast-in-place bridges.

Location of Pedestrian and Bicycle Paths: All pedestrian and bicycle paths would be realigned to lie outside of the Creek Buffer Zone (other than the approaches to the bridge crossings of Copeland Creek), and the wetland area.

Parking Area and Entrance Road Design: The parking area would be divided into four quadrants (the parking area assessed in the DEIR was one large parking area). Open space is proposed between the quadrants so that native planting may be introduced in these areas. In order to accommodate the proposed increased Buffer Zone width and the proposed upland zone adjacent to the wetland mitigation area, the loop road along the west and south edges of the parking area is eliminated.

Emergency Access: All primary paved vehicular roadways within the site for the Center for the Musical Arts would serve as fire lanes. To improve emergency access, two fire lanes are proposed within the landscaped area of the site for the Center for the Musical Arts. One fire lane would extend south from Rohnert Park Expressway, extending along the east side of the proposed concert hall. The second fire lane would extend between the proposed primary internal vehicular road and the special function facility, with a short spur extending north along the east side of the recital hall. These fire lanes would serve as travel ways for University maintenance vehicles as well.

The fire lanes extending through landscape would employ either "turf-paver" or "gravel-pave" systems. The turf-paver system consists of a rolled mat of rings, which when installed and backfilled with planting soil, would result in a porous surface that is 90% planting area, thereby minimizing the area of landscape affected, as well as minimizing the visibility of the structural support component of the fire lane. The turf-pave rings would consist of recycled plastic; each individual ring would be approximately 2 1/2" in diameter by approximately one-inch high. Where the fire lane passes through turf, the planting material would be grass. Elsewhere, where the lane passes through ornamental or native landscape, the planting material would be a mowable, low-growing groundcover that visually merges with the surrounding landscape.

The gravel-pave system is similar to the turf-paver system, and could be employed for the proposed northern fire lane. The gravel-pave system is backfilled with an aggregate, rather than planting soil. This result in a porous all-weather surface with an appearance of a gravel road.

Either fire lane system would be installed according to the manufacturer's specifications for fire truck access, and subject to approval from both the State Fire Marshall and the Rancho Adobe Fire District.

Contour of Sound Attenuation Berms: The sound attenuation berms would vary slightly in height along their length, providing a more natural-looking, undulating effect.

Proposed Vegetation: If vineyards are selected to be planted in the northern acquisition area, they would be delineated as small "pocket" vineyards, and would be separated by native plantings and located approximately 300 feet from Copeland Creek.

In addition to the physical modifications to the northern acquisition area described above, the Copeland Creek Ecological Resource Protection Plan, prepared as part of the Master Plan revision, is revised to include as one of its goals, the formation of an ongoing task force made up of University faculty, staff and students, along with local agency input, to develop and manage the protection plan.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse

Gray Davis
GOVERNOR

Loretta Lynch
DIRECTOR

A

December 16, 1999

Deborah Gannon-DuVall
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, CA 94928

Subject: SONOMA STATE UNIVERSITY MASTER PLAN REVISION EIR
SCH#: 93013045

Dear Deborah Gannon-DuVall:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 15, 1999, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's eight-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

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 contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency
CC: PAUL MITCHELL

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
916-445-0613 FAX 916-323-3018 WWW.OPR.CA.GOV/CLEARINGHOUSE.HTML

Document Details Report
State Clearinghouse Data Base

SCH# 93013045
Project Title SONOMA STATE UNIVERSITY MASTER PLAN REVISION EIR
Lead Agency California State University, Sonoma

Type eir Draft EIR

Description The proposed project consists of a revision to the existing Sonoma State University Master Plan. Like the existing approved Master Plan, the proposed Master Plan revision would maintain a maximum student population of 10,000 full-time equivalents (FTE). The Master Plan revision would not involve an increase in the rate of student enrollment above that anticipated by the existing approved Master Plan. The Master Plan identifies the facilities and actions required to accommodate the University's development from the existing student capacity of approximately 5,400 FTE to the ultimate student capacity of 10,000 FTE. In addition to new facilities proposed on its main campus, this revision proposes new development on 89.3 acres of property north of the main campus across Copeland Creek, including the proposed Center for the Musical Arts (to be located on 54.7 acres of existing campus property) and university housing (to be located on 34.6 acres on property to be acquired by the University). This project level approval is for the total campus Master Plan, including the Schematic Project Plan approval for construction of the Center for the Musical Arts.

Lead Agency Contact

Name Deborah Gannon-DuVall
Agency Sonoma State University
Phone 707-664-2317 **Fax**
email
Address 1801 East Cotati Avenue **State** CA **Zip** 94928
City Rohnert Park

Project Location

County SONOMA
City ROHNERT PARK
Region
Cross Streets Bounded by Rohnert Park Expressway to the north; Petaluma Hill Road to the east, and East Cotati
Parcel No. 047-131-08,-11,-18,-20,-23,-26 and -27
Township **Range** **Section** **Base**

Proximity to:

Highways U.S. 101, SR 116
Airports
Railways Northwestern Pacific RR
Waterways Copeland Creek, Hinebaugh Creek, Crane Creek, Laguna de Santa Rosa, Lichau Creek
Schools Schools within Cotati-Rohnert Park Unified School District
Land Use

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 3; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 4; Regional Water Quality Control Board, Region 1; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 11/01/1999 **Start of Review** 11/01/1999 **End of Review** 12/15/1999

Note: Blanks in data fields result from insufficient information provided by lead agency.

LETTER A – STATE OF CALIFORNIA, GOVERNOR'S OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE

A-1 The comment regarding compliance with the State Clearinghouse review requirements for draft environmental documents is acknowledged. Comment letters received from state agencies and included in this response to comments document include Comment Letter D, the California Department of Fish and Game; Comment Letter F, the California Department of Transportation; and Comment Letter G, California Regional Water Quality Control Board.

B

SONOMA COUNTY
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

2550 Ventura Avenue, Santa Rosa, CA 95403-2829 (707) 565-1900 FAX(707) 565-3767

Post-it® Fax Note 7671	Date 12-17	# of pages ▶ 3
To PAUL MITCHELL	From D DUVALL	
Co./Dept. ESA	Co. SSU	
Phone #	Phone #	
Fax #	Fax #	

December 15, 1999

Sonoma State University
Facilities Services Office
1801 East Cotati Avenue
Rohnert Park, CA 94928

Att: Deborah DuVall, Director of Planning

Re: Comments on Draft EIR for Sonoma State University Master Plan Revision

Thank you for the opportunity to comment on the Draft EIR for the University's Master Plan Revision. Our comments focus on the DEIR's responses to our August 27, 1999 letter and related issues raised by the City of Rohnert Park's General Plan revision.

Project Description: The DEIR is not clear about how the proposed physical facilities are related to the anticipated number of students. The DEIR states on page 1 that the proposed master plan identifies facilities and actions which are required to accommodate the planned increase of "existing student capacity of 5,400 to the ultimate student capacity of 10,000". The analysis of the proposed expansions in instructional space, vehicle parking and student housing concludes that these facilties are needed to serve the planned 85% increase in enrollment, and this conclusion is supported by the tables on page III-8 and III-13 which show that the facilties described in the existing master plan can accommodate only 5,368 students. 1

However, statements on page II-1 and elsewhere in the DEIR indicate that 10,000 students are already allowed by the facilties included in the existing master plan but not yet constructed and that significant impacts on traffic, utilities, air quality and noise could therefore occur with or without the project. Since the facilities described in Chapter V of the DEIR as the "no project" alternative do not appear adequate to serve an 85% increase in enrollment, more information and analysis is needed on the capacity of the existing master plan to accomodate 10,000 students.

Land Use: The DEIR states that inconsistency with local land use plans may be a significant impact and that the proposed use of 75 acres for University expansion appears to be inconsistent with the Diverse Agricultural designation and agricultural protection policies of the Sonoma County General Plan. Although the subsequent analysis finds this impact less than significant due to poor soil conditions and State map designations, the conversion of this much agriculturally-designated land which can be used for hay and pasture could be considered significant by the County. The first policy in the County General Plan on protection of agricultural land (LU-8a), states that extensions of urban uses into any agricultural production area should be limited to parcels with health or safety problems unless the proposal can fulfill the following criteria of policy OS-1c: 2

- Provide permanent open space preservation is provided through open space grants to the County and/or third party land trust.
- Locate and design development to maintain or enhance visual quality.
- Where open space easements are created, provide a landscaping and maintenance plan to maintain or enhance visual integrity

- Provide public benefits which equal or outweigh the impacts of development.
- Provide adequate public services and infrastructure to serve the development.
- Maintain compatibility with surrounding properties, especially those used for agriculture.
- Provide for pedestrian or bicycle links between communities and to any parkland included in the proposed development.

2 Cont.

Traffic and Circulation: The DEIR describes significant traffic impacts which require mitigation by the addition of travel lanes, turn lanes or other improvements to roads and intersections which are contiguous to the campus, but the DEIR then explains that the County or the City of Rohnert Park will have to implement this mitigation because the University cannot legally spend State funds on off-campus road improvements. The EIR should clarify what mitigation by the University is feasible. Can the University or the University Foundation pay part or all of the costs of traffic signals, left-turn lanes, right-turn lanes, pedestrian crossings and bicycle movement at campus entrances and for normal frontage improvements on contiguous public roads, including sidewalks, parking lanes, shoulders, curbs, gutters, signs and bus stops?

3

The County's General Plan designates Petaluma Hill Road as a "parallel arterial" intended to provide an alternate to Highway 101 for long trips. In order to maintain that function, it is necessary to minimize direct access, turning movements and short trips. Since the peak traffic levels on Petaluma Hill Road have already reached unacceptable levels in Penngrove and are projected to reach unacceptable levels near the University, it is important for the University as a major traffic source and destination to contribute to the mitigation of this critical impact. The following mitigation should be considered in the EIR:

4

- Preferential parking locations or fees for cars with two or more occupants.
- Designing the campus entrances on Rohnert Park Expressway and East Cotati Avenue to include traffic signals, left-turn lanes, right-turn lanes, pedestrian crossings and bicycle movement.
- Closing or limiting left-turns to the Laurel Drive access from Petaluma Hill Road.
- Providing vehicle access to the concert area event facility from Redwood Circle rather than from Petaluma Hill Road.

The DEIR's analysis of the cumulative traffic effects of the master plan project and the City of Rohnert Park's General Plan project should be re-evaluated. Although adding student housing on-campus or nearby will reduce long-distance driving trips to and from the University, the housing units will also be a source of trips to other destinations in the community and region. Could changes in on-campus working hours or class hours reduce the contribution of University-related traffic to peak hour levels? The traffic analysis should consider all of the development proposed on the east side of Rohnert Park by the City's new General Plan, and the modeling should be revised as needed to reflect recent changes in assumptions or modeling by the City's traffic analysis.

5

Noise: In order to support the DEIR's conclusion that outdoor event noise will be adequately mitigated, more information is needed on the assumed locations, elevations and noise levels for the loudspeakers, the assumed size and location for the audience, and what noise level was considered acceptable at residential sensors. Changing the ending time from the 11:00 p.m. proposed to 10:00 p.m. for outdoor events on weekends at the soccer stadium and the music center would make the mitigation consistent with the standards in the Noise Element of the County's General Plan.

6

Visual Quality: Additional information on the visual impact of the proposed music center is needed. The description of the concert hall states that it will be 150 feet long, 115 feet wide and approximately

7

70 feet high. Since the top of the proposed berm will be 12 feet high at approximately 250 feet from Petaluma Hill Road, it is reasonable to assume that much of the concert hall will be clearly from Petaluma Hill Road. The EIR should include a visual simulation of the proposed concert hall and other music center facilities from the most visible portions of Petaluma Hill Road, incorporating the screening which would be provided by the proposed berm to be covered with "landscape features characteristic of the region". If the concert hall and/or other buildings are clearly visible from the road, additional mitigation should be provided to reduce this impact. 7 Cont.

Water Supply: The EIR should provide more information about the location, depth and water levels of the University's wells. The EIR should also address the cumulative impacts on groundwater levels of the projected University extraction and increased use of groundwater by other municipal and agricultural wells in the vicinity. 8

Wastewater Treatment: The DEIR explains why the future capacity in the subregional wastewater treatment system may not be sufficient for buildout of the University master plan. However, the proposed responses of borrowing unused allocations and seeking additional allocations appear uncertain. If the wastewater treatment capacity available to the University may not be adequate for the proposed development, the EIR should indicate how this will be monitored and how expansion will be limited to match the capacity available. 9

If you have any questions about this letter or County policies, please feel free to call me at 527-1917.

Sincerely,

Robert Gaiser

Robert Gaiser
Planner III

Copies: City of Rohnert Park
Board of Supervisors
CAO
County Counsel
SCPRMD: Chris Arnold, Pete Parkinson, Greg Carr
SCTPW: Dave Knight, John Kottage
LAFCO
SCTA

LETTER B – SONOMA COUNTY PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

B-1 Section 15126.2 of the CEQA Guidelines requires that "in assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of completion is published . . ." In keeping with the CEQA Guidelines, Table III-2 of the DEIR identifies the University facilities that are representative of the existing environmental setting (i.e., existing facilities), and those currently under construction, but does not represent the total facilities envisioned under the existing approved Master Plan. As discussed in Section III.C (History of the University and Master Plan) and illustrated in Figure III-3 (Existing University Master Plan) of the DEIR, Sonoma State University's existing approved Master Plan provides for an ultimate planned student ceiling of 10,000 FTE and proposes a number of additional future University facilities (including instructional expansion, additional on-site parking and circulation improvements) to accommodate the projected increase in student population (as does the proposed Master Plan revision).

Section III.G of the DEIR presents the project sponsor's objectives for the proposed Master Plan revision. These include providing facilities that more effectively support the University's academic programs, more on-campus housing opportunities, promoting a comprehensible campus plan for pedestrians, bicycles and vehicles which emphasizes accessibility, and protecting important biological resources on campus. In response to these objectives, some of primary additional development proposed under the Master Plan revision that was not specifically identified under the existing approved Master Plan includes the proposed Center for the Musical Arts, the development of additional on-campus housing beyond that assumed under the existing Master Plan, the University Center, the soccer stadium and the proposed designation of the Copeland Creek Preservation and Buffer Zones.

The impact analyses in this DEIR assesses the effect of all proposed University development anticipated under the Master Plan revision, including those facilities that also would have been developed under the existing approved Master Plan. Thus, the environmental impact analyses in this DEIR are conservative in nature.

The environmental effects associated with the development of the existing approved Master Plan are adequately addressed in Section V, Alternatives in the DEIR (see Alternative 1, No Project Alternative), and do not require further analysis.

B-2 The impact of conversion of existing agricultural land to a non-agricultural use is assessed in Impact A.1 in Section IV.A, Land Use and Planning, in the DEIR. As discussed in the DEIR, the portion of the project site north of Copeland Creek, and the

small portion of the project site off East Cotati Avenue (site of proposed soccer stadium and additional parking), are designated Farmland of Local Importance. The USDA has determined the soils on these sites to have moderate limitations that reduce the choice of plants that can be grown. The conversion of these portions of the site would account for a loss of approximately 0.1 percent of the total Farmland of Local Importance within the County. The CEQA *Guidelines* do not specify that loss of Farmland of Local Importance in itself is considered a significant environmental impact. There is no designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the project site. Moreover, the project would not obstruct or hinder the potential for continued agricultural production or processing on adjacent agricultural land uses north and east of the project site. None of the project site parcels are under a Williamson Act contract. These factors were considered in determining the conversion of this land to be a less than significant impact.

As identified in Section IV.A, Land Use and Planning, in the DEIR, the University is exempt from requirement to comply with local land use controls, including local general plans and zoning ordinances. However, a discussion of the project's consistency with local plans, including the *Sonoma County General Plan*, was provided in the DEIR (see pages IV.A-8 to IV.A-9) in an effort acknowledge these plans and to help provided a basis for the University to work with local jurisdictions on planning issues involving the University and the local community. Potential environmental impacts would be largely avoided or minimized by implementation of recommended project design features. Mitigation measures identified throughout the EIR would mitigate residual impacts and make the project generally consistent with local land use policies.

B-3 Under the project, the California State University (CSU) would be responsible for funding all proposed transportation improvements within the campus property, including new roadways, pedestrian crossings, shoulders, curbs, gutters, and bus stops. However, as discussed in Section II.C, Mitigation Responsibility, in the DEIR, the California State University (CSU) has limited powers to mitigate effects that occur outside the project site. Under constitutional and statutory proscription, the CSU cannot contribute funds towards off-site transportation improvements, as well as schools (K-12), police, fire, or similar fee and assessment contributions exacted from private developers. While Sonoma State University cannot commit project funds for improvements to local streets and roadways, the University will work cooperatively with the impacted agencies to identify and pursue other potential funding sources of funds for such improvements.

B-4 The following responds to each of the commenter's proposed mitigation measures:

Preferential parking locations or fees for cars with two or more occupants. Varying schedules for college students are not conducive to carpooling. A system for providing preferential parking locations for cars with multiple occupants was attempted at the

University, but was found to be unsuccessful, and was subsequently discontinued. This measure is therefore not recommended.

Designing the campus entrances on Rohnert Park Expressway and East Cotati Avenue to include traffic signals, left-turn lanes, right-turn lanes, pedestrian crossings and bicycle movement: See response to Comment B.3.

Closing or limiting left-turns to the Laurel Drive access from Petaluma Hill Road: The traffic analysis in the DEIR included consideration of turning movements at Laurel Drive/Petaluma Hill Road. It was determined that by converting Laurel Drive to two-way traffic, but prohibiting left turns out, there would be minimal disruption to traffic on Petaluma Hill Road while also limiting the impacts to East Cotati Avenue and Rohnert Park Expressway.

Providing vehicle access to the concert area event facility from Redwood Circle rather than from Petaluma Hill Road: As discussed in the DEIR, performances and events that would draw more than 3,500 attendees would require the utilization of University Lots "F" and "J," on the south side of the campus off East Cotati Avenue. It was assumed that vehicular access to those parking facilities would occur from Redwood Circle, off East Cotati Avenue.

B-5 The traffic analysis in the DEIR accounted for all off-site vehicle trips associated with the proposed on-site housing at the University. Institute of Transportation Engineers trip generation rates for apartments, used as a base, were decreased by 30 percent for a.m., p.m. and daily rates based on vehicle ownership percentages of existing student housing at the University. The resulting rates were then discounted 80 percent during the a.m. peak hour, 75 percent during the p.m. peak hour and 16 percent on a daily basis to account for "home to school" and "school to home" vehicle trips that would not occur under the proposed project. Consequently, the proposed on-campus housing would result in a net decrease in off-site vehicle trips associated those new students living on-site when compared to off-site vehicle trips that would be generated under the existing approved Master Plan, the effect of which would be most apparent during the a.m. and p.m. peak hours.

The commenter raises the idea of limiting University staff working hours or changing classroom schedules in order to reduce the contribution of University-related traffic to peak-hour traffic. The University currently provides a wide variety of class schedules for its students. However, changing or reducing class schedules or employee shifts solely for the purpose of reducing peak-hour traffic would limit the University from providing the required optimum educational access and availability to its students, a basic goal and mission of the California State University, and is therefore, not considered feasible.

Regarding the cumulative traffic analysis conducted in the DEIR, as discussed on page IV.D-16 of the DEIR, the traffic associated with cumulative development and regional growth was developed using traffic projections from the Rohnert Park General Plan Update traffic model. The model includes the projected traffic volumes associated with buildout of the land uses identified in the Rohnert Park General Plan Update, as well as additional growth throughout the region.

B-6 Table III-5 on page III-14 of the DEIR provides information on the number, size, and timing of events at the proposed Center for the Musical Arts. The sound system for lawn audiences would include primary loudspeakers that would installed in three video/sound towers supplemented by tree and/or pole-supported loudspeakers surrounding the lawn audience. While the precise elevations, locations, and noise levels of all of the loudspeakers is not known, the related noise impact is not expected to be significant for existing uses in the unincorporated areas surrounding the University given that the nearest such residences would be approximately 3,800 feet to the north and approximately 2,500 feet to the east from the nearest lawn seating areas and that the proposed berms along Rohnert Park Expressway and Petaluma Hill Road would reduce concert noise emanating in their direction.

The DEIR does identify a significant cumulative noise impact from use of the proposed center's sound amplification system if the currently undeveloped area north of Rohnert Park Expressway were to be developed with residential uses. The DEIR also identifies a mitigation measure (Mitigation Measure F.4 on page IV.F-10) that would reduce this cumulative effect to less than significant. This measure was drafted to be consistent with the City of Rohnert Park's noise ordinance, rather than County General Plan policies, because development in that area would most likely occur only after the area would be annexed to the City of Rohnert Park. As discussed on page IV.F-3 of the Draft EIR, the City's noise ordinance allows an exception to the normal noise standards for concerts so long as they do not extend past 10:00 p.m. on weekdays (Sunday through Thursday) or 11:00 p.m. on Friday or Saturday.

The DEIR describes the proposed soccer stadium on page III-18. The lengths of the soccer field would be flanked by permanent seating, capable of accommodating approximately 5,000 patrons, with the potential for optional bleacher seating along the south side of the field. Precise elevations, locations, and noise levels of all of the loudspeakers that would be used in connection with the proposed soccer stadium are not known. However, the DEIR (see page IV.F-8) identifies future noise impacts associated with the sound amplification system for the soccer stadium as significant and identifies two mitigation measures to reduce the impact to less-than-significant. Mitigation Measure F.2b would orient the sound amplification system to the north, away from the nearest residences. Mitigation Measure F.2c was drafted to be consistent with the City of Rohnert Park's noise ordinance, rather than County General Plan policies, because the area south of East Cotati Avenue would be annexed to the City of Rohnert Park under the City's proposed General Plan Update. As discussed on page IV.F-3 of the DEIR, the City's noise ordinance allows an exception to the normal noise standards for concerts so

long as they do not extend past 10:00 p.m. on weekdays (Sunday through Thursday) or 11:00 p.m. on Friday or Saturday.

B-7 As discussed in Impact G.1 in Section IV.G, Visual Quality, in the DEIR, the proposed Center for the Musical Arts would be set back several hundred feet from the edge of Petaluma Hill Road (as are existing University buildings located on the main campus). The proposed berms would serve to partially obscure the developed on-site uses from drivers along Petaluma Hill Road. Although the project would alter the roadside landscape, the proposed landscape features would generally enhance the visual quality of the site. The location of the proposed Center for the Musical Arts and earthen berms could affect views of the Copeland Creek corridor from Petaluma Hill Road adjacent to the site, however, it would not block or affect long-range views of the Sonoma foothills from off-site adjacent land uses.

As discussed in Section IV.A, Land Use and Planning, the building and landscaping plans for the various facilities under the project would be developed in consultation with, and subject to review and approval by, the University's Campus Planning Committee (comprised of the President of the University, the University building program officer, the University Consulting Architect, the Campus Planner, and the Director of Public Safety, various faculty, staff and students, and a representative from the community). This process would help ensure all development proposed under the project would be designed in a manner that would be consistent with the aesthetic guidelines of the University, and the visual character of the local community. As such, the proposed project would not result in a substantial adverse effect on a scenic vista and would not create a significant impact.

Although no mitigation is required for the less than significant visual impact, the DEIR identifies measures that would further reduce the visual impacts of the project, including specifying that the landscaping plan will ensure a vegetative buffer and will be created to minimize visual contrast and partially screen project facilities from view from off-site land uses.

B-8 The University has three on-site water wells (Wells No. 2, 3 and 4). Wells No. 2 (currently unused) and 4 are located in the vicinity of Parking Lot A near Copeland Creek. Well No. 3 is located along the west University boundary. Well No. 3 is 410 feet deep, the pump is located at 320 feet below surface level, and the existing standing water level is 146 feet below surface level. Well No. 4 is 346 feet deep, the pump is located 310 feet below surface level, and the existing standing water level is 151 feet below surface level. The wells are lined to prevent extraction of water from upper reaches of the groundwater system.

Cumulative impacts related to the projected University groundwater extraction are discussed in Impact K.2 on page IV.K-6 of the DEIR. As discussed under that impact, over the past 30 years, the aquifer that extends throughout the Santa Rosa Plain (from which the University draws its well water) has experienced increased depletion at its southern end, in the vicinity of the Cities of Rohnert Park and Cotati, both of which rely heavily on groundwater for their municipal water resources. Under the project, the University would continue to contribute to this area-wide depression in the southern Santa Rosa Plain water table. However, with the University's recent shift to use of reclaimed water for irrigation purposes, with project features which would maintain groundwater recharge on the project site, and with implementation of water conservation fixtures in all proposed facilities (including low-flow toilets, sinks and showerheads) as required by state law, the project's contribution to cumulative effects on the groundwater basin would be less than significant.

B-9 As discussed in the DEIR, the proposed Master Plan revision would maintain a maximum student population of 10,000 full-time-equivalent students (FTE), as would the existing approved Master Plan. Moreover, the proposed Master Plan revision would not involve an increase in the rate of student enrollment above that anticipated by the existing approved Master Plan. The rate of increase in student enrollment, particularly over the near-term, is projected to occur at a relatively gradual pace. The most recent enrollment projections indicate the University is projected to increase by approximately 300 full-time-equivalent students per year over the next five years (a projected increase of 1,500 FTE for a total of approximately 7,500 FTE), at which point the available instructional capacity at the University (including that provided by the remodel of Salazar Library) would be reached. Since no funds are currently allocated for additional expansion beyond the available instructional capacity, no additional academic building expansion would occur until and unless such funds were to become available. Since implementation of the Master Plan revision would occur over a long term, it would provide the opportunity for many of the regional growth issues, including those associated with transportation and wastewater treatment, to be addressed over time by those governing jurisdictions as part of their long-term planning efforts.

It is the University's goal to accommodate existing and projected educational demands, and to maintain access for the public to higher education, consistent with the mission and goals of the California State University and the California State Master Plan for Higher Education. The University is currently considering alternative programs for accommodating future increases in student enrollment. The University plans to expand its existing distance learning program, where specific Sonoma State University educational courses (e.g., Technology) are offered at other educational facilities in the region, for example, Mendocino College, thereby providing the potential for off-site instruction via extension programs. In addition, the University is considering

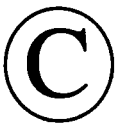
management approaches for increasing the average number of units per student[1], as well as the potential for providing year-round operations. Thus, many of the impacts associated with increases in student enrollment would be more dispersed throughout the region and throughout the year than described in the DEIR.

1 The current average student unit load is 12 units. By increasing the average student unit load to 15 units, the student FTE would increase without increasing the student body It should be noted that 15 units per semester is typically required in order to graduate in four years.

25 ASC ANTHROPOLOGICAL STUDIES CENTER 1974•1999

ANTHROPOLOGICAL STUDIES CENTER

Sonoma State University Building 29 1801 East Cotati Avenue Rohnert Park, CA 94928-3609



24 November 1999

Deborah Duvall
Director of Planning
Facilities Services
Sonoma State University
Rohnert Park, CA 94928

RE: DEIR for SSU Master Plan Revision

Dear Deborah,

Thanks for giving me the opportunity to comment on the DEIR. I have looked at the section that addresses Cultural Resources and believe it to be thorough and well written. However, I do have one suggestion to make.

The DEIR correctly identifies several archaeological sites on the campus and makes provision for these resources in the event of ground-disturbing activities. In the case of major construction projects, the proposed mitigation measures require that an archaeological monitor be present during ground-disturbing activities.

As not all of the SSU campus has been examined for archaeological sites, there is some potential for undiscovered resources. With this in mind, I suggest that, in the case of major construction activities, SSU retain a qualified archaeologist to inspect the location during the planning stage, well before site preparation is scheduled to begin. While this approach may not make archaeological monitoring unnecessary, it will serve to identify previously unknown surface sites and avoid delays that may occur if these resources are discovered during construction. 1

Sincerely,

Adrian

Adrian Praetzellis, Ph.D.
Director

LETTER C – ANTHROPOLOGICAL STUDIES CENTER

C-1 The DEIR acknowledges that potential undiscovered historic or archaeological resources located elsewhere within the project site could be encountered during project construction, particularly in the area of known historic buildings on the site, and near Copeland Creek. Accordingly, Mitigation Measures M.1a will require a qualified archaeologist to be on-site during earthwork activities (i.e., grading, excavating and trenching within 1) 300 feet of Copeland Creek, or 2) on the site of the four buildings in the northern acquisition area or the building on the main campus indicated in historical maps. This measure, combined with Mitigation Measures M.1b and M.1c in the DEIR, would adequately mitigate potential impacts to undiscovered cultural resources on the project site. No further mitigation is therefore identified in the DEIR.

State of California - The Resources Agency
GRAY DAVIS, *Governor*

DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
POST OFFICE BOX 47
YOUNTVILLE, CALIFORNIA 94599
(707) 944-5500

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November 24, 1999

Ms. Deborah Gannon-DuVall
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, California 94928

Dear Ms. Gannon-DuVall:

Sonoma State University (SSU) Master Plan Revision
Draft Environmental Impact Report (EIR)
SCH Number 93013045, Sonoma County

Department of Fish and Game personnel have reviewed the Draft EIR for the Sonoma State University Master Plan Revision and have the following comments.

Figure III-4 and Figure III-5 show a bicycle and pedestrian path along the north side of Copeland Creek. From these figures, we cannot determine if the path is located outside the corridor of existing riparian vegetation along the creek. Our observations indicate that the willow thicket along the north side of the creek is very wide in some places. We are concerned that the path will encroach upon this valuable wildlife habitat and result in a significant impact. The path should be located well outside the willow thicket. 1

Figure III-5 shows a wetland area between Copeland Creek and the Rohnert Park Expressway, just west of the western entrance of the Expressway. Comparing Figure III-5 with Figure IV.H-1, it appears that the wetland shown on Figure III-5 is actually a complex environment of seasonal and perennial wetlands, and riparian vegetation. Is it the intent to maintain, or improve, the habitat complexity in this area? The entrance road and bike path appear to be located very close to the wetland area, possibly leaving no upland buffer adjacent to the wetland. The road and path should be located so that there is an upland buffer to screen the wildlife using the wetland from the traffic on the road and path. 2

Four bridge crossings on Copeland Creek are proposed in the revised Master Plan. Three of these bridges would be pedestrian and bicycle bridges and could be relatively narrow. We are 3

concerned, however, about the impact of vegetation clearing which might be required to satisfy public safety concerns. How wide will the bridges and the trails be that approach the bridges? How much vegetation will have to be cleared beyond the edge of the trails to satisfy public safety concerns? 3 Cont.

On page III-21 there is a reference to a Copeland Creek Ecological Resource Protection Plan that is being prepared as part of the Master Plan revision. We are unable to find this in the EIR and assume that it is to be prepared at a later date. The Department would like the opportunity to review and comment on the plan before it is finalized. 4

On page IV.C-2 there is a brief discussion of flooding issues. We recall that several years ago there was a proposal to build a flood water bypass channel on the north side of Copeland Creek. It also appears that levees have been built along the south side of the creek, presumably to protect the campus from flooding. According to the material presented in the EIR, there is a flood risk on the north side of the creek. Will development on the north side of the creek require any flood control "improvements?" If any flood control "improvements" are needed, will development on the north side of the creek limit the flood control options? Specifically, will development limit the flood control options to widening or clearing the Copeland Creek channel? 5

Given the recent dredging of Copeland Creek at two storm drain outlets on SSU property, the discussion of the storm drain system on pages IV.C-1 and IV.C-2 of the EIR should be expanded to include channel maintenance practices and impacts. Discussions with facility maintenance personnel indicate that the storm drain system on the campus may not function adequately. The discussion of the existing storm drain system in the EIR also alludes to its deficiencies. Are any improvements to the existing storm drain system planned and, if so, what will be the impacts to Copeland Creek? Mitigation measure C.1a identifies a need to discharge storm water from the northern acquisition into Copeland Creek. What will be the impacts to the creek from developing that discharge? 6

Table IV.H-1 in the discussion of biological resources lists special status species with a high potential for occurring in the project area. Steelhead trout, a Federally-listed Threatened species, need to be added to this list. Steelhead spawn and 7

rear in Copeland Creek upstream of Lichau Road and must migrate upstream and downstream through the project area. Appendix D.2 states that steelhead were last reported in Copeland Creek in the late 1800s. In fact, steelhead were observed by Department personnel in Copeland Creek in 1999. A discussion of potential impacts to steelhead trout should be added to the EIR. 7 Cont.

The Department has direct jurisdiction under Fish and Game Code sections 1601-03 in regard to any proposed activities that would divert or obstruct the natural flow or change the bed, channel, or bank of any stream. We recommend early consultation since modification of the proposed project may be required to avoid impacts to fish and wildlife resources. To avoid delays, formal notification under Fish and Game Code sections 1601-03 should be made after all other permits and certifications have been obtained. Work cannot be initiated until a streambed alteration agreement is executed. 8

A recent court order requires the Department, prior to entering into a 1601/1603 agreement, to conduct an environmental review pursuant to the California Environmental Quality Act (CEQA). Therefore, because of the additional process required under CEQA which includes minimum document circulation periods, we are no longer restricted to issuing agreements within 30 days. We will still attempt to issue these as soon as possible but, at this time, we are not certain how long it will take to process these applications. 9

Department of Fish and Game personnel are available to discuss our concerns and comments in further detail. To arrange a meeting, please call Mr. Bill Cox, Associate Fisheries Biologist, at (707) 823-1001; or Mr. Carl Wilcox, Environmental Program Manager, at (707) 944-5525.

Sincerely,

Brian Hunter
Regional Manager
Central Coast Region

LETTER D – CALIFORNIA DEPARTMENT OF FISH AND GAME

D-1 The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, designed to improve the relationship between proposed development and existing natural resources on the site, and further minimize potential environmental effects. All pedestrian and bicycle paths would be realigned to lie outside of the Creek Buffer Zone and the existing limits of riparian vegetation (other than on the approaches to the bridge crossings of Copeland Creek), and the wetland area. See Master Response 1 at the beginning of Chapter IV of this response to comments document.

D-2 The area to which the commenter refers (on the east side of the north-south tributary to Copeland Creek) is suitable land on-site for the creation of wetlands as mitigation. As discussed in Mitigation Measure H.1c on page IV.H-11 to IV.H-12 of the DEIR, the drainage historically supported broader alluvial plain wetlands, and restored seasonal wetland features could be created by grading between 6.0 inches and 20.0 inches below the level of the surrounding field. This would allow maximum ponding during the winter and early spring with natural drying during the summer and fall months. Precipitation and sheet flow will be the supporting hydrology.

With respect to the proposed University entrance road and bicycle path indicated in Figure III-5 in the DEIR as being in proximity to these wetlands, a revised site plan is proposed that would realign the vehicle, pedestrian and bicycle paths to well outside of the wetland area. In addition, an upland area is proposed to serve as a buffer between the wetland area and the proposed parking area. See also Master Response 1 at the beginning of Chapter IV, and revised Mitigation Measure H.1 in Chapter II of this response to comments document.

D-3 The bridges proposed across Copeland Creek have been reduced in number from four to three, and would be narrower than those originally proposed. See Master Response 1 for a description of their locations and proposed construction. The specific size of the approach paths to the creek have yet not been determined. However, as specified in Mitigation Measure H.2a, where bridges are proposed to be constructed across Copeland Creek, the extent of construction impacts within the Copeland Creek protection area will be minimized.

D-4 The Copeland Creek Ecological Resource Protection Plan, prepared as part of the Master Plan revision, has been prepared and included in Appendix A of this document. Note that the Copeland Creek Ecological Resource Protection Plan has been amended to include in its goals and objectives the formation of an ongoing task force made up of University faculty, staff and students, and the solicitation of local agency input (including the California Department of Fish and Game Central Coast Region) to develop and manage the protection plan. The University will designate the Director of Facilities Planning as the university representative for activities related to required permitting, modifications and monitoring of the creek habitat.

D-5 As discussed throughout Section IV.C of the DEIR, mitigation measures are identified for all potentially significant impacts associated with flooding under the project. Specifically, the project shall include a suitable drainage infrastructure and on-site detention system in the northern acquisition area, in conformance with the Sonoma County Water Agency drainage design criteria, that will limit the 100-year peak flow into Copeland Creek (Mitigation Measure C.1a and C.1b). All new development in the northern acquisition area shall be designed with grades and landforms sufficient to prevent stormwater breakout from a 100-year flood flow (Mitigation Measure C.2). This could include placing of fill on the site to raise new buildings above flood elevations, as necessary. However, no widening or widespread clearing of the Copeland Creek channel is proposed as a flood control option under the proposed Master Plan revision.

D-6 As indicated on page IV.C-4 of the DEIR, the SCWA maintains a hydraulic maintenance agreement along Copeland Creek through the project site, whereby the SCWA may improve and maintain the channel by removing vegetation and other impediments to the channel flow. The proposed Master Plan revision would not alter this agreement or impede the SCWA from continuing its ability to provide channel maintenance practices.

Under the proposed project, the University would acquire all necessary permits for new construction and/or maintenance of facilities within Copeland Creek (e.g., bridges, stormdrains), including a Streambed Alteration Agreement (pursuant to Sections 1600-1607 of the California Fish and Game Code). A compilation of this and other permits and approvals required to implement the proposed project has been added to the Project Description of the EIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

Impacts associated with discharges from the northern acquisition area to Copeland Creek are discussed in Impacts C.1, C.4 and C.5 and C.6 in the DEIR. Mitigation measures identified in the DEIR would mitigate all impacts related to increases in flows, potential increases in nonpoint source pollution, erosion and sedimentation to a less than significant level.

A discussion of the project's projected load on the existing storm drain system on the main campus is presented in Impact C.3 in the DEIR. The University's 1995 *Utility System Master Plan* provided a detailed study of the existing storm drain systems for Zones 1, 2 & 3 on the main campus south of Copeland Creek, and included a number of recommendations for upgrading the system in conformance with Sonoma County Water Agency design guidelines. As identified in Mitigation Measure C.3 in the DEIR, the on-site storm drain infrastructure for the main campus shall be upgraded per the recommendations specified in the University's 1995 *Utility System Master Plan.*

D-7 Comment noted. The DEIR is amended to include an update to the description of the Federal Threatened Central California coast steelhead (*Oncorhynchus mykiss*) on page D-4 of Appendix D.2 in the DEIR, an update of Table IV.H-1 "Species Status Species with Moderate to High Potential for Occurring Within Project Area" on page IV.H-3 in

the DEIR; and potential project impacts to, and required mitigation for, this species is included in Impact H.3 (impacts to sensitive animal species) on page IV.H.12 of the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

D-8 Comment noted.

D-9 Comment noted.

City of
ROHNERT
PARK

COMMUNITY
DEVELOPMENT/
PLANNING

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December 13, 1999

Ms. Deborah DuVall
Facilities Services
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, CA 94928

RE: Transmittal of Comments on the Draft Environmental Impact Report, Sonoma State University Master Plan Revision 1999

Dear Ms. DuVall:

The City of Rohnert Park appreciates the opportunity to comment on the Draft Environmental Impact Report for the Sonoma State University Master Plan Revision 1999. City staff, officials, and the community are very excited and supportive of the University's expansion plans. We believe that the new facilities will be mutually beneficial for the City and the University. Particularly, we are very excited about the plans for the new university music center and related facilities and look forward to the implementation of this plan as well as our new mixed-use University Village, which will, given the adoption of our General Plan, be located north of the music center. Moreover, City staff looks forward to working closely with SSU's staff on coordinating your master plan with our new general plan.

While we recognize the University's inability to mitigate the projected off-site impacts, we also believe that further analysis of numerous potential environmental issues is warranted. Our concerns are relative to traffic projections and mitigation, sewer capacity, coordination of public safety, view impacts, etc. We also note that in the City's comment letter on the SSU Master Plan Notice of Preparation dated August 26, 1999, the City requested analysis of various intersections, pedestrian connections and coordination of emergency services and related infrastructure be included in the EIR. In our review of the Draft EIR, a number of these issues have not been addressed or require additional information. We have arranged our comments under the following headings: (1) transportation, circulation, and parking; (2) visual quality; (3) public safety and utilities; (4) noise; and (5) miscellaneous issues:

Transportation, Circulation and Parking:

- On Page II-2 and II-3, under Mitigation Responsibility, the EIR basically states that even if SSU creates off-site impacts, it is not its responsibility to mitigate these. The EIR does state that the State can negotiate with area communities for the imposition of "capital facilities fees," however these are limited to utilities and not roads. It is also stated that "the [f]unding and construction of city and county roads is not a responsibility of the CSU as this lies within the cities and counties in which they are located. Therefore, transportation-related mitigation measures identified in this EIR are the responsibility of those jurisdictions." At the end of the fifth paragraph on Page II-3, the EIR does maintain that "the University will work cooperatively with the impacted agencies to identify and pursue other potential funding sources of funds for such improvements", however this is not really elaborated on elsewhere 1

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in the document. We suggest that additional policies that require or ensure this collaborative effort be included as mitigation measures and policies in the Master Plan. Possibly a policy statement that requires that the Trustees lobby the Legislature to approve the funds for the local agencies to construct the mitigation improvements could be added to the mitigation measure. 1 Cont.

- Page II-6, Table II-1, Item D.1a: The mitigation suggests changing the signal phasing to a protected left turn rather than the current split-phase operation. Since the traffic counts for this EIR were taken in August, 1999, when the university and surrounding schools are operating on reduced schedules, the City does not believe that the intersection analysis shows the true conditions at this intersection at its local peak hour. This intersection experiences peak flows during the arrival and departure times for the high school and middle school located on Snyder Lane. The City requests an analysis of this intersection with the proposed mitigation during the morning and afternoon "school rush" hours. 2

- Table II-1, Item D.1b: The City believes that the proposed roundabout mitigation is not appropriate at this location. According to Caltrans design documents, roundabouts are appropriate where the approach volumes and lane configurations are balanced. A roundabout at a location where the east/west traffic is fairly steady and the north/south traffic is sporadic is not an acceptable solution. We request that the roundabout option be eliminated. 3

- Table II-1, Item D.4 : The traffic impacts for events at the Center for the Musical Arts should be studied at intersections between the Center and Highway 101. Delays of over 10 minutes for vehicles exiting the campus will result in traffic filtering out through other access points, all of which must be provided with traffic control personnel. The current traffic control personnel that SSU provides at the East Cotati Avenue/Sequoia Way intersection would not be capable of controlling the projected large traffic volumes. 4

- Study Intersections, Page IV.D-3 – The City requests the Petaluma Hill Rd./Adobe Rd. intersection be analyzed, as it will be impacted by the proposed project. 5

- LOS Standards, Page IV.D-6 and IV.D-13 – The EIR needs to acknowledge the City of Rohnert Park's proposed General Plan policies, which include LOS C as the acceptable level of service. This standard, and the General Plan as a whole, will be in place prior to development of the SSU master plan projects. This standard is particularly important with regard to cumulative effects. 6

- On Page II-7, mitigation measures D.1.a through D.1.e are transportation-related actions that appear to be the responsibilities of the jurisdictions within which they are located. A basic premise of the EIR is that off-site mitigation will be completed by the surrounding jurisdictions. In the case that Rohnert Park's timing of improvements in the vicinity of the university are not coordinated with SSU's expansion plans and that these mitigation measures are not implement prior to development of the master plan elements, how would that effect the proposed SSU expansion plans? 7

- On Page II-7, impact D.2 relates to the need for additional on-site parking facilities, however, there is no mitigation measure listed. The City suggests that the EIR identify the new on-site parking as the mitigation measure for this impact. The City also suggests that the entire parking needs (student, faculty, residential, special events) be quantified in a table and that mitigation measures more adequately address the projected parking deficiency. Page IV.D-29, includes a discussion of how the special events parking will be accommodated in the expansion of Lots F and J; however, this discussion does not include how regular student parking will be accommodated during these peak demands. Additionally, Mitigation Measures D.5b and D.5c, state that additional off-site parking will be required for events greater than 7,400; however, the off-site parking has not been identified. The EIR states that this parking deficiency is "less than significant," however, without the off-site locations identified, the City does not believe that the impact is less than significant. 8 9

- On Page II-9, impact D.5 states that parking at special events would be accommodated, resulting in a level of significance of "less than significant", however prior impact D.3 states that parking would remain "significant" after mitigation. Please explain this inconsistency. 10

- On Page II-7, mitigation measure D.3.a speaks to the prohibition of parking on Petaluma Hill Road, noting that there "is sufficient capacity on campus to accommodate the parking demand." The level of significance after this mitigation is listed as "significant." This seems contrary, to the earlier discussion that there is sufficient capacity on campus. Please provide clarification of this statement. 11

- On Page IV.D-13, last paragraph, the EIR maintains that "[t]he component of the proposed Master Plan revision expected to have the greatest effect on weekday peak-hour vehicle trip generation at the University compared to the existing Master Plan is the proposed supply of on-campus housing..." This impact is cited as a beneficial one, in that the residents of these new units would not have to come to or leave the campus during the morning and evening peaks. The City believes that the performances at the Music Center would have greater impacts during the P.M. peak and that this would adversely affect traffic, as there would be a large volume of in-bound traffic added at this time. Also, the expansion of the instructional facilities would add new traffic. The City doesn't believe that this is adequately stressed, and that the "offset" provided by the new housing is over-estimated. The City does not believe that using this "offset" as potential mitigation is sufficient, since it is based on a future project on land that they have yet to secure. 12

- On Page IV.D-19, Table IV.D-6 has a few inconsistencies. First, it states that the proposed north entrance off Rohnert Park Expressway, without the project, operates at a LOS of "F.", and without mitigation, would remain at "F." Since there is currently not an entrance at this location, it is unclear how the existing LOS was derived. Secondly, the intersection of E. Cotati Ave. and Snyder Lane/Maurice Ave. is shown to have a delay of 20.8 seconds in the A.M. peak and 28.8 seconds in the P.M. peak and that these delays actually improve with the project. The EIR does not identify the mitigation that would be necessary to support the improve condition. 13

- On Page IV.D-23, the paragraph titled "Significance After Mitigation" restates that SSU is "prohibited by law from committing project funds for off-site transportation (including 14

intersection) improvements." The EIR states that none of the improvements listed as mitigation measures have been approved or funded by the City of Rohnert Park or Sonoma County, therefore, there is no assurance they will ever be accomplished and "this impact is considered to remain significant." Our general concern is that these improvements are necessary to mitigate the impacts associated with the Master Plan, and we question how the project can be implemented without the improvements (in the case that the City's General Plan is not approved and the improvements are never completed). 14 Cont.

- On Page IV.D-23, the final paragraph outlines the intersections outside of the study area that would be most impacted by the project, but it does not appear to address much more than "[I]mpacts beyond the study area will become less perceptible with increasing distance from the campus." The EIR does not include an analysis of the potential major impacts on these intersections such as Rohnert Park Expressway during a large event. Please refer to the City's Response to the Notice of Preparation for a list of the off-site intersections of particular concern. 15

- On Page IV.D-24, the third paragraph does not make sense, particularly the last sentence. 16

- Page IV.D-25 speaks to the prohibition of parking along Petaluma Hill Road and East Cotati Avenue. This doesn't mention the future expansion of either roadway to four lanes, which would likely eliminate this on-street parking anyway. (Note: the final sentences on this page indicate that "the prohibition of parking along these roadway segments and/or provision for buffer improvements are not identified as approved or funded improvements by either Rohnert Park or the County.) 17

- On Page IV.D-28, under "Significance After Mitigation," it is noted that impacts would remain significant after implementation of the measures. Again, this assumes that either Rohnert Park or the County implements the measures. If the mitigation were not implemented, how would that affect the impact? 18

- On Page IV.D-29, the mitigation measures should include provisions that SSU personnel direct traffic to on-site parking. Also, impacts on area neighborhoods from the Music Center have not been adequately addressed. The City requests additional analysis of this potential impact to surrounding neighborhoods. 19

- On Page IV.F-9, the first sentence for Impact F.4 should finish "Rohnert Park Expressway." 20

- Page IV.D-13 - The EIR assumes new University housing in the northwest acquisition area and then makes a further assumption that this housing will reduce off-site vehicle trips. How reasonable is the assumption that University housing will actually be built in this location? The University has not purchased the property, so what guarantees are there for University housing? The analysis should include evaluation of traffic impacts in the case that the housing is not developed. The EIR states that a conservative approach would be to assume low-density housing for this area. Since this area is not currently within the Master Plan project area, we suggest that the analysis be revised to not include housing and its resulting reduction in vehicle trips on this property. 21

- Cumulative Conditions, p. IV.D-18 – Why are vehicle trips associated with the northwest acquisition area subtracted from the analysis? Please provide documentation that these trips are not relevant to the cumulative analysis. 22

- Mitigation at Future University North Entrance, Page IV.D-22 – The EIR points out that SSU can't provide offsite mitigation. However, we question why the University can't provide mitigation at their own access points, a portion of which would be on SSU property. The University is creating this access on their property and we believe that the City of Rohnert Park should not be identified as the responsible party for mitigation. 23

- Impacts on Roadways Outside of Study Area, p.IV.D-23 – any area impacted by the proposed project should be included in the Study Area and should receive full evaluation. For example, the intersection of Petaluma Hill Rd. and Adobe should be included in the analysis. 24

- Special Event Traffic, p.IV.D-27 (2nd and 3rd full paragraph) – Please document why impacts to intersections of Rohnert Park Expressway with Snyder Lane and Petaluma Hill Road would be less than significant. Delays of 10 to 20 minutes would definitely affect these intersections, particularly Petaluma Hill Road. In the third paragraph, wouldn't the intersection of Rohnert Park Expressway/Petaluma Hill Road also be subject to deteriorated operating conditions? 25

- Mitigation Measure D.4a, p.IV.D-27 – How did the number of 400 attendees result as the cut-off for events allowed before 7:00 p.m.? Also, the wording should be changed to "Events proposed on weekdays at the Center for the Musical Arts that are projected to draw more than 400 attendees ~~should~~ shall start no earlier than 7:00 p.m." 26

- Cumulative localized impacts near Music Center – There is no analysis or acknowledgement of the proposed mixed-use district just north of Rohnert Park Expressway that would contribute to cumulative impacts at the intersections adjacent to the Music Center. Wouldn't it be likely that event attendees would come early (during peak traffic times), park at the Music Center and then cross the street to dine in the mixed use area before the music event? 27

- Parking Mitigation, Page IV.D-28-29 – The most reasonable and feasible mitigation measure is to prohibit such events until the "F" lot expansion occurs. Off-site parking locations are difficult to enforce and therefore not effective. 28

Visual quality:

- On Page IV.G-9, fourth full paragraph, mention is made of view impacts related to the future student housing component. What future CEQA action will allow further assessment of this? 29

- P. IV.G-3 – The statement that the University makes every effort to ensure compatibility with policies of local jurisdictions is not followed up with any analysis of the Master Plan's compatibility with City of Rohnert Park policies. Some acknowledgement of the City's proposed General Plan policies regarding maintenance of views to Sonoma Mountain along 30

Rohnert Park Expressway and elsewhere should be included in the EIR. Furthermore, as mitigation, SSU should agree to work with the City in the final design of development in the northeast area to ensure compatibility with the City's policies. 30 Cont.

- Impact G.1, p.IV.G-9 – How is it that a dramatic change in views (first full paragraph) results in an impact that is not significant? 31

- Impact G.1, p.IV.G-9 - The EIR states that the Music Center and berms would not block or affect long-range views of the Sonoma foothills from off-site adjacent land uses. Which off-site land uses were analyzed for this impact? Please document. Would views from Rohnert Park Expressway or the existing homes adjacent to the site on the west be affected? 32

- Need for Mitigation, p.IV.G-9 – As discussed in the Rohnert Park General Plan, sufficient setbacks from existing residential uses on the west side of the proposed northeast housing development must be established to mitigate the aggregate effects of noise, visual, and land use conflicts. This mitigation measure should be added to the SSU EIR. 33

- Missing Visual Cumulative Analysis – There is no discussion of cumulative visual effects in the northeast area. This is a potentially significant impact that should be addressed, given the large amount of proposed development within a concentrated area. Furthermore, mitigation should be included that requires SSU coordination with the City, with regard to road location, landscaping, setbacks, etc., so that the SSU and City development projects are well-integrated and avoid negative impacts on each other. 34

Public Safety and Utilities:

- In reviewing the sections on Public Services and Utilities and Service Systems, the City's comments of August 26, 1999 have not been addressed, particularly those relating to the provision of emergency services. The impacts on student and faculty housing needs is also not addressed, with the Initial Study considering growth impacts to be "Less Than Significant" 35

- The State's requirements for fire protection of structures are less than those currently in the City of Rohnert Park. We believe that since SSU may be eventually annexed into the city of Rohnert Park and that the Department of Public Safety would provide services, all future construction should meet Rohnert Park standards. 36

- Table II-1, Item K.4: How will the delay in availability of additional wastewater capacity affect the schedule for development of the Revised Master Plan? We believe that additional analysis of this issue is warranted. 37

Noise:

- On Pages II-13 to II-14, construction noise impacts are addressed. This should reference City of Rohnert Park construction noise limits (i.e. only during the hours between 8:00 am and 6:00 pm.) 38

- On Page II-15, mitigation measure F-5.b states the SSU "should encourage the City of Rohnert Park to address cumulative noise levels along Rohnert Park Expressway during annexation and subsequent development." This measure is in response to the increase in traffic due to "University and area-wide growth and development..." Again, it doesn't seem appropriate to use this sort of technique as mitigation, especially when some of the traffic creating the impact will be due to the project at hand. Again, mitigation measures should not be worded like this nor should they rely on future actions by another agency. 39

- Noise Ordinance may have to be modified in consideration of outdoor music events in the evening. Please consider this issue. 40

Miscellaneous Issues:

- On Pages III-17 and III-18, the plan for additional university student housing is discussed. This section notes that SSU does not currently own the site, therefore "the proposed development is not illustrated on the University Master Plan...[h]owever...this EIR includes the assessment of the potential impacts of such a development by way of considering a range of housing scenarios ranging from high-density apartment-style courtyard housing to lower-density single-family attached and detached dwellings." The EIR does not state what sort of supplemental review of the student housing plans would be undertaken, however, therefore it is difficult to assess potential impacts on the single-family residences immediately west of this area. This supplemental review (including CEQA) should be noted in the EIR. 41

- On Page IV.A-9, the second paragraph compares the SSU scenario for the northwest acquisition area with what Rohnert Park envisions in the General Plan Update for this area. Within this discussion is the acknowledgement that the Update includes parks and recreation space in this area. In addition, there is a new minor collector street right-of-way (including bike lanes) shown in this area that would extend southward from Eleanor Road to Copeland Creek. While there are no plans presented in the EIR for the proposed student housing development, we request that that the site plan allows for the recreation areas and circulation improvements shown in the Update. 42

- On Page III-18, the new soccer stadium is discussed. To allow for comparison, the seating capacity of the existing stadium should be included. 43

- On Page III-18, last paragraph, the first sentence makes no sense grammatically.

- On Page IV.G-14, Impact G.2 speaks to an increase in light and glare at the project site. How will this issue be addressed when the future student housing project is considered? 44

In conclusion, while we understand the University's funding constraints, we also recognize that many of the identified impacts could not be mitigated to an insignificant level without implementation of improvements by either the City of Rohnert Park or the County. It is, therefore, reasonable that the EIR assess these impacts without the identified improvements. The City is anticipating that the new General Plan will be adopted, but the Urban Growth Boundary, which would include lands to the north and south of the University, may not be approved by the 45

voters. In that case, since many of the required improvements are outside our current jurisdiction, the City neither has the legal right nor the ability to require those improvements. 45 Cont.

We believe that the working group with representatives from the County, Community of Penngrove, Cities of Cotati and Rohnert Park, and the University is a great first step towards resolving many of these subregional issues. We look forward to our continued working relations with the University and appreciate your consideration of these issues.

Sincerely,

Wendie Schulenburg

Wendie Schulenburg
Planning &Community Development Director

cc: City of Rohnert Park City Council
City of Rohnert Park Planning Commission
Joseph Netter
Joe Gaffney
Pat Rooney
Bob Cassel
Vicki Hill
Ron Bendorff
Tim Barry

LETTER E – CITY OF ROHNERT PARK

E-1 Under the project, the California State University (CSU) would be responsible for funding all proposed transportation improvements within the campus property, including new roadways, pedestrian crossings, shoulders, curbs, gutters, and bus stops. However, as discussed in Section II.C, Mitigation Responsibility, in the DEIR, the California State University (CSU) has limited powers to mitigate effects that occur outside the project site. Under constitutional and statutory proscription, the CSU cannot contribute funds towards off-site transportation improvements, as well as schools (K-12), police, fire, or similar fee and assessment contributions exacted from private developers. The responsibility of funding these measures lies with these local agencies. It is up to the local agencies which receive funds for roadway improvements to prioritize the allocation of these funds within their jurisdiction to meet recognized needs.

The comment that the California State University should have its Board of Trustees lobby the legislature to provide funds is a political issue calling for a revision in State policy. CEQA does not require such changes. While Sonoma State University cannot commit project funds for improvements to local streets and roadways, the University will work cooperatively with the impacted agencies to identify and pursue other potential funding sources of funds for such improvements.

E-2 As stated on page IV.D-3 of the DEIR, the a.m. and p.m. peak-hour intersection turning movement counts were conducted during the third week of September 1999 (during the Fall semester) to represent peak traffic activity associated with the University. The traffic analysis in the DEIR focuses on the a.m. and p.m. peak traffic periods (between 7:00 to 9:00 a.m., and 4:00 to 6:00 p.m.), when overall combined traffic volumes (consisting of commute, school and other generators) are at their peak.

E-3 The addition of the new University entrance on Rohnert Park Expressway would likely not be enough to warrant the installation of a roundabout at this intersection. However, the ultimate extension of the intersection to the north into a future mixed-use development as proposed under the Rohnert Park General Plan Update would result in p.m. peak hour traffic volumes which would be fairly balanced (41% north-south, 59% east-west). Mitigation Measure D.1b provides flexibility in providing the option for either a traffic signal or a roundabout, depending on the level of future development under the Rohnert Park General Plan.

E-4 Concerts would typically disperse in the evening when background traffic volumes have dropped from their peak levels. As discussed in the DEIR, unacceptable delays at the campus intersections would only be experienced for vehicles exiting the University entrances. Mitigation identified in the DEIR (temporary use of traffic control) would serve to maximize the capacity of the campus entrances for the vehicles exiting the University. Other approaches at the campus intersections would not be significantly affected.

Similarly, traffic generated by special events would not be expected to substantially degrade level of service at other intersections. Impacts beyond the study area will become less perceptible with increasing distance from the campus. Special events would be infrequent, and traffic impacts would be of limited duration and would occur during off-peak traffic periods. Such special event-generated volumes are inherent with special activities with large attendances; they would be episodic and connected with events of high public interest.

E-5 Traffic generated under the Master Plan revision would be expected to contribute 20 new a.m. peak hour trips and 94 p.m. peak hour trips, on Petaluma Hill Road south of East Cotati Avenue. This level of traffic would be expected to increase existing traffic volumes by less than two percent during the a.m. peak hour and by less than five percent during the p.m. peak hour. In addition, these project volumes would represent less than a one percent of the cumulative a.m. peak hour traffic volumes and less than a three percent of the cumulative p.m. peak hour traffic. This incremental increase in traffic volumes would not result in an adverse effect in level of service conditions at intersections on Petaluma Hill Road south of East Cotati Avenue, including at Adobe Road. Potential impacts would be minimized further in Penngrove with Railroad Avenue as an available route.

E-6 Comment noted. Proposed LOS standards contained in the City of Rohnert Park General Plan Update are acknowledged in the Transportation Setting section of DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR. It should be noted that conclusions reached in the DEIR regarding the project's impact on intersection level of service under cumulative conditions would be the same using either criteria.

E-7 See Responses to Comments E-1 and B-9. Note that because there is no assurance at this time that Rohnert Park or Sonoma County would implement the identified mitigation measures D.1a through D.1e, the DEIR concludes on page IV.D.23 that the contribution of the project to cumulative conditions at the identified city and county intersections would be significant.

E-8 No mitigation is required for Impact D.2, because sufficient on-site parking is proposed as part of the Master Plan revision. As discussed in Impact D.2 on page IV.D-24 of the DEIR, the proposed Master Plan revision would provide a total of 6,858 parking spaces on campus under buildout (i.e., approximately 0.69 spaces per FTE student), which exceeds the recommended supply of 0.57 spaces per FTE (not including potential additional spaces related proposed University housing in northwest acquisition area). Thus, the total quantity of parking associated with the proposed Master Plan is expected to be adequate, with a projected surplus of approximately 1,150 spaces. A supply of 1,368 residential parking spaces is proposed for the 2,200 beds expected on campus at build-out (not including potential additional residential parking spaces and beds associated with proposed University housing in the northwest acquisition area). This yields a ratio of approximately 0.62 spaces per bed, compared to the recommended 0.60

spaces per bed ratio, and would provide a surplus of approximately 48 residential spaces at build-out. Thus, the impact to on-campus parking facilities would be less than significant, and no mitigation is required.

E-9 As discussed in Section III, Project Description in the DEIR, special events drawing more than 3,500 attendees that would require utilization of expanded Lots "F" and "J" would occur only during the summer on Saturday afternoons and/or nights, and Sunday afternoons, when typical on-site parking demands at the University are otherwise low. Thus, special event parking demand at the University is not expected to significantly displace parking availability for other on-site parking demands at the University. As indicated in Mitigation Measure D.5c, proper advance notification would be provided to alert non-event related University traffic of potential alternate on-campus parking lots to use during the times the special events at the Center for the Musical Arts are proposed.

Potential off-site satellite parking locations could include existing and future Caltrans park-n-ride lots at the Rohnert Park Expressway and SR 116 interchanges. These lots should have sufficient capacity on weekends, when they are rarely used. Other off-site parking lots could include employee parking lots at Agilent (formerly HP) and the Rohnert Park community center.

E-10 Impact D.5 assesses the impact of special event parking demand. Implementation of Mitigation Measures D.5a-c by the University would mitigate this significant impact to a less than significant level. Impact D.3 assesses the potential safety impact of concerns related to vehicles parked off-site on Petaluma Hill Road and East Cotati Avenue adjacent to the campus. Implementation of Mitigation Measures D.3a-b would mitigate the potentially significant impact to a less than significant level; however, since the University does not have the authority to implement this measure (but rather the authority would lies with Sonoma County or Rohnert Park, depending on whether those roadways were annexed by Rohnert Park), there is no assurance that these mitigation measures would be implemented. Impact D.5 is therefore considered to remain significant.

E-11 As under existing conditions, the apparent reason why students park along Petaluma Hill Road and East Cotati Avenue is because it is free to park in these areas, whereas the majority of parking facilities on campus require a parking fee. Thus, although there is an existing on-site parking surplus, and there would also be a projected parking surplus under buildout of the Master Plan revision, parking along those off-site roadways would remain an attractive option to certain University attendees, unless parking is prohibited (as discussed in Mitigation Measure D.3a). Also see response to Comment E-10.

E-12 Regarding special events at the proposed Center for the Musical Arts, as discussed in Section III, Project Description in the DEIR, special events occurring on weekdays at the proposed Center would not draw more than 1,200 attendees. Impacts to study area intersection levels of service related to these events (as well as larger events occurring on weekends) are addressed in Impact D.4 in the DEIR. Special events of greater than

1,200 attendees would only occur on weekends, outside of peak-traffic periods, and would be infrequent.

The impact of all off-site traffic generated by the proposed University facilities, including all proposed instructional expansion and housing, on study intersection peak-hour levels of service is assessed in Impact D.1 in the DEIR. Please see the description of project vehicle trip generation on pages IV.D-13 to IV.D-14 of the DEIR. See response to Comment B-5 for additional information regarding the rates for the proposed University housing.

The DEIR recognizes the possibility that the University will not acquire the northwest acquisition area, and therefore includes analyses of three alternatives (Alternatives 1, 2 and 3) that anticipate no university development in the northwest acquisition area.

E-13 The development of the north University access road is anticipated under both the existing approved Master Plan and the proposed Master Plan revision. Therefore, for comparative purposes, both the Future Without Project and Future With Project traffic scenarios were assessed assuming the north University access road was in place.

An error was made in presentation of intersection delay results in Table IV.D-6 in the DEIR for the intersection of East Cotati Avenue / Snyder Lane-Maurice Avenue. Under Cumulative Future With Project volumes, the delay should be 20.3 seconds, and 36.8 seconds for the a.m. and p.m. peak hours, respectively. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

Notwithstanding, there would still be an improvement in delay when comparing "without project conditions" (20.8 seconds) to "with project conditions" (20.3 seconds) during the a.m. peak hour. This improvement is associated with the redistribution of existing traffic from the East Cotati Entrance to the new entrance on Rohnert Park Expressway under the Master Plan revision.

E-14 See Responses to Comments E-1 and B-9. Note that because there is no assurance at this time that Rohnert Park or Sonoma County would implement the identified mitigation measures D.1a through D.1e, the DEIR concludes on page IV.D.23 that the contribution of the project to cumulative conditions at the identified city and county intersections would be significant.

Approval and implementation of the project, should it be approved, would be subject to findings of overriding considerations by the Trustees of tCalifornia State University, acting as the Lead Agency. Such findings by the lead agency are required by Public Resources Code Section 21081 and CEQA Guidelines Section 15093 for each significant effect identified in the EIR. The findings of overriding considerations explain why the lead agency is willing to accept each significant effect.

E-15 The *Sonoma State University Master Plan Revision Draft EIR* assessed a.m. and p.m. peak-hour cumulative traffic conditions at a total of nine study intersections that would

be most affected by the proposed project, four of which were also assessed (p.m. peak hour only) in the *Rohnert Park General Plan Update Draft EIR* (October 1999) (Rohnert Park Expressway/Snyder Lane, Rohnert Park Expressway/Petaluma Hill Road, East Cotati Avenue/Snyder Lane, and East Cotati Avenue/Petaluma Hill Road).

In recognition of other intersections outside the project study area that potentially could be affected by the University Master Plan revision, four additional intersections are assessed herein, consisting of three additional intersections in the City of Rohnert Park (Rohnert Park Expressway/U.S. 101 northbound ramps, Rohnert Park Expressway/U.S. 101 southbound ramps, and Rohnert Park Expressway/Commerce Drive), and one intersection in the City of Cotati (East Cotati Avenue/Old Redwood Highway). The traffic analysis is limited to the p.m. peak-hour, consistent with the analysis of traffic conditions for intersections assessed in the *Rohnert Park General Plan Update Draft EIR*.

Existing p.m. peak-hour traffic volumes for the three Rohnert Park intersections were collected by Whitlock & Weinberger Transportation, Inc. in February 2000. The existing p.m. peak-hour traffic volumes for the East Cotati Avenue/Old Redwood Highway intersection were obtained from the City of Rohnert Park from traffic counts conducted in support of the *Rohnert Park General Plan Update Draft EIR*. As shown in Table 1, below, the four intersections are currently operating at an acceptable level of service (LOS) C during the p.m. peak hour.

TABLE 1
P.M. PEAK INTERSECTION LEVELS OF SERVICE (LOS) FOR EXISTING, AND CUMULATIVE BASE (FUTURE WITHOUT PROJECT) AND CUMULATIVE (FUTURE WITH PROJECT) CONDITIONS

Intersection	Existing Conditions		Cumulative Base (Future Without Project		Cumulative (Future With Project)	
	Delay	LOS	Delay	LOS	Delay	LOS
Rohnert Park Ex./ 101 SB Ramps	15.2	C	14.2	B	15.1	C
Rohnert Park Ex. / 101 NB Ramps	15.4	C	17.0	C	18.6	C
Rohnert Park Expressway / Commerce Blvd.	24.8	C	25.3	D	25.7	D
East Cotati Avenue / Old Redwood Highway	21.7	C	31.0	D	39.0	D

Delay is expressed as Average Seconds per Vehicle

SOURCE: Whitlock & Weinberger Transportation, Inc., 2000

As was done for the traffic analysis completed in the Master Plan Revision DEIR, traffic associated with cumulative development and regional growth was developed using traffic projections from the Rohnert Park General Plan Update traffic model, as well as the *Cotati Citywide Traffic Study* (Whitlock & Weinberger Transportation, Inc., 1996), and adjusted where appropriate.[2] Also, as was done in the Master Plan Revision DEIR, in order to present an accurate representation of Cumulative Base (i.e., Future Without Project) conditions, the traffic projections for future University growth as assumed by the traffic model were subtracted from the model projections, and the vehicle trip generation for existing University development and development currently under construction (approved under the existing Master Plan) as estimated in the Master Plan Revision DEIR were added. In addition, transportation improvements currently being constructed by the City of Rohnert Park and/or Caltrans at the three City of Rohnert Park study intersections were assumed to be in place under Cumulative Base conditions. As shown in Table 1, under Cumulative Base conditions, all four intersections would operate at an acceptable LOS D or better.

As was done for the traffic analysis completed in Master Plan Revision DEIR, the Cumulative (Future With Project) scenario represents the addition of proposed project vehicle trips to Cumulative Base volumes, and the subtraction of vehicle trips associated with non-University uses anticipated by the City of Rohnert Park *General Plan Update* traffic model for the northwest acquisition area. As shown in Table 1, under Cumulative (Future With Project) conditions, all four intersections would continue to operate at an acceptable LOS D or better. Therefore, the proposed project would have a less than significant impact at these intersections.

The proposed project traffic would represent approximately three percent of the cumulative traffic at Rohnert Park Expressway/U.S. 101 southbound ramps, and six percent of the cumulative traffic at the Rohnert Park Expressway/U.S. 101 northbound ramps, and five percent of the cumulative traffic at Rohnert Park Expressway/Commerce Drive. The proposed project traffic growth would represent approximately four percent of the cumulative traffic at East Cotati Avenue/Old Redwood Highway. It should be noted the City of Cotati is planning circulation revisions in the downtown area which may result in the modification of the East Cotati Avenue/Old Redwood Highway four-way signalized intersection into four separate roundabout-controlled intersections. In the *La Plaza Circulation Study* (September 1998) the four roundabouts were expected to all operate with a LOS B assuming the design presented in the report. Operation of the roundabout controlled intersections with the addition of the proposed project would not be expected to change significantly.

[2] A review of traffic output from the Rohnert Park General Plan Update traffic model revealed that traffic projections at the three study intersections in Rohnert Park appear reasonable. However, at the intersection of East Cotati Avenue / Old Redwood Highway, the traffic model's projected traffic volumes exceeded the existing and projected capacity of that intersection. Since no improvements are planned by the City of Cotati to increase available capacity at this intersection (rather, the City of Cotati may actually decrease capacity on one approach leg of East Cotati Avenue), more reasonable future traffic volumes from the *Cotati Citywide Traffic Study* were used instead.

See response to Comment E-4 regarding analysis of traffic conditions related to special events.

E-16 Page IV.D-24, fourth paragraph of the DEIR is revised for clarification. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

E-17 The City of Rohnert Park's proposed widening of Petaluma Hill Road and/or East Cotati Avenue under the *Draft City of Rohnert Park General Plan Update* is referenced on pages IV.D-22 and IV.D-23 of the DEIR. For informational purposes, discussion of the proposed widening of these roadways is also added to the Significance After Mitigation discussion on page IV.D-25 of the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

E-18 It is assumed in the DEIR analysis that the University would be able to control the timing of weekday events and would be able to provide adequate traffic control personnel after events, and that left-turns would be possible from the secondary driveway onto Rohnert Park Expressway. The impacts would remain significant, however, even if the measures were implemented.

Approval and implementation of the project, should it be approved, would be subject to findings of overriding considerations by the Trustees of the California State University, acting as the Lead Agency. Such findings by the lead agency are required by Public Resources Code Section 21081 and CEQA Guidelines Section 15093 for each significant effect identified in the EIR. The findings of overriding considerations explain why the lead agency is willing to accept each significant effect.

E-19 Comment noted. A new mitigation measure is added (Mitigation Measure D.5d) to provide adequate traffic control personnel to direct event patrons to other available on-campus parking Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

The principal impacts associated with special events at the Center for the Musical Arts to the surrounding neighborhood are related to traffic, parking and noise. The commenter is referred to traffic impacts described in Impact D.4, parking impacts described in Impact D.5, and noise impacts are described in Impact F.2. and F.5 in the DEIR. Measures either proposed as part of the project or identified in the DEIR would mitigate significant impacts to the extent feasible.

E-20 Comment noted. "Rohnert Park Expressway" was referred to incorrectly as "Rohnert Park." Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

E-21 The environmental impacts associated with the Master Plan revision without development of University housing within the northwest acquisition area are assessed in Alternative 2 in Chapter V, Alternatives in the DEIR.

E-22 Under Future With Project conditions, the housing assumed by the *Draft City of Rohnert Park General Plan Update* (as described in Footnote 5 on page IV.D-18 in the DEIR) in the northwest acquisition area would not occur, but rather, University-related housing would be built there instead. Therefore, the vehicle trips associated with non-University uses anticipated by the *General Plan Update* traffic model for the northwest acquisition area were subtracted, and the proposed vehicle trips associated with the proposed University housing in the northwest acquisition area were added.

E-23 See response to Comment E-1.

E-24 Regarding the impact of the proposed project on other study intersections, see response to Comment E-15. Regarding the intersection of Petaluma Hill Road and Adobe Road, see response to Comment E-5.

E-25 See response to Comment E-4.

E-26 The estimate of 400 attendees was based on the level of service analysis described on page IV.D-26 to IV.D-27 of the DEIR, in which intersection operating conditions were evaluated for a range of special event attendances at the Center.

Given the wide variety of types of performances that would occur ranging between 400 and 1,000 attendees, (including faculty jazz, faculty chamber music, Bach choir, chorus, chamber singers, lectures, faculty concerts, dance, early music, university special events, and concert hall and recital hall private rentals), the specific times of these events cannot yet be specified. However, the University would make every effort to manage the time schedule for special events mindful of avoiding peak-hour traffic periods to the extent possible.

E-27 It would be speculative to assume event attendees would arrive during the p.m. peak traffic period to dine in the mixed-used district proposed north of the project site across Rohnert Park Expressway under the *Draft City of Rohnert Park General Plan Update.* Any future project proposed in the mixed-use district under the Rohnert Park General Plan Update would be subject to its own environmental review, presumably including traffic analysis.

The implementation of any future potential off-site transportation improvements, including pedestrian improvements (e.g., pedestrian sidewalks and crosswalks) along Petaluma Hill Road and/or Rohnert Park Expressway considered by Sonoma County or Rohnert Park (if these roadways are annexed as anticipated under the *Draft Rohnert Park General Plan Update*) would be the responsibility of the applicable jurisdiction.

E-28 Implementation of Mitigation Measures D.5b for Impact D.5 would adequately accommodate the unmet parking demand associated with large special events at the Center for the Musical Arts that would be created prior to the planned Lot "F" expansion, and is therefore considered feasible. See response to Comment E-9 regarding potential off-site satellite parking locations.

E-29 If and when the northwest acquisition area is acquired and specific plans for that site have been developed, those plans will be reviewed by the University in the context of this EIR to determine whether the proposed University housing project has in fact been adequately addressed in this EIR. If the University's review determines that implementation of the specific plans would have no potentially significant environmental effects that are not addressed in this EIR, then no additional environmental documentation would be required. If the review determines that the plans could have a significant environmental effect that is not adequately addressed in this EIR, then supplemental environmental documentation would be required at that time.

E-30 This EIR assesses all potential environmental impacts associated with the buildout of the total campus Master Plan revision, including the proposed University housing proposed in the northwest acquisition area.

Potential visual impacts related to the proposed University housing in the northwest acquisition area are addressed in Impacts G.1 and G.2 in the DEIR. As described on page IV.G-9 of the DEIR, given the level grade of this site and the residential scale of the proposed University housing, it would not be expected to significantly block or affect long-range views of the Sonoma foothills from off-site adjacent land uses, including views from residences adjacent to the site to the west, which are partially screened by trees. However, the proposed housing development could affect views of the Copeland Creek corridor from Rohnert Park Expressway adjacent to the site. The addition of earthen berms along Rohnert Park Expressway adjacent to the housing would serve to shield the site from visual distractions on Rohnert Park Expressway, as well as provide a visual buffer of the developed on-site uses and Rohnert Park Expressway.

As discussed in Section IV.A, Land Use and Planning, the building and landscaping plans for the various facilities under the project, including the proposed University housing, would be developed in consultation with, and subject to review and approval by, the University's Campus Planning Committee (comprised of the President of the University, the University building program officer, the University Consulting Architect, the Campus Planner, and the Director of Public Safety, various faculty, staff and students, and a representative from the community). This process would help to ensure all development proposed under the project would be designed in a manner that would be consistent with the aesthetic guidelines of the University, and the visual character of the local community.

As such, the proposed project would not result in a substantial adverse effect on a scenic vista and would not create a significant impact. Although no mitigation is required for the less than significant visual impact, the EIR identifies measures that would further reduce visual impacts under the project; see page IV.G.14 of the DEIR. See also Master Response E-29.

E-31 A change in physical conditions is not considered significant unless it is substantial and adverse. As described in detail on pages IV.G-8 through IV.G-14, given the type and

scale of proposed development; the setback of proposed structures from the edge of Petaluma Hill Road, Rohnert Park Expressway and East Cotati Avenue; the proposed landscaping features on the project site; and the design review process the building and landscaping plans would undergo, potential visual impacts (including from close-range views) would not be considered significant.

E-32 Given the size of the berms and their location with respect to adjacent land uses, visual impacts attributable to the berms would limited to partial blockages from close range views of and from the site, however, the berms would not block long range views of the Sonoma foothills from off-site land uses (including from residences located west of the northwest acquisition area). It should be noted, however, that numerous large trees along the backyards of off-site residences adjacent to the northwest acquisition area currently partially screen the residences' easterly views of the Sonoma foothills.

E-33 See responses to Comments E-29 and E-30.

E-34 The project site is located adjacent to land already developed and built out west and south of the project site. Additional development proposed north of, and adjacent to, the project site under the *Draft City of Rohnert Park General Plan Update* includes residential uses, mixed-use park/recreational uses. (There is no planned or proposed new development to the east of the University by either the City of Rohnert Park or the County.) The proposed uses under the University Master Plan revision would not be considered visually incompatible with any of the proposed development under the *General Plan Update*. See also response to Comment E-30.

E-35 The potential impacts of buildout of the Master Plan revision on public fire protection and emergency medical services are addressed in Impact J.1 in the DEIR; potential impacts to public police protection services are addressed in Impact J.2 in the DEIR. As discussed on page IV.J-5 of the DEIR, as a state facility, all proposed new development at the University (including on-site fire prevention equipment and emergency access) is subject to state fire code requirements, and review and approval by the State Architect, State Fire Marshall and Campus Planning Committee. On-going review and maintenance is also the responsibility of the State Fire Marshall.

As under existing conditions, the University would continue coordination with the Rancho Adobe Fire Protection District for campus fire drills and emergency response plans. The University also welcomes the opportunity for future fire safety and emergency response planning and coordination with the City of Rohnert Park Fire Department.

E-36 See response to Comment E-35.

E-37 See response to Comment B-9.

E-38 Comment noted. For clarification, Mitigation F.1a in Section II, Summary, of the DEIR is revised to include the corresponding additional language included in Section IV.F,

Noise, (on page IV.F-5) of the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

E-39 The mitigation measure cited by the commenter is a reasonable course of action for the University to pursue to address the foreseeable impact of increased noise along Rohnert Park Expressway given the limitations of the University to fund off-site improvements. It is acknowledged that a mitigation measure that "encourages" appropriate future planning is not adequate, as a general matter, under CEQA to reduce a significant effect to less than significant. However, the DEIR does not rely on this measure to reduce the cumulative noise impact of increased traffic on Rohnert Park Expressway to a less than significant level and includes this impact in the list of impacts that would remain significant after mitigation on page VI-2 of the DEIR.

E-40 The noise ordinance established by the City of Rohnert Park cannot be enforced against the University and no modification of the City's noise ordinance can extend its reach to outdoor music events held by the University. The DEIR recognizes the standards contained in the City's noise ordinance and uses them in the CEQA noise analysis. For example, Mitigation Measures F.1a and F.4, on pages IV.F-5 and IV.F-10 of the Draft EIR, respectively, were both drafted to be consistent with limitations on allowable hours for construction and concerts as set forth in the City's noise ordinance. However, recognition and use of the noise ordinance standards in formulating CEQA significance criteria and mitigation measures does not imply that the standards are enforceable against the University.

E-41 This EIR assesses all reasonably foreseeable potential environmental impacts associated with the buildout of the total campus Master Plan revision, including the proposed University housing proposed in the northwest acquisition area. As discussed in Section II, Project Description in the DEIR, a range of possible housing scenarios are possible for that portion for the northwest acquisition area. Throughout the DEIR, the housing scenario which would generate the greatest impacts within each environmental parameter was analyzed. Therefore, all environmental impacts associated with the housing development in the northwest acquisition area were conservatively assessed. See also response to Comment E-29.

E-42 As discussed in Section II, Project Description, in the DEIR, since the University does not currently own the northwest acquisition area, no site plan has been developed for that portion of the project site. It is anticipated a site plan would be prepared for that portion of the project site when and if that area is owned by the University. However, the high-density, mixed-use development or lower-density housing scenarios would all provide a structured network of paths would accommodate pedestrian and bike circulation within the development, would provide connection to adjacent bike paths, and would provide landscaped and buffer areas.

E-43 The seating capacity of the existing soccer facility is 2,000 seating capacity.

E-44 Nightlighting associated with the proposed University housing in the northwest acquisition area would be similar in intensity and scale to nightlighting related to adjacent off-site housing development, and therefore, would not be considered incompatible. Moreover, given types of materials typically used for housing construction at the University, the proposed housing would not create substantial daytime glare effects. Although no mitigation would be required for the less than significant visual impact, the EIR identifies measures that would further reduce light and glare effects on page IV.G.14 of the DEIR.

E-45 The DEIR acknowledges that there is no assurance that off-site improvements that are neither approved nor funded by those responsible jurisdictions would be implemented. Accordingly, those impacts are considered in the DEIR to remain significant. See also response to Comment B-9.

DEPARTMENT OF TRANSPORTATION
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December 14, 1999

SON-101-13.88
SCH# 93013045
SON101679

Ms. Deborah Gannon-DuVall
Sonoma State University
1801 E. Cotati Avenue
Rohnert Park, CA 94928

Dear Ms. DuVall:

SONOMA STATE UNIVERSITY MASTER PLAN REVISION – Draft Environmental Impact Report (DEIR)

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. We forward the following comments:

Traffic impacts to State highway facilities are germane to our agency. As it is stated in the "Traffic, Circulation and Parking" section of the DEIR, "U.S. 101 provides primary regional access to the University." Therefore, the impacts of this project on U.S. 101, including its intersections, and the on- and off-ramps, should be included in the report. 1

The figures in Table IV.D-4 do not add up. For example, the figure for the AM Peak Hour total vehicle trips is 1594, whereas the "in" equals 1466 and the "out" equal 152 for a total of 1618. Also in this table, should the "Existing University (1999)" plus the "Additional New Proposal under Master Plan Revision" equal the "Total Buildout of University?" If yes, there are discrepancies. 2

If you have any questions regarding these comments, you may call Alice Jackson of my staff at (510) 622-1644.

Sincerely,

HARRY Y. YAHATA
District Director

By Jean C R Finney

JEAN C. R. FINNEY
District Branch Chief
IGR/CEQA

LETTER F – CALIFORNIA DEPARTMENT OF TRANSPORTATION

F-1 In recognition of other intersections outside the project study area that potentially could be affected by the University Master Plan revision, four additional intersections are assessed herein, consisting of three additional intersections in the City of Rohnert Park (Rohnert Park Expressway/U.S. 101 northbound ramps, Rohnert Park Expressway/U.S. 101 southbound ramps, and Rohnert Park Expressway/Commerce Drive), and one intersection in the City of Cotati (East Cotati Avenue/Old Redwood Highway). See response to Comment E-15.

F-2 Comment noted. The DEIR contained an error in Table IV.D-4 regarding the number of outbound a.m. peak-hour vehicle trips associated with Total Buildout of the University. The correct number of outbound vehicle trips is 128, not 152. This error was made in the presentation of vehicle trips in this table only, and does not affect the conclusions in the traffic analysis in the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

As noted in Footnote b in Table IV.D-4 in the DEIR, the Total Buildout of the University includes the sum of: trips associated with Existing 1999, new facilities currently or soon to be under construction identified under existing approved Master Plan, and additional new facilities proposed under the Master Plan Revision.

California Regional Water Quality Control Board
North Coast Region

Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

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G

December 15, 1999

Deborah Gannon, Director of Planning
Facilities Services
Sonoma State University
1801 Cotati Avenue
Rohnert Park, CA 94928

Dear Ms. Gannon:

Subject: Comments on the Draft Environmental Impact for the Sonoma State University Master Plan Revision.
File: Sonoma County General

Thank you for the opportunity to comment on the above referenced environmental impact report. The North Coast Regional Water Quality Control Board is the state agency responsible for the protection of water quality within the area affected by this project. As a result of reviewing this document, with particular interest in "Chapter IV Section C", I have made the following specific comments on the proposed plans.

IV C.1—Increase of Storm Flows to Copeland Creek

An assessment of the development's contribution to storm-water runoff is presented that is based on a hydraulic model. This assessment is based on an estimated change in the model's runoff coefficient parameter-(i.e. from C=0.52 to C=0.65). A better explanation the underlying assumptions used to develop the parameter values is essential in order to validate the flow estimates generated by the model. 1

Given the fact that development decreases permeability and plant cover and, hence, the availability of soils and plants to buffer storm flows, the report's assessment that storm related runoff will increase is probably correct. The increased storm water inputs mentioned in this section pose a problem with respect to their contribution to peak flows in Copeland Creek, and the proposal to mitigate this issue through the use of detention ponds has clear potential (see Mitigation C.1b). However the effectiveness of detention ponds to mitigate for post-development increases in runoff volumes and the impact of these flows on stream systems is highly dependent upon their design. Ponds must be sized and proportioned to tolerate and dissipate the high energies of floodwaters and provide adequate storage. It is also critical that any pond's design includes access at the outlet for heavy machinery in the event the outlet becomes clogged during a flood event. 2

It is additionally important to recognize that elevated peak flows will have two large impacts on habitat quality in the main channel of Copeland Creek. First, there will be a greater amount of sediment, and other non-point-source pollutants (heavy metals, hydrocarbons, pesticides, nutrients etc.) originating from the new development. Settling ponds or other appropriate BMP's would be means to mitigate this problem (see comments under IV C.4 below). Secondly, increased storm-water flows have the potential impact of altering channel structure and sediment composition of the receiving stream. This type of impact is probably not proportional to change in flood stage, as bottom shear stress is not linearly related to water depth. Thus a separate analysis of the fluvial geomorphology of Copeland Creek is necessary for a full evaluation of the impact of greater storm water flows. 3

In general all practical means should be employed to mitigate increases in runoff volume and runoff pollutant loading (post-construction compared to pre-construction) in order to protect downstream water quality.

IV C.2—Development within the 100 Yr. Floodplain

Flood prevention by channelization and levy construction is prone to the risk of catastrophic failure and will likely result in channel incision and in-stream habitat degradation of Copeland Creek.

A possible alternative mitigation for destructive flooding might be to allow harmless flooding onto undeveloped areas of the floodplain, essentially providing storage for floodwaters on selected areas of the floodplain. Such storage of floodwater may provide a more functional solution that also increases habitat structure and bio-diversity in the riparian zone. Furthermore, by essentially providing temporary storage for upstream floodwaters, a system like this (in addition to properly designed detention structures, Mitigation-C.1b) could compensate for the potential increased storm water introduced to Copeland Creek as a result of the planned development. As a safeguard against the risk of over-flooding, such an "intentional floodplain" could be equipped with a high flow bypass pipe positioned at the edge of the safe extent of floodwaters to divert high flows effectively. 4

It is also important to consider that all development within the floodplain itself (e.g. bridges, storm drain outlets) should be placed and designed to minimize the impacts of detrimental phenomena such as floodwater diversion, eddying and scour. Detrimental impacts from future maintenance needs of such structures should be discussed and mitigated accordingly. Ideally all structures would lie outside the floodplain and never be contacted by floodwaters. Again a fluvial geomorphologic analysis would be useful to determine these risks and habitat impacts, and possible mitigation. 5

IV C.4—Nonpoint Source Pollution Control

Development, in all phases (including post-construction) dramatically increases the inputs of nonpoint source pollutants into surface and subsurface waters. Therefore, careful attention to management of nonpoint source inputs is imperative in any plan.

To minimize the impact of nonpoint pollution, the report addresses facility management issues such as pesticide and fertilizer plans and street sweeping operations that are extremely valuable. We look forward to seeing the details of these plans as they become more developed. 6

It is particularly important to consider the timing of all activities with respect to the seasonal cycles of rainfall. For example street sweeping is especially effective prior to the first rain of the season, while potentially negative impacts such as pesticide application, soil disturbing activities, and equipment cleaning should be scheduled that they do not coincide with the onset of wet weather.

Activities such as temporary storage of landscaping wastes (e.g. grass cuttings) and cleaning of machinery have a great potential to introduce pollutants such as oxygen demanding organic materials and petroleum products and should be done in a manner consistent with efforts to reduce nonpoint source inputs to the Copeland Creek system.

6 Cont.

To mitigate nonpoint source pollutants occuring in runoff, onsite detention ponds (Mitigation C.1b) can easily be designed as permanent wetlands with permanent plant communities. Such biological treatment BMP's are extremely diverse in design and capable of providing the service of behaving like biological filters by trapping sediments and other pollutants. This might be an effective substitute, or backup for storm drain filters, mentioned in "Mitigation C.4a", as it seems that storm drain filters could be prone to saturation and/or failure under the circumstances of a large storm event. Furthermore, such a system would increase habitat diversity, and thereby bio-diversity, providing the educational and aesthetic benefits of an artificial wetland for use by the university community.

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In addition, with respect to the filtration system mentioned under "Mitigation C.4a", accommodation should be made for the possibility of floodwaters backing up through any filters and releasing previously captured pollutants.

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IV C.5—Construction Related Impacts

A detailed plan will be developed as required by a construction Storm Water Pollution Prevention Plan.

9

IV C.6—Unpredicted Cumulative Effects

The success of mitigation should be judged by the degree to which they perform as intended and reduce impacts to the watershed. Assessment of unpredicted cumulative effects of all the manipulations occurring in this system should be done by means of a monitoring program to "ground truth" the effectiveness of mitigation efforts. Parameters that could be monitored include the quantity and rate of runoff, sediment and pollutant levels in runoff leaving the system.

10

In terms of the long-term ecological integrity of Copeland Creek, consideration should be given to developing a program to study and monitor the quality of Copeland Creek over time. Monitoring of habitat and physical parameters can provide valuable information on the cumulative effects of development and can provide feedback on restoration opportunities.

Omission I—Salmonids and Stream Dwelling Organisms

There appears to be no answer in the report to the comment regarding habitat impacts significant to Salmonids (see August, 23rd letter from Peggy Shannon, SCWA). Salmonids and many other animal species, such as other fish and invertebrates rely on Copeland Creek for habitat and it is quite

11

likely that the development will affect habitat quality for organisms in Copeland Creek. For the Salmonids, these habitat impacts are frequently related to filling of bed gravel interstices by sediment.

Nonpoint source pollutants will also affect other organisms. Such factors should be addressed as potential impacts as they may lower dissolved oxygen levels, alter pH, or otherwise harm organisms and food webs existing in Copeland Creek. 11 Cont.

Omission II—Post Construction Erosion/ Sediment Control

While erosion and sediment transport risks are greatest during the construction phase of development, sediment loss from a site continues to be an issue after completion of the construction phase. Please provide specific information on measures that will be taken to mitigate post-construction sediment losses. 12

General Comment

Aside from analysis of the project contribution to 100 Yr. Flood (IV, C.1), there is a conspicuous absence of comment on the impacts, biological and physical, to Copeland Creek itself. Members of the Regional Board have observed maintenance activities at the University inconsistent with accepted BMP's (recently, armoring of the stream bank). Noting that Copeland Creek represents a dynamic biological resource, we would like to see further analysis that develops an analysis of the impacts of this project on channel related processes. 13

If you should have any questions about these comments or any other issue related to this matter, please feel free to contact either me at (707) 576-2065 or Greg Fanslow, at (707) 576-2472.

Sincerely,

John Short

John Short, P.E.
Senior Water Resource Control Engineer

GF:tmk\ssueircomments.doc

LETTER G – CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, NORTH COAST REGION

G-1 The Sonoma County Water Agency (SCWA) hydraulic model of Copeland Creek was developed in 1986, well in advance of any specific plans for development by the University for the area north of Copeland Creek, and in advance of the existing approved Master Plan for the area south of Copeland Creek. A C value of 0.52 for both areas was assumed by the SCWA based on standard SCWA runoff coefficients commonly applied to "school" land uses for areas with average ground slopes of 2.5 percent or less. Given the proposed site plans for the Master Plan revision, a more accurate estimate for C values could be made.

The hydrology and water quality analyses presented is the DEIR is based on a technical report completed by Brelje and Race Consulting Engineers in support of this EIR. That technical report, available for review at Sonoma State University Facilities Services Department, includes all assumptions and calculations used to reach conclusions presented in the EIR.

G-2 Studies by the SCWA conclude that, other than at the extreme west end of the study area, flood flows are currently contained within the banks of Copeland Creek. Mitigation Measure C.1b identifies construction of detention facilities within the expansion area to detain flood flows from the newly developed areas before they reach the creek channel. No diversion of flood flows out of the creek channel and into the detention ponds is proposed. As stated in Mitigation Measure C.1b, the on-site detention system would be designed in conformance with the Sonoma County Water Agency drainage design criteria. Access to the on-site detention ponds, which would be located outside of the creek channel, shall be designed into the project to facilitate routine maintenance of the ponds and removal of accumulated silt and debris.

G-3 Mitigation Measure C.1b identifies the installation of on-site detention ponds, which would ensure peak flow rate from the University area of development into the Copeland Creek would not increase. Therefore, an analysis of fluvial geomorphology is not needed. Potential increase in nonpoint source pollution during operation and construction are adequately addressed in Impacts C.4 and C.5, respectively, in the DEIR

G-4 Since the portion of the project site that is located within a 100-year flood zone is proposed for University housing, the commenter's proposed measure to allow flooding onto this floodplain is not feasible.

G-5 As described in Master Response 1 (at the beginning of Chapter IV of this response to comments document), the number of proposed bridge crossings of Copeland Creek is reduced from four (one combined vehicular/pedestrian crossing and three pedestrian-only crossings) assessed in the DEIR to three (one vehicular-only crossing and two pedestrian-only crossings). The proposed vehicular and pedestrian bridges would be clear-span type bridges, thereby avoiding potential impacts related to diversion, eddying

and scouring. Proposed bridges over the creek shall be designed to provide a minimum of 1 ½ foot of freeboard between the design 100-year water surface and the low-chord elevation of the bridge structures.

Under the proposed project, the University would acquire all necessary permits for new construction and/or maintenance of facilities within Copeland Creek (e.g., bridges, stormdrains). A compilation of this and other permits and approvals required to implement the proposed project has been added to the Project Description of the EIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

G-6 Comment noted. Implementation of Mitigation Measures C.4b in the DEIR would ensure the University's existing on-site street cleaning practices, and existing pesticide and fertilizer management plans would be expanded to include the northern acquisition area.

G-7 Comment noted. This feasibility of having the on-site detention ponds serve as permanent wetlands would be considered in design development of the proposed on-site detention basins.

G-8 Comment noted. Mitigation Measure C.4a has been revised. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

G-9 Comment noted. As specified in Mitigation Measures C.5, DEIR page IV.C-10, the University would develop and implement a Stormwater Pollution Prevention Plan (SWPPP), as required by the State Water Resources Control Board, for areas to be disturbed by construction activities of five acres or more.

G-10. As discussed under Impact C.6, implementation of Mitigation Measures C.1 through C.6 would mitigate the project's impact to hydrology and water quality, and therefore, the project's contribution to cumulative hydrologic and water quality impacts would not be cumulatively considerable.

G-11 Comment noted. The DEIR is amended to include an update to the description of the Federal Threatened Central California coast steelhead (*Oncorhynchus mykiss*) on page D-4 of Appendix D.2 in the DEIR, an update of Table IV.H-1 "Species Status Species with Moderate to High Potential for Occurring Within Project Area" on page IV.H-3 in the DEIR; and potential project impacts to, and required mitigation for, this species is included in Impact H.3 (impacts to sensitive animal species) on page IV.H.12 of the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

G-12 The proposed design for development under the Master Plan revision is not one that lends itself to significant increases in sedimentation. Following construction, surfaces on the project site would consist of either natural areas, proposed landscaped areas, buildings, and impervious parking areas. There would be no large areas of bare, exposed

soil or steep slopes. Implementation of Mitigation Measure C1 through C.5 would assure the potential increases in sedimentation during construction and post-construction would be mitigated to a less than significant level.

G-13 Potential impacts to biological resources within the Copeland Creek corridor are discussed in detail in Section IV.H, Biological Resources. See also Master Response 1 and response to Comment G-5.

City of Cotati

Sonoma County, California

H

December 13, 1999

Ms. Deborah Gannon-Duvall
Facilities Services
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, CA 94928

Re: Sonoma State University Master Plan Revision 1999

Dear Ms. Gannon-Duvall,

The City of Cotati appreciates the opportunity to comment on the Draft Master Plan Revision for Sonoma State University. In August, the City responded to the project NOP with a letter requesting analysis of cumulative traffic impacts to Cotati, as well as a detailed description of how water and sewer capacity issues will be addressed. Regarding your analysis of these areas we have the following comments:

1. Traffic – We are disappointed in the lack of analysis of impacts to downtown Cotati and East Cotati Avenue. The quantity of off-campus student housing required to reach 10,000 FTE will certainly impact downtown Cotati. We do not see any analysis of traffic impacts to Cotati or the campus if East Cotati Avenue were reduced to two lanes in Cotati and other circulation changes to the intersection of East Cotati Avenue and Old Redwood Highway were implemented which are currently under consideration. These issues were discussed with your traffic consultant. We request that this analysis be done and that the Rohnert Park General Plan buildout numbers be included in the analysis. 1

2. Both SSU and Rohnert Park are exceeding their wastewater treatment allocation. Does the University position that it is exempt from off-site mitigation permit the campus to expand without sewer treatment allocation and jeopardize other communities' allocations? Please articulate whether SSU plans to proceed without sewer capacity. 2

Below are several other comments on the EIR:

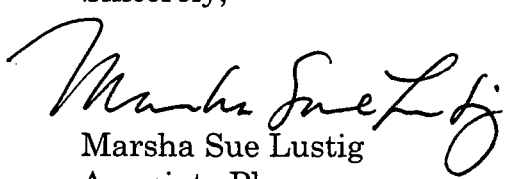
201 West Sierra Avenue, Cotati, CA 94931-4217 • TELEPHONE 707•792•4600 • FAX 707•795•7067

3. We strongly take issue with the University position that it is exempt from CEQA. Surely, the Legislature did not create this body of law with the intention of remaining exempt from its impacts? Impacts to surrounding jurisdictions need to be identified and mitigated. Will the Trustees make overriding considerations? What is the purpose of this EIR if it is not the mitigation of significant impacts (wherever they may be)? 3

4. Impact B.1 under Seismicity identifies a major earthquake as a significant impact. The text further states that an earthquake within the next 30 years will likely produce unavoidable injury to people and buildings. How will sending the building plans to a Seismic Review Board remedy this? Freestanding furniture and people will still be impacted and injury will still occur. Grid system or no this impact is still significant. 4

The City of Cotati has no issue with the concept of SSU expansion. A prospering university is a good thing. However, as a small town located directly in the expansion path of SSU and Rohnert Park we are concerned that this growth not be at Cotati's expense. Thank you for considering the City of Cotati's comments and queries in your evaluation of the expansion of SSU.

Sincerely,



Marsha Sue Lustig
Associate Planner

c: City of Cotati City Council
Dennis Dorch, Director of Planning

LETTER H – CITY OF COTATI

H-1 In recognition of other intersections outside the project study area that potentially could be affected by the University Master Plan revision, four additional intersections are assessed herein, consisting of three additional intersections in the City of Rohnert Park (Rohnert Park Expressway/U.S. 101 northbound ramps, Rohnert Park Expressway/U.S. 101 southbound ramps, and Rohnert Park Expressway/Commerce Drive), and one intersection in the City of Cotati (East Cotati Avenue/Old Redwood Highway). See response to Comment E-15.

H-2 See response to Comment B-9.

H-3 This EIR has been prepared for the proposed University Master Plan revision by the California State University (CSU) Trustees (serving as Lead Agency for the project) in conformance with CEQA. The EIR describes all potentially significant environmental impacts associated with buildout of the University Master Plan revision. For each significant impact identified in this EIR, the EIR identifies, to the extent possible, mitigation measures to avoid or substantially reduce the project's significant environmental effect.

The CSU Trustees do not have unlimited authority to implement the mitigation measures identified in the EIR, however. In mitigating a project's significant impacts, the lead agency may exercise only its express or implied powers provided by law, aside from those provided in CEQA. If under law, an agency lacks the legal authority to impose those mitigation measures for a significant environmental impact, CEQA does not provide that authority. In the case of mitigation measures identified in the EIR that are outside of the University's jurisdiction to implement, and/or which the University cannot legally allocate funding for, the DEIR identifies the entity that has the necessary authority and/or responsibility the mitigation responsibility lies with.

CEQA requires that the Lead Agency shall not approve or implement the project as proposed unless the project's significant environmental effects have been reduced to a less-than-significant level, except under certain conditions. If the Lead Agency does approve the project despite residual significant adverse impacts that cannot be mitigated to less-than-significant levels, the agency must state the reasons for its action in writing. This "Statement of Overriding Considerations" must be included in the record of project approval, including specific findings that state the justification for accepting the remaining significant impacts.

Prior to approval of the project, the CSU Board of Trustees must certify the Final EIR and adopt a reporting and monitoring program for all mitigation measures identified in the EIR in accordance with the requirements of Public Resources Code Section 21081. The monitoring program will ensure that all mitigation measures are implemented.

H-4 As identified in Mitigation Measure B.1 on page IV.B-12 in the DEIR, construction under the project shall comply with site-specific recommendations and standards for seismic design as provided by the project geotechnical engineer; the seismic design requirements of the California Code of Regulations, Title 24; and as recommended by the CSU Seismic Review Board. This mitigation measure would ensure potential significant impacts associated with seismic groundshaking in the event of an earthquake would be mitigated to the maximum extent feasible and to a less than significant level.

SONOMA STATE UNIVERSITY

Department of Environmental Studies and Planning
707 664-2306

1801 East Cotati Avenue
Rohnert Park, California 94928-3609

I

December 15, 1999

Deborah DuVall
Director of Planning
Facilities Services
Sonoma State University
Rohnert Park, CA 94928

Dear Ms. DuVall:

Thank you for the opportunity to comment on the Draft EIR for Sonoma State University's proposed Master Plan Revision. I offer these comments in hopes of improving the current project design, and would welcome the opportunity to work with others at SSU toward this goal.

My training and expertise are in the biological sciences, and the majority of my comments focus on specific biological deficiencies of the DEIR, in particular as the proposed music center development would affect Copeland Creek and associated habitats. These deficiencies are significant, and should be addressed before the EIR is certified. I outline these deficiencies below.

However, in addition to their immediate and specific significance, the deficiencies of the DEIR reflect more fundamental problems that unnecessarily compromise the quality of the project. I preface my remarks on the specifics of the DEIR with comments on three of these broader issues with the hope that they can be addressed with future modifications of the planned development.

First, the conservation of campus biological resources does not appear to have been considered in the initial design of the project. The placement of music center buildings and other features, the aerial extent of parking facilities, and the proposed plantings and landscaping all constitute a plan that ignores the first principles of conservation biology by encroaching on the riparian corridor, creating larger-than-necessary edge and disturbed habitats, unnecessarily fragmenting habitats, disrupting hydrology of wetlands, and introducing exotic species. This lack of consideration of biological resources at the plan's outset is the ultimate cause of most of the plan's specific biological problems (detailed below). The plan should be broadly modified to increase protection of biological resources. 1

CHAPTER IV

WRITTEN COMMENTS ON THE DRAFT EIR AND RESPONSES TO WRITTEN COMMENTS

This chapter includes copies of the comment letters received during the public review period on the Draft EIR and responses to those comments. Where responses have resulted in changes to the text of the Draft EIR, these changes also appear in Chapter II of this Final EIR Response to Comments Document.

MASTER RESPONSE 1 – MODIFICATIONS TO PROPOSED DEVELOPMENT IN THE NORTHERN ACQUISITION AREA

In response to comments received on the DEIR, and meetings that have occurred subsequent to publication of the DEIR between the University and interested agencies (e.g., the California Department of Fish and Game) and community groups (e.g., Friends of Copeland Creek) regarding proposed development in the northern acquisition area under the Master Plan revision, the University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area. Below is a description of the primary changes that are designed to improve the relationship between proposed development and existing natural resources on the site, and to reduce potential environmental effects. Figure 1 provides an illustration of the modified site plan for the northern acquisition area.

Configuration and Location of Center for the Musical Arts Building: The Center for the Musical Arts building would be reconfigured and located further north on the site, away from Copeland Creek. The south edge of the south wing of the modified Center for the Musical Arts Building would be approximately 100 feet further north from Copeland Creek than the building analyzed in the DEIR.

Buffer Zone Width: The width of the proposed Buffer Zone (which originates at the top of the creek bank and extends laterally along the creek) has been increased to an average of150 feet (from an average of 100 feet, which was assessed in the DEIR). As under the Buffer Zone assessed in the DEIR, within the zone, no development would be allowed that would not meet the goal of avoiding or minimizing potential adverse ecological effects to the creek preservation area. The Buffer Zone would serve as a potential restoration site for mitigation for biological impacts generated by development activities elsewhere on the campus. Uses within the Buffer Zone would be restricted to, and consistent with, those uses identified within the Creek Preservation Zone.

Upland Zone in Wetland Area: A suitable upland mitigation area (approximately 500 feet in length, and ranging between approximately 40 and 75 feet in width) is proposed, serving as a buffer between the wetland area and the parking area.

Second, the plan does not consider the larger geographic context of the SSU campus and the potential for improved environmental quality resulting from the many restoration efforts being undertaken throughout the Copeland Creek watershed. For example, the plan's assessment of potential for occurrence of various species is based on the assumption that conditions in the Copeland Creek riparian corridor are fixed at their current levels. This does not take into consideration several recent developments that will improve biotic conditions along Copeland Creek including: the acquisition by SSU of the Fairfield Osborn Preserve (location of the headwaters of Copeland Creek); improving conditions in already relatively intact reaches of the stream below the Preserve (NMFS personal comm. 1999); a large restoration effort being undertaken by the Sonoma County Water Agency (SCWA) just upstream of SSU (SCWA 1999); restoration work in the Laguna de Santa Rosa; and ongoing restoration of the campus section of the creek by the campus organization Friends of Copeland Creek. The result of these developments is likely to be a creek with substantially improved potential as habitat. Similarly, the plan's designation of the Creek protection zones based on the present dripline of trees along the north side of the creek ignores the fact that this dripline is an artifact of past agricultural uses, and does not reflect site potential. By restricting future potential to present conditions, the plan unnecessarily limits the future of the creek as a biological, aesthetic, and educational resource for SSU. 2

Third, and perhaps most fundamental, the plan does not reflect a recognition of the huge potential of the project beyond the benefits of the musical arts facility. Copeland Creek and its associated wetlands are an example of some of the most endangered (Noss and Peters 1995) and biologically valuable (Warner and Hendrix 1984), as well as aesthetically desirable, ecological communities in California, and perhaps North America. Because of an unusual set of circumstances, including watershed-wide restoration activities, campus control of substantial portions of the creek, and intellectual resources and an interested academic community, we have a unique opportunity to produce a world-class restoration of this ecosystem with virtually all of its ecological, biological, aesthetic and cultural resources and functions intact. This project could serve as a model for how to restore an ecosystem and integrate that restoration into a working campus. It would complement other developments on campus, including the music facility, and provide a real sense of environmental and geographic identity for SSU. Perhaps most important, it would provide the opportunity to build a world-class learning laboratory, a model resource for instruction and research that will make SSU a leader, both in environmental restoration and education. For this to occur, however, we must be sure that current plans do not unnecessarily compromise future success. 3

***Specific comments*:**

California Steelhead (pp. D.2, 4)

California Steelhead (*Oncorhynchus mykiss*), a species listed as "Threatened" under the Endangered Species Act, is considered in the DEIR as having low potential for occurring in the project site. However, the California Department of Fish and Game found juvenile steelhead in Copeland Creek upstream of campus in summer 1999 (CDFG 4

pers. comm. 1999). No effort was made to locate fish in the campus section, but adults returning to spawn and juveniles leaving for the ocean are presumed to travel through the campus section of Copeland Creek (CDFG pers. comm. 1999).

Because the DEIR considered this species to have low potential for occurring in the creek, the requirements of the species and impacts of the project on it and its migration habitat requirements were insufficiently addressed. Now knowing that the fish occur in the creek, the DEIR must address these issues.

In addition, the finding of this species approximately two miles upstream of SSU increases the likelihood that the campus section of creek itself may be used for reproduction or juvenile nursery habitat. Therefore, appropriate surveys for the species should be conducted to determine if these uses occur in campus creek sections. If so, the effects of the project on these aspects of the species' life cycle must be addressed in the DEIR. 4 Cont.

Even if Steelhead are not found to reproduce or reside as juveniles in the campus section of the creek under current conditions, ongoing restoration of the creek may create sufficient habitat improvement to allow them to reproduce and live there in the future. One of the justifications for the SCWA restoration of the section of creek on the upstream side of the SSU campus is enhancement of salmonid habitat. Existing and future restored conditions should be assessed for suitability as Steelhead habitat; if this assessment indicates that restoration is likely to result in favorable habitat for Steelhead reproduction or rearing, the effects of the project on these functions should be addressed in the DEIR.

California Coho Salmon

California Coho Salmon (*O. kisutch*), a species listed as "Threatened" under the Endangered Species Act, is not discussed in the DEIR. However, no species inventory was conducted and, the species is known to occur elsewhere in the Russian River watershed. The recent discovery of another listed salmonid (California Steelhead) two miles upstream of SSU and the lack of a systematic inventory of the creek's fish species indicates that before actions are taken, the possibility that Coho salmon exist in the creek should be investigated. This is particularly important given the low tolerance of Coho salmon to human disturbance. 5

Even if Coho are not found to exist in the creek under current conditions, ongoing restoration of the creek may create sufficient habitat improvement to allow them to occur there in the future. One of the justifications for the SCWA restoration just upstream of SSU is enhancement of salmonid habitat. Existing and future restored conditions should be assessed for Coho habitat. If this assessment indicates that there is a significant likelihood that the restoration will result in conditions favorable to Coho salmon, the effects of the project on the species should be assessed by the DEIR.

Species of concern considered to have low potential for occurrence despite restoration potential (pp. D 2-3, 6-7)

Two bird species, the Tri-colored blackbird (*Agelaius tricolor*) (Federal Species of Concern) and the yellow billed cuckoo (*Coccyzus americanus occidentalis*) (State Endangered), that could occur at the project site are classified as having low potential for occurring there and thus potential impacts to them are not thoroughly considered in the 6

DEIR. Both of these species use riparian habitat similar to that along Copeland Creek and both were formerly present in the area, although neither in the last 20 years.

As with Coho salmon, however, even though these species have not been present under recent conditions, ongoing restoration of the creek may create sufficient habitat improvement to allow them to occur there in the future. The likelihood of future occupancy of the restored habitat for tri-colored blackbird and cuckoo should be assessed. If this assessment indicates that restoration is likely to result in conditions favorable to these species, the potential effects of the project on them should be addressed. 6 Cont.

Species of concern likely to be present are not discussed in the DEIR

Two vertebrate species of concern that are likely to occur at the project site receive no mention in the DEIR. These are the Yellow warbler (*Dendroica petechia brewsteri*), a State Species of Special Concern, and the Perigrine falcon (*Falco peregrinus*), protected under the Cal. State Endangered Species Act and California Fish and Game Code. Yellow warblers nest in riparian woodlands of the type that already exists and is being restored along Copeland Creek. They are known to have occurred on the SSU campus in recent years. 7

These species, their habitat requirements, and the impacts of the project on them and their habitat, must be addressed in a DEIR. Species inventories should be carried out to determine if these species are present.

Lack of species-specific surveys (pp. IV H 2)

Species-specific surveys are essential to knowing what biological resources exist on a site. This is true for all species, but is particularly important for species of concern, and especially for cryptic species, such as the California tiger salamander (*Ambystoma californiense*), a Federal Species of Concern. The two site visits conducted to assess populations of this species, which has only a short period of terrestrial activity, were inadequate. More extensive surveys of this and other species are needed to produce enough biological information on which to base judgements about project impacts. 8

Inadequate mitigation: translocation of displaced yellow-legged frogs and other species (pp. IV 12-14)

Proposed translocation of yellow-legged frogs (*Rana boylii*) (Federal Species of Concern) and other species displaced by the project is not an effective mitigation for loss of habitat. Aside from questions about the feasibility of the proposed location and capture of the animals, most threatened and endangered species and species of concern, including yellow-legged frogs, are threatened precisely because of lack of habitat (Wilcove et. al 1998). Therefore, to move displaced individuals to another habitat accomplishes little, since it is the habitat that is limiting the species. Furthermore, translocations of animals have mixed success at best. To be successful, this strategy requires an enormous amount of information about the organisms and the habitats into which they are moved. There is no indication in the DEIR that such information is available. 9

Inadequate mitigation: monitoring and research should be included in wetland creation (pp. IV 11)

The DEIR identifies 0.75 acres of wetland that will be lost in development of the music facility, and proposes creating 2.25 acres of wetland in mitigation. However, the track record for created wetlands is mixed, and the time required for establishment of wetland function can be great (Zedler and Callaway 1999). Therefore, mitigation should include resources for monitoring, management, and research on the created wetland after the project is completed. 10

Loss of raptor winter foraging range

The music building, parking area, lawn, and other non-native vegetation associated with the project will cause a loss of winter foraging area for several species of raptors which hunt in grasslands and fields, including White-tailed kite (*Elanus leucurus*), Red-shouldered hawk (*Buteo lineatus*), Red-tailed hawk (*B. jamaicensis*), and Northern harrier (*Circus cyaneus*), all of which have been seen in and around the project site. The loss of this relatively large site represents one of many incremental losses due to rapid growth in the area, and contributes to a large negative cumulative impact on these species. The DEIR does not address this issue. 11

Creek Preservation Zone is too narrow:

a) No biological justification of width of riparian corridor

The DEIR does not demonstrate that the Creek Preservation Zone is wide enough to serve as an effective habitat and movement corridor for animal species. Forest habitat fragments—such as the Copeland Creek riparian corridor—consist of interior habitat, which contains intact forest conditions; and edge habitat, forest near the boundaries of the fragment, where conditions depart from interior habitat because of different physical conditions (e.g., more light and wind, lower humidity, more extreme temperatures) and biological conditions (e.g., greater numbers of generalist predators, nest parasites, invasive species, human disturbance). Depending on the factor being examined, edge conditions can penetrate into a forest fragment for a few feet to several hundred meters. The narrower a habitat fragment is, the greater the proportion of edge, and the less interior habitat is available to those wildlife species that depend on interior conditions. Thus, for these species only a portion of the forest fragment serves as effective habitat. For example, many studies have found that forest birds suffer increased nest predation from crows, raccoons, cats, etc., and reduced reproductive success with increased proximity to forest edge (e.g. Wilcove et al. 1986). Similarly, for forest fragments to serve as wildlife movement corridors, they must be of sufficient width, determined by the habitat and the behavior of the species of concern. 12

The foregoing indicates that in order to provide effective habitat for wildlife other than edge species (which are well provided for in any event), the plan should delineate the Copeland Creek corridor based on information about habitat value. In the absence of such information, the corridor should be as wide as possible. However, the DEIR offers no biological rationale for the width of the Creek Preservation Zone, nor any analysis of what would be a desirable width from a habitat point of view. Lacking this information, the plan should put as much distance between the creek and the facilities as possible. This is especially important, given the fact that the actual riparian habitat is much

narrower than 100 feet in many places on the south side of the creek. The DEIR should present analysis of creek corridor width options.

One example of an alternative that the DEIR should explore is simply to move all music center facilities northward. If the parking lots were moved as close as possible to the Rohnert Park expressway, approximately 120 feet could be added to the width of the riparian corridor. The music buildings and other facilities should also be moved away from the creek. In addition to increasing habitat value with a wider riparian corridor, this would reduce flood danger and provide more options for flood control and runoff management. 12 Cont.

b) Current dripline is an artifact

Related to the above, the use of the current dripline to define the creek zone is not appropriate because the location of the current dripline is an artifact of past agricultural land use and does not reflect the potential boundary of the riparian forest. Within the corridor on the north side of the creek, trees appear to be younger with greater distance from the creek, and even those farthest from the creek are nearly all willows (*Salix spp.*), a tree species with high water requirements. This suggests that the north dripline is moving northward as succession reclaims the former agricultural land, and that the riparian forest could extend substantially farther northward, becoming increasingly dominated by species with lower water demands, such as California Buckeye (*Aesculus californicus*), Valley Oak (*Quercus lobata*), and Coast Live Oak (*Q. agrifolia*), and eventually grading to open woodland. The plan should consider the potential extent of the riparian forest in defining the Copeland Creek Riparian Zone. 13

Fragmenting effects of bridges

Habitat fragmentation, along with outright loss of habitat, is the leading cause of current loss of biological diversity. Each road or path constructed across a forest habitat results in additional fragmentation of that habitat. Therefore crossings should be kept as few and small as possible. The three creek crossings proposed in the plan should be reduced to two, and resources should be directed at research on the fragmenting effects of these bridges. Contingent on these findings, an additional bridge could be considered later. The DEIR should assess the fragmenting effects of the bridges. 14

Other effects of the vehicular bridge on biological resources

Wider and noisier than paths, roads are particularly serious fragmenters of habitats. They also create noise which can disrupt wildlife (see below), are serious weed vectors, and pose large additional mortality factors for some wildlife species. The DEIR does not assess these impacts and should do so. In the absence of information that shows these impacts to be insignificant, the currently designated vehicular bridge should be changed to a vehicle-compatible, one-way, service road that would be normally closed to vehicular traffic. 15

Noise impacts on wildlife

The DEIR does not analyze the effects of noise—noise associated with events and everyday noise—on the animal species inhabiting the riparian corridor. Automobile noise can affect animal behavior and development in a variety of ways, and has been found to negatively affect bird populations (e.g. Thissen 1995). Noise was a reason for 16

not locating the music facility near instructional buildings (p. V 6), indicating that project developers anticipate substantial noise levels. The DEIR should analyze this potential impact on wildlife in the creek corridor. 16 Cont.

Effects of non-native species included in project planting plan

A major environmental problem along the SSU section of Copeland Creek is non-native invasive plant species, which have choked out native species in many places. Non-native plants have other negative effects as well, including providing poorer habitat than the native vegetation they replace. Three of the non-native plants along the creek, *Maytenus boaria*, Tree of Heaven (*Ailanthus altissima*), and Eucalyptus (*E. spp.*) are ornamental trees that have become invasive. The experience with these species points up the need to carefully study the likely effects of non-native species before planting them in or near a natural area. The DEIR specifies that the project will use non-native vegetation, but offers no analysis as to the potential for invasiveness of these species. The DEIR should include such analysis. The DEIR should also be more specific in what plant species will be used. Furthermore, the project should use native species rather than non-natives, particularly in areas of the project that are close to the riparian corridor. Native species are less likely to be invasive and will be more valuable for habitat. 17

Insufficient analysis of human disturbance in Creek Zone

The presence of thousands of people in an outdoor performance venue near a natural area creates the potential for frequent large-scale disturbance of the plants and animals of the natural area. The DEIR should be more specific in how this potential problem will be addressed. In particular, the DEIR should set out a plan for preventing frequent incursions of people into the riparian zone, dumping of materials into the zone, increased fire danger in the zone, and other potential problems. Part of the solution to these problems could be to move the outdoor seating farther from the creek zone. 18

Related to this, recreational trails and human transportation routes should be located so as to minimize impacts on habitats. In general, they should be placed at the periphery of the buffer (i.e. on the side away from the creek) to maximize distance between human disturbance and the riparian forest. The bicycle path located in the riparian corridor between the music center and Petaluma Hill road would be a major source of human disturbance in the riparian corridor, and should be eliminated.

Inadequate analysis of options for stormwater runoff from campus south of Copeland Creek

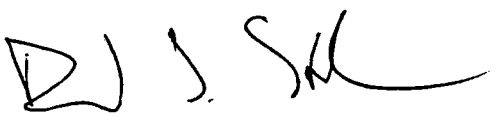
Drainage of stormwater from campus into Copeland Creek is currently a serious problem. The development described in the DEIR will compound this problem, as a greater proportion of the campus will be covered with impervious surfaces. The DEIR should discuss alternatives to solve this problem. One such alternative is to continue to route storm runoff to the creek but 1) maintain a sediment trap upstream of campus to avoid siltation of culvert outfalls, 2) construct a detention wetland or pond through which storm runoff from the upstream culvert would be held before entering the stream, and 3) provide greater width on the north side of the creek for flood waters to flow, either undirected over the surface or in an auxiliary natural channel. Such a solution would result in a more natural and ecologically sound riparian system and would reduce 19

flooding on campus and downstream. However, it would require a wider stream corridor than is envisioned in the DEIR, another reason to avoid unnecessarily narrowing the riparian corridor. The DEIR should address this issue and discuss alternatives.

19 Cont.

Thank you again for the opportunity to comment on the DEIR. I hope these comments are useful in developing a sound plan that makes the most of this great opportunity for Sonoma State University. If I can be of use in any furture efforts along those lines, I would be happy to participate.

Sincerely,



David L. Stokes, Ph.D.
Assistant Professor, Environmental Studies and Planning

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LETTER I – DAVID L STOKES, Ph.D.

I-1 The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, designed to improve the relationship between proposed development and existing natural resources on the site, and further minimize potential environmental effects. Proposed modifications include, among other features: relocating the Center for the Musical Arts further north, away from Copeland Creek, increasing the width of the proposed Creek Buffer Zone, providing an upland zone in the wetland area, reducing the number of bridge crossings of Copeland Creek from four to three, locating all pedestrian and bicycle paths outside the Creek Buffer Zone and the existing limits of riparian vegetation (other than the approaches to the bridge crossings of Copeland Creek) and wetland area, and dividing the parking area into four quadrants separated by open space. See also Master Response 1 (at the beginning of Chapter IV of this response to comments document), and response to Comment I-17, below.

I-2 As discussed in the DEIR, in recognition of the importance of Copeland Creek to the campus environment and the academic program, a Copeland Creek Ecological Resource Protection Plan is being prepared as part of the Master Plan revision. The design concept for the protection of Copeland Creek's ecological resources is based in part on measures that have been developed for other riparian areas in the area (including the Laguna de Santa Rosa and Santa Rosa Creek). The two primary features of the plan are the designation of Creek Preservation and Buffer Zones (as illustrated in Figure III-5 in the DEIR, and modified in Figure 1 in this response to comments document). The Creek Preservation Zone would correspond to the "dripline" of the trees in the riparian woodland along the creek. Within the Preservation Zone, uses would be restricted to scientific study, ecological enhancement and restoration (other than proposed vehicle and pedestrian bridges).

The Creek Buffer Zone, would encompasses a zone originating at the top of creek bank and would extend laterally along the creek, for a 150-foot-width average (under the proposed modifications as discussed in Master Response 1). Within the Buffer Zone, no development would be allowed that would not meet the goal of avoiding or minimizing potential adverse ecological effects to the creek preservation area. The Buffer Zone would serve as a potential receptor site for mitigation (e.g., potential wetland creation and restoration) for biological impacts generated by development activities. Uses within the buffer zone would be restricted to, and consistent with, those uses identified within the creek Preservation Zone.

Another one of its proposed goals is the formation of an ongoing task force made up of University faculty, staff and students, along with local agency input, to develop and manage the protection plan. This will help to ensure all proposed utilization of this area would be coordinated with interested local agency and public groups.

I-3 See response to Comments I-1 and I-2.

I-4 Comment noted. The DEIR is amended to include an update to the description of the Federal Threatened Central California coast steelhead (*Oncorhynchus mykiss*) on page D-4 of Appendix D.2 in the DEIR, an update of Table IV.H-1 "Species Status Species with Moderate to High Potential for Occurring Within Project Area" on page IV.H-3 in the DEIR; and an assessment of potential impacts to this species from the proposed project, and required mitigation, in Impact H.3 (impacts to sensitive animal species) on page IV.H.12 of the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

I-5 There are no known records of coho salmon in Copeland Creek, and the species has low potential of occurring within the project area. However, the SCWA's proposed Copeland Creek Restoration Project upstream of the campus could potentially contribute to future coho salmon use of the creek.

The DEIR is amended to include a description of the federally threatened and State endangered Central California coho salmon (*O. kisutsch*), in Table D-1 "Species Status Species with Low Potential for Occurring Within Project Area" on page D-2 of Appendix D.1 in the DEIR, and on page D-4 of Appendix D.2 in the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR. Implementation of Mitigation Measure H.3a-c (as revised) would ensure potential impacts to salmonids in Copeland Creek, including the Central California coho salmon, would be mitigated to a less than significant level. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

I-6 Neither the tri-colored blackbird nor the yellow-billed cuckoo have been observed in the vicinity of Copeland Creek in the past 20 years. However, ongoing restoration of the creek could enhance habitat for the tri-colored blackbird, and the proposed Creek Preservation and Buffer Zones would not foreclose this possibility. Table IV.H-1, Table D-1 in Appendix D, and Impact H.3 in the DEIR are amended for the Tri-colored blackbird *(Agelaius tricolcor)*. Implementation of Mitigation Measure H.3a-c (as revised) would ensure potential impacts to birds, including the tri-colored blackbird, would be mitigated to a less than significant level. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

I-7 Yellow warblers nest in deciduous riparian habitats. The commenter reports that this species is known to have occurred on the University campus in recent years. Table IV.H-1 and Impact H.3 in the DEIR are therefore amended to include the yellow warbler *(Dendroica petechia brewsteri)*. Implementation of Mitigation Measure H.3a-c (as revised) would ensure potential impacts to birds, including the yellow warbler, would be mitigated to a less than significant level. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

Peregrine falcons typically nest on cliff faces and forage in open grasslands. They are not likely to use the project site regularly or as an essential part of their habitat. Therefore, potential impacts to this species are considered less than significant.

I-8 The California tiger salamander requires California ground squirrel or other burrows in upland areas in which to estivate, and the tiger salamander breeds in temporary pools. Potential breeding habitat in the project area would be protected, and construction in Copeland Creek will not occur during the breeding season of the tiger salamander (see Mitigation Measure H.3a-c, as revised). Estivation habitat is likely to be of poor quality in the farmed portions of the northern acquisition area because California ground squirrels need areas that are not tilled each year. Therefore development of these areas is not likely to have an adverse effect on habitat suitability for the California tiger salamander. General loss of upland habitat is discussed in Impact and Mitigation Measure H.2. See also Master Response 1.

I-9 Translocation of yellow-legged frogs is a feasible and acceptable mitigation measure, especially in light of the minor and mostly temporary nature of impacts in Copeland Creek. Note, for clarification, Impact and Mitigation H.4 has been incorporated into Impact and Mitigation H.3, and expanded. See Chapter II in this response to comments documents for changes made to the DEIR.

I-10 Comment noted. Please see revised Mitigation Measure H.1, in Chapter II of this response to comments document.

I-11 Development in the northern acquisition area would cause a loss of winter foraging area for raptor species that hunt in grasslands. This would be considered adverse, but not significant given the extensive grassland and agricultural lands nearby. Impact H.2 is modified to acknowledge the adverse loss of foraging habitat. Please refer to Chapter II in this response to comments document for revisions made to the DEIR. See also response to Comment I-17.

I-12 The proposed Buffer Zone was developed by the project's lead biologist for the Master Plan revision in consultation with the University and master plan revision landscape architect. The designation of the appropriate buffer zone for Copeland Creek was developed in consideration of a number of factors, including relevant biological studies (Bucholz, 1984; Hynson et al, 1985; OTA, 1987), previous experience with the Laguna Reserve in Sebastopol, and site-specific characteristics of the Copeland Creek corridor. Research indicates a variety of buffer distances have been incorporated into reserve areas throughout the Bay Area, with the majority of the buffer distances consisting of no more than 100 feet. As an example, in the case of the Laguna Reserve, a 50-foot buffer (from the dripline of riparian vegetation) was established for areas adjacent to urban uses, and a 100-foot buffer was established between the 100-year flood elevation and any future development.

The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, including increasing the proposed buffer zone width, and relocating the Center for the Musical Arts further north, away from Copeland Creek. See Master Response 1.

I-13 Comment noted. The proposed Creek Buffer zone would extend well beyond the dripline, allowing riparian vegetation to expand farther from the creek bed.

I-14 The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, including reducing the number of bridge crossings of Copeland Creek from four to three, and locating all pedestrian and bicycle paths outside the Creek Buffer Zone and the existing limits of riparian vegetation (other than the approaches to the bridge crossings of Copeland Creek). See Master Response 1.

I-15 Vehicular traffic would generate noise and would increase the risk of mortality for riparian-associated animals on the vehicular bridge and approaches to the bridge, however, animals would be able to cross unrestricted under all proposed clear span bridges. Regarding effects of noise on wildlife, see response to Comment I-16.

I-16 Studies of wildlife response to human-caused noise indicate that when the noise is predictable and benign, wildlife generally become acclimated to the disturbance and it causes little response (Knight, Richard and David N. Cole, "Effects of Recreational Activity on Wildlife in Wildlands," pp. 238-247, Trans. 56th North American Wildlife and Natural Resources Conference, 1991)

I-17 Comment noted. A new mitigation measure (Mitigation Measure H.2c) is added to the EIR. Under the measure, all plantings within the proposed Creek Buffer Zone shall consist of locally indigenous native species. Elsewhere within the northern acquisition area, at least 50 percent of the upland areas proposed as "Sonoma landscaping" shall be vegetated with locally indigenous plant species in assemblages resembling natural communities, such as oak woodland, oak savanna and grassland. Non-native species, such as wine grapes, may be used elsewhere in the areas proposed as "Sonoma landscaping." Invasive non-native species (including tree-of-heaven, mayten tree, broom, giant reed, and pampas grass) will not be used in the landscaping of the proposed project (an exception would be eucalyptus, which could be planted in the courtyard proposed Center for the Musical Arts). Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

I-18 See Response to Comment I-1.

I-19 As discussed throughout Section IV.C of the DEIR, mitigation measures are identified to for all potentially significant impacts associated with flooding under the project. Specifically, the project shall include a suitable drainage infrastructure and on-site detention system in the northern acquisition area, in conformance with the Sonoma County Water Agency drainage design criteria, that will limit the 100-year peak flow into Copeland Creek (Mitigation Measure C.1a and C.1b). All new development in the northern acquisition area shall be designed with grades and landforms sufficient to prevent stormwater breakout from a 100-year flood flow (Mitigation Measure C.2).

SONOMA STATE UNIVERSITY

Department of Biology
707 664-2189

1801 East Cotati Avenue
Rohnert Park, California 94928-3609

December 15, 1999

J

To: Deborah Gannan-DuVall,
Director of Planning, Facilities Services
Sonoma State University
Rohnert Park, CA 95409

From: Philip T. Northen, Chair
Department of Biology
Sonoma State University
Rohnert Park, CA 95409

Subject: My comments on the Draft EIR for the Sonoma State University Master Plan Revision

Dear Deborah:

As you may recall, I reviewed the plan with you to provide my verbal input a few months ago. At that meeting I endorsed the concepts of wetland protection and development of a buffer along Copeland Creek. I also emphasized that buffers along creeks should protect a whole spectrum of habitats, including grassland/oak savanna. I emphasized that enhancing or restoring natural communities such as oak savanna on the large berms that border the music center would enhance the natural qualities of the site.

I find the DEIR to be sound in many areas, and, with regard to biological issues, to be based not only on the work of competent professionals within the EIR team but on work of other biologists on the site. Nonetheless, the DEIR does not meet my expectations for identifying impacts and specifying mitigation measures necessary to protect Copeland Creek, and does not address one key impact impact at all: loss of foraging area for raptors and riparian birds. The DEIR also does not present adequate means for mitigating loss of seasonal wetland. Finally, it does not identify an "intermittent drainage" as a real tributary of Copeland Creek, which it is, and does not deal with the need to mitigate for loss of this creek as riparian habitat, *per se.* 1 2 3

In reviewing the DEIR, I have noticed a number of ways in which it needs revision, which I detail below. I also noticed, however, that the plan for the music facility would allow for inclusion of the intermittent drainage as a real creek. Adding this creek as an 4

element in the plan would enhance the property immensely in addition to providing a mitigation for impact. I present this idea in Part C of my response below. 4 Cont.

Here are my comments:

A. Deficiencies in the DEIR.

1. The description of Copeland Creek and its adjoining riparian forest is too brief. It provides no information on the successional status of the plant community, which would be determined from a description of the stature and geographic relationships of the constituent tree species. Importantly, the extent of this community in relation to the proposed 100 foot setback is implied but not explicitly depicted. The public, therefore, does not know whether or not the riparian forest would be reduced by the project. Additionally, natural creeks historically had ecotones with grassland/oak savanna habitat that is necessary for full ecological function of the riparian zone. Such habitat not only provides additional plant diversity, but it also provides a feeding zone required by some of the birds that nest in the riparian forest. The existing agricultural/ruderal areas fulfill this function, which is not addressed in the DEIR. 5

2. The agricultural/ruderal plant communities in the area north of Copeland Creek are part of an area that is used extensively by raptors. These zones may also be critical for survival of the much-loved owls that nest on campus. One of the more common skulls seen in pellets of these owls is that of the California vole. This small mammal clearly is not present in landscaped areas of campus, and must therefore be coming from the ruderal, abandonded agricultural areas, such as those north of Copeland Creek, or from surrounding grazing land.

   Nesting potential is referred to in the report as an impact on birds, but the use of the open land for feeding by these birds is not. The area north of Copeland Creek, along with similar areas along Petaluma Hill Road, is used extensively by wintering predatory birds, particularly the red-shouldered hawk. The project would remove a significant segment of this habitat in a geographic zone where incremental loss due to other projects is also occurring, hence should be considered a significant cumulative impact. 6

Partial mitigation could take the form of assuring that the sound-deflecting berms proposed for the project are restored to native grassland/oak savanna that produces prey for these species. The impact is not fully mitigable, however, hence a statement of overriding concern may be necessary. 6 Cont.

3. The "intermittent drainage" described on page IV. H-8 is a seasonal tributary of Copeland Creek, but is not identified as such. It carries water from open land north of the Rohnert Park Expressway across the site to Petaluma Hill Road and thence into Copeland Creek. Most such ditch/roadside creeks represent degraded forms of natural drainages, which may be true of this one as well. I noted on a brief field inspection that the current channel clearly has been dug, but it was probably created in response to drainage problems that arose with an earlier alteration of the site for agricultural. Despite its origin, this creek has proven ability to support true riparian forest as evidenced by stands of willow along its length. It also has supported large stands of the native wetland grass, creeping wild rye. One element of restoration for entire creek systems is bringing these "ditches" back to life as real creeks wherever possible, and SSU has an obligation to do its part in this regard. 7

The DEIR addresses this intermittent drainage on page IV. H-8 only in terms of its mapped seasonal wetland component, not as a creek. With a length of approximately 1,000 ft (DEIR page III-4) the reported value of .24 acres given on page IV. H-8 is equivalent to a "mitigation-requiring" width of only 10.5 ft. In Fig. IV. H-1, however, the area is mapped as having a width of about 50 ft and an area of about 1.1 acres. This width represents the riparian zone of the creek in its current condition, but additional years would clearly allow it to develop further. For example, there are at least two healthy, small coast live oaks mixed in with the willows, and time would allow these trees to add greatly to the total canopy of the forest. In my opinion, the creek should require a mitigation of at least 1.5 acres of riparian habitat, not .24 acres of wetland. Below, I present a creative plan for using this creek as an asset on the site, while at the same time mitigating the impacts the EIR should address.

4. The DEIR does not present an adequate mitigation for loss of the eight seasonal wetlands mapped in Fig. IV. H-1 and described on page IV. H-7. These wetlands contribute uniquely to the biological diversity of the site. In mitigation 8

measure H.1c, the DEIR refers to a maximum mitigation ratio for this habitat of 3:1, which is adequate in my opinion because the wetlands do not contain any rare or endangered plants. The mitigation measure, however, only points to a place (east of the north-south tributary) where such mitigation might occur, and to a possible means for creating wetlands (removing soil to a depth of 6-20 inches). The DEIR should present at least a concept plan, with the following elements:

a. A thorough analysis of the hydrology and biology of the wetlands as they now exist. Without "pre-mitigation" data, mitigation is impossible.
b. Creation of transplant habitat that adequately mimics the known hydrology of the existing wetlands.
c. Description of alternative means by which seed and soil from the existing pools will be transplanted.
d. Specification that there shall be a monitoring/management plan to evaluate and assure success of the project.

8 Cont.

5. Mitigation Measure H. 1b on page IV. H-11 is inadequate to protect Copeland Creek because it does not specify any required mitigation at all. It refers to the Copeland Creek Ecological Protection [Plan] (sic) as if this plan were a formal part of the project, but such is not the case. Reference to this Plan on pages II 21 and 22 states that it is "being prepared." Sentences refer to this Plan in the conditional "would." The mitigation measure should list and require the conditions and policies given on pages III 21 and 22, not merely make reference to them. 9

Beyond this, however, the buffer mapped in the plan does not allow adequate area for a grassland/savanna zone that I referred to above as an essential component of the ecosystem. Ways must therefore be found to increase the size of this buffer and to include an expanded zone as a required mitigation.

6. Impact H.5 (page IV. H-14), referring to tree protection, calls into question the degree to which the Copeland Creek Ecological Protection Plan would actually be implemented because it states that "removal of trees may be required for placement of music hall structures, parking facilities and recreation pathways along Copeland Creek." None of these activities should be allowed within the 10

zone specified by the Copeland Creek Ecological Protection Plan, with the possible exception of paths (which can avoid large trees) and the obvious exception of areas where bridges are needed. Mitigation Measure H.5 should therefore apply only to trees that lie outside the Protection Plan line or are in areas were bridges are needed.

I also disagree strongly with the definition of "significant trees" as "trees greater than 12-inch diameter at breast height." Many cities have ordinances protecting trees under this definition, which often results in inappropriate expenditure of funds to protect non-native trees that frequently don't survive anyway. Since we as a campus are not subject to any such tree-protection regulations, I recommend: (1) that the definition of significance be changed to apply only to native trees greater than 12-inch diameter breast height, and (2) that provisions needed to protect nesting birds be applied from Mitigation Measure H.5 for both native and non-native trees. The decision regarding whether to retain or not retain a particular non-native tree within the project, provided removal respects the need to protect nesting birds, should be at the discretion of the University and not mandated by this mitigation measure. 10 Cont.

B. Other concerns, including errors and ambiguities in the DEIR

1. Impacts on the foothill yellow-legged frog are listed as "less than significant" in the summary of impacts at the front of the DEIR, yet Impact H.4 on page IV H-13 lists the impact as significant. Since specific mitigation measures have been developed, "significant" should clearly be listed in the summary table. 11

2. Mitigation Measure H.1 regarding wetland delineation and subsequent actions should specifically identify habitats where the conditions of fencing, photographing sites, etc. are likely to be needed. One or more of the small seasonal wetlands shown in Fig. IV H-1 are certain to be destroyed, and provisions of this mitigation measure do not apply to them. 12

C. Recommendations

1. Ways must be found to increase the Copeland Creek riparian and buffer zone to allow for some true grassland/oak savanna habitat. 13

2. Drainage from the project should not be directed into the current wetlands in the north/south swale (emergent wetland/meadow) unless additional study shows that these wetlands can handle the water. It would be acceptable the design a system that can carry some runoff into this wetland if it is needed but to use an alternative route (perhaps underground) if it is not needed. Wetlands develop in response to specific hydrological regimes, and if the regime is strongly altered the desirable qualities of a wetland may disappear. 14

3. The intermittent drainage should be retained on the site and significantly enhanced as a desirable feature. To achieve this, a new channel can be constructed along the bases of the sound berms facing the music center. This can be deeper and more aesthetically routed than the current "ditch." Rather than allowing the creek to run along Petaluma Hill Road, it would enter Copeland Creek on SSU property north of the corporation yard. Runoff from a portion of the site should be routed to the upstream portion of this creek to extend its hydrated period. The creek currently functions with small culverts (maximum two foot diameter) at both entrance onto and exit from the SSU property. It obviously carries a small flow and would not create erosion problems even with additional runoff deliberately added to it from the project. 15

Where the two berms join, a large runoff-retention pond can be built. This will eventually become a freshwater marsh that assists in cleansing runoff before it enters Copeland Creek. 16

The creek should be allowed to develop riparian forest naturally, with enhancement as necessary via thinning and selected planting. At least some portion of it should develop or be planted with stands of tall white alder Fremont cottonwood. 17

The creek should be included in literature about the music center, along with other natural features. To emphasize its importance, we should name it "Stocking Creek," in honor of Ken Stocking, prominent conservationist and founder of the Department of Environmental Studies and Planning. 18

4. Some of the mitigation of seasonal wetlands may appropriately be undertaken between Stocking Creek and the music center. 19

5. The sound berms should be restored to natural grassland/oak savanna habitat, which I believe should be required mitigation for loss of raptor and riparian bird foraging area (above) but also because such habitat would be the aesthetic complement of Stocking and Copeland Creeks. I understand that some people favor planting the berms to vineyard. Vineyards are beautiful and wine is an important part of our region. Vineyards are biological deserts, however, and their expansion comes at the expense of native species. In my vision, the music center would be wrapped in native habitats going through their natural annual cycles. This theme of natural process conveys deep meaning to the site. A few decorative vineyards convey artifice, imitation, and the control of humans over nature. The roots of music run much deeper into the mystery of the natural world than they do into the culture of wine. 20

These comments are part of the official process by which the Final EIR is completed. I would be more than happy to discuss any of them with members of the EIR team. Inasmuch as you interact with the consultant on a regular basis, however, you should feel free to contact me on your own.

Sincerely yours,

Philip T. Northen

Philip T. Northen, Chair
Department of Biology

LETTER J – PHILIP T. NORTHEN

J-1 See responses to Comments I-11 and I-17.

J-2 Losses of seasonal wetlands under the Master Plan revision are adequately addressed in Impact and Mitigation Measure H.1(as revised in Chapter II in this response to comments document). Loss of seasonal wetland would be kept to a minimum, since the largest and highest-quality seasonal wetlands along the north-south drainage would be preserved and Copeland Creek would be avoided except for bridge construction.

J-3 Based on a review of topographic mapping, the intermittent drainage in the northeast corner of the northern acquisition area identified by the commenter, as well as the north south tributary that bisects the northern acquisition area, drain north from the project site to Hinebaugh Creek, rather than south to Copeland Creek. References to this tributary in the DEIR as a tributary to Copeland Creek are revised to tributary to Hinebaugh Creek. Please refer to Chapter II in this response to comments document for revisions made to the DEIR. See also response J-15.

J-4 See response to Comment J-15.

J-5 The woody riparian vegetation would not be impacted, except where the proposed bridges across Copeland Creek and bridge approaches would be constructed. The proposed Creek Buffer Zone would protect the existing woody vegetation along Copeland Creek, plus provide additional land that could extend the riparian or floodplain vegetation. See also Master Response 1 at the beginning of Chapter IV of this response to comments document.

J-6 See responses to Comments I-11 and I-17.

J-7 Regarding direction of flows of the intermittent drainage in the northeast corner of the northern acquisition area, see response to Comment J-3. See also response to Comment J-15.

Note that Figure IV.H-1 in the DEIR is for illustrative purposes only. Given the scale of the map it is not intended to be serve as a basis for accurately measuring areas of impact, which would occur as a result of implementation of Mitigation Measure H.1a.

See also response to Comment J-15.

J-8 Comments noted. Please see revised Mitigation Measure H.1, in Chapter II of this response to comments document.

J-9 The intent of Mitigation Measure H.1b is to acknowledge the University's efforts under the Master Plan revision to avoid new construction in Copeland Creek and the tributary to Hinebaugh Creek, as well as provide future protection in these areas. Implementation of Mitigation Measures H.1a-c (as revised in Chapter II in this response to comments

document) would mitigate impacts related to filling of jurisdictional wetlands and waters on the project site.

The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, designed to improve the relationship between proposed development and existing natural resources on the site, and further minimize potential environmental effects. Proposed modifications include, among other features, increasing the width of the proposed Creek Buffer Zone. See Master Response 1.

The Copeland Creek Ecological Resource Protection Plan has been prepared and included in Appendix A of this document. This plan would be adopted by the CSU Board of Trustees along with all elements of the Master Plan revision.

J-10 As shown in Figure 1 and described in Master Response 1 in this response to comments document, construction of the Center for the Musical Arts building, parking areas, and pedestrian and bicycle paths (other than the approaches to the bridge crossings of Copeland Creek), would not occur within the Creek Preservation or Buffer Zones. The Copeland Creek Ecological Resource Protection Plan allows for the construction of vehicle and pedestrian bridges provided they minimize adverse impacts and mitigate for losses within the Creek Preservation Area or Buffer Area.

J-11 For clarification, Impact and Mitigation H.4 in the DEIR has been incorporated into Impact and Mitigation Measure H.3, and expanded; see Chapter II in this response to comments documents for changes made to the DEIR). All potential impacts to the potential upland refugia for the foothill yellow-legged frog would be mitigated to a less than significant level.

J-12 Comment noted. Please see revised Mitigation Measure H.1, in Chapter II of this response to comments document.

J-13 Comment noted. See Master Response 1 and response to Comment I-17.

J-14 Comment noted. See revised Mitigation Measure H.1. Treated runoff may be used to augment rainfall in the ponding in the wetland mitigation area, if average rainfall proves insufficient to maintain hydrophytic (wetland) vegetation.

J-15 Comment noted. See revised Mitigation Measure H.1 As is feasible, the existing intermittent drainage in the northeast corner of the project site would be rerouted within the University property.

J-16 Comment noted. The addition of on-site detention facilities are identified under Mitigation Measure C.1b; however, the specific location of such facilities has not yet been determined.

J-17 Comment noted. As described in Master Response 1, the Master Plan revision would establish a wider Creek Buffer Zone than that originally assessed. See added Mitigation

Measure H.2c in Section II of this response to comments document regarding the use of locally indigenous species in plantings in the buffer zones.

J-18 The University will consider the commenter's suggestion regarding including information regarding the campus' riparian resources in literature about the proposed Center for the Musical Arts. However, it should be noted such an action would not serve to mitigate environmental impacts associated with the project.

J-19 Comment noted. See response to Comment J-17.

J-20 Comment noted. See response to Comment J-17.

December 13, 1999 K

Deborah Gannon-DuVall
Director of Planning
Facilities Services
Sonoma State University
1801 E. Cotati Avenue
Rohnert Park, CA 94928

Dear Ms. Gannon-DuVall:

This is response to your request for comments on the Draft EIR for Sonoma State University's proposed Master Plan Revision. I have more than a slight interest in the DEIR document and Master Plan Revision. I am a faculty member at SSU in the Department of Environmental Studies and Planning. I have a Ph.D. in Urban Planning with a specialty in environmental impact assessment of transportation systems. I teach a course on CEQA and NEPA entitled, "Environmental Impact Reporting." I will confine my comments on the DEIR both to general CEQA compliance inadequacies, as well as to substantive omissions and inadequacies within areas of my expertise.

CEQA Compliance Inadequacies:

Chapter I (Introduction) of the DEIR contains the statement, "... this EIR is intended to serve as a Project EIR *(CEQA Guidelines* Section 15161), and it is anticipated that **no further environmental review under CEQA would be necessary to implement any aspect of the project.**" (emphasis added) Given the high degree of uncertainty, lack of detail, and unresolved issues associated with so many of the components of "The Project," it is frankly absurd to view the present EIR as an adequate assessment of all the environmental consequences of campus developments until buildout at 10,000 FTE. For example, the evaluations of the developments north of Copeland Creek are based on a "Schematic Project Plan" and vague "scenarios" of possible housing development types and numbers of units. At best, the present EIR document is only the "first tier" document in a process of CEQA compliance extending until buildout. The all-inclusive nature of "The Project" as defined in Chapter I and elsewhere in the DEIR gives the appearance that SSU/CSU is trying to dodge its mandate as a public agency "to afford the fullest possible protection to the environment" as clarified in the landmark 1972 *Friends of Mammoth* court decision. 1

In Chapter II (Summary), section "A" includes the statement, "In addition to new facilities proposed on its main campus, this revision proposes new development on 89.3 acres of property north of the main campus across Copeland Creek, including the proposed Center for the Musical Arts (to be located on 54.7 acres of existing campus property) and university housing (to be located on 34.6 acres on property to be acquired by the University." Omitted in this section are the facts that the University in the past two years acquired the 54.7 acres as stated for the Music Center (using campus parking fund dollars), and has been actively soliciting private donations to pay for construction of said facility. The University has been moving 2

thousands of yards of earth excavated from construction sites on the main campus to the Music Center site, and has constructed a substantial berm, presumably associated with site development for the Music facility. **All of this has occurred *before*, and without the benefit of, the present CEQA document and the required public review process.**

2 Cont.

This has been, and continues to be, in direct violation of Section 15003 (g) of the *CEQA Guidelines* which states, "The purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind." I call your attention to Section 15004, of the *CEQA Guidelines,* in particular, subsections (b)(1) and (b)(2), as amended in 1998. EIRs must be prepared **before** an agency makes a decision on the project and **early enough to influence the project's plans or designs**. Early preparation is necessary for the legal validity of the process and for the usefulness of the documents. Early preparation enables agencies to reduce or avoid adverse environmental effects **before the agency has become so committed** to a particular approach that it can make changes only with difficulty. Public agencies must consider the significant effects of a project before taking actions which may **limit their choice of potential project alternatives and mitigation measures.** Most importantly, Subsection (b)(1) concludes, **"...CEQA compliance should be completed prior to acquisition of a site for a public project."** Subsection (b)(2)(B) states, (agencies **shall not**)...Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that **forecloses alternatives or mitigation measures** that would ordinarily be part of CEQA review of a public project."

3

The point I am making should be self-evident: a major component of "The Project" as spelled out in the EIR involves the land north of Copeland Creek. The University has expended campus Parking funds and has acquired 54.7 acres of this land in order to construct a Music Center, before engaging in the required CEQA review and public participation process. In the DEIR, **this project on this site is assumed to be a "given."** Looking at the "Range of Alternatives" (Chapter V) considered for "The Project," it is clear that consideration of potential alternative sites, both on- and off-campus, for the Music Center, and their associated impacts and mitigation measures, has been foreclosed. Also lacking is a "Project" alternative that includes some other University use for the 54.7 acre purchased site. Without a serious and rigorous consideration of a **reasonable range of alternatives** what we are left with in the DEIR is *post hoc rationalizing* of the Music Center on the purchased parcel.

For the above reasons and others described below, the discussion of Alternatives (Chapter V) in the DEIR is grossly deficient. It fails to satisfy the CEQA requirement of providing a range of reasonable alternatives. *CEQA Guidelines* Section 15126.6 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...it must consider a reasonable range of potentially feasible alternatives that **will foster informed decisionmaking and public participation.** Besides the required "No Project" alternative, the DEIR evaluates only two alternatives, which are actually two variations of one theme: "No

4

Development in the Northwest Acquisition Area." Both of these alternatives are ***unreasonable*** at the present time. The University Administration is actively engaged in negotiations to purchase the properties in the western portion of the land north of Copeland Creek (indeed, already may have reached agreements to purchase these). The Administration recently has established a committee to determine the precise nature of the housing complex to be developed there. In recent difficult budget times for the campus, the committee has been given a budget of $50,000.00 for travel to other campuses which presently have the anticipated types of housing. 4 Cont.

Any "Project" alternatives which fail to recognize the high degree of commitment the University Administration has to campus-sponsored housing on this site cannot be deemed reasonable because they fail to achieve some of the actual objectives of "The Project," as evidenced by the University Administration's documentable recent actions. Furthermore, the primary difference between Alternative 2 and Alternative 3 is that the latter includes a proposed "seven-story building accommodating a total of 900 students and/or faculty." (DEIR page V-4) The SSU campus community has a long history of rejecting highrise development as being out of character with the traditional and desired small campus ambiance. The EIR consultants may not have been familiar with this when they generated this alternative. Nevertheless, Alternative 3 is politically, if not physically, unreasonable. 5 6

This leaves "The Project" and the "No Project" as the only two "reasonable" alternatives included in the DEIR. The explanations provided in the DEIR for "Alternatives Considered but Rejected as Infeasible" **for the Music Center site**, both on- and off-campus, are merely attempts at rationalizing this portion of "The Project." (See pages V-5 through V-7) **There are no alternatives considered and discussed in the DEIR that address the overwhelming majority of the significant elements of the Master Plan *besides* the Music Center!!** (For example, one gets the idea that there are no other possible alternative locations for the University Center project, nor for the Soccer Stadium, nor for the Parking Structure, and perhaps most importantly, for the North Entrance road). **One gets the impression that "The Project" *is* the Music Center, and nothing else.** 7

The reasons given for rejecting **alternative sites** for the Music Center are seriously flawed. First, most of the identified on- and off-campus sites are not only infeasible, it is absurd to list them at all. (The "Botanical Garden," "Commencement Lawn" sites on-campus, and the "East,"and "West and South" off-campus sites are examples). There is **no substantial evidence** provided in the DEIR for rejecting other potentially more feasible sites. These might include the "rejected" Softball Field site or the agricultural land north of the Rohnert Park Expressway, both potentially better suited for a major public facility like this. (It might be that the presently proposed Music Center site would be well-suited for athletic fields, should some portion of the athletic fields be found to provide a feasible site for the Music Center. Also, the land north of the Rohnert Park Expressway is presently 8

proposed for annexation into the City of Rohnert Park in that city's General Plan update, and for future extensive development. This would suggest that there is land nearby that could be available for a development of this magnitude). 8 Cont.

Another flaw in the "Alternatives" section is that there is no discussion of the alternative of **scaling down the size (and magnitude)** of the proposed Music Center, to a size that could be accommodated on or near the campus as it is situated with respect to roadway capacities, etc., with considerably less significant, and more mitigatable, environmental effects. After analysis, this alternative could be found to be the **"Environmentally Superior Alternative,"** an alternative that is required by CEQA [CEQA Guidelines, Section 15126.6 (c)(2)] but is indeed **missing from the DEIR.** I believe that most of the objectives of the Master Plan Revision, including expanding the musical arts on campus, would be accommodated by this less ambitious alternative. I direct you to the decisions in the landmark *Citizens of Goleta Valley* court cases (1988,1990). Santa Barbara County (the Lead Agency) was required to include substantial evidence to show that a scaled down project was infeasible, and to consider alternative sites not owned by a project applicant. 9

In summary, the limited range of alternatives discussed in the DEIR **does not meet the "rule of reason"** as specified in *CEQA Guidelines,* Section 15126.6(f). It would be impossible for decisionmakers to make an informed and "reasoned choice," and to foster meaningful public participation," from the essentially two alternatives provided, "The Project," and the "No Project." In purchasing the land across Copeland Creek for the Music Center, and soliciting major private donations for the Center's construction **without any prior CEQA review**, the campus decisionmakers have foreclosed other alternatives, and essentially denied the possibility of any meaningful public participation. As it stands now, the DEIR document is regretably a textbook example of *post hoc rationalization*, and as such, the document is fatally flawed. 10

The last comment I would like to make about CEQA compliance inadequacies associated with the DEIR involves the issue of public participation in this Draft EIR. As noted in the previous paragraph, meaningful public participation in the review of "The Project" and its alternatives has been severely limited by the inadequate consideration of reasonable alternatives. Even if the flaws in the DEIR related to this did not exist, I feel that public participation in the review of the DEIR has been discouraged. First of all, the first apparent public notification of the availability of the DEIR occurred on the SSU campus at a meeting of the Academic Senate on November 4, 1999. The 45 day review period was said to have begun on November 1, 1999. It was well into the 45 day review period that access to the document was possible in the University library, and then only on two hour loan. The availability of sufficient copies increased as the difficulty in viewing a copy became evident to more and more people. I finally requested a personal copy from the campus Facilities 11

Services office, which was quickly provided. Nevertheless, it is not clear to me that full compliance with the intent of the public notice and availability requirements have been achieved, as specified in Public Resources Code Section 21092 and *CEQA Guidelines* Sections 15085 and 15087. 11 Cont.
Furthermore, scheduling the DEIR review to coincide with the very end of the academic semester ensured that a broad based response would be discouraged. Two public hearings were conducted. These were poorly attended due to their inconvenient times. All of this is very unfortunate, having limited public participation, especially on the SSU campus itself. 12
(The campus had made an earlier, and seemingly successful effort to conduct a community outreach program related to the Master Plan Revision involving a Website and campus news publications, but for some unexplained reason, all of these previous efforts were dropped when the DEIR was completed). The impression all of this has left is that public participation in the review of the DEIR wasn't wanted. 13

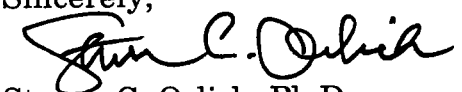
A Final Comment:

Because the DEIR fails to contain a reasonable set of feasible alternatives, it is difficult to comment on a number of substantive areas. I am particularly concerned about two of these, **mitigation** and **cumulative effects**, especially the mitigation of cumulative traffic impacts. I am dismayed at the discussion on pages II-2 and II-3, in which the campus summarily dismisses itself from any off-site mitigation responsibility. I believe that this is a very narrow interpretation of a State agency's CEQA and environmental protection responsibilities. Surely paying for a traffic signal, the need for which was caused by the growth and expansion of the campus, should not be considered a "gift." And certainly if money for mitigation of the significant effects of agency projects is not included in standard budget appropriations, it can be acquired by specific requests to the Legislature, or some similar method. I doubt if local governments in this area will willingly take on the cost of funding traffic improvements caused by cavalier expansion decisions by Sonoma State University. Therefore, it is safe to say that many of the necessary mitigation measures identified in the DEIR **will not be adopted and implemented**, therefore leaving unmitigated significant effects that are bound to alienate the communities SSU is dedicated to serve. 14

If I had more time, I could comment further. I hope this document is significantly revised and recirculated. Both are needed, and the campus would be well-served.

Thank you for the opportunity to comment, and I await your responses

Sincerely,



Steven C. Orlick, Ph.D.
Professor, ENSP

LETTER K – STEVEN C. ORLICK, Ph.D.

K-1 When specific plans for each proposed construction project under the Master Plan revision have been developed those plans will be reviewed by the University in the context of this EIR to determine whether those individual construction projects have in fact been adequately addressed in this EIR. (An exception would be the proposed Center for the Musical Arts, for which a site plan already exists and for which sufficient information is available for the development to be assessed on a site-specific level of detail in this DEIR.) If the University's review determines that implementation of the specific plans would have no potentially significant environmental effects that are not addressed in this EIR, then no additional environmental documentation would be required. If the review determines that the plans could have a significant environmental effect that is not adequately addressed in this EIR, then supplemental environmental documentation would be required at that time.

K-2 The University has been soliciting funds for the proposed Center for the Musical Arts, as is typically done by higher education institutions for developments of this type. However, the University has not committed any formal action towards the development of such use on its proposed site, and would not until such time CEQA compliance is completed, and the development subsequently becomes an approved land use for this site in the Master Plan revision.

The University elected to deposit excess soil excavated from the Information Center construction site, and previously from the Sauvignon Village construction site, in the northern acquisition area due to its proximity to those sites, lack of other feasible on-campus locations for depositing the soil, and because of economically burdensome costs associated with hauling and disposing of soil at an off-site location. Any movement of soil related to those projects was not conducted in anticipation of any new development that would be constructed under the Master Plan revision. (It should be noted that soil associated with those projects was deposited only in the northeast corner of the northern acquisition area, and potential wetlands in that area were flagged by qualified biologists and avoided to prevent any potential impacts to those resources.)

K-3 Pursuant to Section 15004(b) of the CEQA Guidelines, "EIRs . . .should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provided meaningful information for environmental assessment." Consistent with this guideline, all aspects of the proposed Master Plan revision, including the proposed schematic site plan for the Center for the Musical Arts, are in draft stage, and would not be finalized and approved until CEQA requirements are satisfied.

As an example, in response to comments received on the DEIR, and meetings that have occurred subsequent to publication of the DEIR between the University and interested agencies (e.g., the California Department of Fish and Game) and community groups (e.g., Friends of Copeland Creek) regarding proposed development in the northern

acquisition area under the Master Plan revision, the University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area. Proposed modifications include, among other features: reconfiguring and relocating the Center for the Musical Arts further north, away from Copeland Creek, increasing the width of the proposed Creek Buffer Zone, providing an upland zone in the wetland area, reducing the number of bridge crossings of Copeland Creek from four to three, locating all pedestrian and bicycle paths outside the Creek Buffer Zone (other than the approaches to the bridge crossings of Copeland Creek) and wetland area, and dividing the parking area into four quadrants separated by open space. See Master Response 1 at the beginning of Chapter IV of this response to comments document.

It should be noted the University has made a concerted effort to provide agency and public participation throughout the planning process for the Master Plan revision, including for the proposed Center for the Musical Arts. As discussed in the Project Description in the DEIR, an extensive Community Outreach Program was conducted for the Master Plan revision, consisting of public workshops, a web-site, an ad hoc committee, and direct solicitation of input from local agencies and interested groups, as well as University students, staff and faculty.

As discussed in response to Comment K-2, the University has not committed any formal action towards the development of such use on its proposed site, and would not until such time CEQA compliance is completed, and the development subsequently becomes an approved land use for this site in the Master Plan revision. As such, no actions have been undertaken under the proposed project that would have a significant environmental effect limit the choice of alternatives or mitigation measures, or irrevocably commit the University to a course of particular action before CEQA compliance.

K-4 Other alternatives locating the Center for the Musical Arts at another location were considered for inclusion in this EIR. Specifically, alternative on-campus locations for the Center for the Musical Arts (including the Botanical Garden, Commencement Lawn, and the Softball Field sites), in addition to off-site alternative sites (adjacent to the site and at off-site properties owned by the University), were assessed. As discussed on pages V-5 to V-6 of the DEIR, all were rejected because none would meet most of the sponsor's basic objectives and/or avoid or substantially lessen the potential environmental impacts of the proposed project while not also creating new potentially significant environmental effects.

Potential scaled-back versions of the Center for the Musical Arts, or an alternative that assumes no development of the Center, were also considered to be infeasible. As discussed in the Project Description, due to recent expansion in the University Performing Arts Programs serving the campus population, as well as programs serving pre-college youth and the local community, the University is currently experiencing a shortage of space for rehearsal and teaching studios, and well-designed and equipped performance venues. Scaling back or elimination of the proposed Center for the Musical Arts from the Master Plan revision would prevent the University from housing its

projected range of choral and instrumental programs, as well as other required University lecture and conference space. Moreover, scaling back or eliminating the proposed Center for the Musical Arts would limit the ability of the University to foster mutually beneficial partnerships with local school district music programs and musical organizations, including the Santa Rosa Symphony. For these reasons, scaling back or eliminating the Center for the Musical Arts would be contrary to the central mission and goals of the University for meeting the academic, cultural and social needs of the University and enhancement of beneficial contributions to the community.

K-5 Alternatives 2 and 3 would maintain the University housing that is proposed on the main campus under the project. In addition, Alternative 3 would accommodate almost all of the students and/or faculty anticipated in the northwest acquisition area under the low-density scenario, or roughly one-third of the students and/or faculty anticipated in the northwest acquisition under the high-density scenario of the proposed project. Thus, the project alternatives do recognize the commitment of the University Administration to campus-sponsored housing.

K-6 In the analysis of Alternative 3, the DEIR acknowledges that this building would be the sole building on the campus greater than three stories in height, could therefore be considered less compatible with adjacent land uses, would have a greater potential to block short-range and long-range views as compared to the proposed project, and would be a more prominent source of light and glare than the building proposed under the project.

K-7 No significant project impacts of the proposed University Center were identified in the DEIR (refer to response to Comments L-6 and L-12); therefore, alternative locations for the University Center need not be assessed. Regarding the proposed soccer stadium, the University has determined that there are no feasible locations on-site, given the required location of other proposed project components on the campus. The parking structure and north access road are not new features of the proposed Master Plan revision, but were components of the existing approved Master Plan; and in any case these two features do not by themselves result in significant environmental impacts. It should be noted that proposed north access road increases overall access to the University, and would reduce overall significant traffic effects that would otherwise occur along East Cotati Avenue.

K-8 There is adequate evidence provided in the DEIR explaining why alternative on-site locations for the proposed Center for the Musical Arts were rejected. Potential alternative on-site locations were identified based in part on a siting study conducted by the University as part of planning for the proposed Center for the Musical Arts. The criteria selected in that siting study included a number of factors, including size, natural beauty, accessibility, campus proximity, ambient noise and parking capacity. The DEIR also addressed these sites in the context of their environmental constraints.

Specifically, as discussed in the DEIR, the softball field site was rejected because the development of a music center on this site would not provide enough space for the

instructional expansion proposed in this area under the Master Plan revision. In addition, the available land for proposed parking that would be required to serve the facility could not be located within a reasonable walking distance to the proposed development. Also, given the proximity of this site to existing and proposed instructional buildings and athletic fields, development of a music center with outdoor facilities would have the potential to result in noise impacts to these facilities. See also response to Comment K-4.

K-9 See response to Comment K-4.

K-10 See response to Comments K-2, K-3 and K-4.

K-11 Comment noted. The public review and comment period for the DEIR was extended for an additional 45 days between January 2, 2000, and February 15, 2000. Adequate public noticing of the DEIR for the second 45-day review period occurred prior to the release of the document for the second 45-day review period (via noticing in the *Press Democrat*, and direct noticing of adjacent properties within 300 feet of the site). Although not required by CEQA, the University also provided electronic noticing to faculty, staff and University organizations; and noticing in the Sonoma State University *STAR* newspaper and *Newsbytes* newsletter. This effort ensured adequate public noticing and availability of the DEIR was provided.

K-12 The University held public hearings on the Draft EIR on Monday, November 29, 1999 (in the University Commons), and Thursday, December 2, 1999 (at the University Facilities Services Department), while the University Fall semester was still in session. Advance noticing of the public hearings occurred in the *Press Democrat,* the *Rohnert Park Community Voice,* and the Sonoma State University *STAR* newspaper and *Newsbytes* newsletter. The University also provided electronic noticing to faculty, staff and University organizations, and did direct noticing of adjacent properties within 300 feet of the site.

The public hearings were held in middle of the initial 45-day public review period to allow the public sufficient time to review the EIR, as well as provide ample time for commenters to submit written comments on the DEIR. Moreover, the meetings were held at different times of the day (7:00 p.m., and 12:00 noon, respectively) to allow flexibility for local residents, faculty, students, staff and other interested parties with a varying work and school schedules. A written transcription of the spoken public comments received at the two public hearings, as well as the responses to those comments, are included in this response to comments document.

K-13 See response to Comment K-11.

K-14 Under the project, the California State University (CSU) would be responsible for funding all proposed transportation improvements within the campus property, including new roadways, pedestrian crossings, shoulders, curbs, gutters, signage, handicapped access and bus stops. However, as discussed in Section II.C, Mitigation Responsibility,

in the DEIR, the California State University (CSU) has limited powers to mitigate effects that occur outside the project site. Under constitutional and statutory proscription, the CSU cannot contribute funds towards off-site transportation improvements, schools (K-12), police, fire, or similar fee and assessment contributions typically exacted from private developers. While Sonoma State University cannot commit project funds for improvements to local streets and roadways, the University will work cooperatively with the impacted agencies to identify and pursue other potential funding sources of funds for such improvements.

The DEIR acknowledges that there is no assurance that off-site improvements that are neither approved nor funded by those jurisdictions responsible would be implemented. Accordingly, those impacts are considered in the DEIR to remain significant. See also response to Comment B-9.

SONOMA STATE UNIVERSITY

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1801 East Cotati Avenue
Rohnert Park, California 94928-3609

December 14, 1999

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Deborah Gannan-DuVall
Director of Planning
Facilities Services
Sonoma State University
1801 E. Cotati Ave
Rohnert Park, CA 94928

Dear Ms. Gannan-DuVall:

Thank you for the opportunity to comment on the Draft EIR for Sonoma State University's proposed Master Plan Revision (the "Master Plan DEIR" or "DEIR").

As you know, the California Environmental Quality Act (California Public Resources Code section 21000 et seq.), requires extensive opportunity for public participation. Among the reasons for this is the belief that the quality of environmental review, and the decisions that such review informs, will be improved by including the public in meaningful ways. For this reason, CEQA speaks not only to the opportunity, but also the responsibility, of the public to comment on draft environmental impact reports. In this spirit, I offer the following comments. 1

As a general matter, I note that the DEIR is characterized as a "project" EIR. This characterization is critical to evaluating the adequacy of the DEIR, as it assumes that no additional environmental review will be required for buildout of the revised Master Plan (including the "Schematic Project Plan Approval" for the Music Center). Thus, the level of specificity, detail, and degree to which issues are resolved needs to reflect this being the last opportunity for environmental assessment of the revised Master Plan. 2

I also note that many of the deficiencies in the DEIR might have been avoided had the preparation of the DEIR more fully utilized the results of the Community Outreach Program for the proposed Master Plan Revision, undertaken Spring 1999. Those results were provided to the Campus Planning Committee in a memorandum dated April 28, 1999, from Deborah Gannan-DuVall and Thomas Jacobson (the "Campus Planning Committee Memorandum"). At its meeting on May 19, 1999, the Campus Planning Committee discussed the results of the Community Outreach Program, and directed that a number of additional planning activities be undertaken and reflected in the DEIR. In this way, the Community Outreach Program functioned as part of a "scoping" process, helping to identify environmental issues and areas of concern that should be addressed in the DEIR. 3

While some of these planning activities were completed and the results reflected in the DEIR, several important ones received superficial treatment, at best. As a result, many important impacts and mitigation measures did not receive the discussion in the DEIR to which they are entitled. I point out several of these instances, below.

With regard to more specific matters, the Master Plan EIR needs to address the following points in order to comply with the requirements of CEQA.

Energy

The DEIR's assessment of the Project's impact on energy consumption is inadequate. The DEIR asserts that the Project will not have a significant impact on energy consumption (Impact L.1). The DEIR also states that "[a]s much as one million square feet of additional building space would be constructed under the project." (p. IV.L-3) This is estimated to result in an increase in energy use (acknowledged to be primarily from non-renewable sources) of approximately *110 percent* over existing conditions (page IV.L-4). The DEIR suggests that this substantial increase will not be significant because it will not be "wasteful." However, the standard of significance for this impact under CEQA is not whether use is "wasteful"; it is use itself. Clearly, more than doubling the amount of energy consumed at a major public institution is a significant impact. Furthermore, the DEIR asserts that the impact will not be significant because certain CSU-approved design standards will be employed, and improved bicycle and pedestrian paths will be provided. This rationale is contrary to the analysis required by CEQA. Design standards and bicycle/pedestrian paths may, or may not, mitigate a significant impact on energy use, but they are not a basis for determining that an impact will not be significant prior to mitigation. 4

The DEIR's discussion of mitigation measures for Impact L.1 is inadequate. An increase in energy use of 110 percent is clearly a significant impact. Can it be reduced to a level that is less than significant? Perhaps. A wide array of "green building" techniques (including those that will be demonstrated at SSU's Environmental Technology Center) is available that could help to mitigate the impacts of the Project on energy use. Neither the Project description nor the DEIR contemplate utilizing the many innovative building techniques available that go well beyond the CSU standards. The DEIR should first recognize that the Project's impacts on energy use are significant, and then consider the types of green building techniques that should be employed in the various construction activities that are part of the project description (e.g., the Music Center, University Center, classroom buildings, etc.) to mitigate those impacts. 5

Aesthetics

The DEIR fails to address adequately the aesthetic impacts of constructing the University Center at the proposed location. This location moves several uses (e.g., the University Commons, the Student Union, and the SSU Bookstore) from their current sites to one amidst classroom and office buildings, the new Schulz Information Center, and existing and proposed student housing. In addition, new uses will be provided at the University Center that are not currently present on campus. The result of adding the 217,000 square foot University Center in the middle of an already highly developed location will be to fundamentally alter the aesthetic experience (visual and otherwise) of the campus, which is described in the DEIR as "a rural, natural setting." (Page IV.g-2) Although the DEIR includes brief discussion of the University Center's potential for blocking views of the surrounding area, it does not include a complete discussion of the aesthetic impacts of the proposed location of the University Center on the thousands of students, staff, and faculty who spend much of their days on campus. The brief statement in the DEIR to the effect that building and landscaping plans for new campus facilities contemplated by the Project will be reviewed by the Campus Planning Committee is beside the point. The issue here is the siting of the University Center, which is accomplished by this Master Plan Revision. The DEIR needs to address these impacts. While aesthetics are generally experienced in a somewhat subjective and personal way, nonetheless, CEQA requires that aesthetic impacts be addressed. 6

Public Services

The DEIR fails to address adequately the impacts of the project on on-campus recreational facilities. Buildout of the proposed Master Plan will effectively preclude adding on-campus recreational facilities. This makes a thorough discussion of the degree to which the need for various types of recreational fields are met imperative. Unfortunately, despite the fact that the Campus Planning Committee recommended that a more detailed plan for recreational fields on campus be developed as part of this Master Plan Revision process, this has not been done. For instance, the DEIR, in its discussion of recreational fields fails to distinguish between intercollegiate, intramural, and informal play fields. 7

Transportation, Parking and Circulation

The DEIR fails to address adequately the need for bicycle paths and related facilities. Although the Campus Planning Committee recommended that a more detailed plan for bicycle use be developed as part of this Master Plan Revision process, including paths, parking and storage, relationship to pedestrian paths, etc., this has not been done. The bicycle path plan provided shown in the DEIR is virtually identical to that in the proposed Master Plan circulated in early Spring of 1999. 8

The DEIR does not adequately consider the implications for parking and circulation of holding events on the same day at both the Music Center and the new Soccer Stadium. These implications include the degree to which opportunities to utilize each facility will be compromised by events at the other. 9

Biological Resources

The EIR must revisit potential impacts on Copeland Creek; to do so effectively, the Master Plan Revision should take advantage of a rigorous and robust planning process. The DEIR evidences numerous deficiencies in its treatment of Copeland Creek and associated resources, which will require revision and, likely, recirculation. I note here that a proactive approach to making these revisions would be to convene a planning process that will take into account the array of values that this area represents (biotic, aesthetic, recreational, etc.). It is wrestling with how to address various, and sometimes competing, values that characterizes good planning. To date, the planning of this area has not been as ambitious as this important resource warrants. 10

Alternatives Analysis

The DEIR fails to identify an environmentally superior alternative other than the no-project alternative. CEQA requires that an EIR identify an "environmentally superior" alternative. If the no-project alternative is the environmentally superior alternative, the EIR must identify another environmentally superior alternative. Guidelines Section 15126.6. The Master Plan Revision DEIR fails to do so. 11

The DEIR fails to consider an alternative site for the University Center. One of the most frequently raised concerns voiced during the Spring 1999 public participation program for the proposed Master Plan Revision had to do with the siting of the proposed University Center (see the Campus Planning Committee Memorandum). Despite this, the potential for impacts associated with the proposed University Center site, and the potential for another site to reduce significant impacts of the Project, the DEIR fails to consider another site for the University Center as a project alternative. 12

Project Description

The DEIR fails to adequately describe how the Lead and Responsible Agencies intend to use the EIR. The project description in an EIR must include a list of the agencies expected to use the EIR in their decisionmaking, as well as a list of approvals for which the EIR will be used. It must also include a list of the related environmental review and consultation requirements required by federal, state, and local laws, regulations or policies. Such lists are not evident in the DEIR. Meeting this requirement is especially important with a project, such as this one, with a wide range of significant environmental impacts, including some reaching well beyond the immediate campus (e.g., affecting biodiversity, water quality, etc.). As a result of this information not being provided, there is confusion within the campus community, and elsewhere, about how the University's approval process relates to and is affected by the review of other public (state and federal) agencies. Consequently, the ability to comment effectively on this DEIR has been severely compromised. 13

Adequate Public Notice and Opportunity for Review

Public notice of the availability of the DEIR. Public Resources Code Section 21092 spells out specific public notice requirements regarding the availability of a draft EIR for public review. It is not clear that these requirements were substantially met. The absence of adequate notice is especially troubling in light of the fact that a number of avenues for public notice were developed and utilized last Spring for the Community Outreach Program accompanying the presentation of the proposed Master Plan Revision, but these methods were not used to notify the public that the DEIR was available for public review until well into the public review period, if at all. These methods include, among others, the student newspaper ("The Star"), the weekly staff/faculty newsletter ("Newsbytes"), on-campus postings at areas of high pedestrian traffic, campus-wide e-mail messages, and the website established specifically for the purpose of communicating with the campus community and the general public about the proposed Master Plan Revision. I note that pursuant to the CEQA Guidelines, the University's CEQA procedures "should include, whenever possible, making environmental information available in electronic format on the Internet, on a web site maintained or utilized by the public agency." Guidelines Section 15201. SSU has such a website in place, specifically developed for the purpose of public participation in the Master Plan Revision process, but it was not used for the purpose of environmental review under CEQA. 14

Availability of the DEIR. Furthermore, for a substantial portion of the 45-day public review period, access to copies of the draft EIR was so limited as to compromise such review to the point that there was no substantial compliance with the requirements of state law. 15

Fiscal Impacts

While CEQA does not require the analysis of economic impacts by themselves, such analysis is required if the economic impacts will lead to an environmental effect. Guidelines Section 15064(f). The Spring 1999 public participation process for the proposed Master Plan revision identified the concern that the costs of construction and ongoing operation of the Music Center would exceed its revenues. (See Campus Planning Committee Memorandum, p.4.) If, in fact, the Music Center does not "pay for itself," it is likely that the shortfall will have to be made up from the budgets of other on-campus activities. In an era where the "walls" between University funds continue to erode, any source of money is fair game. Thus, it is highly foreseeable that some of the many mitigation measures identified by the EIR would be among those activities and facilities that 16

would go unfunded or underfunded, should the Music Center require funding assistance from elsewhere on campus. For this reason, among others, the EIR needs to consider the economic impacts of the construction and operation of the Music Center. 16 Cont.

Recirculating the DEIR

As you know, CEQA requires that when significant new information is added to an EIR prior to certification, the public agency must recirculate the draft EIR. In light of the additions required for the Master Plan Revision DEIR, such recirculation appears to be necessary. 17

Conclusion

The development of a proposal prior to Spring 1999, and the Community Outreach Program that followed it, were important steps in the revision of the Campus Master Plan. The Community Outreach Program, I believe, accomplished its goal of focusing attention on an initial proposal and helping to identify issues needing additional scrutiny, problem-solving, and community involvement. Many of these additional steps (e.g., convening a group to consider the Copeland Creek corridor, preparing a thorough analysis of the effects of the proposed site of the University Center on campus character, preparing a fiscal analysis of the Music Center) have not been undertaken in a fashion worthy of the consequences of adopting this Master Plan Revision. This revision to the Campus Master Plan will effectively complete major construction on our campus. Such an important step, which will affect students, staff, and faculty for generations, and which will have substantial effects off campus and on non-human campus residents, deserves a more thorough planning process. The DEIR points this out; in many cases, the shortcomings of the DEIR reflect a truncated planning effort. The planning process for the Master Plan Revision should continue. 18

The Master Plan Revision presents a unique opportunity for Sonoma State University to assume a leadership role in showing the immediate and larger communities how, in a rapidly urbanizing setting, to effectively integrate environmental concerns with responsible development. Developing a visionary, yet practical, plan is important to the long term interests of this campus. It is also presents a remarkable opportunity to learn and teach -- an opportunity we should embrace.

In closing, I would emphasize that these comments should not be taken as criticism of the campus' Facilities Services Department. The Director of Planning and others have done a professional job given the time and resources they have had available. The reality, however, is that it has not been enough.

Respectfully,

M. Thomas Jacobson, JD, MCP, AICP
Associate Professor

LETTER L – M. THOMAS JACOBSEN, JD, MCP, AICP

L-1 The comment is noted.

L-2 Please see response to Comment K-1.

L-3 The Report on the Community Outreach Program for the proposed Master Plan revision was distributed to, and discussed with, the Campus Planning Committee (CPC) on May 6 1999. The CPC elected to provide that information to the EIR consultant. The University discussed all Community Outreach Program results with the project architects and EIR consultants on May 26, 1999. At that meeting, it was determined that issues associated with environmental concerns would be appropriately addressed in the EIR, relevant design issues related to the Master Plan revision would be addressed by the project architects, and certain issues associated with management implementation of the proposed Master Plan revision would be addressed by the University. As such, all applicable Community Outreach Program concerns were considered and addressed in the Master Plan revision planning and environmental processes.

L-4 The commenter is correct that the DEIR bases its conclusion of "less than significant" impact related to energy consumption on the premise that the increase in energy consumption at the University under the Master Plan revision would not be "wasteful," rather than on the absolute increase in energy consumption itself (e.g., in terms of percentages). Prior to 1999, Appendix G of the CEQA Guidelines contained a list of the types of impacts that could be deemed "significant" by a lead agency in a CEQA document, and while the list was not intended to be exclusive nor mandatory, energy impacts were included. Specifically, Appendix G stated that a project may be deemed to have a significant effect on the environment if it would encourage activities which result in the use of large amounts of fuel or energy, or that would use fuel or energy in a wasteful manner. As of January 1, 1999, the revised CEQA Guidelines no longer include a list of "significant effects," and the revised Appendix G now includes the Environmental Checklist Form, which no longer refers to energy at all. Rather, the Draft EIR's energy analysis for the Master Plan revision derives from the guidance contained in Appendix F (Energy Conservation) of the CEQA Guidelines, which states that EIRs must discuss the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy. Following the guidance of Appendix F, the DEIR's energy analysis appropriately focuses on the potential for unnecessary, or wasteful, consumption of energy rather than on the absolute increase in energy consumption. As such, the DEIR's mitigation measures also relate to avoiding unnecessary consumption of energy.

L-5 The commenter believes that a 110 percent increase in energy consumption is a significant effect on its face. However, for the reasons stated in response to Comment L-4, above, the DEIR energy analysis appropriately focuses on the efficient use of energy and, conversely, the avoidance of unnecessary or wasteful energy consumption, rather than on the absolute increase in consumption. The DEIR concludes that, with

implementation of CSU Design Standards, the increased consumption of energy would not be wasteful and, thus, would not represent a significant adverse effect of the project. As such, no mitigation for energy impacts is required. However, the DEIR does identify mitigation measures related to energy consumption (see page IV.E-13 of the DEIR). These measures are intended to reduce air pollutant emissions by reducing related energy consumption, and thus, they would reduce both the air quality and the energy impacts of the project.

L-6 A change in physical conditions is not considered significant unless it is substantial and adverse. Although the campus as a whole may be characterized as being within a rural, natural setting, the site for the University Center itself is not in a natural state, but rather has been altered by development of temporary one-story structures (the Village) and Parking Lot D. The existing approved Master Plan identifies the site for the development of a two- and three-story building.

The University Center is proposed as a two-story building, thereby serving as a transition building between the residential complex and the nearby three-story academic core buildings. The proposed University Center footprint would maintain spatial relationships between buildings similar to those that already exist on campus, including a central courtyard which would serve to break up the building massing. As discussed in the DEIR, the University Center would be located with an east-west orientation, and would have a separated profile, minimizing the obstruction of easterly views from points on the campus west of the proposed building. Moreover, the University Center would be set back more than 1,000 feet from the west property boundary, and approximately 800 feet from the south property boundary; thus, development of these buildings would not block or affect long-range views, including views of the Sonoma foothills, from off-site adjacent land uses.

As discussed in the DEIR, the building and landscaping plans for the various facilities under the project, including the proposed University Center, would be developed in consultation with, and subject to review and approval by, the University's Campus Planning Committee (comprised of the President of the University, the University building program officer, the University Consulting Architect, the Campus Planner, and the Director of Public Safety, various faculty, staff and students, and a representative from the community). This process would help to ensure all development proposed under the project would be designed in a manner that would be consistent with the aesthetic guidelines of the University, and the visual character and sensibilities of the local community.

For these reasons, the proposed development under the Master Plan revision, including the University Center, is not expected to cause significant visual impacts. See also response to Comment L-2.

L-7 In response to the Campus Planning Committee's request for a more detailed plan for recreational fields, the project architects identified the proposed formal intercollegiate

soccer stadium, in addition to a new intramural, multi-purpose playing field (adjacent to, and north of Sauvignon Village). Additional details of the soccer stadium are described on page III-18 of the DEIR. Both athletic facilities are illustrated in Figures III-4 and III-5 in the DEIR.

The Master Plan designates which facilities would be used for recreational use. However, the specific level of use of these fields outside of these known designations would be determined by the University according to need and interest for these facilities.

As discussed in the DEIR, the California State University (CSU) standard is 29 acres for a population of 10,000 FTE. The proposed Master Plan revision exceeds that standard by providing 33 acres, and use of 4.5 acres on future building sites as interim fields until such time as the buildings are constructed. Therefore, impacts to on-campus recreational facilities are not expected to be significant.

L-8 In response to the Campus Planning Committee's request for a more detailed bicycle and pedestrian circulation plan, the project architects, in consultation with the Sonoma County Bicycle Advisory Committee, included a comprehensive plan for bicycle circulation, including paths, parking and links to bicycle paths in the surrounding community. All campus entrances and each campus roadway accessing the internal campus would have a bicycle lane terminating at a circulation node or delivery access point, where bicycle parking and storage would be available. On the major paths within the central campus core, where pedestrian and bicycle uses are combined, the paths would have a twelve-foot minimum width to allow for adequate pedestrian and bicycle separation.

Potential bicycle and pedestrian impacts are discussed in Impact D.7, in Section IV.D, Traffic and Circulation, in the DEIR. As discussed in the DEIR, the proposed vehicular, bicycle and pedestrian network proposed under the Master Plan revision would result in an overall improvement in the on-campus vehicular/bicycle/ pedestrian circulation system. Mitigation measures are identified to ensure that potential increases in conflicts as a result of increases in vehicular, bicycle and pedestrian activity under the Master Plan revision would be less than significant.

L-9 The proposed soccer stadium is planned to be used during soccer season, which occurs between September and December. Large festivals at the proposed Center for the Musical Arts would occur only during the summer months. Therefore, concurrent traffic and parking effects from these uses would not occur.

L-10 The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area that are designed to improve the relationship between proposed development and existing natural resources on the site (including Copeland Creek), and further minimize potential environmental effects. Proposed modifications include relocating the Center for the Musical Arts further north, away from Copeland Creek, increasing the width of the proposed Creek Buffer Zone, providing an upland zone in the wetland area, reducing the number of bridge crossings of

Copeland Creek from four to three, locating all pedestrian and bicycle paths outside the Creek Buffer Zone (other than the approaches to the bridge crossings of Copeland Creek) and wetland area, and dividing the parking area into four quadrants separated by open space. See Master Response 1 at the beginning of Chapter IV of this response to comments document.

L-11 The No Project Alternative was identified as the environmentally superior alternative in the DEIR. CEQA Guidelines state that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

A comparison of Alternatives 2 and 3 was provided in Table V-1 in the DEIR. To provide further clarification, additional text comparing the alternatives is added to page V-7 in the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR on page V-7.

L-12 CEQA requires an evaluation of the comparative effects of a range of reasonable alternatives to the project that 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 (*CEQA Guidelines* Section 15126.6(a)). As described in the DEIR, and further discussed in response to Comment L-6, the development of the University Center on its proposed site would not by itself result in a significant impact (visual or otherwise) on the environment. Therefore, analysis of an alternative site for the University Center is not required under CEQA.

It should be noted that during the Fall 1998 semester, a task force comprised of University students, faculty and staff studied three alternative sites for the University Center, and selected the site that is identified in the proposed Master Plan revision as the preferred site. The Report on the Community Outreach Program suggested that if the Campus Planning Committee wished to explore further issues concerning the siting of the University Center, an alternative could be studied in the EIR. However, the Campus Planning Committee did not make such a recommendation.

L-13 The approval process for the EIR and Master Plan revision is discussed in Chapter I, Introduction, of the EIR. Required approvals for specific developments under the Master Plan revision are discussed throughout the EIR. To provide clarification, a consolidation of the approval process will be added to the Project Description of the EIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

L-14 Refer to response to Comment K-11.

L-15 Refer to response to Comment K-11.

L-16 The comment does not address the adequacy of the DEIR. As specified in CEQA *Guidelines* Section 15131, "Economic or social effects of a project shall not be treated as

significant effects on the environment." No economic effects associated with the project would result in substantial adverse physical changes in the environment that are not addressed in the EIR.

L-17 Additional information included in the Final EIR serves primarily to provide clarification on specific issues. The Final EIR provides no significant new information with respect to the environmental setting. Moreover, the Final EIR does not add new significant information to the DEIR in the form of a new significant impact or substantial increase in the severity of an existing environmental impact, nor does it introduce a new project alternative or mitigation measure considerably different from others previously analyzed. As such, the EIR does not contain new information that requires recirculation under Section 15162 of the CEQA Guidelines.

L-18 This comment does not raise significant environmental issues. Therefore, no response is required. Please refer to responses to Comments L-3, L6 through L-8, L10, L12 and L-16.

December 13, 1999

Deborah Gannan-DuVall
Director of Planning
Facilities Services
Sonoma State University

Dear Ms. Gannan-DuVall:

I appreciate your invitation for members of the campus community to comment on the Draft EIR for SSU's proposed Master Plan Revision.

My concerns fall into two areas. The first, and most general, is that many sections of the Draft EIR sound as though the planning for the Master Plan Revision has been done without full consideration of, and coordination with, the planning process for the wider community surrounding our campus. This is especially the case in relation to cumulative traffic impacts of SSU expansion combined with potential development in neighboring communities, and in relation to potential growth-inducing impacts of SSU proposals for use of the land between Copeland Creek and Rohnert Park Expressway. Regarding the latter, the Draft EIR states that only a minimal amount of the county's agricultural land will be directly affected by the placement of the Music Center and supporting facilities in this area, but it appears to ignore the very strong development pressures which are likely to result on agricultural land on the other side of Rohnert Park Expressway just north of the campus. If that land is subject to development, it will also affect the traffic load on the Expressway and on Petaluma Hill Road beyond what is described in the Draft EIR for the campus projects alone. For this reason, I believe it is essential for SSU to coordinate its planning efforts with those of the City of Cotati and the City of Rohnert Park. This is also in the spirit of the university being a "good neighbor" of the nearby communities. 1 2

The second concern I have is with the location of the University Center. The currently-proposed placement of the Center just south of Darwin Hall seems as though it will overload one area of the campus with large and heavily-used buildings while leaving other parts of the campus land relatively underutilized. At one Campus Planning Committee meeting which I attended there was some discussion of placing the Center in an alternative location east of Ives Hall. This area is currently designated for future classroom buildings, but as I understand it there is some question when these may be built, if at all. I hope this alternative location for the University Center will receive further consideration, because I believe it would lend itself to a lower-density, more human-scale, and more aesthetically pleasing utilization of the university's endowment of land. 3

Again, thank you for this opportunity to comment on the Draft EIR, and I hope the thoughts included here will be useful in the planning process.

Sincerely,

James C. Stewart
Professor, Department of Environmental Studies and Planning, Sonoma State University

LETTER M – JAMES C. STEWART

M-1 Regarding the cumulative traffic analysis conducted in the DEIR, as discussed on page IV.D-16 of the DEIR, the traffic associated with cumulative development and regional growth was developed using traffic projections from the Rohnert Park General Plan Update traffic model. The model includes the projected traffic volumes associated with buildout of the land uses identified in the Rohnert Park General Plan Update (including development north of the University across the Rohnert Park Expressway), as well as additional growth throughout the region.

As identified on page IV.A-4 of the DEIR, the University is exempt from requirement to comply with local land use controls, including local general plans and zoning ordinances. However, the University attempts to ensure its Master Plan is compatible with the goals and policies of local jurisdictions, including Sonoma County, and the City of Rohnert Park. On page IV.A-6 of the DEIR, a discussion is provided of the project's consistency with local plans to acknowledge these plans and to help provided a basis for the University to work with local jurisdictions on planning issues involving the University and the local community.

M-2 See response to Comments L-6 and L-12.

N

A Review of the EIR for the SSU Master Plan Revision of 1999
by Dr. Stephen A. Norwick, Professor of Geology
in the Department of Environmental Studies and Planning, SSU

I regret that I do not have time and space to commend the campus planners for the many good things which they wish to provide in the Master Plan and the serious and significant mitigations which the authors of the EIR have proposed. For example, I am proud of them for the good provisions for storm water control and decontamination which they wish to carry out, and other significant proposals, but my following comments must, of necessity, address the problems which still remain and therefore the following review will seem negative. I also wish to commend the authors of the EIR. They have done a generally good job exposing the many short comings of the campus master plan. My complaints are not in general with them but with us; we have started but not finished planning the very important act of designing our school for the next century. This plan will essentially be the "build out" or our campus. After this, if the campus must grow further, it will grow vertically or begin to consume the surrounding suburbs.

Mitigation of off-site impacts page II-2, paragraph 3

The authors the EIR have invented a new public policy: that a state agency need not mitigate significant effects if they occur off-site. I notice that they do not cite any legal code or court decision, probably because none exist. The argument which follows on page II-3 is hollow and needs to be replaced with a statement that the CSU is morally and legally obliged to mitigate significant environmental impacts both on and off-site in a reasonable manner. The U.S. Department of Defense used exactly the same argument for half a century but it was eventually forced to act by the courts, and now spends about two hundred billion dollars a year mitigating its environmental impacts, many of them off site. If the campus must cause significant environmental impacts on or off campus, the campus must go to the board of trustees or donors and find the money to fulfill its public responsibilities. 1

Conversion of existing agricultural land to non-agricultural use page II-4 A.1 and IV.A-5

Expansion of the campus constitutes a conversion of high quality farm land to urban use. The present farming practices do not indicate the agricultural potential of the soil on this site. This is a violation of Objectives LU-8.3 and 4 of the Sonoma County General Plan. In a world in which several hundred million people are at this moment starving to death and more than a billion are underfed, the loss of dozens of acres of Class II farmland (Class I is the very best, Class VIII is the worst) is a little part of a global disaster. One acre of such land could produce food for several people. The continued development of our campus will indirectly cause the deaths of dozens if not hundreds of people in poor countries. Not that we should grow food for them, but that the use of fine land for non-agricultural purposes causes the price of food to rise around the world. If, for example, any part of this plan were to cause the death of ,let us say, twenty students, it would be considered serious, and it would be fully mitigated, perhaps at great expense. But the 2

urbanization of dozens of acres of Class II soil will cause the deaths of several dozen people each year for hundreds of years. Two hundred years from now, the placement of this campus on fine agricultural land will be considered grotesque. There is nothing we can do about it now. It was a poor decision made by state planners in about 1960. But at least we can recognize what we are forced to carry out in order to meet the educational needs of the future. 2 Cont.

Hydrology page II-5 and IV.C-2 Flooding

This section acknowledges that the campus is on a flood plain. But the authors do not seem to understand that there are many different types of flood plains, nor do they seem to understand the behavior of a flood plain such as ours. The campus sits at the crest of the Copeland Creek alluvial fan. Over the last several hundred thousand years the fan has been building out into the fault valley in which we are situated. The creek has swung north and south over the years by a processes known as "avulsion". The last avulsion was probably in the mid 1950's when the creek broke from it banks in the vicinity of the native plant garden and flooded the area north west of that point. The EIR quoted the FEMA study of 1991, which predicts only one foot deep flooding, but local residents remember up to 4 feet of water in the prune orchard north of the campus during the last avulsion. The writers of the EIR seem to think that the flooding on our campus is not significant because it is one foot or less but the Art Building, for example, has had four or five feet of water in it on two or perhaps three occasions. Our campus buildings must be flood proofed! Even one foot of water is enough to destroy tens of thousands of dollars worth of wallboard. If wet buildings are not dried rapidly, they will develop dry rot. It is not known whether the Art Building is at this moment slowly being destroyed by fungus. 3

Hydrology page II-5 and IV.C-2 Gravel and Gradient Management for Fishery Conservation

An alluvial fan is an area of soil deposition. The creek is at the crest of the fan because the creek creates the fan. During the major floods, every ten years or so, the creek dams itself with its own debris, and spills out into the lower land north or south of the crest. The city of Rohnert Park has built right up to the creek and so they have no choice but to remove the sediment which builds up. This has been an acceptable if unsightly procedure which removes much of the vegetation as well. However, now that listed endangered salmonoids have been found in the creek, it would be much better for the fish if the water were well shaded by trees. The shade keeps the water cool, which keeps the oxygen high enough for the fish to live and reproduce. 4

Although alluvial fans are fairly common, the best management of fisheries along alluvial fan creeks (called "distributaries") is not well understood. There are several different options for the campus, one of which is to build a siltation basin big enough to catch most of the sediment which comes from the Sonoma Mountains to prevent the buildup (called "aggradation") so that sand, gravel, and cobbles do not need to be removed from the stream bed, and the vegetation can grow and undergo succession, to keep the creek shaded and cool. The problem with this option is that

if the sedimentation basin removes too much sediment, the creek will not be at equilibrium between the natural erosion and deposition. If the creek has net erosion, the channel will deepen (called "entrenchment") which will decrease or prevent flooding, but it will also destroy much of the spawning gravel, and that is detrimental to the salmonoids. Entrenchment will also undermine the riparian trees which usually fall into the creek. This causes lack of shade on the water, and erosion from the stream banks. This in turn causes siltation further down stream which is detrimental to the fish on their passage up stream, and if they should try to spawn in the reach of the stream on campus. 4 Cont.

The Meandering of Copeland Creek page II-5

The EIR fails to mention the fact that the meander pattern of the creek was destroyed a century ago by farmer Copeland. There are several kinds of creeks on alluvial fans. Copeland Creek is fed by a large drainage basin which is exterior to and upstream of the apex of the alluvial fan. Such streams in this region have a meander envelope width of about 400 feet. Streams which have been straightened erode their banks until the meander pattern is reestablished. Copeland Creek has meandered somewhat in the last century but most of its attempts to meander have been restraightened by the earlier managers and by our campus workers. The problem with a straight stream is that as it undercuts its banks, that causes erosion. Erosion muddies the waters during high flow and is detrimental to the health of resident fish. It also causes siltation down stream which is detrimental to eggs which may be laid in the gravel beds below the straightened stretch.

We have built too close to the south side of Copeland Creek, but fortunately the north side is undeveloped. If we build a parking lot up to the creek on the north side, or worse, if we build structures on the north side, we will be like Rohnert Park, which will be unable to manage the creek for the health of the fish. Our college has an opportunity to show how to manage such situations. We can artificially reconstruct the meanders of Copeland Creek. We will not need all 400 feet of the original width to greatly improve the fish habitat. For example, the State of Calif. is restoring many miles of meandering of the Sacramento River which had a 12 mile wide meander plain with a one mile wide restored meander plain which is helpful if not completely protective of the fish. This will not avoid the problem of aggradation, but it will avoid siltation caused by natural meander development, it will provide habitat for birds and small mammals as well as for endangered salmonoids, and it will provide a beautiful garden of which our campus can be proud. It would also provide space for informal recreation which is significantly missing from the present Master Plan. The restoration of meanders to benefit salmonoids is encouraged by the California Legislature in S.B. 1086, 1987. It should also be noted that over the long run, meandering stretches of creek are much less expensive to maintain than straightened stretches. California Fish and Game should require a specific plan to manage the fishery in Copeland Creek before approving the EIR and condition the approval with a strong set of written conditions. 5

Hydrology page II-6 and IV.C-8 and 9 Nonpoint Source Pollution

Mitigation Measure C.4a, b and c are excellent ideas, and the present managers and staff who care for our grounds are equipped to carry them out. However, maintenance of such facilities is probably going to become a major problem in the U.S. I believe that the North Coast Water Quality Control Board should condition their approval of the EIR based on submission of an amended Utility System Master Plan and a Stormwater Pollution Prevention Plan. 6

Transportation, Parking and Circulation page II-6, D.1 a

If a new music hall is constructed, it might be a waste of funds and sit empty most of the time, and drain money from the rest of the institution. The Spreckles Center, just down the creek from the campus is a serious problem for the city of Rohnert Park because it does not generate funds which pay for its upkeep. On the other hand, the boosters of the new music hall believe it will be wildly popular and attract large crowds. If this is so, most of those crowds will surely come from Santa Rosa, and many of them will drive down Petaluma Hill Road. The present plan calls for this traffic stream to turn right from Petaluma Hill Road and then left across traffic into a set of parking lots on the north side of the creek. If the new music hall must go as shown on Figure III-4 a better plan would be to direct traffic on Petaluma Hill Road to drive south, past the light at the corner of Petaluma Hill Road and the Rohnert Park Expressway to a parking lot east of the new music hall. This would require only a right turn into the campus. 7

Transportation, Parking and Circulation page II-7, D.2

The EIR states that "The project would create a demand for additional on-campus parking facilities" but it is the opinion of the authors of the EIR that this is insignificant and no mitigation is necessary. I never drive to school, I bicycle, but my students and colleagues have been complaining about the lack of parking close to the buildings. My female students are afraid to walk to their cars at night if they are parked in the distant lots. Many people on campus believe that parking is already a problem, and not just an inconvenience. Furthermore, the spreading parking facilities which are planned will change the character of our campus from a suburban to an urban facility. The building of more dorms and apartments for the students, is one of the most positive aspects of the new master plan but it requires more informal recreation space which is incompatible with the perceived need for safe parking. This is a significant matter and must be mitigated. 8

Transportation, Parking and Circulation page II-10, D.7 c and IV.D-8 and 9

The mitigation proposed for separating bicycles and walkers, a mildly serious problem, does not include a further mitigation for separating bicycles and cars, a much more deadly interaction. The new dorms will likely cause more students to use bicycles both on campus and for travel to Cotati and Rohnert. The Master Plan should provide more paths for bikes and walkers. The quad should probably be only 9

for walkers, and there should probably be special bike paths with parallel marked walking paths around the outside of the quad, to separate bicycles which are moving rapidly to get around the obstruction of the quad if the quad is closed to bicycles.

9 Cont.

Noise from the roads and its impact on the proposed music hall II-13 and V-6

The new music hall is proposed as a place for the production of exquisite music. Rock music and Dixieland jazz can be presented in the gym or Rohnert Park's Spreckles Auditorium which needs more cultural events. But the aesthetes who have planned the new music hall sing such delicate and precious music that it requires the finest acoustics. Unfortunately someone has convinced them that they should build it at the corner of Petaluma Hill Road and Rohnert Park Expressway. The problem with this is that the drivers of large trucks have discovered that it is often faster to use Petaluma Hill Road than the Highway 101 freeway,. If the traffic lights were simply on a timer, it would be possible for drivers to look along the road and set their speed to drive through the traffic lights without stopping. However the new traffic lights are activated by magnetic sensors and computerized in such a way that it is impossible for drivers to know from a distance how to set their speed to avoid stopping. Truck drivers, who are almost always in a hurry, drive rapidly up to the traffic lights and often must use their engines as well as their brakes to stop safely for the light. This causes backfiring and other sounds which sometimes exceed 130 dB. The affect of this on some precious passage from Heinrich Schutz, so beloved to the choir, can be well understood.

10

It is a policy of the campus Space Committee, who should have been consulted by the creators of the Campus Master Plan, that departmental activities should be geographically concentrated. The Space Committee has taken extensive testimony over the years that placing different parts or functions of one department at a great distance from each other across the campus is more than an inconvenience. It seriously erodes faculty and student communication and spirit which is so important in education. The music department should be deeply involved in the operations of the new music hall. If the placement of the music hall has so little to do with the music faculty and students, then it might as well not be on our campus at all. By the way, I would say that a majority of the students on this campus do not see the music hall as an interesting or important addition to the campus and would just as soon have it off campus.

11

The Campus Master Plan should place any new music facilities, whether a choral hall or otherwise, next to the present music department. The master plan has placed a future instructional building in position 31, south of Ives Hall and southeast of Person Theater. How appropriate to have the theater and music hall in the same area of campus and both next to the faculty and students in the music and theater departments.

It is not the fault of the authors of the EIR that the Campus Master Plan is so poor, but they should have insisted that several different future plans were considered. The old master plan reflects 40 year old ideas about the campus. Many of the other alternatives presented for comparison with the master plan were not serious proposals. The EIR is seriously flawed because it did not evaluate realistic and in many cases probably superior alternatives. The position of the proposed new

12

music center is one, but only one of the problems which will occur in the future if we do not consider reasonable alternatives and choose the best for our future. 12 Cont.

Seasonal Wetlands IV.H-7

The EIR identified meadowfoam Limnanthes douglasii a fairly common plant in Sonoma County, but it is often associated with Sonoma meadowform Limnanthes viculens, a listed rare and endangered species. We need to make an extensive evaluation every spring to make sure what responsibilities we may have purchased with any property we acquire on the north side of the creek. 13

In conclusion:

The campus has had poor and partial planning in the development of its new Master Plan in the areas which I have addressed, and probably in many other subjects of concern. There are some problems with the EIR, but in general, we are lucky to have a good document to show us honestly and almost fully the problems with the Master Plan. At this time the best thing for us to do is to complete the Master Plan instead of taking our campus into a new millennium with a such a poor plan for the future. 14

LETTER N – DR. STEPHEN A. NORWICK

N-1 As discussed in Chapter II, Summary, of the DEIR, the Legislature in Government Code Section 5499 et. seq. has allowed local entities to negotiate with the State for the imposition of "capital facilities fees" for the connection of specified utility services. Therefore, insofar as CSU agrees with a local entity for a capital facilities fee, that amount may be assessed by CSU. Utilities covered under Section 54999 include water, light, heat, communications, power, garbage services, flood control, drainage, sanitation and sewage collection, treatment and disposal. With regard to the project site, the CSU would negotiate with the local agencies as established by statute.

However, under constitutional and statutory proscription, the CSU cannot contribute funds towards off-site transportation improvements, as well as schools (K-12), police, fire, or similar fee and assessment contributions exacted from private developers. While Sonoma State University cannot commit project funds for improvements to local streets and roadways, the University will work cooperatively with the impacted agencies to identify and pursue other potential funding sources of funds for such improvements.

N-2 See response to Comment B.2.

N-3 Infrequent on-campus flooding incidents that occurred on the campus have been associated with temporary blockages of certain stormdrains which became clogged with leaves. These stormdrain blockages resulted in temporary instances of flooding of low areas surrounding the affected stormdrain. University maintenance staff estimate that the flooding that affected the northeast side of the Art Building (resulting from a clogged stormdrain north of the bookstore) was limited to one to two inches. Clogged stormdrains also have resulted in similar temporary flooding incidents on subgrade floors of Ives and Darwin Halls.

It should be noted that these isolated instances of flooding should not be compared to the designated flood zone A0 on the campus, which corresponds to the shallow breakout flooding (average inundation of one foot or less) of Copeland Creek during a 100-year storm.

As discussed throughout Section IV.C of the DEIR, mitigation measures are identified for all potentially significant impacts associated with flooding under the project. Specifically, the project shall include a suitable drainage infrastructure and on-site detention system in the northern acquisition area, in conformance with the Sonoma County Water Agency (SCWA) drainage design criteria, that will limit the 100-year peak flow into Copeland Creek (Mitigation Measure C.1a and C.1b). All new development in the northern acquisition area shall be designed with grades and landforms sufficient to prevent stormwater breakout from a 100-year flood flow (Mitigation Measure C.2). Moreover, the on-site storm drain infrastructure for the main campus shall be upgraded per the recommendations specified in the University's 1995 *Utility System Master Plan* (Mitigation Measure C.3). Implementation of these

mitigation measures would ensure that all potential flooding impacts would be mitigated to a less than significant level.

N-4 The DEIR is amended to include an update to the description of the Federal Threatened Central California coast steelhead (*Oncorhynchus mykiss*) on page D-4 of Appendix D.2 in the DEIR, an update of Table IV.H-1 "Species Status Species with Moderate to High Potential for Occurring Within Project Area" on page IV.H-3 in the DEIR; and potential project impacts to, and required mitigation for, this species is included in Impact H.3 (impacts to sensitive animal species) on page IV.H.12 of the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

As noted in the DEIR, the SCWA, as part of its Fisheries Enhancement Program, is currently implementing a creek restoration project immediately upstream of the project site. The goal of this project is to improve aquatic habitat and water quality in Copeland Creek by decreasing sediment and nutrient loads and water temperature, and decrease erosion through development of more stable channel banks and channel courses. As funding becomes available, the SCWA also proposes to implement additional improvements, including construction of a sedimentation basin east of Petaluma Hill Road (similar to a sedimentation basin constructed for the Laguna de Santa Rosa, to the north).

N-5 A substantial creek buffer zone is proposed along Copeland Creek that would exceed creek setback recommendations of the SCWA, which would allow for potential natural meandering of the streambed.

N-6 See response to Comment L-13.

N-7 Regarding the need for the proposed Center for the Musical Arts refer to response to Comment K-4.

The transportation access plan proposed by the commenter would not avoid or substantially reduce any significant environmental impacts identified in the DEIR. Moreover, the proposed location for parking areas identified by the commenter would place parking facilities adjacent to Petaluma Hill Road, identified as a scenic corridor in the *Sonoma County General Plan.*

N-8 Regarding adequacy of proposed parking facilities, refer to response to Comment E-8.

N-9 Regarding adequacy of proposed recreational facilities, refer to response to Comment L-7.

N-10 As described on page IV.F-8 of the DEIR, the Center for the Musical Arts is designed to avoid impacts on concert attendees from off-campus noise sources, principally traffic on Rohnert Park Expressway and Petaluma Hill Road. The current design would reduce the impact of traffic noise on patrons by including substantial buffer zones between lawn seating areas and Rohnert Park Expressway (to the north) and Petaluma Hill Road (to the

east), by orienting the concert hall to the south, and by constructing earthen berms in the buffer zones of up to 15 feet in height along Rohnert Park Expressway and up to 13 feet in height along Petaluma Hill Road. The heights of the berms were selected to break the line-of-sight between patrons and the tops of the exhaust stacks associated with heavy-duty trucks. With these design features, the outdoor acoustical environment of the Center for the Musical Arts would be sufficiently protected from traffic noise, which does not mean that intrusive noise from intermittent traffic-related noise events, such as truck braking or motorcycle acceleration, would not occasionally be audible by patrons from the lawn seating areas.

N-11 See responses to Comments K-3, K-4 and K-8.

N-12 See responses to Comments K-3, K-4 and K-8.

N-13 This area was surveyed by qualified botanists at appropriate times of year for detection of *Limnanthes vinculans* (Stromberg, unpubl.). It was concluded that this species was not present.

N-14 See response to Comment K-3.

SONOMA STATE UNIVERSITY

Department of Environmental Studies and Planning
707 664-2306

1801 East Cotati Avenue
Rohnert Park, California 94928-3609

December 15, 1999

Deborah Gannan-DuVall
Director of Planning
Facilities Services
Sonoma State University
1801 E. Cotati Aye
Rinehart Park, CA 94928

Dear Ms. Gannan-DuVall:

I'm pleased to have the opportunity to offer the following comments on the Draft EIR for Sonoma State University's proposed Master Plan Revision (the "Master Plan DEIR" or "DEIR").

As you know, I was a voting member and faculty representative of the Campus Planning Committee (CPC) when the proposal for a Master Plan Revision was first brought to the CPC last year. Earlier this year I was also a member of the Campus Master Plan Revision Ad Hoc Committee of the CPC. I therefore have been involved from the outset in trying to promote the fullest consideration of perspectives and options *before* the development and approval of a *project* DEIR. Through a committed process of meetings and an extensive web site, I do feel that prior to the DEIR public participation has been strong.

Now we have a DEIR. As you also know, the California Environmental Quality Act (California Public Resources Code section 21000 et seq.) requires extensive opportunity for public participation and underscores the responsibility of the public to comment on draft environmental impact reports. Extensive public participation is especially crucial at this time given that this is a *project* ERR which assumes that no additional environmental review will be required for build out of the revised Master Plan (including the "Schematic Project Plan Approval" for the Music Center). Simply said, this is the last opportunity for environmental assessment of the revised Master Plan. 1

Unfortunately, it is my opinion that much of the valuable feedback that was provided through the initial public participation process was overlooked or ignored in preparing the DEIR, resulting in an inadequate document. I am aware that several of my colleagues have provided extensive commentary on areas of inadequacy where they have substantial professional experience and scientific background. It's unfortunate that many of the inadequacies in the DEIR that they address could have been avoided with greater attention to input already received through the public participation process that was initiated by the Campus Planning Committee and conducted prior to the development of this DEIR.

I want to underscore that I do not see anything which suggests that there are aspects of the developments proposed in the DEIR that cannot be mitigated. In fact, there are significant opportunities for enhancement of biological resources for education and research as well as an opportunity for the University to demonstrate sustainable practices which save energy, naturals resources, and money. It is my belief that through continued discussion and dialog we can achieve what is in the best interest of the campus, the surrounding community, and the biological resources of the watershed. 2

In addition to these general comments about what I feel has been a short-coming in the public participation process and the need to address the inadequacies outlined by my colleagues, I would like to comment on one area of the DEIR where I personally have significant professional and academic experience. For over 18 years I have headed up the 3

Energy Management and Design Program at Sonoma State University. In addition, I have been a driving force behind the design and development of our on-campus Environmental Technology Center.

After reviewing the DEIR, it is my opinion that the assessment of the Project's impact on energy consumption is inadequate. The DEIR implies that the project will not have a significant impact on energy consumption (Impact L.1). The DEIR also states that "[a]s much as one million square feet of additional building space would be constructed under the project." (p. IV.L-3) This is estimated to result in an increase in energy use (acknowledged to be primarily from non-renewable sources) of approximately *110 percent* over existing conditions (page IV.L-4). Clearly, more than doubling the amount of energy consumed at a major public institution is a significant impact. Fortunately, a wide array of sustainable techniques, including those that will be demonstrated at SSU's Environmental Technology Center, are available that could help to mitigate the impacts of the Project on energy use. Neither the Project description nor the DEIR contemplate utilizing the many innovative building techniques available that go well beyond the Title-24 standards. The DEIR should first recognize that the Project's impacts on energy use are significant, and then consider the types of sustainable building techniques that should be employed in the various construction activities that are part of the project description (e.g., the Music Center, University Center, classroom buildings, etc.) to mitigate those impacts. 3 Cont.

The ability to mitigate energy impacts is most achievable early on in the design process (ideally in the Schematic Design). At this point, since the design of some of the most significant projects is already at or beyond Schematic Design, obvious options may already be precluded. Again, the opportunity for public participation is being lost along the way and therefore resulting in less than optimal timing in terms of public feedback.

Nevertheless, significant opportunities for energy savings still exist and I would be delighted to work with anyone involved in the process to help achieve significantly reduced impacts of the Projects energy use.

The Master Plan Revision presents a wonderful opportunity for our campus to assume a leadership role in demonstrating to the immediate and larger communities how we can effectively integrate environmental concerns with responsible development. I believe that with a closer ear to comments already offered in the public participation process prior to the DEIR as well as an authentic attempt to incorporate suggestions being offered at this time in the DEIR process — the end result will be a vibrant and healthy campus that we can all be proud of for many years to come.

Sincerely,

W.J. "Rocky" Rohwedder
Professor

LETTER O – W.J. ROHWEDDER

O-1 Regarding future environmental review of individual projects under the proposed Master Plan revision, see response to Comment K-1. Regarding use of information in the EIR from the Master Plan revision and EIR public participation processes, see responses to Comments K-3 and L-3.

O-2 This EIR has been prepared for the proposed University Master Plan revision by the California State University (CSU) Trustees in conformance with CEQA. The EIR describes all potentially significant environmental impacts associated with buildout of the University Master Plan revision. For each significant impact identified in this EIR, the EIR identifies, to the extent feasible, mitigation measures to avoid or substantially reduce the project's significant environmental effect. All significant impacts to biological resources would be mitigated to a less than significant level.

O-3 Please see responses to Comments L-4 and L-5.

SONOMA STATE UNIVERSITY

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P

14 December 1999

Ms. Deborah Gannon-DuVall
Facilities Services
SSU

Dear Ms. Gannon-DuVall,

I write in response to the Draft Environmental Impact Report on the SSU Master Plan Revision. I greatly appreciate this opportunity to contribute to the process of imagining SSU's future in a way that's respectful and protective of the natural environment we all cherish. My comments pertain to impacts H.2 and H.3 and their mitigations as proposed in the EIR, outlined both in Table II-1 and in Chapter IV.

The impacts in question concern possible losses to natural habitat and species, across campus but specifically in the Copeland Creek riparian zone. I have two concerns relative to these impacts as discussed in the EIR: I believe that the impacts (arising specifically from the proposed vehicular bridge) could be far more damaging than the EIR suggests; and I believe that the EIR process was grossly inadequate to determine these impacts. My particular area of interest is in the campus's avian populations, and I'll speak to and from that area of interest. 1

Worldwide, habitat loss is resulting in dramatic decreases in the populations of migrating passerine species, e.g., warblers in North America. Many of these species require wide wooded tracts in order for them to live and reproduce effectively. Without such spaces available, these species fall prey to many different dangers, from increased predation to "noise interference" to reproductive parasitism from savannah-dwelling species such as Brown-headed Cowbirds. In managing the Copeland Creek corridor, SSU has an opportunity not merely to contribute to protection of sensitive avian species but also to augment protection efforts; to contribute to these species' long-range survival. Building a vehicular bridge across Copeland Creek will work decidedly against this goal. Such a bridge would fragment the already fragile corridor, perhaps decimating species already at risk. 2

The Copeland Creek corridor is already none too wide, leaving resident species vulnerable to many dangers. Indeed, at least one of the depredations listed above has already been documented at SSU: Cowbird parasitism on Yellow Warblers. The mitigations proposed for the impact of the bridge (using environmentally sensitive construction techniques, relocating sensitive species, and building outside of nesting season) simply do not mitigate that impact. The only possible mitigation to fragmentation of the Creek corridor is not to fragment it--i.e., not to build a vehicular bridge at the location proposed in the Master Plan Revision. I strongly urge that Campus Planners reconsider including the vehicular bridge in the Plan. 3

My second area of concern relates to the way information was gathered during the EIR development process, and I would guess that this concern is shared by many faculty, staff, and students on campus. The EIR appears to me to be highly impoverished in its treatment of specific features of the campus fauna, and this fact seems clearly to point toward severe limitations in data gathering. A university community like SSU consists in part of resident experts, people who live here and keep track of our local biological topography, and it seems clear that these local resources 4

had little role in developing the EIR. I, for instance, develop and update a campus web site entitled *The Birds of Sonoma State University*, and through my contacts with fellow bird-lovers, my own regular perambulations of the campus, and my knowledge of local bird populations and avian life, I have the privilege of keeping track of seasonal and annual fluctuations in avian populations. I know, for instance, that rarer species do frequent SSU and the Copeland Creek riparian corridor. The following species are documented, recent additions to the SSU bird list: 4 Cont.

- Peregrine Falcon
- Sharp-shinned Hawk
- Broad-winged Hawk
- Osprey
- Least Bittern
- Great Egret
- Common Merganser
- White-tailed Kite
- White Pelican
- Winter Wren
- Black-throated Gray Warbler
- MacGillvray's Warbler
- Orange-crowned Warbler

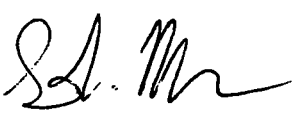
5

I offer this information for two reasons: as a contribution to the data available to the EIR process and as an example of the kind and specificity of information available from local information sources. I also attach, as an appendix, a complete list of documented avian species resident or observed at SSU. My point is that no EIR process can be complete without detailed knowledge of the biological environment; we can't guess at impacts until we know which species will be impacted. The fact that specific data are so evidently lacking in the EIR concerns me a great deal.

SSU faces a crucial juncture: wise development of the land north of Copeland Creek could dramatically enhance the campus as a residence for diverse species; unwise development could devastate those same species, dramatically reducing our biodiversity. As you know, much hinges on the fate of Copeland Creek. If we invest in the creek, work to widen the riparian corridor, resist all efforts to fragment it further, and otherwise make it an attractive residence for species, the biodiversity will follow. Movement to favor maximal biodiversity will position SSU as a model for a wise, environmentally positive, richly educational and ethical public institution. Conversely, if we work toward the Creek's diminishment, our legacy will be decidedly negative. 6

I look forward to your thoughtful response and to learning of considered adjustments made to the EIR following my comments and others. I also look forward to continuing my participation in this process as well as, of course, continuing my careful and regular inventories of the health of SSU's avian biodiversity. Please let me know how I and the resources available to me can assist further in promoting wise, environmentally positive development at SSU.

Sincerely,



Scott L. Miller
Director, SSU Writing Center

Appendix--A Comprehensive List of Birds Observed at Sonoma State
Primary Source: http://www.sonoma.edu/projects/campus/birds/

Double-crested Cormorant
Least Bittern
Great Blue Heron
Great Egret
Green Heron
Turkey Vulture
Canada Goose
Muscovy Duck
Mallard
Common Merganser
Osprey
White-tailed Kite
Sharp-shinned Hawk
Cooper's Hawk
Red-shouldered Hawk
Broad-winged Hawk
Red-tailed Hawk
Ferruginous Hawk
Golden Eagle
American Kestrel
Peregrine Falcon
Wild Turkey
California Quail
American Coot
Killdeer
Ring-billed Gull
California Gull
Western Gull (?)
Rock Dove
Mourning Dove
Barn Owl
Great Horned Owl
Anna's Hummingbird
Belted Kingfisher
Nuttall's Woodpecker
Downy Woodpecker
Northern Flicker
Pacific-slope Flycatcher
Black Phoebe
Western Scrub-Jay
American Crow
Common Raven
Violet-green Swallow
Cliff Swallow
Barn Swallow
Chestnut-backed Chickadee
Bushtit
White-breasted Nuthatch
Golden-crowned Kinglet
Ruby-crowned Kinglet
Swainson's Thrush
Hermit Thrush
Varied Thrush
Northern Mockingbird
European Starling
Cedar Waxwing
Orange-crowned Warbler
Yellow Warbler
Yellow-rumped Warbler
Black-throated Gray Warbler
Townsend's Warbler (?)
MacGillivray's Warbler
Wilson's Warbler
Spotted Towhee
California Towhee
Song Sparrow
White-crowned Sparrow
Golden-crowned Sparrow
Dark-eyed Junco
Black-headed Grosbeak
Brewer's Blackbird
Brown-headed Cowbird
Bullock's Oriole
House Finch
Lesser Goldfinch
American Goldfinch
House Sparrow

LETTER P – SCOTT MILLER

P-1 Regarding impacts from development of the proposed bridges, see response to Comment P-2. Regarding information sources used in the EIR, refer to response to Comment P-4.

P-2 Copeland Creek exists as a continuously wooded corridor for about one mile, from Petaluma Hill Road westward and downstream. West of the University campus it becomes an improved channelized stream. These conditions have existed for many years. The bird species now occupying Copeland Creek within the project area are species that can live in relatively narrow riparian woodlands, and can move across the existing openings or gaps in riparian forest. While the proposed bridges across the creek would create a break in the riparian forest, these gaps would be relatively narrow and easily negotiable by the birds currently occupying the habitat. This minor adverse impact would be compensated by the protection of a wider buffer zone along Copeland Creek than exists at present.

The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, designed to improve the relationship between proposed development and existing natural resources on the site, and further minimize potential environmental effects. The number of bridge crossings of Copeland Creek is reduced from four (one combined vehicular/pedestrian crossing and three pedestrian-only crossings) assessed in the DEIR to three (one vehicular-only crossing and two pedestrian-only crossings). The proposed bridges would all be clear-span, of prefabricated construction, and would be narrower than those originally proposed. Moreover one of the proposed pedestrian bridges would be adjacent to the proposed vehicular bridge, thereby effectively creating only two breaks along the creek. See Master Response 1 at the beginning of Chapter IV of this response to comments document.

P-3 See response to Comment P-2.

P-4 Comment noted. The DEIR focused on information sources and species that must be considered under CEQA. The information available in *The Birds of Sonoma State University* web site is a welcome addition to the information presented in the DEIR, and is incorporated into the FEIR as a part of this comment.

P-5 Comment noted. However, the species noted are for the most part occasionally occurring ones that do not depend on Copeland Creek for breeding or essential wintering habitat.

P-6 Comment noted. The University remains committed to preserving and enhancing the natural biological resources on the campus under the Master Plan revision. Please see Master Response 1, see also response to Comment I-17.

SONOMA STATE UNIVERSITY

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DEPARTMENT OF PSYCHOLOGY
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Q

To: Facilities Services
From: Mary E. Gomes, Associate Professor of Psychology
Re: Draft Environmental Impact Report for Revision of Campus Master Plan

I am writing to express concern about the impact of several of the proposed building projects on the health of Copeland Creek. Specifically, I am concerned about the automobile bridge across the creek. The presence of car traffic across the creek will increase noise and air pollution, and will impact wildlife in and around the creek. It will also diminish the ability of students, faculty, and staff to spend quiet, undisturbed time near the creek. I frequently bring students to the creek in my course on Ecopsychology, and the presence of car traffic would be a major disruption of our activities there. 1

I am also concerned about the proposed parking lots, which would be built quite close to the creek, resulting in potential runoff problems. I would suggest the use of stacked parking lots to minimize the area of land needed for parking, allowing more land to remain in a natural and unpaved state. 2

I am concerned that the increase in lighting is dismissed in the report as "insignificant." Many species rely heavily on natural fluctuations in light for feeding, sleep, and reproduction. I suggest that close attention be paid to lighting alternatives that minimize unnecessary brightness, and that wild areas of campus, such as the area around Copeland Creek, remain free of artificial lighting. 3

Thank you for your attention in these matters.

Mary Gomes

LETTER Q – MARY GOMES

Q-1 Potential noise generated from automobiles crossing the proposed bridge at Copeland Creek would be limited to the vicinity of single vehicular crossing of Copeland Creek. Vehicular noise generated at this crossing and at the proposed parking area would be similar to vehicular noise generated within the University, including at University parking lots A, G and H, located adjacent to the creek. Regarding potential noise impacts on wildlife, see response to Comment I-16.

Air quality effects that would remain significant after mitigation identified in the DEIR are primarily related to contributions to regional and cumulative air emissions. Any specific effects such air emissions would have on biological resources within the Copeland Creek corridor is speculative. See also Section IV.E, Air Quality, and IV.F, Noise, in the DEIR.

Q-2 Mitigation Measure C.4a-c identifies mitigation for potential increases in nonpoint source pollution from automobiles on the project site. This includes the installation of proper devices on the site to capture oil, grease and other pollutants from storm water runoff. (Mitigation Measure C.4a has been revised. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.) In addition, as identified under Mitigation Measure C.4c, project roadways and parking areas would be frequently cleaned using street sweeping equipment and the collected material properly disposed. These measures would ensure this impact would be mitigated to a less than significant level.

Q-3 The lighting proposed for the proposed pedestrian and vehicle bridge over Copeland Creek would be required for security and safety. This lighting would provide localized lighting over the bridge crossings. Low profile, directional lighting is standard for such security lighting, and would be used for this application. It would not create a significant disruption of overall lighting levels in the Copeland Creek riparian corridor, as it would be quickly attenuated by the dense woody vegetation.

MEMO

DATE: December 13, 1999

TO: ESA - c/oFacilities Services, Sonoma State University

FROM: Elizabeth Herron, Hutchins School of Liberal Studies

RE: Draft EIR Master Plan Revision 1999

Impacts and mitigations as described thus far are insufficient. For your final report, please respond to the following areas with further explanation and assessment.

*Air pollution emissions are said to be significant (after mitigation). Since the entire area will be affected, including delicate plants, birds, butterflies, aquatic insects, and listed species, further mitigation is necessary. What plans are being developed to reduce impacts of air pollution emissions for the final EIR? 1

*How heat and glare reflected off high-albedo ground surfaces and roofs, with resulting higher temperatures, will affect landscaping, air quality and avian and invertebrate life. Effects here have not been properly explored, nor have mitigations been suggested. Please address these impacts which will be critical to the area. 2

*Impacts of the storm water drainage system and maintenance system, including flows and pollution apart from oil and grease, such as heavy metals and fibers from tires (now known to be a significant source of non-point pollution) require greater exploration, identification, and mitigation. Whether drainage is to Copeland or Hinebaugh, habitat degradation and water quality associatiated with storm water needs deeper examination and greater mitigation (such as permaculture filtration). 3

*Impacts of vehicle traffic bridge on creek life, endangered species, native plants garden and environs has not been sufficiently addressed. Consideration has not been given to alteration in the quality of experience offerred to the campus community by the Native Plants Garden. The fundamental character of the Native Plants Garden would be completely altered by automobile access across the creek as presently placed. 4

Noise, air quality, night light, and the continual disturbance resulting from a vehicular bridge has not been addressed. Since these impacts cannot be mitigated, further and heretofore unexplored alternatives need study and elucidation in the final EIR. 5

*Biological impacts need elaboration and clarification: how will biological surveys will be conducted. Who will the biologist be and what credentials will the biologist have? - How will future surveys take into account pre-EIR disturbance currently under agency investigation? How and when have any surveys referred to in the report been done? Exactly how would animals be captured and moved? 6

Several listed species are involved that have not been sufficiently addressed in the current EIR, specifically steelhead salmon, the yellow-billed cuckoo, yellow warbler, and white-tailed kite. These species need to be addressed in terms of habitat mitigation and protection. 7

Steelhead, for example, migrate upstream during winter rains, which fall into the period between July and February, identified in the EIR as periods when work may be undertaken in the riparian corridor. 8

-There were several pools in the creek as late as October, when a trench was dug in the streambed which drained them. These pools are capable of sustaining aquatic and amphibian life, including listed species: frogs, pond turtles, and steelhead. What measures will be taken to protect areas of the creek where pools are found? 9

-Sightings of the white-tailed kite have been made by a number of people, including myself (today 12/13/99). This species of concern may soon be placed on the endangered list. I have photographed it hunting over the northeast quadrant of campus (north side of Copeland Creek). Presumably it nests in the area. What mitigation measures cover this species, aside from inactivity on the creek during its nesting period? 10

- Listed frog species need to be surveyed (yellow-legged and red-legged) in the wetland areas north of the creek. 11

-I have found and photographed tracks of bobcat, deer, racoon, coyote, rabbit, and other small mammals along the creek and north of the creek, supporting the EIR's report that the creek and north field provide both wildlife corridor and and habitat linkage. How will these animals be protected? Are they considered expendable? 12

*Who will the biological and wetland monitors be and how will they be credentialed and selected? 13

*The area on the north side of the creek requires a more complete wetland survey to complete the identification of seasonal wetlands and plants. The plant survey is incomplete. What mitigation for disturbance of any endangered plants will be made? Sebastopol meadowfoam and Sonoma sunshine were not listed in the EIR; a further look is needed to be certain these two listed species are not found. The overall wetland inventory is incomplete. 14

*Plans for wetland losses and mitigation are insufficient. It is noted that research indicates most wetland mitigation is unsuccessful. How will the wetland mitigations be undertaken and by whom; please detail the process? "Relict" streams and creeks, along with Copeland Creek and Hinebaugh Creek, as impacted by the master plan need clarification, closer description, and elaboration of guarantees for protection. 15

*Pesticide and fertilizer management plans and practices. How will effects of herbicide be mitigated? Latest research indicates weed killer, *dichlorprop*, is not as harmless as has been thought (*Science News*, , October 30, 1999, vol.156, pg.276). Herbicide residue is known to be toxic to aquatic species. Fish and Game imposes heavy fines if traces of pesticide/herbicide are found in local waterways because of the toxicity of these chemicals which require sunlight to biodegrade. Precisely what will the plan be for the management of these chemicals? This response is necessarily tied to existing toxic chemical management practices on the campus, which need revision in light of current research findings and now that Copeland Creek is designated habitat of sensitive steelhead salmon. Exactly how will the system be expanded? What are the amounts of chemicals that will be added to present use? What is present use? Has the University considered alternatives to turf, such as the use of native grasses, which would lessen dependence on herbicides and also minimize water use and drainage impacts? 16

*According to the current EIR light and glare require no mitigation. Both need further research and do require mitigation. Night light and biotic reproductive cycles, is an area of recent concern in the scientific community (and medical). Light should be directed downward to specific areas and omitted except where essential to public safety. Safety is best guaranteed by a sense of accessibility and community. The EIR 17

needs much greater developement in this area. How will safety, habitat protection, and a sense of community be developed together? 17 Cont.

* Plant survey and mitigation seems insufficient. For instance, fennel is referred to as "weedy" (Pg. IV.H-5) Fennel is swallow-tail butterfly habitat. Guidelines for designation of plant species need reevaluation. 18

* Redwoods identified as expendable along the east side of campus along the creek act as sponges where bank slope could easily erode and slip, causing major sedimentation, violating clean water requirements and aquatic species protections. Evidence exists that redwoods also gather moisture in dry months; their loss, even if eventually mitigated by replanting, would significantly alter existing natural systems, raising the water temperature, affecting endangered steelhead. Has CDFG or NMFS been consulted? Trees cannot be removed from the riparian corridor without a permit from CDFG. A coherent plan for steelhead habitat protection is an essential aspect of mitigation for creek disturbance of any kind. What plans exist? 19

* Riparian corridor width along Copeland Creek needs clarification. References to buffer zone, set-back and riparian corridor along with drip-line all need clarification. Where measures of width begin and end remains unclear. According to NMFS, measure should never be calculated from stream center. Definition of riparian area in terms of plant communities needs clarification and specific data. 20

*Alternatives to vehicular traffic bridge across Copeland Creek have not been sufficiently explored. What alternatives exist in collaboration with CalTrans and the city of Rohnert Park? 21

*Alternatives to parking lots have not been sufficiently explored. Feasable innovations in parking design are an area of intense study by urban planner and contemporary urban designers. More investigation is needed in this area. 22

Throughout the EIR, interrelated areas of concern are treated separately. The biological report, for example, is not integrated with information regarding air emissions or water quality. How will this be remedied in the final EIR? 23

LETTER R – ELIZABETH HERRON

R-1 Air quality effects identified in the DEIR that would remain significant after mitigation are primarily related to contributions to regional and cumulative air emissions. Substantial evidence to suggest that such air emissions would have identifiable effects on biological resources within the Copeland Creek corridor is unavailable.

R-2 Insufficient information has been developed on the effects of high-albedo constructed surfaces to suggest that such impacts would be significant to local populations of plants and animals. While the reflective surfaces are intended to reduce heat absorption by buildings and roads, the effects of the reflected heat and light on nearby biological receptors is unknown and is not within the scope of this EIR.

R-3 Potential increase in nonpoint source pollution during operation and construction of the proposed project are adequately addressed in Impacts C.4 and C.5, respectively, in the DEIR. Implementation of Mitigation Measures C.4a-c would mitigate all project impacts associated with increases in nonpoint source pollution to a less than significant level. Also, please refer to Chapter II in this response to comments document for revisions made to Mitigation Measure C.4a. See also response to Comment Z-9.

R-4 The proposed bridges crossing Copeland Creek would be of clear span construction. Although there would be temporary impacts from loss of vegetation and construction activity, long-term impacts to vegetation from the bridge would be minor. Mitigation measures identified in the EIR would mitigate all potential impacts to endangered species to a less than significant level. See also revised Mitigation Measures H.1 through H.3 in Chapter II of this response to comments document. The Native Plants Garden on the south side of Copeland Creek would not be directly impacted by the proposed bridge construction or by vehicular activity.

R-5 See responses to Comments Q1, Q3 and R-4.

R-6 Comment noted. Please see revised Mitigation Measures H.1 and H.3, in Chapter II of this response to comments document. See also Response R-13, below. See pp. IV.H.1-2 for a description of the site surveys carried out as a part of this DEIR.

R-7 Regarding potential impacts to the Central California coast steelhead, see response to Comment D-7. Regarding potential impacts to the yellow-billed cuckoo, see response to Comment I-6. Regarding potential impacts to the yellow warbler, see response to Comment I-7. Regarding potential impacts to the white-tailed kite, see response to Comment I-11.

R-8 Regarding potential impacts to the Central California coast steelhead, see response to Comment D-7.

R-9 See also revised Mitigation Measures H.1 through H.3 in Chapter II of this response to comments document.

R-10 Regarding potential impacts to the white-tailed kite, see response to Comment I-11.

R-11 See response to Comment R-6.

R-12 The species mentioned in this comment are not rare regionally or statewide. Copeland Creek, its proposed Creek Buffer Zone, and landscaped areas would continue to provide wildlife corridor and habitat linkage for these species.

R-13 Biological and wetland monitors would be qualified with at least an undergraduate degree in biology or a related field, and a minimum of three years professional experience, or would be working under the direct supervision of a professional biologist with at least six years field experience. Such monitors would be selected by Sonoma State University or its designee. Their scope of work and results are generally forwarded and reviewed by the appropriate resource agency, such as the California Department of Fish and Game, or the U.S. Army Corps of Engineers.

R-14 The wetlands have been surveyed on several occasions, both as part of this project and earlier projects (Golden Bear Biostudies, 1997; Stromberg, no date). No evidence of any special status plants was found during these surveys, and both Sebastopol meadowfoam (*Limnanthes vinculans*) and Sonoma sunshine (*Blennosperma bakeri)* were not found to be present. Therefore, no further studies and no further mitigation measures were recommended for special status plants as part of this project.

R-15 See revised Mitigation Measures H.1 through H.3 in Chapter II of this response to comments document. See response to Comment I-10.

R-16 As described on page IV.C-2 of the DEIR, the University currently maintains a Pesticide Management Plan that manages the handling and application of pesticides on the campus. This plan includes, among other provisions, training for employees in the proper use of pesticides, the use of employee change areas and washing facilities, and the designation of pesticide management zones. Expansion of this plan to include the proposed landscaped areas would ensure potential impacts to the environment, including biological and water resources, are minimized. Operation and landscaping of the facility would comply with state and federal regulations concerning the safe application of pesticides.

R-17 Lighting would generally be outside the riparian buffer zone. Where it is required to assure public safety near Copeland Creek (bicycle trails, bridge crossings), it would consist of low profile directional lighting with the minimum brightness needed for public safety.

R-18 Fennel has been identified by the California Exotic Pest Plant Council (CalEPPC) as a pest plant in natural areas (CalEPPC, *Exotic Pest Plants of Greatest Ecological Concern in California*, October, 1999). While fennel may serve as a nectar source for native butterflies such as the swallowtail, it does not provide exclusive or essential habitat for any native butterfly species, and it displaces other native plant species.

R-19 Regarding potential impacts to steelhead, see response to Comment D-7. Under the proposed project, the University would acquire all necessary permits for new construction and/or maintenance of facilities within Copeland Creek (e.g., bridges, stormdrains). A summary of permits and approvals required to implement the proposed project has been added to the Project Description of the EIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

R-20 As described on page III-21 to III-22 of the DEIR, the Creek Preservation Zone would correspond to the "dripline" of the trees in the riparian woodland along the creek. The Creek Buffer Zone, would encompasses a zone originating at the top of creek bank and would extend laterally along the creek.

The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, designed to improve the relationship between proposed development and existing natural resources on the site, and further minimize potential environmental effects. One of the proposed modifications includes increasing the width of the proposed Buffer Zone to an average of 150 feet (from an average of 100 feet assessed in the DEIR). See Master Response 1 at the beginning of Chapter IV of this response to comments document.

R-21 Neither the City of Rohnert Park or Caltrans have offered suggestions regarding alternatives to the proposed vehicular bridges. However, the number of proposed bridge crossings of Copeland Creek has been reduced from four to three. The proposed bridges would all be clear-span, and of prefabricated construction. The proposed vehicular bridge would be 26 feet in width (reduced from the 48-foot bridge originally proposed), and would provide two travel lanes. Two six- to eight-foot wide pedestrian bridges are proposed, one of which would be in proximity to the vehicular bridge. See Master Response 1.

R-22 The modified proposed parking area in the northern acquisition area would be divided into four quadrants (the parking area assessed in the DEIR was one large parking area). Open space is proposed between the quadrants so that native planting may be introduced in these areas. See Master Response 1.

R-23 As a matter of course, environmental topics (e.g., biological resources, air quality, hydrology and water quality) are assessed in their individual sections. However, where applicable and appropriate, individual sections within the DEIR are cross-referenced.

X3105

S

Rebecca Olsen
8 Pine Tree Circle
Cotati, CA 94931

Decemb r 15, 199 9

Deborah Gannan DuVall
Planning Departm nt
Facilitie Services

Dear Ms DuVall;

l ease acc ept my comments for the recently completed DEIR for the SSU campus.

I would fi st like to comment that the amount of EIRs available for review seemed to be qu e limitec . The library allows you only 2 hours at a time to review the document which is ardly enough time to be thorough. 1

lthough public review began on November 1st, I did not learn of it until News Bytes c: ne out o n November 15th. Perhaps notification by campus e-mail might have helped.

am conc rned with the amount of "no significant impacts" that the document shows. With the i ncrease in student population and use of the concert hall how can there be no signi cant imp act to traffic? Why won't there be a traffic light at the corner of the main entranc ' SSU w ll be responsible for generating more traffic in the area. 2

looking through the document I did not find where the cumulative impacts of the future h using ar a (west of the concert hall) were included in the EIR. Surely this will have a s gnificar impact in traffic and growth. How will that be addressed? 3

fy last c oncern is the proposed bridge over Copeland Creek. You may or may not be awar that tha area is host to many spring migrant as well as resident birds who nest along th creek. There are also many fall migrants that make Copeland Creek their winterii g ground s. I am opposed to a bridge, but if it must be built I ask that the constru ion not ake place in the spring or early summer so as not to destroy nests and nestling . Becau e my time available to read the EIR was limited I did not find any mentioi of mitig ation for destruction to Copeland Creek. How do you intend to mitigate this los ' 4

hank yc u for you time.

Sincere y,

Rebecc Olsen

LETTER S – REBECCA OLSEN

S-1 Comment noted. The public review and comment period for the DEIR was extended for an additional 45 days between January 2, 2000, and February 15, 2000. Adequate public noticing of the DEIR for the second 45-day review period occurred prior to the release of the document for the second 45-day review period (via noticing in the *Press Democrat*, and direct noticing of adjacent properties within 300 feet of the site). The University also provided electronic noticing to faculty, staff and University organizations; and noticing in the Sonoma State University *STAR* newspaper and *Newsbytes* newsletter. This effort ensured that an adequate public noticing and availability of the DEIR was provided.

Copies of the Draft EIR were made available for public review in the University Library, at University Facilities Services Department, and the City of Rohnert Park Library. Moreover, copies of the Draft EIR were provided to individuals who wished to review the DEIR off-campus.

S-2 This EIR has been prepared for the proposed University Master Plan revision by the California State University (CSU) Trustees (serving as Lead Agency for the project) in conformance with CEQA. The EIR describes all potentially significant environmental impacts associated with buildout of the University Master Plan revision. For each significant impact identified in this EIR, the EIR identifies, to the extent possible, mitigation measures to avoid or substantially reduce the project's significant environmental effect.

The DEIR finds that the project would result in a significant degradation in level of service at the intersection of East Cotati and Sequoia Way (see Impact D.1 in the DEIR). Mitigation Measure D.1e (page IV.D-22 of the DEIR) indicates that installation of a traffic signal or single-lane modern roundabout prior to project buildout would improve intersection operating conditions to an acceptable level of service. Implementation of this measure would be the responsibility of Sonoma County, unless and until the intersection were annexed to the City of Rohnert Park, at which time it would become the responsibility of Rohnert Park.

S-3 The proposed University housing's contributions to cumulative effects are accounted for throughout the EIR, including changes in runoff characteristics and water quality (Impact C.6), increases in traffic (Impact D.1), increases in regional emissions of criteria air pollutants (Impact E.3); cumulative increases in public roadside noise levels (Impact F.5), and potential exceedance of future wastewater treatment allocation designated by the subregional wastewater treatment system (Impact K.4).

S-4 See Mitigation Measure H.3a-c (as revised in Chapter II in this response to comments document) for mitigation for potential impacts to birds. See also Master Response 1 at the beginning of Chapter IV of this response to comments document.

T

Carolyn Dixon 1027 Leddy Ave. Santa Rosa, Ca. 95407
(707) 526-6069

Post-it® Fax Note 7671	Date 15 Dec 99	# of pages ▶ 2
To Deborah DuVall	For: ESA	
Co./Dept. SSU Facility Serv.	Co. Please Respond	
Phone #	Phone #	

Re: SSU Master Plan Revision,
EIR Sch#93013045 1 Nov 99

Here are some of my thoughts regarding the EIR:

Critical, I think, are the issues regarding development of 89.3 ac. north of Copeland Ck. Its true that eliminating development also eliminates the preservation measures leaving the area subject to natural decline due to random human abuse. However, it is important that the preservation measures do protect the habitat values and not merely provide lip service in order to accelerate the project. For this reason it is important that your group continue involvement in the Copeland Creek Ecological Resource Protection Plan which is being prepared. 1

The section on Hydrology and Water Quality, (C.1 & C.2) refers to increased storm flows to the creek remediated by on-site detention and housing within the 100 yr flood. I don't believe that housing belongs in the 100 yr. flood zone and that land for remediation facilities should be deducted from development acreage and not openspace. This can add up to a substantial amount. 2

The plan mentions establishment of buffer zones (fig. III-5) encompassing 100 ft. from the bank which could serve as a mitigation receptor. The 100 ft. setback from the habitat area should apply to the seasonal wetlands, swales and riparian zone. I don't believe that seasonal wetlands should be mitigated or moved into the riparian zone for protection as these are entirely different habitat types. This would constitute an "out of kind" mitigation. A creek preservation zone of 100 ft. does not provide enough uplands for vernal pool/swale mitigation which should incorporate upland mounds and oak groves. 3

Section H.1 refers to avoidance to the extent possible of jurisdictional wetlands and onsite compensation with ratios to be established. Again, seasonal wetlands should be protected where they are with some enhancement and setbacks rather than moved. H.2 admits to loss of natural communities both riparian and wetland. In other areas the plan refers to the dripline or a 12 ft. radius where trees may be impacted. Many trees' roots extend to one and one half the dripline. Perhaps a standard 30 ft. protection from trees(or greater) beyond the 100 ft. setback would provide better protection to trees. 4

Page IV.H-5 states that "there are four wildlife habitat types in the project area" Urban/developed, Annual grassland, fresh emergent wetland, valley foothill riparian, yet, 5

Fig. IV.H-1 includes seasonal wetland and Fresh Emergent wetland meadow., riparian, cropland and Urban/ Developed. While this is a slight discrepancy, clarification should consider adding oak grove or woodland which is likely to have occurred in the area long ago. The plan states that the swale and wetland meadow constitute 1.9 acres. A typical seasonal wetland complex is most likely to contain 75% uplands. An appropriate wetlands preserve in this case would contain six acres of uplands protected around the 1.9 acres. Page IV.H-10 refers to 2.9 acres of seasonal wetlands of site which would require 12 acres of preserve (9 acres of uplands). It continues to say that the project could fill 0.75 acres of jurisdictional wetlands. Whatever the end result, it is important to incorporate uplands and associated vegetation into wetlands preserves in a non-riparian setting. 5 Cont. 6

While accommodating these suggestions would result in larger preserves and smaller development acreage, I think it would send a better message to development in the future. Who better to establish a higher quality precedent than the University?

Call me if you wish to discuss any of this.

Sincerely,

Carolyn

14 Dec 99

LETTER T – CAROLYN DIXON

T-1 Comment noted. The Copeland Creek Ecological Resource Protection Plan, prepared as part of the Master Plan revision, has been prepared and included in Appendix A of this document. Note that the Copeland Creek Ecological Resource Protection Plan has been amended to include in its goals and objectives the formation of an ongoing task force made up of University faculty, staff and students, and the solicitation of local agency input to develop and manage the protection plan.

T-2 Implementation of Mitigation Measure C.2 (designing northern acquisition area with grades and landforms sufficient to prevent stormwater breakout from a 100-year flood flow) would mitigate the project impact associated with introducing new development within a designated 100-year flood zone.

T-3 The great majority of seasonal wetlands would be protected on site; only relatively small wetlands would be lost as a part of the music facilities, parking area, and housing. As specified in Mitigation Measure H.1a-c, loss of these wetlands would be mitigated as required by the U.S. Army Corps of Engineers and the California Department of Fish and Game.

T-4 Regarding loss of wetlands, see response to Comment T-3. The Buffer Zone along Copeland Creek would extend well outside the width of the existing dripline of riparian trees.

T-5 Pursuant to the CEQA Guidelines, the purpose of the habitat description on pages IV.H-5 to IV.H-8 is to provide a description of habitat conditions under existing conditions. Any description of past vegetation that may have occurred on the site is speculative and could not be reliably delineated.

PO Box 1061
Santa Rosa, CA 95402

December 14, 1999

Reference: EIR Master Plan Revision 1999

Deborah DuVall
Facilities Services Office
1801 East Cotati Avenue
Rohnert Park, CA 94928

Dear Deborah DuVall,

I am concerned about the wildlife of Copeland Creek. The proposed plan to build the Center for Musical Arts and new entrance to the university across the creek is unnecessary and the cost to our wildlife is too great.

There are fewer and fewer wildlife habitats left like Copeland Creek. The Sonoma State University website boasts that "SSU provides home to dramatically diverse wildlife" and features the bird sightings "along Copeland Creek". (http://www.sonoma.edu/projects/campus/default.html) The many plants and animals who live at Copeland creek are an asset to our community and they deserve our protection. Sonoma State's plans for a greater presence and a better image in the community can be accomplished without these precious species losing their homes, and for some their lives. 1

The school can continue to grow and build without the substantial alteration of Copeland Creek. According to the official CSU websites, CSU Chico has 13,798 students and their campus size is 119 proper acres. San Jose State University has 25,997 students and their campus is 92 acres. SSU currently has 6,778 students and our campus is 220 acres, which was acquired in 1966. 2

We have a responsibility to grow in such a way as to protect the wildlife habitat of Copeland Creek.

Theresa C. Rosarno

LETTER U – THERESA C. ROSAMO

U-1 Comment noted. The University is committed to protecting Copeland Creek through the establishment of a protection area around the creek and undertaking restoration and enhancement of its riparian zone.

U-2 No substantial alteration to Copeland Creek is proposed under the proposed project. The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area that are designed to improve the relationship between proposed development and existing natural resources on the site and to further minimize potential environmental effects. Proposed modifications include, among other features: relocating the Center for the Musical Arts further north, away from Copeland Creek, increasing the width of the proposed Creek Buffer Zone, providing an upland zone in the wetland area, reducing the number of bridge crossings of Copeland Creek from four to three, locating all pedestrian and bicycle paths outside the Creek Buffer Zone and the existing limits of riparian vegetation (other than the approaches to the bridge crossings of Copeland Creek) and wetland area, and dividing the parking area into four quadrants separated by open space. See Master Response 1 at the beginning of Chapter IV of this response to comments document.

V

December 15, 1999

Deborah DuVall, Facilities Services

Thank you for your time during recent meetings. I greatly appreciate the consideration and incorporation of several items into the revised plan. These items include:

- an expanded creek buffer zone
- a rerouting of traffic through the middle of the new parking lot rather than along the southern edge, near the creek.
- division of the parking lot into subunits with integrated landscaping
- increased upland mitigation (larger buffer area) near the wetland area
- the use of native plants in part of the Sonoma landscape to reduce the use of water, fertilizers, and pesticides.
- the diversion of runoff from the turf area by means of a channel, north of the creek
- movement of the small service building (east side) away from the creek
- movement of the south end of the music building from the edge of the creek zone
- creation of a Copeland Creek Committee to guide future activities regarding the creek

1

Additional items that I would like to see in the E.I.R. are listed below.

- inclusion of the following species of special status that are present in the area (reported to me by others)
  Yellow Warbler
  Peregrine Falcon
  Steelhead (upstream)

2

- a site survey of plants in the project area, completed by CNPS

3

- assessment of noise impact on the native plant garden
  a chart (similar to the one on page IV-F7) that compares current noise levels in the garden with predicted levels, during and after the project construction

4

I look forward to future discussions as planning proceeds.

Sincerely,

Julie Bright

Julie Bright

LETTER V – JULIE BRIGHT

V-1 The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, designed to improve the relationship between proposed development and existing natural resources on the site, and further minimize potential environmental effects. See Master Response 1 at the beginning of Chapter IV of this response to comments document.

V-2 Regarding the yellow warbler and peregrine falcon, see response to Comment I-7. Regarding steelhead, see response to Comment I-4.

V-3 Site surveys indicated the presence of native and non-native plant species typical of low-elevation sites in Sonoma County.

V-4 Noise levels within the native plant garden would be affected temporarily during construction of some of the projects included in the Master Plan revision, such as the Center for the Musical Arts and the Physical Education Addition building. Construction-related noise impacts and mitigation measures are described on pages IV.F-4, IV.F-5, and IV.F-6 of the Draft EIR.

In general, construction noise impacts are considered significant in the vicinity of noise-sensitive uses but can be reduced to a less-than-significant level by limiting the hours during which construction occurs and by using construction equipment that has been equipped with mufflers. Over the long-term, noise levels within the native plant garden would be largely unaffected by concerts at the Center for the Musical Arts or by increases in traffic volumes along Rohnert Park Expressway and Petaluma Hill Road because of the substantial buffering distances between the garden and those noise sources. The buffering distances would exceed 400 feet, 1,000 feet, and 1,200 feet relative to the Center for the Musical Arts (nearest lawn seating area), Rohnert Park Expressway, and Petaluma Hill Road, respectively. In contrast, the noise level estimates shown in Table IV.F-2 on page IV.F-7 of the Draft EIR correspond to a distance of only 50 feet from the roadway centerline. At a distance of 1,000 feet, the traffic noise levels would be approximately 20 dBA less than those shown in Table IV.F-2.

December 15, 1999

To: Facilities Services Office
1801 East Cotati Ave.
Rohnert Park, Ca 94928

Attention: Deborah DuVall
RE: Master Plan Revision- Musical Arts Center

Dear Ms. Du Vall:

I would like to know why the parking lots are so big. On my copy of the Master Plan Map the Musical Arts Center is very small in comparison to the parking lots. When the heavy rains come this water will surely flood into the Copeland creek and overflow. This will destroy the plants, and the soil will be washed away. This will also be very destructive to any wildlife in the area. 1

I spoke at the public hearing on December 2, 1999 without having time to fully review and understand the plan. At that time I spoke for the record about one large bridge, instead of four small ones. I would like to retract that statement now. The air pollution, and the noise will have a negative effect on the existing wildlife. 2

I believe the Alternative Plan to locate the project on the soccer fields, or existing fields on the main campus, would be better solution. 3

If we only look at the current benefit, and not think of the long term impact and the destruction of the environment we will pay for it even more so, at a later date. It might be too late then to save the wildlife in Copeland creek. 4

Sincerely,

Cathy Chen
8218 Windmill Farms Drive
Cotati, Ca 94931

LETTER W – CATHY CHEN

W-1 The parking areas proposed in the northern acquisition on the main campus (as with the existing and proposed parking on the main campus) are intended to accommodate the projected parking demand from all uses of the University, not just the proposed Center for the Musical Arts. See Impact D.2 and D.5 in the DEIR for a discussion of parking impacts.

W-2 Comment noted; see response to Comment Q-1. Note that the number of proposed crossings of Copeland Creek is reduced from four to three. See Master Response 1 at the beginning of Chapter IV of this response to comments document.

W-3 See response to Comment K-4.

W-4 This EIR has been prepared for the proposed University Master Plan revision by the California State University (CSU) Trustees (serving as Lead Agency for the project) in conformance with CEQA. The EIR describes all potentially significant environmental impacts, including long-term impacts, associated with buildout of the University Master Plan revision. For each significant impact identified in this EIR, the EIR identifies, to the extent reasonable and feasible, mitigation measures to avoid or substantially reduce the project's significant environmental effect.

X

December 15, 1999

FACILITIES SERVICES
1801 E.Cotati Ave.
Rohnert Park, Ca 94928

Dear Ms. Duvall:

I take my early morning walks on campus and around Copeland Creek. I have enjoyed the refuge that this wild area provides. I feel another location for the Musical Arts Center would be more appropriate. At the public hearing on December 2, 1999 you discussed relocating the vernal pools after contruction. I disagree with this concept. Don't destroy it in the first place. 1

I believe the gentleman from ESA spoke about an alternative location. This is a section in the EIR I would like to see explored more thouroughly. We cannot replace a wetland, and vernal pools, and wildlife after it's gone. Also this would be expensive, and probably not successful. 2

Thank You For Your Time,

Mary Licht
27 George Street
Cotati,Ca 94931

LETTER X – MARY LICHT

X-1 and X-2 As discussed in the DEIR, all potential impacts to biological resources on the project site would be mitigated to a less than significant level. Regarding potential alternative locations for the proposed Center for the Musical Arts, see response to Comment K-4.

Y

RECEIVED
99 DEC 15 PM 4:46
FACILITIES SERVICES

December 15, 1999

Facilities Services Office
1801 East Cotati Ave
Cotati, Ca 94928

MEMO: Regarding Master Plan Revision 1999 (Musical Arts Center)

To Whom It May Concern:

Chapter 1 section E

#1) The EIR was severly restricted to me as a resident of Cotati for fifteen years and a taxpayer I have a legal right to know about any construction that will effect the wildlife habitat that my family and I enjoy in and around Copeland Creek. I was informed on November 29, 1999 that a copy was available to me at the Ruben Salazar library. However I was denied access because I am not a faculty member, or a student. The librarian refered me to Ms. Susan Kushak of the New and Information Dept. She informed me that she had sent several copies to Cotati City Hall Planning Dept., and that I may pick one up free of charge. However, in direct contrast to this statement Mr. Dennis Dorch of Cotati Planning Dept. said at the public hearing on Dec. 2, 1999 that only one copy was sent to him and he needed it for his personal notes. A spokesman for ESA told me that forty copies were sent to the Facilities Office. A professor from the Invironmental Studies Dept. stated on November 29, 1999 at the first hearing that he thought it was an outrage that only two copies were available to the staff. 1

Table !V H-1

I would like to speak for the living creatures who cannot speak for themselves. I believe because of the large parking lots, and the vehicular bridge, the carbon monoxide fumes will greatly cut off the oxygen supply to the bird population. Nesting sites for the raptors will be destroyed by cutting down trees, and their hunting ground, the wetlands on the north side of Copeland creek will be gone. The combination of the open space, grasslands, wetlands, stream site habitat, makes this a unique area for the diverse population of birl life. 2

#2 Over the last fifteen years my family, friends, and I have observed the following bird species: Kestrel, White-Tailed Kite, Red-Shouldered Hawk, Red-Tail Hawk, Cooper's Hawk, Sharp-Shinned Hawk, Marsh Hawk, Turkey Vulture, California Quail, American Goldfinch, Western Meadowlark, Water Pipit, Yellow Warbler, Audubon Warbler, Kinglets, Rufus-Sided Towee, Brown Towee, Western Bluebird, Red Robin, Loggerhead Shrike, Acorn Woodpecker, Red- Shafted Flicker, Morning Doves, Ash-Throated-Flycatcher, Barn-Swallow, Great-Blue Heron, Great-Horned Owl, Barn Owl, White Egret, Gold-Finch, Rosey-House Finch, Red-Wigned-Blackbird, Brewer's Blackbird, Oregon Junco, Western-Bluebird, Mockingbird, White-Crowned-Sparrow, Golden-Crowned-Sparrow, White-Throated-Sparrow, Bushtits, Waxwings, Stellars-Jay, Scrub-Jays. 3

Restoration of Copeland Creek Upstream

#3) Mr. Ed Grossi is the organic farmer who owns the property east of the contruction site. He and the Fish and Game Dept are involved in restoring the part of Copeland creek that runs through his property. In a telephone conversation I had with Mr. Grossi on December 2, 1999 he stated to me "We have Salmon up here!" He also stated his neighbor was also restoring the part of Copeland Creek that runs through his property. I want to know what effect the project will have on their efforts. 4

#4 I want to know what effect the noise will have on the birdlife, any mammals, amphibians, and reptiles such as the Northwestern Pond Turtle 5

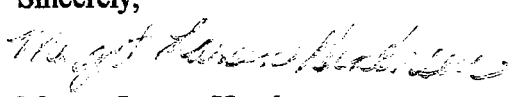
#5 I want to know what pesticides will be used for the landscaping of the Arts Center. And what effect that will have on the wildlife, the water, the fish, the yellow-legged frog (observed), and the red-legged frog. 6

#6 I want to know the location of the ancient vernal pools that are at least several million of years old that the meadowfoam (five-petaled Limanthus-vinculans) sprouts in the Spring. 7

Alternatives V

#7 I would like to request the project be moved to another site to save the birdlife, the wetlands, the salmon, that depend on Copeland Creek as their home. Perhaps as a last alternative the Musical Arts Center I see is only the arts center, and one foot bridge. NO PARKING LOTS, NO VEHICULAR BRIDGE. 8

Sincerely,



Margot Larsen Henderson
29 George Street
Cotati, Ca 94931

LETTER Y – MARGOT LARSEN HENDERSON

Y-1 Comment noted. The public review and comment period for the DEIR was extended for an additional 45 days between January 2, 2000, and February 15, 2000. Adequate public noticing of the DEIR for the second 45-day review period occurred prior to the release of the document for the second 45-day review period (via noticing in the *Press Democrat*, and direct noticing of adjacent properties within 300 feet of the site). The University also provided electronic noticing to faculty, staff and University organizations; and noticing in the Sonoma State University *STAR* newspaper and *Newsbytes* newsletter. This effort ensured an adequate public noticing and availability of the DEIR was provided.

Copies of the Draft EIR were made available for public review in the University Library, at University Facilities Services Department, and the City of Rohnert Park Library. Copies of the Draft EIR were also provided to individuals who wished to review the DEIR off-campus.

Y-2 Air quality effects identified in the DEIR that would remain significant after mitigation are primarily related to contributions to regional and cumulative air emissions. Substantial evidence to suggest that such air emissions would have identifiable effects on biological resources within the Copeland Creek corridor is unavailable.

The great majority of trees along Copeland Creek and along the riparian wetland to its north would be protected. Regarding loss of foraging habitat, see responses to Comments I-11 and I-17.

Y-3 Comment noted.

Y-4 Comment noted. See response to Comment D-5.

Y-5 See response to Comment I-16.

Y-6 See response to Comment R-16.

Y-7 Sebastopol meadowfoam (*Limnanthes vinculans*) has not been found in the vernal pools or seasonal wetlands on the project site. It has been reported, however, from the Yountville, Santa Rosa, Sebastopol, Camp Meeker, and Two Rock quadrangles. The project area lies in or near the geographic distribution of this species, but the vernal pools on the project area were not found to support this species.

Y-8 Regarding potential alternative sites for the proposed Center for the Musical Arts, see response to Comment K-4. Regarding the proposed bridge crossings of Copeland Creek, the number of crossings has been reduced from four to three. The proposed bridges would all be clear-span, and of prefabricated construction, to minimize potential impacts to Copeland Creek. See Master Response 1 at the beginning of Chapter IV of this response to comments document.

Brian Turner
1260 West Sexton Road
Sebastopol

Attn: Deborah DuVall

Comments on the Sonoma State University Master Plan Revision Draft Environmental Impact Report

Thank you for the opportunity to comment on the draft EIR. I support much of the University's plans in regard to the revision, but I do believe that there are significant deficiencies in this environmental review, most especially in those portions dealing with the northern property and Copeland Creek.

This EIR

The presentation of this DEIR as a programmatic review is inappropriate for the scale of this project. The development of additional buildings and pathways on the already developed southern portion of campus in order to accommodate already planned increases in enrollment is a very different undertaking than the development from scratch of raw land approximately one-third as large again as the existing campus, and the development thereon of a facility intended to provide for attendance as great as that of the rest of the campus together. It is therefore inappropriate to lump these projects together as one Project EIR, and there should be some seperation of the environmental review of portions of the project. Specifically, I suggest that the Master Plan revision be given a Project-level environmental review, but that the music center, with the many possible permutations of impact dependent upon its eventual design, siting, and operation, be subject to its own environmental review. 1

IV. A Land Use and Planning

Impact A.2 The creation of employment by the project is not an impact apropos to the residential impact of the project. If it were, it would be a negative one, given the presently imbalanced, excessive jobs-housing ratio in the Rohnert Park area. 2

IV.C Hydrology and Water Quality

Setting I question the accuracy of the conclusion that the project property north of Copeland Creek drains away from Copeland Creek and ultimately into Hinebaugh Creek. There is a freshwater seep and tributary that bisects the property that is elsewhere identified as flowing into Copeland Creek. This would be impossible if all the lands in the property drained away from Copeland Creek. 3

Impact C.1 I question the accuracy of the calculation of the runoff coefficient ("C" factor) for the proposed project. The amount of increase of impervious materials in the proposed project is substantially greater than the 25% increase in the "C" factor given in the EIR. This would increase the potential for flooding. 4

Further, under Impact C.3, it is stated that the 1995 Utility Master Plan estimated the main campus to experience stormwater runoff increases of at least 69.1 cfs with the development of the existing master plan. This increase alone would result in a change in 5

flow at Snyder Lane from 2047.3 cfs to 2116.4, already more than the impact projected under Impact C.1, and this does not include the increase from directing the whole of the northern properties into the creek, and paving half of them. The stormwater increase estimates for the project should be given a legitimate and thorough evaluation. 5 Cont.

There is no consideration of the impact of the proposed project on the potential for flooding beyond the confluence of Copeland Creek and the Laguna de Santa Rosa. The development of the project could affect the potential for flooding of the Laguna de Santa Rosa and the Russian River. This would be a significant impact. 6

Mitigation C.1a The inclusion of suitable drainage infrastructure in the northern acquisition area is not an applicable mitigation for the impact of increased potential for flooding, given that the drainage infrastructure does not reduce actual runoff. A mitigation measure that does reduce this impact is described below. 7

Mitigation C.1b This mitigation states that detention systems will be incorporated into the project to ensure that design peak flow does not exceed the pre-project value for a 100-year event. However, the project should be designed to ensure that it does not create the potential for flooding during two- or ten-year storm events, either. 8

Alternative Mitigation: I would propose that a further mitigation measure be included of paving the proposed northern parking area in pervious paving tiles, which are commercially available and cost efficient and allow stormwater to drain directly into soil. Such mitigation would provide twofold benefits in that it would reduce total runoff amounts and would allow for terrestrial decomposition of potential pollutants (oxygen-demanding materials, hydrocarbons, and others). 9

Impact C2

Mitigation C2 The design of the northern property with "grades and landforms sufficient to prevent stormwater breakout from a 100-year flood flow" may still place structures that would impede or redirect flood flows. 10

Impact C3 The estimates of stormwater increase from the main campus taken from the 1995 Utility Master Plan exceed the estimates of the impact of the entire project areas given in Impact C1. Further, the assertion that the proposed distribution of developed land remains "approximately the same" from a drainage standpoint is not supported and is insufficient evidence for assessment of impact here. A more detailed and thorough assessment of drainage impacts of the proposed project is necessary. 11

Mitigation C.3 The 1995 Utility System Master Plan has not been evaluated by the Sonoma County Water Agency to determine whether it actually would bring the campus drainage system into conformance with their guidelines, the cited recommendations are not presented here so that the reviewer can assess their sufficiency, they have not previously been evaluated according to CEQA, nor is their any indication that they are any more likely to be implemented than they have so far. As such, this mitigation measure is insufficient. 12

Furthermore, given the recent activities to upgrade drainage systems in the creek, which were in violation of permitting requirements of state and federal agencies and a serious compromise of water and habitat quality, further plans for drainage improvements in connection with this project should be given environmental review and presented for public comment. 13

Impact C.4 The impact of additional thousands of cars' detritus and emissions entering the stormwater runoff to Copeland Creek is a very significant impact. 14

Mitigation C.4b The extension of the University's pesticide and fertilizer management plans to the proposed additional landscaped areas is not an adequate mitigation when the nature of neither the landscaping nor their management is stated. Certain landscaping materials and designs will require more or less chemical maintenance and will have more or less adverse environmental impacts than others. The nature of the proposed landscaping and the pesticides and fertilizers to be used must be stated in order to assess the impact of such use. 15

Proposed Alternative Mitigations: As stated above, significant mitigation benefits could be achieved with little additional cost if the use of porous paving materials were used in proposed parking and roadway areas of the project. Also, movement of the proposed roadways and parking areas further from the creek, toward Petaluma Hill Road and Rohnert Park Expressway, will further reduce the impact of pollutants on the water quality of the creek and region. 16

Impact C.6 This section does not adequately identify the cumulative impacts of the project on runoff characteristics and water quality. For example, the cumulative impact of impervious surface development in the Russian River watershed has caused and continues to cause excessive potential for flooding along the river and its tributaries, and this project would exacerbate this effect. 17

Mitigation C.6 Mitigation Measures C.1 through C.5 are designed to mitigate the immediate impact of the project, and are thus not necessarily adequate to mitigate cumulative impacts. For example, the Mitigation Measures for Impact C.1 do not address the cumulative impact of impervious surface development on the Laguna de Santa Rosa or Russian River. 18

Further Hydrological Impact: The effect of the proposed project on the recharge of the local aquifer needs to be considered, especially in light of the ability of Copeland Creek to maintain summer flows and pools. This has further relevance to the protection of biological resources, especially salmonid fishes. 19

Further Hydrological Impact 2: This section fails to consider the effects on streambed erosion on the creek immediately surrounding and downstream of drainage outflow. 20

IV.H Biological Resources

This section is primarily deficient in the lack of appropriate species-specific biological surveys of the project area and vicinity during different seasons. This should include both fauna and flora surveys. The project area also requires a proper wetland delineation, and this delineation should be produced as part of this EIR, as its information is an important part of the estimation of the environmental impact of this project. 21

Additional impacts of the proposed project on biological resources beyond physical displacement are not discussed. These include: noise impacts on adjacent ecological communities, impacts of ongoing human disturbance, air quality impacts, water quality (both contaminants, sedimentation, and changes in water level), in-stream water levels, and physical disturbance besides displacement. 22

Given that steelhead trout have been observed in Copeland Creek, the possibilities for restoration of steelhead habitat in the portion of Copeland Creek running through SSU should be considered, and the effect of the proposed project on such potential evaluated. 23

In addition, there is already existing efforts at enhancing fishery habitat occurring upstream of the project site. This restoration effort is mentioned in the consideration of an alternative location for the music center to the east of Petaluma Hill Road The music center on the currently proposed site should be evaluated as to its potential effect on the success of this program. 24

The actual impact to significant habitat cannot be adequately gauged or mitigated without knowledge of the exact nature of the proposed project. These areas should have environmental review of actual designs, when specific placement of buildings and parking lots and type of landscaping used is known. Therefore, the area north of the creek should be subject to separate environmental review. 25

Alternatives

There is no consideration of an "environmentally superior" alternative that is separate and in addition to the "no project" alternative, as required by CEQA. 26

Alternatives "considered but rejected as infeasible" seemed to regard the development of the music center as one of the project sponsor's objectives, when in fact it is not. Therefore, alternatives that did not include the development of the music center should have been considered as to their relative environmental impact and ability to meet the project sponsor's objectives. 27

In fact, the project sponsor's objectives would seem to contain significant language to undermine the feasibility of the present siting of the music center. This includes the primary objective that the Master Plan revision, "use existing campus resources to the fullest extent, by appropriate use of currently underutilized developed space. Develop additional space only as needed." The "need" for a 10,000-person capacity performing arts center is not identified in the project sponsor's objectives. There is only the objective to "provide facilities to effectively support the University's academic programs", and if the development of the music center is to fall into this category, such a justification needs to be made specifically. 28

In addition, there are the three objectives that clearly state the intention to "identify and protect important biological resources on campus". This identification has not taken place, so protection cannot be said to be have occurred. These also state the objective to, "Protect and enhance existing sensitive riparian habitat," and, "Avoid or minimize potential adverse ecological impacts to the Copeland Creek preservation area." Given that these are objectives of the Plan revision and the development of the music center is not, the protection of habitat and avoidance of ecological impacts must be said to take precedence over the development of the center. Again, the alternatives and their appraisal need to recognize this. 29

Miscellaneous Other:

Landscaping

The designation of landscaping surrounding the proposed center for the musical arts as "Sonoma Landscape" is not sufficiently specific to allow for assessment of potential environmental impacts. Some types of landscaping (for example grape vineyard 30

or eucalyptus) may involve negative impacts that are not mitigated by extension of existing landscape management techniques and that warrant specific assessment. Similarly, other types of landscaping (for example oaks and native grasses) may have positive ecological impacts worthy of assessment.

30
Cont.

LETTER Z – BRIAN TURNER

Z-1 See response to Comment L-1.

Z-2 As discussed on page IV.A-9 of the DEIR, the project would create new temporary construction employment opportunities at the project site, and would create new permanent on-site full-time and part-time employment positions for new University faculty and staff. A number of new on-site student employment opportunities would also be created.

Z-3 See response to Comment J-3.

Z-4 See response to Comment G-1.

Z-5 A theoretical increase in peak runoff from the three University campus drainage systems does not simultaneously increase the theoretical peak runoff to Copeland Creek by their combined amounts. The peak flow quantities presented in the DEIR represent the highest amount of flow expected as a result of the 100-year storm at Snyder Lane, and of the 10-year storm at the three campus outfalls into Copeland Creek, and do not theoretically occur at simultaneous points in time both before and after the point in time associated with peak flow. Therefore, the various flow quantities from the three main campus drainage systems, and from the northern acquisition area are not directly additive to the SCWA's current theoretical 100-year peak flow quantity for Copeland Creek. Instead, they are meant to be applied as a measure by which the creek's particular existing or proposed drainage system may be evaluated for runoff conveyance capacity.

As discussed throughout Section IV.C of the DEIR, mitigation measures are identified for all potentially significant impacts associated with flooding under the project. As discussed in Mitigation Measure C.1a, C1b and C3, all proposed new drainage systems on the campus, including the proposed on-site detention system, would be designed in conformance with the Sonoma County Water Agency drainage design criteria. This would ensure potential increases in stormwater flows to Copeland Creek would be mitigated to a less than significant level.

Z-6 See discussion under Impact C.1. The calculated water surface elevation at the west end of the University would increase by 0.15 feet or less with buildout of the project if onsite stormwater detention were not included in the project. However, the proposed detention system identified in Mitigation Measure C.1b would maintain the currently predicted elevation of the 100-year flood flows in the creek channel. Therefore, with implementation of identified mitigation, the impact from all proposed development under the proposed Master Plan revision would be mitigated to a less than significant level.

Z-7 Refer to Mitigation Measure C.1b, which mitigates the potential flooding impact.

Z-8 See Mitigation Measures C.1a and C.1b. SCWA criteria are designed to preclude flooding of buildings for occupancy from storms with a return frequency of up to 100 years. Site improvements are to be designed to prevent flooding of site features due to storms with a return frequency of up to 10 years.

Z-9 The site is underlain with clay soils, which have a very low infiltration rate and as such are not suitable for a direct infiltration system. Therefore widespread use of pervious paving tiles is not recommended. However, as discussed in Master Response 1 (at the beginning of Chapter IV of this response to comments document), it is proposed that the fire lanes extending through landscape in the northern acquisition area would employ either a "turf-paver" and/or "gravel-pave" systems.

Z-10 Other than the proposed clear-span bridges, approaches to the bridges, and storm outfalls, no development would occur within Copeland Creek, or the Creek Preservation and Buffer Zones under the Master Plan revision. The proposed vehicular and pedestrian bridges would be clear-span type bridges, and shall be designed to provide a minimum of 1½ foot of freeboard between the design 100-year water surface and the low-chord elevation of the bridge structures.

Z-11 The assertion that the proposed distribution of developed land remains approximately the same was based upon a review of the current and proposed site plans. This review concluded that generally, land proposed for new buildings in many cases was already hard surfaced (e.g., parking lots), therefore, there would not be an increase in the percentage of impervious surfaces on the campus lands south of Copeland Creek that would result in a substantial increase in runoff.

Z-12 Mitigation Measure C.3 provides that on-site storm drain infrastructure for the main campus shall be upgraded per the recommendations specified in the University's 1995 *Utility System Master Plan.* Prior to approval of the project, the CSU Board of Trustees must certify the Final EIR and adopt a reporting and monitoring program for all mitigation measures identified in the EIR in accordance with the requirements of Public Resources Code Section 21081. The monitoring program will ensure that all mitigation measures are implemented.

Z-13 See response to Comment L-13.

Z-14 Air quality effects identified in the DEIR that would remain significant after mitigation are primarily related to contributions to regional and cumulative air emissions. Substantial evidence to suggest that such air emissions would have identifiable effects on biological resources within the Copeland Creek corridor is unavailable. See also Section IV.E, Air Quality, and IV.F, Noise, in the DEIR.

Z-15 As described on page IV.C-2 of the DEIR, the University currently maintains a Pesticide Management Plan that manages the handling and application of pesticides on the campus. This plan includes, among other provisions, training for employees in the

proper use of pesticides, the use of employee change areas and washing facilities, and the designation of pesticide management zones

If vineyards are selected as one of the new vegetation types to be planted in the northern acquisition area, they would be delineated as small "pocket" vineyards, and would be separated by native plantings and located approximately 300 feet from Copeland Creek. In any case, the University's pesticide and fertilizer management plans and practices would be expanded as necessary to account for all vegetation proposed in that area, thereby ensuring all potential impacts associated with landscaping materials would be mitigated to a less than significant level. Operation and landscaping of the facility would comply with state and federal regulations concerning the safe application of pesticides.

Z-16 Mitigation Measure C.4a-c identifies mitigation for potential increases in nonpoint source pollution from automobiles on the project site. This includes the installation of proper devices on the site to capture oil, grease and other pollutants from storm water runoff. (Mitigation Measure C.4a has been revised. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.) In addition, as indicated under Mitigation Measure C.4c, project roadways and parking areas would be frequently cleaned using street sweeping equipment and the collected material properly disposed. These measures would ensure this impact would be mitigated to a less than significant level.

Regarding the use of porous paving materials, see response to Comment Z-9.

Z-17 As discussed in Impact C.6, implementation of Mitigation Measures C.1 through C.5 would mitigate the project's impact to hydrology and water quality, and therefore, the project's contribution to cumulative hydrology (including to the Laguna de Santa Rosa and the Russian River) would not be cumulatively considerable.

Z-18 See response to Comment Z-17.

Z-19 As discussed in Impact K.2 in the DEIR, the proposed project would not result in a significant impact to the recharge of the local aquifer.

Z-20 Impacts associated with discharges from the northern acquisition area to Copeland Creek are discussed in Impacts C.1, C.4 and C.5 and C.6 in the DEIR. Mitigation measures identified in the DEIR would mitigate all impacts related to increases in flows, potential increases in nonpoint source pollution, erosion and sedimentation to a less than significant level.

Z-21 Comprehensive surveys for special status species are not required under CEQA. CEQA requires examination at a level of detail to support impact analysis. Where there was a high potential for a special status species to occur on site, it was assumed to be present and impacts and mitigations identified accordingly. As discussed in Mitigation Measure H.1a, a verified wetland delineation and streambed alteration permit would be required

as part of the permitting for the project. The DEIR assesses the maximum impact to wetland and riparian resources that could occur as a result of the project.

Z-22 Regarding potential noise impacts on biological resources, see response to Comment I-16. Regarding potential air quality impacts on biological resources, see response to Comment Z-14. Hydrologic and water quality impacts are adequately addressed in Section IV.C, Hydrology and Water Quality, in the DEIR.

Z-23 Comment noted. The DEIR is amended to include an update to the description of the Federal Threatened Central California coast steelhead (*Oncorhynchus mykiss*) on page D-4 of Appendix D.2 in the DEIR, an update of Table IV.H-1 "Species Status Species with Moderate to High Potential for Occurring Within Project Area" on page IV.H-3 in the DEIR; and potential project impacts to, and required mitigation for, this species is included in Impact H.3 (impacts to sensitive animal species) on page IV.H.12 of the DEIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

Z-24 Revised Mitigation Measure H.3 would ensure potential impacts to steelhead and their habitat would be mitigated to a less than significant level. With this mitigation in place, the proposed project will not affect upstream restoration efforts.

Z-25 See response to Comment L-13.

Z-26 See response to Comment L-11.

Z-27 See response to Comment K-4.

Z-28 See response to Comment K-4.

Z-29 As discussed in the Project Description in the DEIR, in recognition of the importance of Copeland Creek to the campus environment and the academic program, a Copeland Creek Ecological Resource Protection Plan is being prepared as part of the Master Plan revision. (The Copeland Creek Ecological Resource Protection Plan is included in Appendix A of this document.) Note that the Copeland Creek Ecological Resource Protection Plan has been amended to include in its goals and objectives the formation of an ongoing task force made up of University faculty, staff and students, and the solicitation of local agency input (including the California Department of Fish and Game Central Coast Region) to develop and manage the protection plan.

Note that the University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, designed to improve the relationship between proposed development and existing natural resources on the site, and further minimize potential environmental effects. Proposed modifications include, among other features: relocating the Center for the Musical Arts further north, away from Copeland Creek, increasing the width of the proposed Creek Buffer Zone, providing an upland zone in the wetland area, reducing the number of bridge crossings of

Copeland Creek from four to three, locating all pedestrian and bicycle paths outside the Creek Buffer Zone and the existing limits of riparian vegetation (other than the approaches to the bridge crossings of Copeland Creek) and wetland area, and dividing the parking area into four quadrants separated by open space. See Master Response 1.

Z-30 Comment noted. See response to Comment I-17.

AA

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707.433.5544, fax 433.9449

14 December, 1999

Facilities Services Office
Sonoma State University
1801 E. Cotati Ave.
Rohnert Park,CA 94928

Attn: Deborah DuVall

Dear Ms. DuVall,

This letter is in response to the Draft Environmental Impact Report on the Sonoma State Master Plan Revision. I understand that these comments will be addressed in the Final EIR, and hope that it can include significant change.

First, I am surprised that there is only one planning document for the increase of the student population by 85% and 124 acres of development, plus a 55 acre music center. The growth of the campus is classroom, residential, stadium and parking; the music center for the Santa Rosa Symphony is a project regional in scope, vision and impact. 1

Second, the addition of 6,858 parking spaces, or 25 acres, exceeds need for soccer games or the symphony, including grass seating. Admittedly, with full festival seating with concerts on video and loudspeaker and a crowd of 10,000, all the parking will be used. I would hope that, with reconsideration, much of the parking needed can be found in existing lots. 2

Third, there is an assumption that people want to go to symphonies on videos and loudspeakers. I, for one, would choose not to. 3

Third, regarding traffic delays at the Expressway, if the relationship holds that 400 people wait 5 minutes, 1300 wait 15 and 3,000 wait twenty, then 10,000 should wait at least 54 minutes, barring accidents. Your 4

report should acknowledge that an hour wait entering and leaving the campus is significant, and will move people to buses, reducing the need for parking while increasing demands on Sonoma County Transit. 4 Cont.

Fifth, the EIR cannot determine if Copeland creek is large or small. On page IV-A-3 it is called seasonal. On page IV-C-5, the watershed is described as greater than one square mile. Community members assert that this is a potential steelhead spawning stream, a target for restoration actions. What is the biological condition, past, present and future, of Copeland Creek? 5

Sixth, The flooding potential of the project is calculated downstream on Copeland Creek, at the western limits of the campus. The additional parking lots and building roofs are assumed to change the permeability of the whole campus by only 8 percent. The erosion from increased runoff will occur at and closely downstream to the points of entry for the water... it cannot be averaged over space. 6

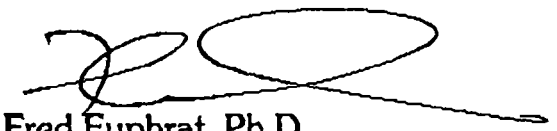
Seventh, the plan assures us that, while runoff from parking lots is a significant hazard in creeks, no oil and grease will reach Copeland creek. What happens if the filter systems fail? Who is responsible? Where will the water pond while it waits to go through filters? 7

Eighth, as the new home of the Santa Rosa Symphony, how does this plan affect the rest of Sonoma County? Planning efforts for Santa Rosa say we need cultural resources downtown, a walk from parking, restaurants and shopping. This music mall will continue the withering of downtown Santa Rosa. Will there be a Symphony Express bus or donwtown concert hall to bring music to Santa Rosa, or Santa Rosa to music? 8

Finally, there is the scope of the EIR. This project affects the region, but looks little beyond Rohnert Park. Alternatives for the bundle of projects scarcely leave the campus. Locking together the symphony with dormitories and a soccer stadium disallows creativity in planning, and concentrates impacts on the campus, local roads and Copeland Creek. Consider, as an alternative, untying the projects, putting cars into existing spaces and allowing people to travel less. 9

I'm worried that our symphony will suffer if founded on a lack of harmony with nature and people. 9 Cont.

Thanks for this opportunity to comment.



Fred Euphrat, Ph.D.

LETTER AA – FRED EUPHRAT, Ph.D.

AA-1 See response to Comment K-1.

AA-2 As discussed on page IV.D-29 in the DEIR, the maximum number of attendees expected at the summer festivals is 10,000 persons. With the completion of on-campus parking facilities planned by the University, combined with parking proposed under the Master Plan revision, special events parking demand would be adequately accommodated on-site. However, until all the proposed and planned additional parking facilities are built, large festivals at the Center would not be accommodated by on-campus parking facilities. Mitigation is identified in the DEIR to ensure parking impacts would be mitigated to a less than significant level under those interim conditions.

AA-3 Comment noted.

AA-4 See discussion of transit impacts in Impact D.8 in the DEIR. In addition, Mitigation Measure E.2c in the DEIR identifies measures for improving planning and coordination of transit development with the University.

AA-5 An description of existing hydrologic conditions of Copeland Creek, and potential hydrologic and water quality impacts from the Master Plan revision is presented in Section IV.C, Hydrology and Water Quality in the DEIR. A description of existing biological resources along Copeland Creek, and potential impacts to these resources under the Master Plan revision is presented in Section IV.H, in the DEIR. Regarding the presence of steelhead in Copeland Creek, see response to Comment D-7.

AA-6 See response to Comment G-1.

AA-7 As discussed in Mitigation C.4a in the DEIR, periodic maintenance of these filters would be incorporated into the maintenance routine normally associated with the University facilities. This would ensure proper operation of the proposed filter system. (Mitigation Measure C.4a has been revised; see revision in Chapter II in this response to comments document.) Regarding proposed on-site detention basins to store stormwater runoff, see Mitigation Measure C.1b in the DEIR.

AA-8 The comment does not address the adequacy of the DEIR. As specified in CEQA *Guidelines* Section 15131, "Economic or social effects of a project shall not be treated as significant effects on the environment." No economic or social effects associated with the project would result in substantial adverse physical changes in the environment that are not addressed in the EIR.

AA-9 See response to Comments K-3 and K-4.

Wendy Losee
17575 Middlefield Road
Sonoma, Ca 95476

BB

December 13, 1999

Facilities Services Office
Attn: Deborah DuVall
Sonoma State University
Rohnert Park, Ca. 94928

To Whom It May Concern,

I am responding to the EIR for the Master Plan that is circulating. I am a student within the Environmental Studies Department at SSU. I am gravely concerned about the impacts this Master Plan will have upon the riparian corridor of Copeland Creek that runs through the SSU campus and the wetland on the Northside of the creek.

The first issue I'd like to address are the hydrology systems at play in this area of proposed development. Riparian habitats rely on the terrestrial habitat for water exchange. This meaning that when the creek floods the land either uses this water like a sponge and soaks it in or forms a wetland. This sponge action is important because it provides flow to the creek within the dry months. The exchange of water from the creek to the wetland is important also for water cleansing, organism interplay, and species habitat. If the development is built the surface run-off will impact this area, the amount of riparian-wetland interaction will gravely be cut off, and the wetland will be completely surrounded by development greatly impacting its ability to be a viable wetland habitat. Some of the plant species and organisms that rely on these habitats to survive are sensitive and do not respond well to development these include frogs, salamanders, snakes, birds, certain plant species, and ones that are already listed as a threatened species for these habitats. 1

Second, I'd like to bring your attention to the 'Sonoma landscape' within the proposed plan. This states that vineyards will be placed on the north and east sides of the developments. What are the guarantees that this establishment will not harm the wetland and riparian systems? Where is the run-off going to go? And if the creek floods, which it has numerous times before, how will there be no interaction between the vineyards and the creek thus possibly polluting the creek with pesticides &/or fertilizers? 2 3

Third, when I read the noise concerns within the EIR I noticed that there were no actions taken to bring attention to the noise impacts the proposed road across the creek would have upon wildlife? Riparian organisms are very sensitive to noise factors especially when the road goes right over the creek. This along with the foot paths will create alot of noise within the corridor. Another issue with this road is the loss of riparian vegetation with the cutting of a road and footpaths. Riparian habitat is highly regarded by its inhabitants for its protective habitat. This protection is provided by the consistent vegetative corridor along the riparian zone. This consistent closed vegetative cover is important also for the temperature of the creek corridor to stay within its optimum temperature levels throughout the various seasons. This regulation of temperature that the vegetation provides is extremely important for the life cycles of almost all of the species that use this corridor. 4 5

Fourth, I am concerned that the proposed student housing will impact the creek. I am aware of the footpaths that everyone is supposed to use but I just want to comment on human behavior in relation to this. Yes, there will be footpaths but will everyone use them? Every college I've ever been to has seen the cutting of new paths by students for the ability of getting to class faster and easier. I believe new paths will be created through the creek (especially when the creek is dry) which will impact it further than it already will if this plan is developed. This creek will collect more trash from the paths and road and will probably serve as a 'hang out' place for students in the new dorms. This could greatly impact the creek with trash, erosion by created walkways through the creek, and increased trampling of the vegetation around the creek. 6

Fifth, I don't see why you can't move the whole project towards the North as much as you could to establish a greater riparian corridor? The wider this corridor is the better! If the corridor was given 7

enough room it could feasibly serve as prime habitat for species. This action would give the Environmental Studies Department a GREAT CHANCE at creating and implementing a restoration project with this riparian corridor? Other departments such as Biology, Geology, Geography, and the Education programs could all use this resource for the betterment of their students and community. Other campuses have established this kind of action. For example, the California State University Chico campus has paid attention to its Big Chico Creek by setting university policy to keep the riparian zone natural, state that the riparian zone should only contain native plants, and removed the irrigation to the creek. This creek within CSUC has become an important part of their campus by implementing a restoration plan, bringing in various departments to use the creek as an educational tool and outdoor laboratory, and has become apart of their community.

7 Cont.

8

Finally, Sonoma State University is a LEARNING institution and because of this, extra attention should be placed upon this extraordinary educational tool called a riparian zone. There are only less than 10% riparian habitats left! This coincidence that SSU holds a part of this 10% is an absolute gift to its students! I ask this University to see the wealth that will be created if they hold this riparian corridor dearly. We can always develop land but we cannot always have this kind of natural habitat that is an invaluable resource to our livelihood! I don't care what anyone says, mitigation is no replacement for the real thing and most certainly cannot be used as the educational tool that a natural habitat can provide. There is still so much to learn, will you allow this learning to take place after all that is supposed to be your job! There must be a balance that can be achieved between your plan and the preservation of this unique riparian environment? I ask you to seriously re-evaluate your options with the development of this plan!

9

Sincerely,

Wendy Losee

LETTER BB – WENDY LOSEE

BB-1 Mitigation Measures are proposed in Section IV.C, Hydrology and Water Quality, and Section IV.H, Biological Resources, to ensure potential impacts to wetland habitat would be mitigated to a less than significant level. See also response to Comment I-17, and Master Response (at the beginning of Chapter IV of this response to comments document).

BB-2 See responses to Comments BB-1, and R-16.

BB-3 See responses to Comments BB-1, and R-16.

BB-4 See response to Comment I-16 and Master Response 1.

BB-5 See response to Comment R-2.

BB-6 Comment noted. Copeland creek supports a healthy stand of blackberry, which serves as an effective barrier to most human traffic at present. As under existing conditions, the University would discourage the creation of illegal trails through signage and enforcement.

BB-7 Comment noted. See Master Response 1.

BB-8 As discussed in the DEIR, in recognition of the importance of Copeland Creek to the campus environment and the academic program, a Copeland Creek Ecological Resource Protection Plan is being prepared as part of the Master Plan revision. The design concept for the protection of Copeland Creek's ecological resources is based in part on measures that have been developed for other riparian areas in the area (including the Laguna de Santa Rosa and Santa Rosa Creek). The two primary features of the plan are the designation of creek Preservation and Buffer Zones.

The Copeland Creek Ecological Resource Protection Plan is included in Appendix A of this document. Note that the Copeland Creek Ecological Resource Protection Plan has been amended to include in its goals and objectives the formation of an ongoing task force made up of University faculty, staff and students, and the solicitation of local agency input to develop and manage the protection plan.

BB-9 Comment noted.

CC

Sonoma State University-Facility Services 12/14/99
Attn: Debra DuVall-Director of Planning
1801 East Cotati Avenue
Rohnert Park, CA 94928
707-664-2337

Please include all attachments and enclosures

Re: Sonoma State University's draft Environmental Impact Report

Thank you for the opportunity to comment on SSU's draft EIR. As you know from our initial correspondence dated 9/30 an information packet dated 9/21, related to a presentation we made to the City of Rohnert Park, was sent to you by this committee. The information noted that Penngrove is in the process of evaluating circulation alternatives due to existing severe regional traffic impacts and expressed concerns about additional impacts resulting from Rohnert Park's and SSU's proposed plans. (see attachments dated 9/21 and 9/30) Since that time, Rohnert Park's and SSU's DEIRs were released and both drafts utilized a traffic model prepared by Crane Transportation Group. (See: SSU's DEIR: Page IV.D-16 CUMULATIVE DEVELOPMENT)

It's been determined that the traffic level projections in the DEIRs are in serious error because the modeling assumptions and calibration incorporated regional roadway improvements from the Sonoma County General Plan CT-6g **that do not exist**. Additionally, the modeling did not incorporate recent data of record related to existing severe traffic impacts in the Penngrove environs at the intersection of Adobe and Petaluma Hill Rd. Thus, the level of traffic impacts and mitigations in Rohnert Park's and SSU's DEIRs for the proposed plans were not properly evaluated as required by CEQA. (See attachment dated 11/10: Agency review, for reference.) 1

Because of this "flawed analysis" a "special technical working group", represented by many agencies, has been assembled to review regional traffic circulation needs. Having met for the first time on 11/19/99 this "technical working group" will continue to develop unified regional traffic circulation policies and solutions, in real terms. Additional modeling will be required to properly evaluate the level of impacts and proposed mitigations.

Based on extensive analysis and existing factual data on file with the County of Sonoma it is recommended that the following guidelines be incorporated to properly evaluate the additional impact of Rohnert Park's and SSU's plans on the regional roadway systems. 2

a) The model shall **be calibrated to present day 1999** "existing roadway network configurations."

b) Intersections are the first place congestion occurs, therefore in addition to "mid-roadway LOS evaluation", modeling shall also incorporate "intersection LOS evaluation." 3

c) Where a "LOS" cannot increase because it is already at the worst level, stated as"F and significant in the EIR", the increment of impact shall be measured and evaluated by the additional delay in seconds that traffic will experience as the delay increases with buildout. 4

d) The model shall incorporate existing factual data as a baseline and project the "PM and AM peak hour" volume and delay in seconds to the year 2020 **without considering** Rohnert Park's and SSU's proposed plans. 5

e) Once the existing baseline (d) as above is established, the model shall **then incorporate** Rohnert Park's and SSU's proposed plans and project the "PM and AM peak hour" volume and delay in seconds to the year 2020. 6

f) The model run shall depict five-year increments; 2005, 2010, 2015, 2020 and state the methodology used in the evaluations and the level of development occuring in the time periods. 7

g) The model run shall incorporate circulation alternatives and level of road improvements for evaluation and consideration with respect to proper mitigations, phasing and timing. 8

To maintain an acceptable LOS on Petaluma Hill Rd., the DEIR proposes a concept of widening a portion of Petaluma Hill Rd. as the mitigation. However a number of other potential impacts need to be addressed;

1) Where the widened section of Petaluma Hill Rd. tapers back into two lanes, traffic LOS north and south of the improved stretch would worsen and back-up along Petaluma Hill Rd. This will compound the existing severe traffic impacts in Penngrove at the intersection of Adobe and Petaluma Hill Rd. Local residential traffic, businesses and the Fire Dept. and Paramedic emergency service response times which are already impacted, will degrade further. 9

2) One proposed traffic LOS mitigation noted in Rohnert Park's DEIR is to widen Petaluma Hill Rd. to four lanes through central Penngrove to Redwood Hwy. Because the existing "right of way" on Main St. in central Penngrove is not anywhere near sufficient for widening to four lanes the buildings in the historical district on the west side of Main St. would have to be removed. This would literally represent the removal of a historical town that has been in the County of Sonoma since 1863. What is the proposed mitigation for the removal of a historical town? 10

In SSU's DEIR, section C. MITIGATION RESPONSIBILTY, pages II-2 and II-3 it explains that by statutory definitions the provision, funding and construction of city and county roads is not the responsibilty of the CSU system. Therefore, transportation-related mitigation measures suggested in the DEIR are the responsibility of the local jurisdictions. While SSU cannot commit project funds to local streets and roadways SSU will work cooperatively with the impacted agencies to identify and pursue other potential sources of funds for such improvements. 11

Considering the existing regional impacts in Penngrove and the additional impacts of the proposed level of development of the City and SSU we request that the identification and means of pursuing other potential sources of funds for road improvements be identified in the EIR. Further, considering the probable damage caused should these "potential sources of funds for road improvements" not materialize, all political and legal remedies should be pursued.

Residents in this region have reported difficulty with their private wells. Be advised that 2000 survey forms have been distributed to areas surrounding the City and SSU related to water well level depletion. Surveys received at this time have been submitted to the City of Rohnert Park for consideration in their EIR and we request that SSU access the forms submitted to the City and address this issue by reference in SSU's EIR. CEQA requires that the lead agency "properly" evaluate the project's potential impacts and mitigations. No recent comprehensive study of water table depletion surrounding SSU is available. A moratorium should be implemented until such time that a comprehensive feasibility study is completed, rather than proposing intensive development, reliant on wells, in advance of properly identifying the available water resource. 12

Thank you for your consideration.
Respectfully, Rick Savel (vice chairman)

ad hoc Penngrove Area Plan Advisory Committee
PO Box 251; Penngrove, CA 94951-0251
Email* Soenke@sonic.net

LETTER CC – RICK SAVEL

Note: The commenter submitted a two page comment letter (preceding this page), in addition to a 28-page attachment. For clarity, the 28-page attachment is included in Appendix B in this response to comments document.

CC-1 Traffic associated with cumulative development and regional growth was developed using traffic projections from the Rohnert Park General Plan Update traffic model. The model includes the projected traffic volumes associated with buildout of the land uses identified in the Rohnert Park General Plan Update, as well as growth throughout the region. The assessment in the *Sonoma State University Master Plan Revision Draft EIR* regarding the University Master Plan revision's contribution to cumulative traffic impacts, and required mitigation of those impacts, are not expected to change substantially as a result of potential modifications to the City of Rohnert Park traffic model being considered by the City of Rohnert Park. As such, all conclusions reached in the transportation section of the *Sonoma State University Master Plan Revision Draft EIR* remain valid.

CC-2 This comment does not specifically address the traffic analyses conducted for the *Sonoma State University Master Plan Revision Draft EIR,* but rather, calibration of the Rohnert Park General Plan Update traffic model. See response to Comment CC-1.

CC-3 The *Sonoma State University Master Plan Revision Draft EIR* conducted a comprehensive intersection level of service analysis for existing conditions, cumulative base (i.e., without Master Plan revision) and cumulative with project (i.e., with Master Plan revision). Please refer to Section IV.D of the DEIR.

CC-4 The *Sonoma State University Master Plan Revision Draft EIR* used an increase in intersection level of service delay as the basis for judging the impact of the project (the Master Plan revision) at study intersections (including those intersections operating at LOS F under cumulative base conditions). As stated on page IV.D-13 of the DEIR, the DEIR considered a significant impact to occur if the project would increase the average vehicle delay at an intersection by 15 seconds or greater.

CC-5 The *Sonoma State University Master Plan Revision Draft EIR* considered no improvements to the study area roadway network beyond that assumed by the Rohnert Park General Plan Update traffic model. See response to Comment CC-1.

CC-6 This comment does not specifically address the traffic analyses conducted for the *Sonoma State University Master Plan Revision Draft EIR.* See response to Comment CC-3.

CC-7 This comment does not specifically address the traffic analyses conducted for the *Sonoma State University Master Plan Revision Draft EIR*, but rather, potential interim year traffic model scenarios for the City of Rohnert Park traffic model. The *Sonoma*

State University Master Plan Revision Draft EIR used the 20-year buildout traffic projections from the City of Rohnert Park traffic model.

CC-8 This comment does not specifically address the traffic analyses conducted for the *Sonoma State University Master Plan Revision Draft EIR*, but rather, potential alternative scenarios for the City of Rohnert Park traffic model. See response to Comment CC-1.

CC-9 See response to Comment EE-5.

CC-10 As discussed in the DEIR, the widening of Petaluma Hill Road to four lanes is identified as a recommended improvement in the *Draft City of Rohnert Park General Plan Update.* The widening of Petaluma Hill Road would be the responsibility of Sonoma County, unless and until the intersection were annexed to the City of Rohnert Park, at which time it would become the responsibility of Rohnert Park.

CC-11 While Sonoma State University cannot commit project funds for improvements to local streets and roadways, the University will work cooperatively with the impacted agencies to identify and pursue other potential funding sources of funds for such improvements. It would be speculative for the EIR to identify specific funding sources. See also response to Comment B-9.

CC-12 Potential project and cumulative impacts to groundwater supply and recharge are addressed in Impact K.2 in the DEIR. As discussed in that impact, the project would result in a less than significant impact to these resources. See also response to Comment B-8.

SONOMA COUNTY WATER AGENCY

DD

FILE: FDR/TENT/SONOMA STATE UNIVERSITY MASTER PLAN REVISION, EIR

January 10, 1999

Deborah DuVall
Facilities Services Meeting
Sonoma State University
1801 E. Cotati Avenue
Rohnert Park, CA 94928

RE: SONOMA STATE UNIVERSITY MASTER PLAN REVISION, EIR

Dear Ms. DuVall:

The Sonoma County Water Agency (Agency) has reviewed the above mentioned project and, in response, submits the following comments:

1) The Agency is concerned with the cumulative effects of flooding as a result of incremental increases in fill material and runoff due to surfacing within the 100-year flood plain of Copeland Creek. The proposed project will reduce the flood capacity and/or obstruct the flow of floodwaters in the creek. Although an individual project's impact to flood control would likely be minimal, the contribution from the subject project and other projects in the Copeland Creek watershed could cause a significant cumulative impact on the ability to control flooding in the Agency's flood control waterways and facilities. 1

2) Page IV.C-5, fifth paragraph of the EIR states that "the project would result in an increase in the water surface elevation of 0.15 feet or less over conditions estimated by the 1987 SCWA hydraulic model" and page IV.C-6, first paragraph, states "the project would reduce the available freeboard in the Copeland Creek downstream of the University...to less than the 1.5-foot minimum required by the SCWA drainage design criteria." Because of the Agency's concerns for cumulative effects of flooding, we recommend that the proposed project result in no net increase in floodwaters and no increase to the existing freeboard of Copeland Creek. Also, page IV.C-6, last paragraph, of the EIR states that the "proposed bridges over the Creek shall be designed ...to... provide a minimum of 1 foot of freeboard." The freeboard should be a minimum of 1.5 feet, as specified in the Agency's *Flood Control Design Criteria*. 2

3) Page IV.C-7, Impact C2, of the EIR indicates that University housing would be located within the 100-year flood zone of Copeland Creek but does not discuss or mitigate impacts related to flooding in Copeland Creek as a result of fill within the 100-year flood plain. Please refer to Items 1 and 2, above, regarding the Agency's concerns over flooding. 3

P.O. Box 11628 - Santa Rosa, CA 95406 - 2150 W. College Avenue - Santa Rosa, CA 95401 - (707) 526-5370 - Fax (707) 544-6123

4) The Agency is concerned with any activity that may affect the operation and maintenance of our facilities located at Copeland Creek. The Agency has a hydraulic clearing easement along Copeland Creek within the project area, which requires the periodic removal of debris and vegetation. The proposed bridges, other development, and landscaping near the creek may block access to Agency staff or our maintenance activities may result in damage to landscaping when accessing the creek. Therefore, we request that access for Agency staff and vehicles be provided along the creek, as specified in the Agency's Flood Control Design Criteria. 4

5) A Revocable License will be required for access or construction work within the Agency's easement located along Copeland Creek. For questions on obtaining a Revocable License, please contact Bob Oller at (707) 521-1865. 5

6) The Agency requests the opportunity to review environmental documents and civil design plans for the subject project when they become available. 6

Thank you for the opportunity to comment.

Sincerely,

David Cook
Environmental Specialist

c Bob Oller

rs3/u/ctmp/rosario/fdr/ssueir

LETTER DD – SONOMA COUNTY WATER AGENCY

DD-1 Potential cumulative effects of flooding are addressed in Impact C.6 in the DEIR. As discussed in that impact, the proposed project could contribute to changes in runoff characteristics and water quality in Copeland Creek that were not anticipated in the cumulative development assumed in the 1987 SCWA hydraulic model for Copeland Creek. However, implementation of Mitigation Measures C.1 through C.5 would mitigate the project's impact to hydrology and water quality, and therefore, the project's contribution to cumulative hydrology would not be cumulatively considerable.

DD-2 Comment noted. Mitigation Measure C.1b identifies the installation of on-site detention ponds, which would ensure that the peak flow rate from the campus into Copeland Creek would not increase.

Proposed bridges over the Creek shall be designed to provide a minimum of 1½ foot of freeboard between the design 100-year water surface and the minimum low-chord elevation of the bridge structures, consistent with the SCWA's Flood Control Design Criteria. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

DD-3 The project shall include a suitable drainage infrastructure and on-site detention system in the northern acquisition area, in conformance with the Sonoma County Water Agency drainage design criteria, that will limit the 100-year peak flow into Copeland Creek (Mitigation Measure C.1a and C.1b). All new development in the northern acquisition area shall be designed with grades and landforms sufficient to prevent stormwater breakout from a 100-year flood flow (Mitigation Measure C.2). Implementation of these mitigation measures would ensure potential impacts from flooding under the Master Plan revision would be mitigated to a less than significant level.

DD-4 As indicated by the commenter and identified in the DEIR, the SCWA maintains a hydraulic maintenance agreement along Copeland Creek through the project site, whereby the SCWA may improve and maintain the channel by removing vegetation and other impediments to the channel flow. The proposed Master Plan revision would not alter this agreement or impede the SCWA from continuing its ability to provide channel maintenance practices in Copeland Creek.

DD-5 and DD-6 The approval process for the EIR and Master Plan revision is discussed in Chapter I, Introduction, of the EIR. A consolidation of the approval process, as well as specific permits that will be required to implement the specific developments under the Master Plan revision has been added to the Project Description of the EIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

City of Cotati

Sonoma County, California

EE

February 15, 2000

Ms. Deborah Gannan-DuVall
Director of Planning
Facilities Services
Sonoma State University
1801 E. Cotati Avenue
Rohnert Park, CA 94928

Dear Ms. Gannan-Duvall:

Thank you for the additional time to comment on the proposed Environmental Impact Report for the Sonoma State University Master Plan Revision. Although we have sent previous correspondence to you regarding the draft EIR, we are using this opportunity to provide a more comprehensive analysis of the document. We have reviewed the previous correspondence sent to you from various sources, and have included many of the same points in this letter.

Before I address all of the numerous concerns with the document, I would like to state again our problem with a basic premise contained within the document. On page II-2 you state:

> the California State University has specific powers to mitigate effects that occur within the campus, but limited powers for those that occur outside of the project site. Because of these limitations, it is not feasible for the CSU to mitigate off-site impacts..."

1

The argument, in essence, is that the University has no responsibility to mitigate off-site impacts as required by CEQA. We have asked for specific legislation or "points of authority" for this position from you and your attorney. This information has not been provided. We still maintain that you do have a responsibility to identify reasonable mitigation measures for off-site impacts. This would also require that you coordinate your project with neighboring jurisdictions to address important issues of area-wide significance.

201 West Sierra Avenue, Cotati, CA 94931-4217 • TELEPHONE 707•792•4600 • FAX 707•795•7067

Land Use and Planning

A.2 *The project would increase the residential population on the project site and the local community. (Less that Significant).*

There is a basic premise in the document that the analysis need not address the population growth between the existing number of "full time equivalent" students and that which is projected in the previously approved "Master Plan". This is false. CEQA requires that one begin with the existing number of students and evaluate the proposed growth from that baseline. Thus, the finding in A.2 that the impact is "Less than Significant" is not supportable with the present analysis. 2

There will be significant impacts on housing demand for both the surrounding communities and Sonoma County in general through the nearly doubling of the FTE. A more comprehensive analysis is required.

Geology, Soils and Seismicity

B-1: *In the event of a major earthquake in the region, seismic groundshaking could potentially injure persons at the project site due to resulting structural damage, structural collapse or falling of the existing facilities structures. Groundshaking could potentially expose persons and property to seismic-related hazards, including localized liquefaction, related ground failure and seismically-induced settlement.* 3

Impact B.1 under Seismicity identifies a major earthquake as a significant impact. The text further states that an earthquake within the next 30 years will likely produce unavoidable injury to people and buildings. Although following accepted engineering "best practices" for structure design and construction will reduce damage, fatalities and injuries, there is no way to reduce the impact to "less than significant" for the type of earthquake predicted for this location in the next 30 years.

Hydrology and Water Quality

C-1: *The proposed project would increase stormflows to Copeland Creek, increasing the potential for flooding of the natural channel portion of Copeland Creek during a 100-year event. (Significant)*

C-2: *The project would introduce new development, including proposed University housing, within a designated 100-year flood zone.(Significant)* 4

The EIR estimates the potential approximately one foot of standing water for parts of the university site in the event of a 100-year storm event. In fact, the university has had a

history of standing water as deep as four feet (source: Dr. Steve Norwick, SSU Professor of Geology). This factual discrepancy should be evaluated and resolved. Until this is done, a finding of less than significant after mitigation is not defensible.

4 Cont.

One additional point: The State of California recommends that all structures build within the 100 year flood zone have pads elevated to one foot above the 100 year flood elevation.

Transportation, Parking and Circulation

D.1: *Project-generated vehicle trips would contribute to delays at study intersections during the a.m. and p.m. peak hours under Cumulative (Future with Project) conditions. (Significant)*

We have previously requested an analysis of traffic impacts on the City of Cotati traffic circulation network (see letter of August 11). To date this has not been done. The document is inadequate until this analysis is completed: such an analysis must include the following intersections:

5

East Cotati/La Salle
East Cotati/Old Redwood Highway (with existing configuration and with proposed roundabouts.
Commerce Avenue/Old Redwood Highway
Old Redwood Highway/Gravenstein Highway
Old Redwood Highway/George Street

This analysis should be coordinated with and without the proposed growth in the new Rohnert Park General Plan.

D.4: *Special events at the proposed Center for the Musical Arts would generate surges of traffic prior to and/or following the events, resulting in traffic delays at one or more campus entrance intersections before and/or following the event. For events of between 400 and 1,300 attendees, an average delay of five to 15 minutes would occur for vehicles exiting the campus at the intersection of Rohnert Park Expressway/proposed University north entrance following the event. For the occasional events of between 1,300 and 3,000 attendees, average delay of ten to 20 minutes would occur for vehicles exiting the campus at the intersection of Rohnert Park Expressway/proposed University north entrance following the event. For the occasional events of between 3,000 and 10,000 attendees, instances of delays over 20 minutes could occur for vehicles exiting the campus at East Cotati Avenue.....*

6

There is a comment on page IV.D-23 that the impacts will be significant because the University is not planning to implement the proposed mitigations D1a through D1e. The City of Cotati maintains that this is a violation of CEQA as discussed earlier. Also, the other mitigations are listed as "shoulds". This needs to be changed to "shall".

Also, the City of Cotati is requesting information regarding the impacts from the Center for Musical Arts on the City of Cotati traffic network, as requested earlier. 6 Cont.

Visual Quality

G1: *The project would alter the existing visual character of the site and result in a change to the scenic vistas of which the proposed project site is a part.* 7

There is no visual analysis in the EIR as required by CEQA. Without such an analysis a finding of "less than significant" cannot be made.

Biological Resources

H.1 *Development of the project could result in impacts to potentially jurisdictional wetlands/waters of the U.S. and streambeds under the jurisdiction of the Corps of Engineers and the California Department of Fish and Game. (Significant)* 8

The EIR document states that a wetland delineation will be done at a later date. CEQA does not allow for deferring analysis to a later date. This needs to be done prior to the adoption of the EIR.

H.2 *Development of facilities under the project could result in the loss of natural communities, such as riparian forest and wetland/marsh habitat. (Significant)*

It is inferred in the analysis that there will be a future study that could lead to conditions that would require the development of additional wetlands "on-site". Beyond the fact that this is a deferred analysis (as mentioned above this is not allowed by the Sundstrom decision) this is not a "given". Soil conditions have to be appropriate to develop wetlands and this analysis has not been done. A finding of "less than significant" is not appropriate without additional analysis. 9

H-3 *Development of project facilities could adversely impact habitat for sensitive animal species. (Significant)*

According to the document (IV.H-12) the necessary animal surveys have not been done prior to the preparation of this document. Thus the finding of "less than significant" after mitigation is not appropriate for this section. 10

H-4 *Construction within the project area may reduce potential upland refugia for adult and breeding pools for tadpoles of foothill yellow-legged frog (FHYLF), a state and federal species of concern (Less than Significant)* 11

The necessary animal surveys have not been done prior to the preparation of this document. Thus the finding of "less than significant" after mitigation is not appropriate for this section

11 Cont.

Public Services

J.1 The project would increase demand for fire protection services. (Less than Significant)

As mentioned earlier, the analysis cannot assume the previous master plan FTE, but must look as the present conditions as the baseline for any analysis. This issue needs to be revisited.

12

J.2 *The project would increase demand for police protection services. (Less than Significant)*

Contrary to the analysis on page J-5, this project is growth inducing. Any determination based on a different conclusion is flawed.

13

Utilities and Service Systems

K.4 *With the proposed project, the University would increase its exceedance of its current wastewater treatment allocation designated by the subregional wastewater treatment system, unless an increase in treatment capacity is received. (Significant)*

Both SSU and Rohnert Park are exceeding their wastewater treatment allocation. Contrary to the discussion on page K-10, there is no existing provision in the subregional sewer agreement for a member of the subregional facility to lend or borrow unused capacity from another contracting jurisdiction. This is a completely erroneous mitigation and should be deleted from the document.

14

Energy

L.1 Development under the project would increase energy consumption, most of which would be derived from non-renewable resources (Less than Significant)

The DEIR's assessment of the Project's impact on energy consumption is inadequate. The DEIR asserts that the Project will not have a significant impact on energy consumption (Impact L.1). The DEIR also states that "[a]s much as one million square feet of additional building space would be constructed under the project." (p.IV.L 3) This is estimated to result in an increase in energy use (acknowledged to be primarily from non-renewable sources) of approximately *110 percent* over existing conditions (page IV.L.4). The DEIR suggests that this substantial increase will not be significant

15

because it will not be "wasteful." However, the standard of significance for this impact under CEQA is not whether use is "wasteful"; it is use itself. Clearly, more than doubling the amount of energy consumed at a major public institution is a significant impact. Furthermore, the DEIR asserts that the impact will not be significant because certain CSU-approved design standards will be employed, and improved bicycle and pedestrian paths will be provided. This rationale is contrary to the analysis required by CEQA. Design standards and bicycle/pedestrian paths may, or may not, mitigate a significant impact on energy use, but they are not a basis for determining that an impact will not be significant prior to mitigation. (Source: Professor Thomas Jacobson, Sonoma State University). 15 Cont.

General Comments:

There is no environmentally superior alternative identified in the document, as required by CEQA. 16

The cumulative impacts section (VI-2) attempts to minimize cumulative impacts by stating that these impacts were evaluated in Chapter IV. However, if the original analysis is incomplete (traffic and biology), or flawed by misunderstandings of CEQA (planning and housing section), then the cumulative impacts section will be deficient. 17

Finally, the growth inducing impacts will need to be redone, since it does not evaluate the impacts from increasing the existing baseline FTE (approximately 5,000) to 10,000 FTE. Using the argument that the 10,000 FTE was in the previous master plan and therefore outside the scope of this EIR is not consistent with CEQA, as discussed earlier in this document. 18

Thank you for the opportunity to comment on the document. If you wish any clarification of these issues, or if you wish to discuss any of the contentions in our comments, please do not hesitate to contact me.

Very truly yours,

Dennis A. Dorch

Dennis A. Dorch
Director of Planning

LETTER EE – CITY OF COTATI

EE-1 Under the proposed project, the California State University (CSU) would be responsible for funding all proposed transportation improvements within the campus property, including new roadways, pedestrian crossings, shoulders, curbs, gutters, and bus stops. However, as discussed in Section II.C, Mitigation Responsibility, in the DEIR, the California State University (CSU) has limited powers to mitigate effects that occur outside the project site. Under constitutional and statutory proscription, the CSU cannot contribute funds towards off-site transportation improvements, schools (K-12), police, fire, or similar fee and assessment contributions commonly exacted from private developers. While Sonoma State University cannot commit project funds for improvements to local streets and roadways, the University will work cooperatively with the impacted agencies to identify and pursue other potential funding sources of funds for such improvements. See also response to Comment B-9.

EE-2 Section 15126.2 of the CEQA Guidelines requires that "in assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of completion is published . . ." In keeping with the CEQA Guidelines, the DEIR assesses all environmental impacts associated with buildout of the proposed Master Plan revision against the existing environmental setting (existing facilities and student enrollment). Thus, the impact analyses in this DEIR assesses the effect of all proposed University development anticipated under the Master Plan revision, including those facilities that also would have been developed under the existing approved Master Plan. However, for comparative purposes, the DEIR also presents where appropriate, the relationship between the effects that would occur under the Master Plan revision with those that would occur under the existing approved Master Plan.

As discussed under Impact A.2, the Master Plan revision would result in an increase in students, faculty and staff over existing conditions. The increase in off-site student, faculty and staff population would be dispersed within the local community (Rohnert Park/Cotati), nearby cities (Petaluma, Santa Rosa and Sebastopol), and elsewhere within the county. Much of the housing demand would be accommodated by proposed additional on-site housing, thereby reducing the off-site project-associated housing demand. The project would also create new temporary construction employment opportunities at the project site, and would create new permanent on-site full-time and part-time employment positions for new University faculty and staff. A number of new on-site student employment opportunities would also be created. As indicated in the Moreover, the project would not displace any existing housing on the site, or displace any people necessitating the construction of replacement housing elsewhere. For these reasons, the increase in residential population on the project site and local community would be less than significant.

EE-3 Mitigation Measure B.1 would require the University to comply with site-specific recommendations and standards for seismic design as provided by the project geotechnical engineer; the seismic design requirements of the California Code of Regulations, Title 24; and as recommended by the CSU Seismic Review Board). Implementation of this measure would ensure that all facilities are designed to withstand the highest expected peak acceleration as determined by seismic evaluation under the Uniform Building Code for each specific building location. Moreover, the mitigation would require each development under the Master Plan revision to incorporate corrective measures as needed for site-specific soil and geologic conditions. This level of protection would be adequate to meet the currently accepted standard of an acceptable level of risk, and would reduce hazards resulting from seismic ground shaking to less-than-significant levels.

EE-4 See response to Comment N-3 regarding flooding incidents on the main campus. Consistent with Sonoma County Water Agency design criteria, all newly constructed building finished floors would be set at an elevation of not less than one foot above the predicted 100-year water surface elevation.

EE-5 In recognition of other potential intersections outside the project study area that could be affected by the University Master Plan revision, four additional intersections are assessed herein, consisting of three additional intersections in the City of Rohnert Park (Rohnert Park Expressway/U.S. 101 northbound ramps, Rohnert Park Expressway/U.S. 101 southbound ramps, and Rohnert Park Expressway/Commerce Drive), and one intersection in the City of Cotati (East Cotati Avenue/Old Redwood Highway). See response to Comment E-15.

EE-6 Regarding the CSU's ability to fund off-site transportation improvements, see response to Comment EE-1.

Given the wide variety of types of performances that would occur ranging between 400 and 1,000 attendees, (including faculty jazz, faculty chamber music, Bach choir, chorus, chamber singers, lectures, faculty concerts, dance, early music, university special events, and concert hall and recital hall private rentals), the specific times of these events cannot yet be specified. However, the University would make every effort to manage the time schedule for special events mindful of avoiding peak-hour traffic periods to the extent feasible.

EE-7 A change in physical conditions is not considered significant unless it is substantial and adverse. As described in detail on pages IV.G-8 through IV.G-14, given the type and scale of proposed development; the setback of proposed structures from the edge of Petaluma Hill Road, Rohnert Park Expressway and East Cotati Avenue; the proposed landscaping features on the project site; and the design review process the building and landscaping plans would undergo, potential visual impacts of the project would not be considered significant.

EE-8 As discussed in Mitigation Measure H.1 (see revised Mitigation Measure H.1 in Chapter II of this response to comments document), a U.S. Army Corps of Engineers permit, Regional Water Quality Control Board Section 401 water quality certification or waiver and State of California Stream Alteration Agreement will be required for temporary or permanent construction within any wetlands or waters of the U.S or areas under state jurisdiction. The verified wetland delineation for the portion of the project site north of Copeland Creek will be completed and made available the U.S. Army COE prior to any final site planning and construction of facilities within or adjacent to potential jurisdictional wetlands.

The applicant shall develop and implement a wetland mitigation, monitoring, and compensation program to mitigate adverse effects to wetland and water-associated habitats. The program shall be acceptable to the aforementioned agencies. A mitigation plan is required prior to the initiation of any ground clearing, grading, construction, or other activities that could directly impact wetlands. The mitigation plan shall provide for no net loss of wetlands values or functions. The plan shall be submitted as part of the CWA 404 Permit Application Pre-Construction Notification (PCN) process and incorporated into a Streambed Alteration Agreement with CDFG. The determination of adequacy of proposed mitigation will be made as part of the permit application review process; preliminary plan designs are consistent with prevailing practices and have been discussed with the COE in early, informal consultation. Modifications of the final plan may be required as a result of permit requirements imposed by the COE, RWQCB, and/or CDFG, and all permit conditions shall be implemented.

EE-9 See response to Comment EE-8.

EE-10 As discussed in Mitigation Measure H.3 (see revised Mitigation Measure H.3 in Chapter II of this response to comments document, to protect sensitive fish (including steelhead), amphibians, reptiles or insects that may be present, preconstruction surveys in areas of suitable habitat for these species shall be carried out, and if such species are found, they shall be relocated out of the construction zone.

EE-11 See response to Comment EE-10. (Note, for clarification, Impact and Mitigation Measure H.4 has been incorporated into Impact and Mitigation Measure H.3 in Chapter II of this response to comments document).

EE-12 See response to Comment EE-2 regarding approach for assessment of impacts in the DEIR.

As discussed in Impact J.1, the potential increase in calls for fire/medical response associated buildout of the Master Plan revision would be similar in nature to the existing types of responses at the University and the general area. The Rancho Adobe Fire Protection District does not anticipate the project would result in a significant increase in response calls for service. All proposed development identified under the Master Plan

revision would be required by state regulations to include adequate fire protection systems, subject to review and approval by the State Architect, State Fire Marshall and the University's Campus Planning Committee. As under existing conditions, the University would continue coordination with the Rancho Adobe Fire Protection District for campus fire drills and emergency response plans. Therefore, the project's impact to public fire protection services, when compared to either existing conditions or the existing approved Master Plan, would be less than significant.

EE-13 See response to Comment EE-2 regarding approach for assessment of impacts in the DEIR.

As discussed in Impact J.1, under the project, the University's police protection services would be increased as needed to maintain adequate police protection levels of service at the campus. As under existing conditions, the University would continue to maintain an Emergency Operations Center at the campus. The project would result in a potential incremental increase in off-site calls for response from the local police protection services (e.g., in responding to off-site vehicular accidents); however, these calls would not be expected to be of a nature or magnitude that would significantly affect police protection services in these jurisdictions. Therefore, the project's impact to public police protection services, when compared to either existing conditions or the existing approved Master Plan, would be less than significant.

EE-14 The DEIR acknowledges that the potential for the University to "borrow" reserve capacity in the future from other agencies participating in the subregional treatment system is unknown at this time. Therefore, the project's potential exceedance of future wastewater treatment allocation would be considered a significant impact of the project, and cumulatively significant.

As discussed in Chapter II, Summary, under Mitigation Responsibility, the Legislature has allowed local entities to negotiate with the State for the imposition of "capital facilities fees" for the connection of specified utility services. Utilities covered under Government Code Section 54999 include sanitation and sewage collection, treatment and disposal. With regard to the project site, the CSU would negotiate with the local agencies as provided by statute.

EE-15 See response to Comment L-4.

EE-16 See response to Comment L-11.

EE-17 As stated in Section VI in the DEIR, each topical analysis presented in Chapter IV, Environmental Setting, Impacts, and Mitigation Measures considers all possible cumulative impacts related to the discussion and identifies circumstances in which the project would contribute to significant cumulative impacts. Those impacts are summarized in Chapter VI.

As discussed in responses to Comments EE-2, EE-5 through EE-6, and EE-8 through EE-10, potential impacts of the proposed Master Plan revision to housing, transportation, and biological resources, respectively, including potential cumulative impacts, are adequately addressed in the DEIR.

EE-18 See response to Comment EE-2.

FF

CITIZENS UNITED FOR REAL BOUNDARIES

David B. Hardy, AICP, Chair
1418 Parkway Drive
Rohnert Park, CA 94928

February 14, 2000

Ms. Deborah DuVall
Campus Planner
Sonoma State University
1835 East Cotati Avenue
Rohnert Park, California

Dear Ms. DuVall,

Thank you for the opportunity to comment on the Sonoma State University Master Plan update, and for the courtesy you extended in making a copy available for Citizens United for Real Boundaries. Our group formed to support the creation of a strong Urban Growth Boundary for the City of Rohnert Park. We are on record supporting a line that includes the SSU campus and community, and we support the concept of the proposed mixed-use "University Center" development north of the present campus. Our concern about the location of the UGB reflects an underlying worry about the nature of the growth within the line. Also, we consider it paramount that SSU, as a major influence on the City of Rohnert Park's traffic, housing, water supply, and sewage discharge, go beyond mere formalities and tokenism in the development caused by natural population increase in Sonoma County and the State of California. 1

The university may be constitutionally exempt from local jurisdictional regulation; nevertheless, it is by contract dependent upon the broader community for water, wastewater, and transportation infrastructure. Thus, it is important that the EIR for the campus's Master Plan correctly evaluate the plan's environmental impacts upon that community, with many of those impacts being cumulative in nature. 2

The Master Plan project description seems most concerned about the new musical facility, and the effects of doubling the FTE enrollment appear to be considerably downplayed, usually by reference to how this was considered previously. Regardless of previous consideration, the effect of adding 5,000 new students and another 500 to 1,500 staff and teachers has to be evaluated anew in light of the changing environmental setting. You may remember the old adage, "The same man cannot cross the same river twice." Why not? Because with each crossing, the river will be different or the man will be different. As the river changes in the adage, the environmental setting has changed surrounding SSU. Thus, the effect of adding up to 6,500 new staff and students must regarded in a new light. 3

While there are many aspects of the Master Plan EIR that deserve comment, we would like to focus on just two environmental effects, traffic and water.

Traffic Mitigation. Traffic is everyone's concern. It is morally offensive that the university claim a right of exemption from mitigation of the traffic impacts it causes, as it does in Section II C. The City of Rohnert Park's proposed Growth Management policies, especially GM 6 to GM 4

11, require that projects demonstrate adequate public facilities. We can argue all day what "adequate" means. But one thing seems clear...if an intersection is currently screwed up, it needs to be fixed before someone can build something that makes the intersection worse. That the university can impose five significant traffic impacts with its Master Plan, and then blithely dismiss its moral responsibility to mitigate those impacts is something that will be brought to the attention of our local representatives in the Legislature. Further, we will urge the City of Rohnert Park to carry out its responsibilities in this matter by restricting the services it provides until all impacts of the SSU Master Plan are fully mitigated. 4 Cont.

Water Supply. The EIR for this plan essentially says that the campus is now using more reclaimed water to irrigate landscaping, replacing previously used potable groundwater sources from on-campus wells. The EIR mathematics goes on to say that amount of well water previously used is sufficient to accommodate future potable water needs on campus. Impact K.2 says that increased groundwater extraction would be less than significant. The analysis completely ignores the growth-inducing element of the enrollment increase on the larger community, particularly off-campus water use associated with an additional 5,000 students. Since on-campus housing is insufficient to accommodate the 5,000, most of them will live in new housing somewhere. This is where they will take their showers, and wash their dishes, clothes, and cars. This water use is not considered in the report, yet it is directly attributable to the proposed project. 5

The EIR fails to identify the source of water to provide for this impact, as the law requires.

Like the EIR on the Rohnert Park General Plan Update, prospective water sources to serve new development are not identified. The pipes are, but the sources aren't. There is no description of the extent of the groundwater basin that serves this community. The document does not say how far north or south it goes, nor does the plan give any reference to a data source. The SSU EIR does not identify the safe yield of the groundwater basin. What is "safe yield"? It is how much water you can take out, on an average basis over time, without drawing down the water table permanently. Exceeding the safe yield is called "overdrafting." The Rohnert Park plan update says we should figure this out. It seems to me that the General Plan and Master Plan EIRs are where we figure this out. Of greatest concern to me is the cumulative impact on this groundwater basin of Rohnert Park's growth, combined with Sonoma State's growth, combined with the City of Santa Rosa's plan to drill new wells, combined with the pumping to serve new vineyards that are cropping up in the area to the north and east of Rohnert Park. I was hoping that this document would say something like, the safe yield is 25,000 acre feet per year and the city's requirement and SSU's is only 7,500 AFY and all other foreseeable uses are another 17,500 AFY, and everything adds up. Instead, the plans and their EIRs are silent in this regard. They are deficient. 6

The Rohnert Park EIR discussion of the County Water Agency contract is pretty meager. Yes, we have a contract for 15 million gallons a day. That's great, if the Water Agency has 15 MGD to deliver. Does it? Reliable sources say it doesn't. The General Plan mentions there is litigation challenging the Water Agency EIR of the Russian River project. At a bare minimum, the SSU Master Plan and this EIR ought to either restate the conclusions of the Water Agency EIR or incorporate them by reference. 7

Infrastructure includes water supply. Somebody somewhere has got to demonstrate that there is enough water in the ground, or that the Water Agency has the ability to deliver its promised capacity. Pipes and wells are conduits. They bring the water from the ground and the river, 8

which are the real sources. The adequacy of these real sources is not discussed in the Rohnert Park General Plan or in its EIR, or in this SSU plan and its EIR. 8 Cont.

The SSU EIR proposes Mitigation Measure K.4b to borrow excess wastewater capacity. Borrowing is what Rohnert Park has been doing to obtain water, and it has become dependent upon that borrowed source. A better, more prudent mitigation would be to defer new construction and expansion until long term sources are identified and a contract and funding source are assured. 9

Thank you for your attention.

David B. Hardy, AICP
Chair, Citizens United for Real Boundaries

LETTER FF – CITIZENS UNITED FOR REAL BOUNDARIES

FF-1 Comment noted.

FF-2 This EIR has been prepared for the proposed University Master Plan revision by the California State University (CSU) Trustees (serving as Lead Agency for the project) in conformance with CEQA. The EIR describes all potentially significant environmental impacts associated with buildout of the University Master Plan revision, including cumulative impacts. For each significant impact identified in this EIR, the EIR identifies, to the extent feasible, mitigation measures that would avoid or substantially reduce the project's significant environmental effect.

FF-3 See response to Comment EE-2.

FF-4 See response to Comment EE-1.

FF-5 It can be reasonably assumed that the majority of the increase in demand for potable water under the Master Plan revision related to students, faculty and students living off-site would be dispersed within the local community (Rohnert Park/Cotati), nearby cities (Petaluma, Santa Rosa and Sebastopol), and elsewhere within the county, thereby dispersing associated impacts to individual municipal water supplies. It can also be reasonably assumed that a percentage of the off-site water demand from new students, faculty and staff already occurs (and is therefore, part of the existing setting) to the extent that this population currently lives in the local community, nearby cities and elsewhere within the County.

FF-6 Cumulative impacts related to the projected University groundwater extraction are discussed in Impact K.2 on page IV.K-6 of the DEIR. As discussed under that impact, over the past 30 years, the aquifer that extends throughout the Santa Rosa Plain (from which the University draws its well water) has experienced increased depletion at its southern end, in the vicinity of the Cities of Rohnert Park and Cotati, both of which rely heavily on groundwater for their municipal water resources. Under the project, the University would continue to contribute to this area-wide depression in the southern Santa Rosa Plain water table. However, with the University's recent shift to use of reclaimed water for irrigation purposes, with project features which would maintain groundwater recharge on the project site, and with implementation of water conservation fixtures in all proposed facilities (including low-flow toilets, sinks and showerheads) as required by state law, the project's contribution to cumulative effects on the groundwater basin would be less than significant.

Comments made in this comment on the adequacy of the City of Rohnert Park General Plan Update and its EIR are outside of the scope of this EIR.

FF-7 See response to Comment FF-5 and FF-6.

FF-8 See response to Comment FF-5 and FF-6.

FF-9 See response to Comment EE-14.

GG

David B. Hardy, AICP
1418 Parkway Drive
Rohnert Park, CA 94928

February 15, 2000

Ms. Deborah DuVall
Campus Planner
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, California

RE: SSU Master Plan EIR Comments

Dear Ms. DuVall,

In a letter I wrote dated February 14, 2000, on behalf of Citizens United for Real Boundaries of Rohnert Park, I made some comments about the CSU causing environmental impacts that it claims no requirement to mitigate. Since then, I have made some additional inquiries, and I have the following questions regarding **factual accuracy** of the Master Plan and its EIR:

Public records indicate that the **Sonoma State University Academic Foundation, Inc., a private charitable 501(C)3 corporation, owns the property** on which the proposed Music Center is to be located—not the State of California. The distinction that the property is privately owned is ignored in the EIR, and it seems important in light of the comments in Section IIC of the report about the exemption of California State University from environmental mitigation outside its jurisdiction. The entire premise of the Section IIC comments is that this is a public project on publicly owned land. In fact, it is on private land, and significant private fundraising is being undertaken by the SSU president to acquire funds to build this project. This project is apparently not being funded by state bonds, etc. If some $40 million can be raised privately to acquire and build the facility, then it would appear feasible to raise another $1 million or so to mitigate the traffic impacts of this project, wouldn't it? 1

If this property is owned by a private corporation, would it not be under the jurisdiction of the County of Sonoma? If so, shouldn't the County be the lead agency in preparing the EIR? Shouldn't the Foundation be applying to the County for permission to construct the Center? Shouldn't this EIR be withdrawn and the entire process started over? 2

If this property is owned by a private corporation, would it not be required to mitigate its impacts fully? What is the rationale for stretching a state Constitution claim of immunity to this private non-profit corporation?

I raise these issues not with the intent of opposing the music center project, because I like music and look forward to attending the center. Rather, **I am incensed that an agency of the state can cause significant environmental impacts and then claim no responsibility to mitigate them, especially traffic impacts at a LOS "F" intersection.** It's not just a matter of law; it's a matter of what's right. If people make a mess, it's their responsibility to clean it up. Isn't that what environmental law is about? I am further concerned about a lack of accuracy that has the 3

appearance of misleading the public and undermining the integrity of the university and its administration. 3 Cont.

Thank you for your attention. If you or someone else could shed some light for me about these questions prior to the formal issuance of the Final Draft of the EIR, I would appreciate it. I can be reached at DvdBHrdy@aol.com, or at 586-9175 (home) or 529-5332 (mobile).

Sincerely,

David B. Hardy, AICP

Cc: County Supervisor Tim Smith
County Supervisor Mike Cale
County Supervisor Mike Kerns

LETTER GG – DAVID HARDY, AICP

GG-1 to GG-3

The proposed project consists of a revision to the Sonoma State University Master Plan. The project would place land currently owned by the Sonoma State University Academic Foundation (Academic Foundation), Inc., into the University Master Plan. Under the Master Plan revision, the Academic Foundation would transfer land ownership to the University. As such, the proposed project would not be undertaken by the Academic Foundation, but rather by the University itself. Present land ownership is not a determinative factor in the CEQA analysis. If the project were to be developed by the Academic Foundation, it might, depending upon the circumstances, be a project subject to local regulation. However, this is not case. Thus, the analysis of what a private corporation would be obliged to provide does not apply to the proposed project.

The DEIR describes how the land would be developed and used by the University, and describes respective responsibilities of the University, local governments and other public agencies under the project. The explanation of legal responsibilities and the limitation of jurisdiction as it relates to the University, a State agency, is discussed in Section II.C in the DEIR. Under the project, the California State University (CSU) would be responsible for funding all proposed transportation improvements within the campus property, including new roadways, pedestrian crossings, shoulders, curbs, gutters, and bus stops. However, as discussed in Section II.C, Mitigation Responsibility, in the DEIR, the California State University (CSU) has limited powers to mitigate effects that occur outside the project site. Under constitutional and statutory proscription, the CSU cannot contribute funds towards off-site transportation improvements, as well as schools (K-12), police, fire, or similar fee and assessment contributions exacted from private developers. While Sonoma State University cannot commit project funds for improvements to local streets and roadways, the University will work cooperatively with the impacted agencies to identify and pursue other potential funding sources of funds for such improvements.

CEQA expressly recognizes that agencies may make legal findings that particular measures are outside their jurisdictions and are the responsibilities of other public agencies. It is expected that such findings will be made in this case.

SONOMA STATE UNIVERSITY

1801 East Cotati Avenue
Rohnert Park, California 94928-3609

Women's Resource Center
Tel: 707 664-2845
E-mail: wrc.student@sonoma.edu
http://www.sonoma.edu/campuslife/WRC/

HH

Ms. Deborah DuVall
Facilities Services Office

February 15, 2000

Dear Ms. DuVall:

I would like to comment on the current version of the Master Plan Revision and Project Plan for the Center for Musical Arts.

In our plan for the campus, insuring personal safety of students, faculty, staff and visitors must be one of our top design considerations. We must also balance that priority with the preservation of the natural ecology of the Copeland Creek watershed. 1

Based on those values, I have significant reservations about the current Proposed Master Plan as it applies to the CMA and Creek. With increased use by pedestrians, this mixed-use area poses significant safety issues. I also think there are some positive solutions that would balance personal safety requirements with maintenance of the delicate environment of the Creek.

My concerns are as follows:
The current placement of the CMA and its parking lots creates a virtual "dead zone" in the heart of campus. From Commencement Lawn and the lakes to both the Rohnert Park Expressway on the North and the CMA on the Northeast, the area becomes a black hole, empty of buildings, much covered by dense natural landscaping. This creates an alarming safety problem for the increasing numbers of pedestrians we can expect with the opening of the CMA and adjacent parking. 2

According to campus police and the Rohnert Park officers, the Copeland Creek area already has higher crime statistics when compared with other areas. The lack of lighting, plus natural landscaping and hidden aspect of the Creek makes it more inviting to criminal activity and more dangerous to visitors.

I have been working with Officer Judy Mefferd on installation of lighted emergency phones that will be placed all over campus, including the Creek area, but that is not enough to prevent criminal activity. We must look at alternatives to the current design

that creates this large isolated area that will be potentially dangerous to our campus and community. 2 Cont.

For solutions, I suggest we consult urban design experts who specialize in mixed-use area design. Fisher and Hall in Santa Rosa is one such firm that combines expertise in social, environmental and technical aspects of the design process. The company has been instrumental in the success of several significant local mixed-use projects, including the downtown section of Santa Rosa Creek, Washington Creek in Petaluma and Rohnert Park's own Spreckel's Theater area. I would be happy to share the information packet from Fisher and Hall with you. You may also contact the firm yourself at 707/544-1910. 3

I'd be happy to talk with you further about these issues. Feel free to contact me at 664-2784 or my email: kris.montgomery@sonoma.edu.

Sincerely,

Kris Montgomery

Kristen Montgomery
Coordinator, Women's Resource Center

CC: Nate Johnson
Rand Link
Eileen Naughton-Merberg
Bruce Walker

LETTER HH – KRIS MONTGOMERY

HH-1 Comment noted.

HH-2 The Chief of University Police indicates that, contrary to the commenter's comment, the Copeland Creek area does not currently experience higher crime statistics than other areas on the campus.

Notwithstanding, under the Master Plan revision, the University's police protection services would be increased as needed to maintain adequate police protection service to all areas of the campus, including the northern acquisition area. This would include regular patrolling of all proposed new areas of development on the campus. Consistent with existing campus facilities, all proposed roadways and walkways (including bridge crossings) and parking areas would have night lighting to promote security and maximize visibility. In addition, development of the Master Plan revision would not preclude the potential development of other security systems on campus, including the lighted emergency phone system indicated by the commenter.

HH-3 Comment noted.

II

February 15, 2000

Facilities Services Office
1801 E. Cotati Avenue
Rohnert Park, CA 94928

To Deborah DuVall,

This letter represents the Associated Students, Inc. response to the Sonoma State University Master Plan Revision. The ASI asks that one of our projects be added in the final copy of the Master Plan for full disclosure and totality in regards to projects to be completed on campus.

In 1998, the Associated Students passed a Resolution requesting "an official designation of the Free Speech Area on the Sonoma State University Campus Master Plan to be located in the corner grass area of the quad lawn area between Stevenson Hall and the Student Union" (please see attached). This document also stated that "in concurrence with the Campus Planning Committee, (the Associated Students) recognize that there is no official Free Speech Area denoted on the Campus Master Plan".

The Free Speech Area was a campaign designed in 1997 by the California State Student Association to ensure that the students' voice could be heard in a democratic arena as well as provide an area for guest speakers visiting each campus. Many CSU campuses have designated Free Speech Areas in their Master Plans. The Associated Students, Inc. of SSU wishes to join these campuses in their efforts to provide an essential service to the students.

1

The Associated Students, Inc. of SSU has secured funding for this project and is currently finalizing schematics to be brought before the Campus Planning Committee as well as the Campus Reengineering Committee for approval.

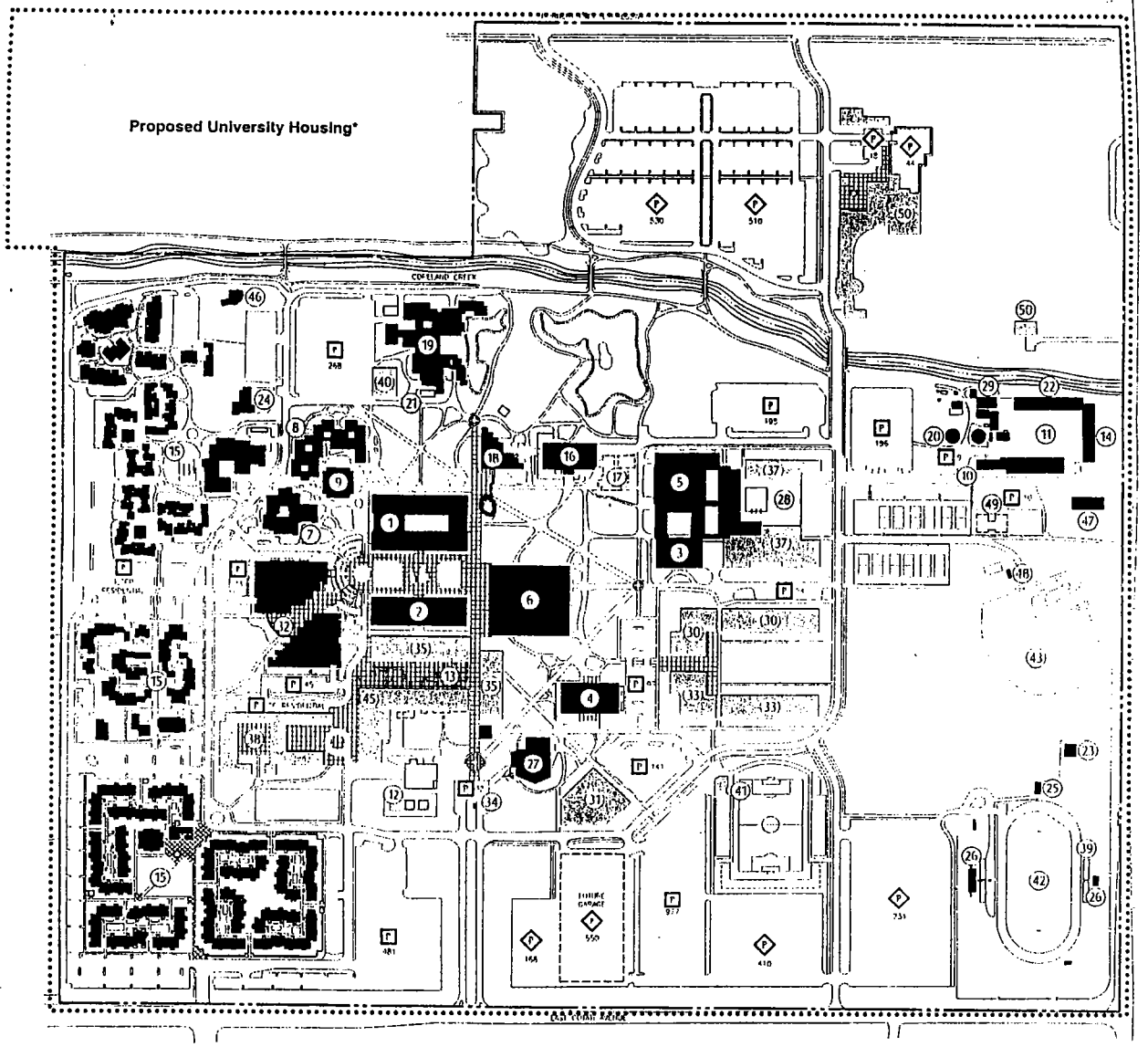
The Associated Students, Inc. of SSU hereby requests the addition of the Free Speech Area to the final copy of the SSU Master Revision Plan.

Sincerely,

Crystal Shrouf
AS President

Megan Solomon
AS Vice President,Internal Affairs

ASSOCIATED STUDENTS, INC.
SONOMA STATE UNIVERSITY ● 1801 EAST COTATI AVENUE ● ROHNERT PARK, CA 94928
PHONE: (707) 664-2815 ● FAX: (707) 664-2694 ● E-MAIL: Associated Students, Inc. ● http://www.sonoma.edu/as/



Free Speech Area

FACILITY LEGEND: EXISTING FACILITY; Future Facility

Master Plan Enrollment: 10,000 FTE

1 STEVENSON HALL
2 DARWIN HALL
3 FIELD HOUSE
4 IVES HALL
5 PHYSICAL EDUCATION
6 RUBEN SALAZAR BUILDING
7 STUDENT HEALTH CENTER
8 RACHEL CARSON HALL
9 NICHOLS HALL
10 PLANT OPERATIONS OFFICE
11 CORPORATION YARD
12 BOILER PLANT
13 THE VILLAGE (Temporary)
14 CORPORATION YARD SUPPORT SERVICES
15 RESIDENCE HALLS & DINING FACILITY
16 COMMONS
17 BOOKSTORE (Temporary)
18 COLLEGE UNION
19 ART BUILDING
20 PUMP HOUSE
21 PUMP HOUSE - FIRE
22 CORPORATION YARD WAREHOUSE
23 PHYSICAL EDUCATION STORAGE BUILDING
24 CHILD CARE FACILITY
25 ATHLETIC FIELD FACILITY
26 BLEACHERS & PRESS BOX
27 EVERT B. PERSON THEATER
28 AQUATIC FACILITY
29 ANTHROPOLOGICAL STUDIES CENTER
30 Instructional Expansion
31 Instructional Expansion
32 INFORMATION CENTER
33 Instructional Expansion
34 PARKING AND INFORMATION BOOTH
35 University Center
36 not used
37 Physical Education Addition
38 RESIDENCE HALLS ADDITION
39 Bleacher Addition
40 Art Building Addition
41 Soccer Stadium
42 STADIUM
43 BASEBALL FIELD
44 not used
45 ADMINISTRATION & FINANCE CENTER (Temporary)
46 ENVIRONMENTAL TECHNOLOGY CENTER
47 CAMPUS STORAGE BUILDING
48 BASEBALL STORAGE BUILDING
49 CALIFORNIA INSTITUTE FOR HUMAN SERVICES (Temporary)
50 Center for Musical Arts

BUILDINGS
6 EXISTING
50 Future
(17) TEMPORARY

PARKING
EXISTING
FUTURE
6,858 TOTAL SPACES

PROJECT SITE BOUNDARY
EXISTING CAMPUS BOUNDARY

0 50 100 200 400 800

* The University does not currently own this portion of the project site. However, the project includes the development of University-related housing on this site; see text for description of housing scenarios assessed in the EIR.

SOURCE: Sonoma State University

Sonoma State University Master Plan Revision EIR / 990097 ■

Figure III-4
Proposed Master Plan

LETTER II – ASSOCIATED STUDENTS, INC.

II-1 This comment does not address the adequacy of the Draft EIR, but rather comments on the Master Plan revision itself. Any potential designation and/or development of a "free speech area" at the campus is outside the scope of this EIR.

JJ

February 15, 2000

Facilities Services Offices
1801 E. Cotati Avenue
Rohnert Park, CA 94928

To Deborah DuVall,

In regard to the Master Plan Revision, I must state that I disagree with an aspect to the plan of 'increased circulation' on campus, specifically the notion to create new concrete pathways through the middle of the Quadrangle. The idea to connect the diagonal corners of the Quad with a concrete path will necessitate the removal of the tree from the Northwest corner which is unacceptable to many students.

Also, adding more concrete to the Quadrangle will degrade the ability of all students to enjoy outdoor games by increasing the possibility of injury from contact with the pathway. Many students have expressed to me that they do not wish to see a new pathway added to the Quadrangle as they prefer the attractive green lawns as they currently are. I foresee that adding new pathways to the Quadrangle in an effort to increase circulation will cause more problems than they were intended to rectify.

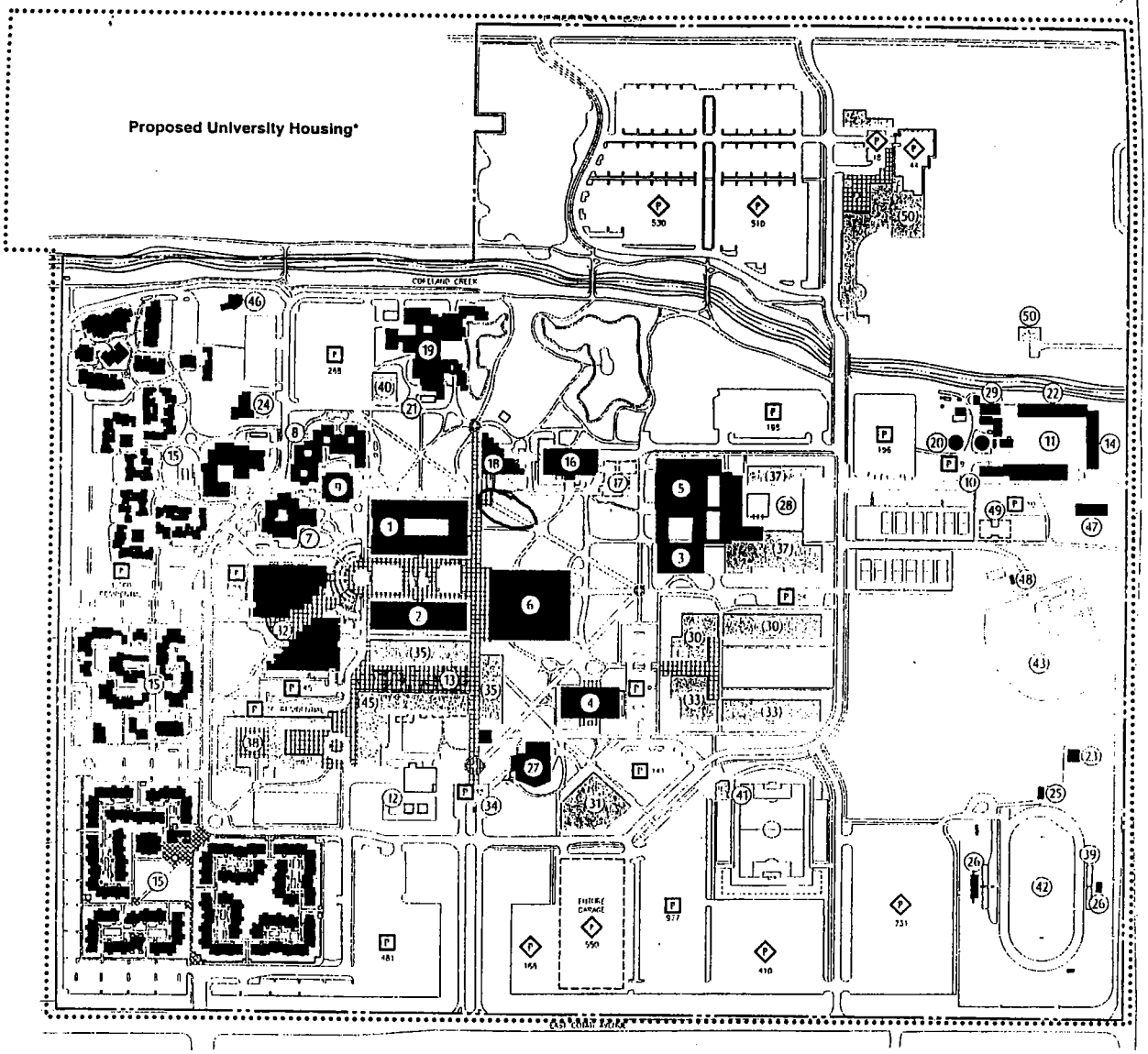
1

Thank you for your time,

Brian Talbot

Crystal Shrouf

Joe Latiluppe



FACILITY LEGEND: EXISTING FACILITY; Future Facility

Master Plan Enrollment: 10,000 FTE

1 STEVENSON HALL
2 DARWIN HALL
3 FIELD HOUSE
4 IVES HALL
5 PHYSICAL EDUCATION
6 RUBEN SALAZAR BUILDING
7 STUDENT HEALTH CENTER
8 RACHEL CARSON HALL
9 NICHOLS HALL
10 PLANT OPERATIONS OFFICE
11 CORPORATION YARD
12 BOILER PLANT
13 THE VILLAGE (Temporary)
14 CORPORATION YARD SUPPORT SERVICES
15 RESIDENCE HALLS & DINING FACILITY
16 COMMONS
17 BOOKSTORE (Temporary)
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20 PUMP HOUSE
21 PUMP HOUSE - FIRE
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* The University does not currently own this portion of the project site. However, the project includes the development of University-related housing on this site; see text for description of housing scenarios assessed in the EIR.

SOURCE: Sonoma State University

Sonoma State University Master Plan Revision EIR / 990097 ■

Figure III-4
Proposed Master Plan

LETTER JJ – BRIAN TALBOT, JOE LATILUPPE, CRYSTAL SHROUF

JJ-1 See response to Comment L-8 regarding the need for improved bicycle /pedestrian circulation. All potential environmental impacts to biological resources, including potential loss of trees, are mitigated to a less than significant level in Section IV.H, Biological Resources, of the DEIR.

KK

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February 8, 2000

To Whom It May Concern:

We are the sixth grade class at Cross and Crown Lutheran School Middle School here in Rohnert Park. We are writing to share our concerns with you about the proposed concert hall project along Copeland Creek. Our school has a watershed program along Copeland in which every grade participates. For example, the third grade studies the birds that live along the creek; the fourth and eighth grades study the geology of the creek, with the older students helping the younger ones. Our sixth grade class has been practicing the different steps of the scientific process using the creek as an outdoor laboratory. We also write stories and poetry along the creek. Yesterday, we sat there in silence writing poems to enter in a contest.

Many of us have musical interests as well. We play in our school band or in the Chime Choir or sing in the vocal choir. Music is important to us, and so we think that the idea of a concert hall is a really good one. Along with the sports complex and recreation center here in town, it will give people more to do besides go to a movie or play miniature golf. It will help our city become more of a cultural center. It will also bring money to the University and maybe the city as well.

While we feel positive about the idea of a music center, we have great concerns about the location planned for this building. Even with 100 feet of open space between it and the creek, we feel there will be a definite negative effect on the only remaining nice stretch of creek from Petaluma Hill to the Laguna de Santa Rosa.

The following are our concerns:

1. Cars in the large parking lot will leak oil and possibly gasoline over time, which will run off into the creek or into groundwater supplies. | 1
2. There will be more air pollution in the area from increased traffic. | 2
3. The area covered over by asphalt will no longer absorb rainwater. That water will run off, carrying dirt and debris into the creek during heavy rains. | 3
4. We have spent time over the last few years cleaning up trash tossed from cars and pedestrians on the Snyder Lane bridge. The litter problem will spread up the creek as people throw trash off the three-foot bridges and the bridge for cars. | 4
5. Future proposed student housing in the area will only increase the amount of litter and water pollution. | 5
6. Copeland Creek is one of the many creeks in Sonoma County that runs into the Russian River. That river is on the twenty "most endangered rivers" list in America. The more we mess up creeks like ours, the more we damage the larger river system. | 6
7. Finally, all of the above leads to habitat destruction for plants and animals. | 7

We urge you to consider building this concert hall on a different piece of land in town that is not beside our creek. Why can't it be possible to add a cultural center to our area and still keep the prettiest part of our creek the way it is? | 8

Sincerely,

The Sixth Grade
Cross & Crown Lutheran School

CROSS & CROWN LUTHERAN SCHOOL
5475 SNYDER LANE
ROHNERT PARK, CA. 94928
PRESCHOOL THROUGH EIGHTH GRADE
(707) 795-7863 FAX (707) 795-0509

Lauren Anderson

Katie Terwilliger

Danielle Patricia Zisk

Ken Pote Nunes

Nick Pisinich

JOShua Mugridge

Sam Simmons

Breana Rooney

Nick Heenan

Marika Shiga

Molly Wilson

Stephen Atallah

Mary-Kate Williamson

Angelica Kaye Pritchard

Shawna Eirmann

Danny Pugh

Larissa Sternberger

Yanna Seyedkazemi

Sierra Harlan

Kelsey McCarthy

Rachel Ann Peterson

Kyle Wrucke

Stellsea Rayne Stoughton

LETTER KK – CROSS AND CROWN LUTHERAN SCHOOL

KK-1 All potential impacts of the project to hydrology and water quality are assessed in Section IV.C, Hydrology and Water Quality, in the DEIR. Implementation of Mitigation Measures C.1 through C.6 in the DEIR would mitigate all potentially significant impacts of the project to water quality to a less than significant level.

KK-2 All potential impacts of the project related to air quality are assessed in the DEIR Section IV.E, Air Quality. Implementation of Mitigation Measures E1 through E.4 in the DEIR would mitigate all potentially significant impacts of the project to air quality to a less than significant level, to the extent feasible.

KK-3 See response to Comment KK-1.

KK-4 There are no design aspects of the project that would contribute to direct increases in litter. As with existing University facilities at the campus, all proposed areas for development would be equipped with indoor and outdoor trash receptacles, where trash is regularly collected and removed for disposal. Moreover, the University's litter collection practices would be expanded for all new areas of the campus. As such, development of the Master Plan revision is expected to result in a less than significant effect on litter creation.

KK-5 Regarding potential impacts to water quality, see response to Comment KK-1. Regarding potential impacts to litter, se response to Comment KK-4.

KK-6 See response to Comments KK-1 and KK-4.

KK-7 All potential impacts to wildlife and vegetation from development of the Master Plan revision is assessed in Section IV.H, Biological Resources, in the DEIR. Implementation of mitigation measures H.1 through H.5 in the DEIR would mitigate all potentially significant biological resource impacts of the project to a less than significant level.

KK-8 Regarding potential alternative on- and off-site locations for the proposed Center for the Musical Arts, see response to Comment K-4. See also Master Response 1 at the beginning of Chapter IV of this response to comments document.

February 12, 2000

LL

Response to the E.I.R.
Sonoma State University Master Plan Revision.

I would like to address the impact and alternatives to the proposed road, or vehicular bridge which would cross over Copeland Creek from the north side of campus. (Mitigation Measure H.1b, H.2a, and H.2b)

It seems to me we have caused enough disruption to our waterways and natural ecosystems in the last century to warrant protecting any intact systems that we can, rather than mitigating them away. In the case of Copeland Creek we are faced with not only development in wetlands, but a road (vehicular bridge) crossing over the Creek to the new music center. This bridge, and subsequent road, along with heavy construction close to the creek, would have significant impacts on soil compaction, runoff, wildlife and fish habitat, water quality, and non-point source pollution. 1

The long-term effects of construction around and through this watershed are not being considered in this approval process. No matter how much you mitigate, you are still degrading an intact ecosystem and allowing unnecessary changes to occur. For example, the effects of removing a wide section of the riparian forest will have dramatic effects on erosion and water quality. The soils along copeland creek are prone to massive slumping due to their heavy clay content, and once vegetation is removed jute netting and rocks will not help. These effects are often not fully detected for years after the activity. Major slumping of soils does not occur until roots of trees have rotted, a process that could take 7-8 years, and could have severe impacts on Copeland Creek, and the Laguna de Santa Rosa as well. 2

The distance from the parking lots on the north east corner of campus to the new music center is a very short distance and should not warrant a road to get there. The rationale of disrupting this ecosystem to serve the few people wanting to drive through campus to reach the music center rather than leaving campus to loop around to the Expressway is not good reasoning. It would be a significant impact to allow this construction project to occur for the mere convenience of direct car access from campus, when it would probably take 3 extra minutes to get there by leaving campus. 3

We talk about sustainable communities, reducing the impact of development on our natural systems, and restoring what has been lost or degraded yet we continue to allow development projects which go against the grain of protecting habitat, and water quality. Plant removal, habitat fragmentation, erosion and increased sedimentation, and non-point source pollutants are all contributing to the decline of our waterways, and roads are a major contributor of non-point source pollutants. 4

The alternative would be to build a foot-bridge where people can walk the short distance to the music center, or be shuttled across with electric carts or such. It could be a popular scenic walk, as opposed to a road with cars, dust, and noise, and it would be less harmful to the creek. We need to support the idea of sustainability by reducing our reliance on the automobile to move us every 500 feet, and reducing any unnecessary impacts to the environment. Communities like Sonoma State University are walkable, people do it, and this alternative to a vehicular bridge would be suitable to their needs while severely reducing the environmental impacts on Copeland Creek. 5

The significant impacts of bridge construction within the Copeland Creek watershed will not be minimized unless it is eliminated. There are too many environmental impacts relating to this vehicular bridge project that are being overlooked. Anytime there is heavy equipment near a creek, there are significant impacts on that watershed afterwards, and I failed to see any mitigating efforts for the loss of riparian vegetation, erosion, and sedimentation incurred from this kind of activity. 6

I also want to mention that the quality of life and aesthetics of this section of campus would be affected by a bridge with car traffic. This area is used as a natural walking trail which passes through the native plant garden, and butterfly garden where people come to escape the noise and pace of campus life. A bridge and traffic would severely affect this experience. 7

Considering all I have stated, a footbridge would be an adequate compromise for northern access to the music center and would reduce substantial undue harm to Copeland Creek. If allowed, this project will have substantial repercussions, not just in the immediate area, but in the entire watershed. 8

Thank you for the opportunity to express my opinion.

Janice Gilligan
2405 Bloomfield Road
Sebastopol, CA. 95472

LETTER LL – JANICE GILLIGAN

LL-1 All potential impacts of the project to hydrology and water quality, and biological resources are assessed in Section IV.C, Hydrology and Water Quality, and Section IV.H, Biological Resources, respectively, in the DEIR. Implementation of Mitigation Measures C.1 through C.6, and H.1 through H.5 in the DEIR would mitigate all potentially significant impacts of construction and operation of the project to hydrology, water quality, and biological resources to a less than significant level.

LL-2 See response to Comment LL-1, and Master Response 1 (at the beginning of Chapter IV of this response to comments document).

LL-3 Note that the purpose of the proposed vehicular access road across Copeland Creek is not intended merely to connect people on the main campus to the proposed Center for the Musical Arts. Rather, the proposed northern access and bridge crossing would provide improve overall access to the University, would disperse University traffic and minimize potential concentrated traffic effects that would otherwise occur at existing vehicular access points on East Cotati Boulevard.

LL-4 See response to Comment LL-1, and Master Response 1.

LL-5 See response to Comment LL-3.

LL-6 See response to Comment LL-1.

LL-7 See response to Comment Q-1.

LL-8 See response to Comment LL-3.

MM

SONOMA STATE UNIVERSITY
1801 EAST COTATI AVE.
ROHNERT PARK, CALIF. 94928-3609

To Whom It May Concern:

I will not be able to be in attendance at your meeting regarding the expansion of the University. I do have some concerns that may or may not be addressed on that February 15th gathering. (1) What effect will this expansion have on the property values of single family homes in the "J" section, just west of your proposed growth? (2) What will be built in the area that is adjacent to the backyards of the homes on Jasmine Circle? I hope the dormitories will be located completely on the other side of this expansion. We have enough traffic and noise coming from the Rohnert Park Expressway.

1

2

Thank you,

ROBERT B. AMEND
1397 Jasmine Circle
Rohnert Park, California

LETTER MM – ROBERT B. AMEND

MM-1 The comment does not address the adequacy of the DEIR. As specified in CEQA *Guidelines* Section 15131, "Economic or social effects of a project shall not be treated as significant effects on the environment." No economic effects associated with the project would result in substantial adverse physical changes in the environment that are not addressed in the EIR.

MM-2 Chapter III, Project Description, in the DEIR, provides a description and the location of all proposed facilities under the Master Plan revision. As discussed in Chapter III in the DEIR, the University has a goal to build more housing on the 34.6-acre rectangular parcel located adjacent to, and northwest of, the existing campus boundary. This EIR considers a range of housing scenarios ranging from high-density apartment-style courtyard housing to lower density single-family attached and detached dwellings. The site is large enough to accommodate a mixed housing density featuring extensive open space and possibly community buildings.

As discussed in Section IV.A, Land Use and Planning, in the DEIR, the City's General Plan Update designates that parcel primarily as a mix of intermediate and high density residential, with a small portion of parks/recreation area. When comparing the University's highest density scenario for that parcel (approximately 300 apartment units) to the maximum housing scenario that would be anticipated under the City's General Plan Update for that area (over 600 units), the University's impact from new housing would be considerably less than that envisioned by the City.

CHAPTER V

PUBLIC HEARING COMMENTS PRESENTED ON THE DRAFT EIR AND RESPONSES TO PUBLIC HEARING COMMENTS

Public Hearings on the Draft EIR were held by the University on November 29 and December 2, 1999. The following individuals provided spoken comments at those hearings:

- Steven A. Norwick
- David L Stokes
- Brian Turner
- Jill Fitterer
- Steve Hernandez
- Richard Gale
- Margot Larsen Henderson
- Cathy Chen
- Mary Gomes
- Justin Stoddard
- Leita Allen

A. PUBLIC HEARING COMMENTS PRESENTED ON THE DRAFT EIR

The comments of each individual commenter from the two public hearings are contained in the transcripts for each public hearing, below. Each comment is identified with an alpha-numeric designator, beginning with commenter AAA.

PROPOSED MASTER PLAN PUBLIC HEARING

11/29/99

IN RE: STATE OF CALIFORNIA/SSU

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

GOLDEN GATE REPORTERS
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SAN RAFAEL, CA 94903

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REPORTER'S TRANSCRIPT

STATE OF CALIFORNIA
SONOMA STATE UNIVERSITY.
_____/

PROPOSED MASTER PLAN PUBLIC HEARING

Monday, November 29, 1999

REPORTED BY: HEIDI J. RYDER CSR No. 10053

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--o0o--

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APPEARANCES:

UNIVERSITY REPRESENTATIVES:
DEBORAH DUVALL, Director of Facility Planning
JOHN BOND, Senior Director Facilities Services
BRUCE WALKER

ENVIRONMENTAL SCIENCE ASSOCIATES:
MARTY ABELL
PAUL MITCHELL

225 BUSH STREET
SUITE 1700
SAN FRANCISCO, CALIFORNIA 94104

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--o0o--

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Rohnert Park, California
Monday, November 29, 1999
7:05 p.m. - 7:46 p.m.

--o0o--

MS. DUVALL: My name is Deborah Duvall. I am Director of Planning on campus. I am acting as a moderator monitor. This is a public hearing for the draft Sonoma State University Master Plan Revision.

The purpose of this hearing is to provide the public with an opportunity to comment on the draft EIR, not on the merits of the master plan revision itself. Comments and inputs on the merit of the plan itself were received at a series of public forums conducted during the last spring semester.

This is one of two hearings. The next one will be December 2nd at noon, and it will be held at the Facility Services Meeting Room. Any written comments can be received, if you will direct them to me by December 15th.

Written responses will be prepared to any comments received tonight, written or verbal;

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and it will be, as part of the final EIR, will be incorporated into the final EIR. It will then be reviewed first by the campus planning committee, which is chaired by the President and has student and faculty staff representatives, and then later by the CSU Board of Trustees.

The agenda for tonight's meeting will be that I will give a short summary of the plan and the revision elements that are incorporated into that plan. And then I will turn it over to our consultant for ESA who authored the EIR, and they will do a similar exercise giving a summary of the EIR itself. And then I will open it up to the public for comment.

And at that time we will ask you to come up to the front here, because we are recording this, both with a reporter and with a machine.

So I can get responses to you properly, there is a small orange card sitting at the table by Andy over there. If you will pick that up if you are interested in making a comment so we make sure we get your name and send you any future notification and so forth.

Having said all of that, I would like

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to review the plan a little with you.

The black and white graphic here on my right is the existing approved Campus Master Plan, and that colored graphic is the Proposed Revision.

The population, the ceiling population for both the existing and the proposed is 10,000 FTE. We haven't changed that and, therefore, this is not considered a growth project, if you will.

The ceiling population remains at 10,000 FTE for the proposed plan. You may know that we have on campus existing now capacity for about approximate 6000 FTE. And so the plan, both plans incorporate the difference that will give us on the 6000 to the 10,000 FTE.

The plan, the proposed revision, therefore, has sited academic expansion buildings that would accommodate us for the difference between the 6000 to 10,000.

But it doesn't try to articulate what disciplines will go into those future buildings. That's a function of the Academic Master Plan. And it will be an exercise of that plan to determine that in the future, depending on where

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our growth is.

The plan that you are looking at here is an illustrated plan. It has actually three overlays. It has a landscape land use plan; it has a vehicular circulation plan; and it has a pedestrian plan.

Besides the instructional expansion buildings -- by the way, on this plan the blue is the existing campus buildings and the brown represents future buildings.

There is a group of copies of this black and white sitting on that table back there. If you would like to look at it closer, please help yourself.

Besides the academic expansion building, you see the new plan incorporate a site for the university center complex. This would house a bookstore and retail operations and a fitness center.

The plan also incorporates the newly acquired parcels of property north of Copeland Creek. And on those parcels, it incorporates the Center for the Musical Arts and associated parking, which would serve the center during events; but then during regular campus hours would

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serve the general public for parking.

Although this campus has not acquired the property west of these new parcels and we have, therefore, not master-planned it, when you read the EIR, you will see that we have addressed those parcels in the EIR. We have done that because it is a goal of the campus to purchase those parcels and develop them into university related housing.

Since we don't own it and haven't planned it specifically, the EIR creates scenarios, if you will, from the highest density housing to lowest density housing so it can study the impacts that we would experience should we go ahead and purchase that and develop it in this way.

The plan also incorporates additional student housing as an extension to the newly constructed Sauvignon Village, in recognition that students are having a lot of trouble finding housing off campus and in recognition that the more students that we house on our campus, the lower traffic impact we have in the surrounding Rohnert Park area, because we reduce the trips to and from campus. So we do plan another student

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housing here as well.
Like with the existing master plan, most of our parking continues to remain outside Redwood Circle, creating the academic core as a primary pedestrian campus. However, during the Outreach Program that we conducted in the spring, we received a lot of comments and concerns about the need for some disabled and specialty, if you will, parking closer in.
So we have created, besides the parking that is here within the circle, we have created a new lot down here, east of Ives Hall as well.
Also, in response to comments received in the Community Outreach Program, we created new additional playing fields, one that would be closely associated with the housing complex; and then we have a new field here, that is closely related to the majority of our athletic fields.
Again that Outreach Program, one of the main concerns was how to protect Copeland Creek. So this plan for the first time creates a buffer zone along a protective preservation zone along the creek and includes the native plant

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garden as well.
Another comment that was very predominant during our Outreach Program was the need for improved bicycle paths on the campus and connecting us with the off-campus bicycle paths. So this plan does that for the first time.
I think the last thing that I want to bring out a revision element, that the plan is somewhat self-mitigating, if you will, as far as wetlands go in the northern properties.
In recognition of the existing wetlands, which are predominantly here along this strip, we have avoided developing it. And we have created restoration potentials, if you will, for future wetlands restoration in the area here.
I think that really, without going into great detail, kind of summarizes the plan and its revision elements.
And so I think I will stop there, turn it over to the ESA consultants and let them address the EIR.
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///
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ENVIRONMENTAL SCIENCE ASSOCIATES PRESENTATION

MR. MITCHELL: The California Environmental Quality Act, originally enacted in 1970, serves as the foundation for environmental law and policies in California.
California Environmental Quality Act, known as "CEQA," requires all governmental discretionary actions that may result in a direct physical change in the environment, or a reasonably indirect change in the environment, to be subject to environmental review.
Sonoma State University, representing the California State University Board of Trustees, is serving as the lead agency for this project.
CEQA requires that before a decision can be made to approve a project with potentially significant environmental effects, an Environmental Impact Report, known as an "EIR," must be prepared that fully describes the environmental effects of the project.
The EIR is a public information document, used by both governmental agencies and the public, to identify and evaluate potential

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environmental consequences of a proposed project, to recommend mitigation measures to lessen or eliminate adverse impacts, and examine feasible alternatives of the project.
The information contained in the EIR is reviewed and considered by the lead agency prior to the ultimate decision to approve, disapprove or modify the project.
The environmental review process for the project consists of a number of mandatory steps under CEQA. The first step was the distribution of a Notice of Preparation for Environmental Impact Report to governmental agencies, organizations, and persons interested in the project to solicit participation and determine the relevant environmental issues addressed in the EIR.
The Notice of Preparation is included as Appendix A in the draft EIR, and all written responses to the Notice of Preparation are included in Appendix B to the EIR.
On November 1st, 1999, the University released for public review the draft EIR on the proposed master plan revision.
The 45-day public review and comment

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period on the draft EIR began on November 1st and will close to December 15th of this year. During this public review period, government agencies, interested groups, and individuals may submit written comments on the adequacy of the draft EIR.

Today's and Thursday's public hearings provide the public with an opportunity to also provide spoken comments to the draft EIR.

After the public review period has ended, the lead agency must prepare a final EIR.

The final EIR is required to include the draft EIR, copies of written and public hearing comments received during the public review period, and the lead agency's responses to all substantive comments received on the draft EIR. To respond to comments, the lead agency may revise the draft EIR and or add new material as appropriate.

The Board of Trustees of the California State University will then review and consider the final EIR for certification based on its fulfillment of CEQA requirements.

Prior to approval of the project, the Board of Trustees of California State University must certify the final EIR and adopt a reporting

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and monitoring program for all mitigation measures identified in the EIR.

The EIR for Master Plan Revision is comprised of seven chapters. For those interested in a summary of the EIR, refer to Chapter 2, which provides an overview of the project, environmental impacts resulting from the project, and mitigation measures identified to reduce or eliminate those impacts.

As required by the California Environmental Quality Act, Chapter 5 presents a reasonable range of alternatives for the proposed project: Discussion of the environmental impacts associated with each alternative, reviews alternative sites considered, but rejected as unfeasible, and compares the relative impacts of each alternative to those of the project.

Three alternatives to the proposed project were considered for the draft EIR. As required by CEQA, this consisted of a no-project alternative, where the proposed master plan revision would not occur, but rather the project site would be developed under the existing approved master plan.

Alternative 2 consists of an

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alternative where the University would not acquire the northwest acquisition area and not develop housing nor any other university use within that portion of the project site.

As under the proposed project, however, the ultimate plan student capacity would be 10,000 full-time equivalents.

Alternative 3 is somewhat similar to Alternative 2. However, this alternative assumes that the University would accommodate, to the extent possible, the housing that was proposed here on the main campus. As under the proposed project, the ultimate plan student capacity of the University would be 10,000 full-time equivalent as with Alternative 2 and Alternative 1.

Chapter 6, Impact Overview presents discussions of growth inducement and summarizes discussions of cumulative impacts, impacts that would remain significant, even after mitigation, and effects found not to be significant.

Mitigation measures proposed as part of the project, as well as mitigation measures identified in the EIR, would reduce or avoid most of the environmental impacts to a less-than-significant level. However, as

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discussed in Chapter 6, certain impacts in the categories of utilities, traffic, air quality, and noise would remain significant after mitigation.

Since the proposed master plan revision would maintain a maximum student population of 10,000 full-time equivalents and would not involve an increase in the rate of student enrollment above that anticipated by the existing approved master plan, the majority of the significant impacts would occur either with or without the project.

It should be noted that since the proposed master plan proposes more on-campus housing than the existing approved master plan, it would generate less off-site weekday traffic volumes, particularly during the a.m. and p.m. peak hours during which the majority of the additional students housed on-site would not be making the home-to-school and school-to-home trips. Therefore, the significant impacts on the weekday peak hour levels of service would be less than that during under the existing master plan.

In the case of the traffic delays related to special events at the proposed Musical Center of Arts, the primary traffic impact would

be limited to the campus intersections, impact of limited duration, and would occur during off-peak traffic periods.

I will now turn the mike back over to Deborah.

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PUBLIC COMMENT FORUM

MS. DUVALL: What we would like to do now is open up the public comment portion. As I said, you can, if you have written comments, you can pass them in; but you can also come up to the microphone and speak.

I would ask you, please, to do that one at a time, and to state your name and your address as appropriate, and to fill out the card to make sure we spell it first, properly.

If you would keep it down, I don't know how many of you wish to speak, but if you could keep it down to three or five minutes, it probably would be reasonable.

And remember that your comments here are directed to the issues of the EIR itself. So those who want to speak, would you please come

forward.

DR. NORWICK: I am Steve Norwick. I am one of the physical scientists from environmental studies. And I plan to respond to the EIR in writing, but I want to point out to everyone that Copeland Creek is an artifact, created by kindly old Farmer Copeland about a century ago. It is a distributary on an alluvial fan; and as such, everything in our neighborhood is a flood plain.

Now, for the last 25 years, I have risen in various circles on this campus to object to construction next to the distributary, which we call Copeland Creek, and to no avail. The art building was built over my objections, if not my dead body, and the apartments that are next abut the creek. And my own department is about to build a building next to the creek.

AAA-1

But as we constrain the creek, we constrain ourselves and our response to not only flooding, but sedimentation. We have recently made ourselves unfortunately prominent in the news by noticing that a distributary almost always fills itself in with sediment, as ours is.

So I would just like to remind

everyone that the art building has had as much as 4 feet, some people say 5 feet of water in the rooms, particularly in the art gallery on at least two occasions, according to the groundsman, maybe three, the stories vary. And we need to have a plan to manage the sediment if we are not going to back away from the distributary and allow it to flood.

AAA-1 Cont.

So that is something I know a little bit about and I haven't seen it in the EIR, but, perhaps, I shall find it.

The other thing is not in my area of expertise, but it is in my hobby as a flower sniffer. And I want to assure everyone that the northwest section, which we see in green over there, is, in the spring, white with Limnanthes. I am not enough of a botanist to know whether Limnanthes douglasii or vinculans is an uncommon or common species, depending where you are, Limnanthes are rare or endangered, the fact is they are often found together.

AAA-2

And so I don't find that in the EIR. And it is quite a large set of ponds in that region which will have to be either preserved or mitigated in some way.

Thank you.

MS. DUVALL: Do we have any other speakers?

MR. STOKES: My name is Dave Stokes. And I am also an ESP. I was trained as a biologist. And I have read through the EIR and I found a lot of specific things to comment on. And I will submit my written comments.

There was an absence of discussion of several species of organisms that probably should be included; the yellow warbler is a state species of concern, was not brought up in the EIR.

BBB-1

There was very little discussion of the California steelhead, which is a federally listed species, and has been documented to occur upstream of the project site; the implication being the fish got there by swimming through the project site. And that seems like something that should be dealt with more elaborately in the EIR.

BBB-2

There is little discussion of the noise effects on wildlife. There have been some works recently that show bird species are negatively effected by excessive noise. That hasn't been addressed. Although noise effects on instructional buildings was addressed, I notice.

BBB-3

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So we need to broaden that topic a little bit. BBB-3 Cont.
There were, as the EIR says there were, no species-specific inventories done. I consider that a shortcoming. BBB-4
So there are lots of specific problems, from my point of view, as a biologist.
But I really wanted to concentrate on three general limitations that I saw in the EIR. The first is a -- seems to be an absence of a recognition of the bigger landscape picture, bigger sort of watershed level, regional effects of the projects. Just the shape of the designated core riparian core area and buffer zone, if you know anything at all about habitat, you know that anything that is that skinny is bound to have a lot of edge effects, a lot of other negative sorts of aspects to habitat. BBB-5
And if you were designing a habitat, which, in fact, we have the chance to do right now, you would not design it to be 100 feet wide or 200 feet wide. You would do something a little different. You would make it a little fatter, as much fatter as you could, to provide as much interior riparian habitat as you could. BBB-6
You would not break it up with all of BBB-7

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these crossings. Each crossing segments this habitat. Again, that is a problem for a lot of wildlife species. You would minimize the number of crossings, you would minimize the amount of human disturbance, would locate your facilities as far from the habitat as you could. BBB-7 Cont.
So, to me, the plan doesn't reflect much consideration of the riparian core, other than we will designate at that 100 foot width.
I think that is something that could be worked with, because it seems the project could be moved toward Rohnert Park Expressway with no change at all to the design -- or very little change.
The second thing is what the project doesn't recognize, is the potential for restoration. Restoration is happening both on-site and off-site. Fairfield Osborne Preserve was purchased by SSU. It is a fairly pristine piece of habitat, below Fairfield Osborne Preserve there is some fairly intact structures of Copeland Creek by default. They are fairly wooded, relatively intact sections of riparian habitat. BBB-8
Below that there is Sonoma County BBB-9

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Water District restoration going on upstream of SSU. About three-quarters of a mile of creek is being restored. In that context -- oh, on campus, friends of Copeland Creek and others have been over the years gradually working to restore this habitat to weed out exotic species and plant and other native species. In that context, it makes sense to not center on what we have now, but try to imagine the potential of what we could have if we really put our heads to it and try to do a serious restoration effort in the context of these other things that are happening. BBB-9 Cont. BBB-10
That brings me to the third point I want to make, which is, this is a great opportunity. And I have just started talking to John Bond and others. It seems like there are people on campus who are interested in making this riparian corridor something more than a place to dump. BBB-11
We have the chance now to, if we act with foresight, we can have a real amenity on this campus, representative of our region that has our regional biota in it an intact ecologically functioning system.
But that can't happen if we don't

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allow -- as Steve said, if we constrain our options now, we won't be able to do it later.
So I would like to see a plan that reflects more of these biological needs. No one ever, I don't think, very few people, I guess, I can think of a couple of exceptions, few people think we should have cut down more virgin redwood forests. We wish we had more.
I think riparian habitat in Central California, Central Coastal California, is one of the most endangered types of plant and ecosystems there is. BBB-11 Cont.
I don't think anyone 50 years from now will wish we leveled more of Copeland Creek's riparian or restored less of it.
So my plea is, I am hearing some good things from various people that we should work together. This is a great opportunity. I would like to see the music center built. I think we could do it in a way that we got both a world class music center with world class campus amenities and functioning ecosystem we can point to and say, "This is SSU."
So that's what I would like to see.
I guess the specifics that I look at when I look

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at this I find most troublesome are the location of things up against the creek, rather than as far as from the creek as possible. BBB-11 Cont.

If we backed off this parking lot, didn't change the size of it so it was closer to the road, you could double the width. You would avoid some of the flooding danger and you would definitely make a much more biologically intact riparian system. BBB-12

So I will leave it at that and will submit written comments as well. Thanks.

MS. DUVALL: Anybody else out there?

MR. TURNER: My name is Brian Turner. I am a student. I have got several specific points which I will be submitting as written, but I wanted to make two of the larger points, more planning oriented, points here tonight.

The first is regarding the alternatives. And I believe it is deficient in lacking environmentally superior options, separate from the no-project alternative. At least I didn't see one that specified itself. CCC-1

Environmental superior to all the others, especially in regards to the project sponsor objectives. And this is my larger point,

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that the project sponsors' objectives are all about efficient use of undeveloped space first and the most sufficient use of developed space thereafter, and that the project alternatives are not evaluated on those bases. In fact, the purpose behind the music center, I don't wish to attack that here at all, but it is not evaluated on that basis, whether that is fitting the project sponsors in the alternative section. CCC-1 Cont.

The other large point that I wanted to make was about the statement that the University is not responsible for off-site mitigation. And this relates to traffic, this relates to air quality, and the storm water and flooding, and maybe other impacts as well. But any impact that is happening in Cotati or Rohnert Park, the university regards itself not responsible for mitigating for; this is from the argument why that is to mitigate for something in effect they have off-campus would be to be giving away funds they might not have to give away. CCC-2

It strikes me that such a defense is risky to use that as reason for not needing to mitigate the off-site accumulative impacts.

That's all.

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MS. FITTERER: My name is Jill Fitterer. And I am in the Art Department, in the art building. I am speaking just from a more visceral response for the creek, being a lover of the creek and being someone who walks by the creek all the time.

I wouldn't have known about this, but there was a small sign in the library that is not there tonight. It was on the bulletin board upstairs. So, to my aghast, I walked by the creek last week and it has already been bulldozed where they are putting a parking lot, which was upsetting to me to see it is filled in with rocks and willows are down. DDD-1

One hundred years ago there were probably grizzly bears in the creek. And they are not in California anymore.

Speaking on behalf of the creek -- and I would really like to second what the first three speakers had said as far as the importance of riparian areas and endangered species and any thing that can be done to preserve our wild lands is really important and not just for our own environmental enjoyment, but because it is.

So, anyway, that's what I have to

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say. Please consider what the first two gentlemen said and the third gentleman and consider an emotional statement as well. DDD-1 Cont.

So thanks.

MS. DUVALL: Any others?

MR. HERNANDEZ: My name is Steve Hernandez. I'm a student here in the environmental studies, concentration in ecological restoration.

I wanted to bring up two points. One had to do with the proposed parking garage here along South Sequoia Way, I believe it is.

And one of the things that was brought up as an alternative to the existing parking that they have for the music center, one of the suggestions that was brought up during the public comment period, last semester I believe it was, was why not consider a multi-parking garage so that you increase capacity and you essentially, what you are doing, is not using up as much space. EEE-1

One of the responses I received to that question was that the costs would be 7 to 1 to construct a multi-level parking garage.

So it seems kind of ironic on the new plan we have a multi-level parking garage here,

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and not necessarily one where a lot of the major impacts are going to occur with respect to Copeland Creek.

If I am not mistaken, on the plan it will accommodate, I believe, 510 parking spaces. And I believe there is 530 parking spaces in one of the two parking lots for the proposed center for the musical arts. EEE-1 Cont.

So I wanted to bring that up.

And the other thing I wanted to bring up was the issue of multiple outlets for storm water discharge into Copeland Creek. And one of the things that is currently going on is the need to continue dredging those outlets so they can drain properly so that certain locations won't back up and flood areas of the university. EEE-2

And if we maintain the level of dredging in the creek, essentially we are going to continue disturbing the creek and we will not rectify the problems that is creating.

So I think what needs to be done is to create a potential alternative to having those outlets. And I think if we could brainstorm some sort of method to provide an alternative for the storm water discharge from the University, that we

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could eliminate some of the impacts for the creek. EEE-2 Cont.

Thank you.

MR. GALE: I am Richard Gale. I wanted to piggyback on some comments made earlier and add some things.

In terms of the idea of shifting the music center north, I am in full agreement with this. I want to add two aspects to it in the EIR.

The lawn-seating area is not dealt with sufficiently in terms of what impact that activity would have on the creek area. And in the EIR, it is mentioned that the parking lot would be considered a detention-base environment for the flood plain. FFF-1

It seems to me there is a dangerous proximity to the wetland and the creek itself. I would encourage another buffer zone there as well.

In terms of the Copeland Creek Ecological Resource Protection Plan, it was, I thought, much too vague in the way it was dealt with in the EIR. And I assume it will expand, add more information coming. FFF-2

Three issues I would like to bring to your attention, the specifics of the drip line zone as described for the creek, I don't think FFF-3

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were terribly useful, so we have no idea of what exactly the area is being used. FFF-3 Cont.

The issues of use which were brought up, the multiple use of restoration for investigation, et cetera. I think that needs to be expanded, add the effects the bridges are going to have, especially the auto bridge wasn't dealt with sufficiently. So I think those can be examined again. FFF-4

MS. DUVALL: Are there any further speakers?

If not, I will close this hearing and thank you all for coming tonight.

There will be another one on the second Thursday at noon, if you should want to come again. That one is being held because it is so hard to book places for over 50 on the campus, which probably most of you know, in the Facilities Services meeting room.

Thank you for coming.

(Hearing concluded 7:46 p.m.)

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REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)
ss.)
COUNTY OF NAPA)

I, HEIDI J. RYDER, a Certified Shorthand Reporter licensed by the State of California, and empowered to administer oaths and affirmations pursuant to Section 2093(b) of the Code of Civil Procedure, do hereby certify:

That the said proceedings were recorded stenographically by me and were thereafter transcribed by me via computer-assisted transcription;

That the foregoing transcript is a true record of the proceedings which then and there took place; That I am a disinterested person to said action.

IN WITNESS WHEREOF, I have subscribed my name on November 31, 1999.

HEIDI J. RYDER, CSR 10053

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PROPOSED MASTER PLAN PUBLIC HEARING

12/2/99

IN RE: STATE OF CALIFORNIA/SSU

Page 1 to Page 29

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REPORTER'S TRANSCRIPT

STATE OF CALIFORNIA
SONOMA STATE UNIVERSITY.
_____/

PROPOSED MASTER PLAN PUBLIC HEARING

Thursday, December 2, 1999

REPORTED BY: HEIDI J. RYDER CSR No. 10053

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INDEX

Rohnert Park, California
Thursday, December 2, 1999
12:03 p.m. - 12:37 p.m.

--o0o--

MS. DUVALL: I am going to get started, because I know you have busy schedules. Maybe people will come in as we go on.

I am Deborah Duvall. I'm the Director of Facilities Planning on the campus. I am moderator today for these hearings.

This is the public hearing for the draft Sonoma State University Master Plan Revision. The purpose of this, the purpose of this hearing is to provide the public with an opportunity to comment on the EIR, not on the merits of the plan itself. Comments and input on the plan itself were received last spring at an Outreach Program that was listed for several months last spring.

Any comment received here today will be responded to in writing in the final EIR. If you want to submit written comments as well, they should get to us by December 15th. That's the end

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of the public hearing time.
What will happen then, I should say, is that the review of the comments that are made here will also be taken to be reviewed at the Campus Planning Committee, which is chaired by the President and has representation throughout the campus faculty staff, students. Later it will be taken down to the CSU Board of Trustees in Long Beach.
The agenda for today would be, I give a short summary of the plan itself with recision elements. Then ESA, who are the two authors of the EIR, will stand up and give a short summary on the EIR as well; and then I would like to open for public hearing.
What I would ask you to do, there is little cards here, or if you have a business card you can leave that with me so we make sure we spell your name right in the documents and are able to send to you any future documentation. We would ask you to come up here and speak into the microphone so the reporter can see you, to make sure she gets your comments accurately.
Having said all of that, let me do a quick summary.

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This black and white graphic is the existing Master Plan, approved, and the colored is the proposed revision.
What you are looking at here is an illustrative copy. There are also overlays to this which are the land use, pedestrian, and vehicular plans.
The two of them, both of them, have a ceiling population of 10,000 FTE. We haven't increased our ceiling population from one to the other, so it is not considered a growth project as such.
As some of you may know, we have a capacity in our buildings now of approximately 6,000 FTE. So what this represents is the growth in academic buildings from 6,000 to 10,000 FTE.
Now, as in the existing approved plan, we have expansion buildings for the academic community. We haven't tried to articulate what discipline goes into them. That is a function of the Academic Master Plan and determining over time, depending on where the growth is on the campus, which discipline the growth is in.
Another element of revision in this plan is there is a site identified for a

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University Center. And this University Center is a combination building of bookstore, retail function, and a fitness center. This proposed plan also includes, incorporates, the new acreage, which the campus has just purchased, to the north of Copeland Creek.
On those acreages, it proposes a Center for the Musical Arts, along right here, along with supporting parking. This parking will support the Center for Musical Arts, also during regular hours be regular campus parking.
The north entrance road, which is here, is not really a revision element. It exists on the existing plan as well. But it is incorporated into the design of this project.
Let's see. I want to say that like the existing plan, parking remains on the perimeter of the campus so that the campus core really remains primarily pedestrian.
However, one of the elements that changed a bit was during our Outreach Program, there were a lot comments about the need of having some parking inside the circle for disabled parking and special-use parking, which we have incorporated into the plan.

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Another comment that we received last spring in the Outreach Program very strongly was that we needed more playing fields. So we have incorporated playing fields, primarily oriented towards the residential community, also over here toward the athletic fields as well.
Some of the observations and comments that came out of the Outreach Program was the difficulty that the students are experiencing getting housing in the local community. So the plan includes an additional housing complex that is related to the new one that is being built, Sauvignon Village. So there is an additional student housing project on the campus as well.
The campus does not own the property that is to the west of the newly acquired property. And so we have not tried to master plan it specifically. We don't own it, so that is not appropriate for us to do, from the viewpoint of the trustees.
However, you will see in the EIR that we have addressed that property because it is a goal of the university to own that property and to have university related housing on it. Since we don't own it and couldn't really plan it

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specifically, what we have done in the EIR is show you a range of housing density from low to high, so that you could evaluate what could happen on that property, should we be successful in purchasing and building university housing.

The most important thing, well, the two most important things, one is that you can see the existing plan doesn't really have any kind of a protection or any kind a buffer or anything for the creek. So one of the things that came up very, very strongly last year in our Outreach Program was the need to protect the creek.

So what we have done here is we have created a buffer along the creek. And we have included the native plant garden in that buffer.

We haven't tried, in the EIR, to articulate exactly what uses the academic community may make of the protection zone or the preserve, if you want to call it preserve. It is really an academic question. And what the EIR suggests is that the ENSP Biology Department develop that plan.

What this does is to put a zone on it to protect it from inappropriate construction. What it does, also, is that it is somewhat

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self-mitigating here. We know that we have a certain amount, quite a bit of wetlands in this area here. But we know we have that here. So we have avoided building in that area.

And we have left enough of a surplus space beside the wetlands to do restoration over there as well. So any small pools we would have here, we would restore. And actually there is even -- there is more than we need for any of that. We could use it for other restoration possibility potentials. One of the other things that came out of the Outreach Program was a strong concern about bicycle paths on campus and connecting the surrounding community. So this plan, for the first time, does have a bicycle plan as well.

I think those are actually the major elements, revision elements that differ between the two plans.

So I will let ESA talk to us about the EIR.

MR. MITCHELL: Thank you, Deborah.

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ENVIRONMENTAL SCIENCE ASSOCIATES PRESENTATION

MR. MITCHELL: My name is Paul Mitchell. I am from ESA in San Francisco. And ESA is the environmental consulting firm working on the Master Plan Revision.

The California Environmental Quality Act, known as "CEQA," serves as the foundation of environmental law and policy in California. CEQA requires that all discretionary governmental actions that have the potential to result in either direct physical change in the environment or reasonably foreseeable indirect physical change are subject to environmental review.

The proposed Sonoma State University Master Plan Revision serves as a project which is subject to environmental review under CEQA. Sonoma State University, representing the California State University Trustees, is serving as the lead agency for the project.

CEQA requires that before a decision could be made to approve a project with potentially significant environmental effects, an

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environmental report, known as an "EIR," must be prepared that fully describes the environmental effects of the project.

The EIR is a public information document for use by governmental agencies and the public to identify and evaluate potential environmental consequences of a proposed project, to recommend mitigation measures to lessen or eliminate adverse impacts, and to examine feasible alternatives to the project.

The information contained in the EIR is reviewed and considered by the lead agency prior to the ultimate decision to approve, disapprove, or modify the proposed project.

The environmental review process for this project consists of a number of mandatory steps under CEQA. The first step was the distribution of the notice of preparation of an EIR to governmental agencies, organizations, and persons interested in the project to solicit participation in determining the relevant environmental issues to be addressed in the EIR.

The notice of preparation is included as Appendix A in the draft EIR. And all written responses to the Notice of Preparation are

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included as Appendix B in the draft EIR.
On November 1st, 1999, the Sonoma State University released for public review the draft EIR on the Master Plan Revision. The 45-day public review period began on November 1st, and will end on December 15th of this year.
During this public review period, governmental agencies, interested groups, and individuals may submit written comments on the adequacy on the draft EIR.
This public hearing, as well as last Monday's public hearing, provides the public with an opportunity to also provide spoken comments on the draft EIR.
After the public review period has ended, the lead agency must prepare a final EIR. The final EIR is required to include the draft EIR, copies of written and public hearing comments received during the public review period, and the lead agency's responses to alternative substantive comments received on the draft EIR.
To respond to comments, the lead agency may revise the draft EIR and/or add new material as appropriate. The Board of Trustees of the California State University will then review

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and consider the final EIR for certification, based on the fulfillment of CEQA requirements.
Prior to approval of the project, the Board of Trustees of the California State University must certify the final EIR and adopt a reporting and monitoring program for all mitigation measures identified in the report.
The contents of the EIR, I will highlight on the main sections.
For those interested in an overall summary of the project, refer to Chapter 2. It provides an overview of the project, the environmental impacts that would result from the project, and mitigation measures modified to eliminate those impacts as required by CEQA.
Chapter 5 is a reasonable range of alternatives to the proposed project, provides discussion of the environmental impacts associated with each alternative, reviews alternative sites considered but rejected as infeasible, and compares the relative impacts of each alternative to those of the project.
Three alternatives to the proposed project were considered in the draft EIR.
As required by CEQA, Alternative 1

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consists of a no-project alternative, where the proposed Master Plan Revision would not occur, but rather this project would continue to be developed under the existing approved master plan.
Alternative 2 consists of an alternative where the university would not acquire the northwest acquisition area, nor would develop any housing or any other university use within this area.
As under the proposed project, however, the total ultimate plan student capacity would be 10,000 full-time equivalents.
Alternative 3 would be somewhat similar to Alternative 2; however, this alternative assumes that the university would accommodate, to the extent possible, the university housing population that would have occurred here on the main campus instead.
As under the proposed project as well as Alternative 1 and 2, the ultimate plan student capacity of the university would be 10,000 full-time equivalents.
Mitigation measures proposed as part of the project as well as mitigation measures identified in the EIR would avoid or reduce most

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of the environmental impacts to a less-than-significant level.
However, as discussed in Chapter 6 of the draft EIR, certain impacts in the categories of utilities, traffic, air quality, and noise would remain significant after mitigation.
Since the proposed master plan revision would maintain a maximum student population of 10,000 full-time equivalents and would not involve an increase in the rate of student enrollment above that anticipated by the existing approved master plan, the majority of the significant impacts would occur either with or without the project.
It should be noted that since the proposed Master Plan proposes more on-campus housing than the approved existing master plan, it would generate less off-site weekday traffic problems, particularly during the a.m. and p.m. peak hours, during which the majority of the additional students housed on-site would not be making the home-to-school and the school-to-home trips.
Therefore, the significant impacts on the weekday peak hour level of service would be

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less than would occur under the existing master plan. In the case of traffic delays related to the Center for the Musical Arts, primarily the impacts would be limited to the campus and intersections, would be infrequent, of limited duration, and would occur during off-peak traffic periods.

I think that summarizes.

MS. DUVALL: What I would like to do now is open it up for public comment.

Those of you who want to speak, if you would come up to the front of the room, state your name and address, fill out one of these little cards, that would be great.

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PUBLIC COMMENT FORUM

MS. DUVALL: It is now open to public speaking.

Do we have any public speakers today?

MS. LARSEN-HENDERSON: Margot with a "T," Larsen with an "E," Henderson with an O.

And the first thing that I would like GGG-1

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to address is the public notification.

The availability of this Master Plan was in the Ruben Salazar Library, only available to either faculty or students, not open to the community.

I had to -- I was rejected to be able to see this document. GGG-1 Cont.

I contacted the Cotati City Hall. They had one document for their use only.

So with less than 24 hours to prepare for this hearing and to reach the rest of the community, I think that a continuance is reasonable, since these were not made available to the general public.

The other thing would be in Section 4, Table H-1; I have personally seen the white-tailed kite, the loggerhead shrike, the yellow warbler, the golden crown kinglets, the meadow lark, the western bluebird, the gold finch and -- let's see, the pond turtles, the rufasided towey [phonetic] -- which I believe is rare, I am not sure it is endangered -- red-tail hawks, red shoulder flickers, quail, and one river otter. GGG-2

And basically that is all I have had time to prepare for.

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But this buffer zone here, on the south side, already exists a buffer zone. But on the north side, I don't see one. I see the parking lot, the concrete comes right up to the edge of the creek. The vehicular bridge, the air pollution that would cause to the bird life there, the carbon monoxide fumes, is a concern. GGG-3 GGG-4

So that's basically all that I have had time to prepare for. Thank you.

MS. DUVALL: Are there any other speakers?

MS. CHEN: My name is Cathy Chen. Cathy with a "C."

I am from the neighborhood and not the students here. But I have the same concern as the previous speaker about the environmental impact. And I am concerned about the creek too.

So my suggestion is just the idea would be throw at you guys and hopefully we get respond on that [sic]. HHH-1

The thing about building the parking lot so close to the creek, is it possible that you can build maybe by the Rohnert Park Express side so that way it is on the street so the noise and dust and all that would be on the street, not --

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not, you know, create problem for the creek. That's what I was thinking about.

And then also maybe in here, try to keep a bigger space like you have; keep a space here, maybe build, like, a park area or something that looks some more nicer and more friendlier near the creek. HHH-1 Cont.

Also the bridge, I thought, instead of having that, two small tiny bridges, I think that is possibly for a car to drive through; is it possible maybe just one big one and then instead of have this -- this two bridges over, so just have one maybe big one to cut down all of those bridges and cars going through and noises. HHH-2

So that's all the suggestion I have. Thanks.

MS. LARSEN-HENDERSON: I am Margot Henderson again. I forgot to mention one point, is that this morning I spoke with Ed Grossi, the owner of this property over here. And he has informed me that he is restoring his portion of Copeland Creek. And he says to me, quote, "We do have salmon up here." GGG-5

So the Fish and Game Department is involved in restoring that. Now, they are going

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to spend I don't know how many dollars in doing this. And also the adjoining -- I didn't catch the name of the adjoining farmer, but they owned the property that goes all the way up to Presley Road. So they are in the process of restoring Coleman Creek. And I see this as destroying. When they are making restoration efforts upstream, how is that going to effect them? GGG-6

And he does not have a copy of the ERR [sic], but he will be coming to this facility to obtain one.

Thank you.

MS. DUVALL: Any other speakers?

MS. GOMES: I am Mary Gomes. I am Professor of Psychology. And one of the classes that I teach is eco psychology. I take students to the creek area as well as the native plant garden regularly. The habitat is a real asset to the campus, to students, and to the students in my classes.

I am quite horrified to hear of a vehicular bridge across the creek. And I would like to lodge my complete opposition to a vehicular bridge anywhere on the creek. III-1

Thank you.

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MR. HERNANDEZ: My name is Steve Hernandez. My address is P.O. Box 2944 in Rohnert Park, California.

I am a student here in environmental studies and planning.

In reviewing the draft EIR and the Master Plan Revision, I notice that one of the on-site project alternatives that were considered, but rejected, was the softball field here, located, I believe, south of the P.E. building. EEE-3

And it seems to me, if we look at the amount of area that the proposed Music Center will take up, you know, there, and it seems like it would make a good fit to adjacent buildings within the pro -- within the existing softball area.

And another thing that, just in noticing the design of the overall plan for the Music Center, it is this amount here of Sonoma landscape, which is actually -- I don't know if this map is drawn to scale, but if it is, it would be taking up more area than the proposed Music Center itself. EEE-4

So that seems like quite a bit of area to devote to landscaping.

I understand that, to your knowledge,

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it is going to be for mock vineyard, which, you know, is fine. But to devote that much area to that seems wasteful. EEE-5

Another reason cited in the EIR for the rejection of the softball field is that it would not allow for instructional expansion. And I believe that might be able to be located somewhere else within the University to accommodate instructional expansion. EEE-6

And it was ironic to me that we would build a proposed building berms around, you know, to reduce the noise effects of Petaluma Hill Road for the Music Center; and yet it was cited that noise would be affecting the adjacent buildings, if this softball field site was going to be used. EEE-7

So it seems like it is just another reason to spend funds to try to mitigate noise within the area.

So that's basically all I had to say. Thank you.

MR. STODDARD: Justin Stoddard, S-t-o-d-d-a-r-d. And I am a student in environmental studies here at Sonoma State.

Some of the things, I haven't had a chance to look at the EIR myself, I am not

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familiar with. I am in environmental education, so I have a little understanding of the terminologies and things involved in it. But my concern is to the length of the buffer zone they have included here with the parking lot, going right out to the creek.

In response to that, I would say there should be at least 100 to 150 feet of a buffer zone between the parking lot and the creek. Because from what I have found in my studies is that the effluents from the vehicles in the parking lots and the asphalt itself is going to cause runoff into the creek and completely alter that ecosystem, which is very important for us to maintain, protect, and restore. JJJ-1

I would like to oppose the vehicular bridge across the creek also. I feel that will add to the runoff and discharge of the fossil fuels and the other effluents into the creek. JJJ-2

One thing that I notice, as you were talking about this, is the area is not going to be developed due to the wetlands. I feel that the parking lot, once again, goes right up to the edge of the wetland area. And there is also this service road or some type of vehicular road going JJJ-3

to the side here.

If that's the case, I think there also needs to be an adequate 100 to 150 feet of buffer zone located there to protect those wetlands. And I think further investigation -- they said there were smaller pools that would be covered here. They would then restore and locate into another area. I think more investigation needs to go into looking into those pools and whether, you know -- what types of wildlife are located in those areas. Because filling them in and trying to create them in another place has often been found to be unsuccessful in restoration projects in the past. JJJ-3 Cont.

So I guess that's about all I have to say.

Thank you.

MS. ALLEN: I am Leita Allen. I am an environmental planning major also. Some of my concerns are the same. And I don't think it hurts to let you know how many of us are concerned.

I am concerned there hasn't been enough studies of the wetlands. I also oppose a vehicular bridge across the creek. KKK-1 KKK-2

I understand that there has to be a buffer, that Rohnert Park insists on a buffer between us and the Expressway. But I propose moving the parking lot and all of the buildings as close to Rohnert Park Expressway as possible. I mean right up to the inch. KKK-3

KKK-3 Cont.

I am greatly opposed to the vineyard. I feel like that is a waste of land. I would be in favor of California wild grapes being grown along there and an extension of the native plant garden. KKK-4

And let's see . . . what else.

I think that's all. Thank you.

MS. DUVALL: Any other speakers in the crowd?

If not . . .

MS. LARSEN-HENDERSON: Margot Henderson.

I am concerned about any landscaping. Vineyards are notorious for using toxic pesticides. And any landscaping that will be used in, you know, the pesticides, the runoffs that will go into the creek where the salmon are protected, the pesticide runoff. GGG-7

MR. STODDARD: Justin Stoddard again. JJJ-4

I think that one thing I would like to propose to the ESA or EIR committee would be in that area that is proposed for vineyard, I would strongly oppose also. We have plenty of vineyards in Sonoma County. They are causing enough damage to the local area. JJJ-5

And I would propose to leave that as open space and to define "open space" as an area unaltered and set aside for conservation and preservation. JJJ-6

I am also concerned with whether or not along the creek there were low traffic service roads that were included in the plan along the creek. I am not sure if that is the case. If so, I would have to oppose that too. That increases the possibility of discharge or runoff into the creeks. JJJ-7

Thanks.

MS. DUVALL: If there are no other comments, I would thank you very much and close this public hearing.

Thank you for coming.

(Hearing concluded 12:37 p.m.)

--o0o--

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)
ss.)
COUNTY OF NAPA)

I, HEIDI J. RYDER, a Certified Shorthand Reporter licensed by the State of California, and empowered to administer oaths and affirmations pursuant to Section 2093(b) of the Code of Civil Procedure, do hereby certify:

That the said proceedings were recorded stenographically by me and were thereafter transcribed by me via computer-assisted transcription;

That the foregoing is a true record of the proceedings which then and there took place;

That I am a disinterested person to said action.

IN WITNESS WHEREOF, I have subscribed my name on December 4, 1999.

HEIDI J. RYDER, CSR 10053

Page 29

CONTACT INFORMATION PROVIDED BY PUBLIC SPEAKERS:

Steve Hernandez
P.O. Box 2944
Rohnert Park, CA 94928

Margot Larsen-Henderson
29 George Street
Cotati, California 94931

Cathy Chen
8218 Windmill Farms Drive
Cotati, California 94931

Mary Gomes
Department of Psychology
Sonoma State University

Justin Stoddard
1600 Yulupa Avenue, Number 24
Santa Rosa, California 95405

B. RESPONSES TO PUBLIC HEARING COMMENTS

The responses to the comments of each individual commenter are contained below. For ease of reference, each response corresponds to the alpha-numeric designators identified in the transcripts of the public hearings.

Commenter AAA: Steven A. Norwick, Professor of Geology, Department of Environmental Studies and Planning, Sonoma State University

Response AAA-1 See response to Comments N-3 in Chapter IV of this response to comments document.

Response AAA-2 See response to Comment N-13 in Chapter IV of this response to comments document.

Commenter BBB: David L. Stokes, Ph.D., Assistant Professor, Environmental Studies and Planning, Sonoma State University

Response BBB-1 See response to Comments I-7 in Chapter IV of this response to comments document.

Response BBB-2 See response to Comment I-4 in Chapter IV of this response to comments document.

Response BBB-3 See response to Comment I-16 in Chapter IV of this response to comments document.

Response BBB-4 See response to Comment R-6 in Chapter IV of this response to comments document.

Response BBB-5 See responses to Comments I-1 through I-3 in Chapter IV of this response to comments document.

Response BBB-6 See response to Comment I-12 in Chapter IV of this response to comments document.

Response BBB-7 See response to Comment I-14 and Master Response 1 in Chapter IV of this response to comments document.

Response BBB-8 See responses to Comments I-1 through I-3 in Chapter IV of this response to comments document.

Response BBB-9 See responses to Comments I-1 through I-3 in Chapter IV of this response to comments document.

Response BBB-10 See responses to Comments I-1 through I-3 in Chapter IV of this response to comments document.

Response BBB-11 See responses to Comments I-1 through I-3 in Chapter IV of this response to comments document.

Response BBB-12 See Master Response 1 in Chapter IV of this response to comments document.

Commenter CCC: Brian Turner

Response CCC-1 See response to Comment L-11 in Chapter IV of this response to comments document.

Response CCC-2 See response to Comment N-1 in Chapter IV of this response to comments document.

Commenter DDD: Jill Fitterer

Response DDD-1 All potential impacts of the project to hydrology and water quality, and biological resources are assessed in Section IV.C, Hydrology and Water Quality, and Section IV.H, Biological Resources, respectively, in the DEIR. Implementation of Mitigation Measures C.1 through C.6, and H.1 through H.5 in the DEIR would mitigate all potentially significant impacts of construction and operation of the project to hydrology, water quality, and biological resources to a less than significant level. See also Master Response 1 (at the beginning of Chapter IV of this response to comments document). Regarding excess soil from projects on campus that has been deposited in the northern acquisition area, see response to Comment K-2 in Chapter IV of this response to comments document.

Commenter EEE: Steve Hernandez

Response EEE-1 Both the existing approved Master Plan (see Figure III-3 in the DEIR) and the proposed Master Plan revision (see Figure III-4) anticipated a parking structure off East Cotati Avenue, east of South Sequoia Way.

As discussed in the DEIR, all potential significant impacts to hydrology, water quality and biological resources associated with the proposed surface parking in the northern acquisition area would be mitigated to a less than significant level. See also Master Response 1 (at the beginning of Chapter IV of this response to comments document).

Response EEE-2 Under the proposed project, the University would acquire all necessary permits for new construction and/or maintenance of facilities within Copeland Creek (e.g., bridges, stormdrains). A compilation of this and other permits and approvals required to implement the proposed project has been added to the Project Description of the EIR. Please refer to Chapter II in this response to comments document for revisions made to the DEIR.

Response EEE-3 See response to Comment K-4 in Chapter IV of this response to comments document.

Response EEE-4 The proposed extent of landscaping for the Center for the Musical Arts is for the main audience lawn (intended for up to 3,000 patrons), an additional audience lawn area (which would accommodate up to 7,000 additional

people), sound attenuation earthen berms, and adequate buffer distance from Copeland Creek, Rohnert Park Expressway and Petaluma Hill Road.

Response EEE-5 See response to Comment I-17 in Chapter IV of this response to comments document.

Response EEE-6 See response to Comment K-4 in Chapter IV of this response to comments document.

Response EEE-7 The proposed Center for the Musical Arts is designed to avoid noise impacts on adjacent uses, and conversely, to avoid noise impacts on concert patrons from off-campus noise sources, principally traffic on Rohnert Park Expressway and Petaluma Hill Road.

Commenter FFF-1: Richard Gale

Response FFF-1 The University proposes a number of modifications to the elements of the Master Plan revision in the northern acquisition area, designed to improve the relationship between proposed development and existing natural resources on the site, and further minimize potential environmental effects. See Master Response 1 (at the beginning of Chapter IV of this response to comments document).

Response FFF-2 See Master Response 1.

Response FFF-3 The Copeland Creek Ecological Resource Protection Plan, prepared as part of the Master Plan revision, has been prepared and included in Appendix A of this document. Note that the Copeland Creek Ecological Resource Protection Plan has been amended to include in its goals and objectives the formation of an ongoing task force made up of University faculty, staff and students, and the solicitation of local agency input to develop and manage the protection plan.

Response FFF-4 Regarding potential impacts to the Central California coast steelhead, see response to Comment D-7 in Chapter IV of this response to comments document. Regarding potential impacts to the yellow-billed cuckoo, see response to Comment I-6 in Chapter IV of this response to comments document. Regarding potential impacts to the yellow warbler, see response to Comment I-7 in Chapter IV of this response to comments document. Regarding potential impacts to the white-tailed kite, see response to Comment I-11 in Chapter IV of this response to comments document.

Commenter GGG-1: Margot Larsen Henderson

Response GGG-1 See response to Comment Y-1 in Chapter IV of this response to comments document.

Response GGG-2 Regarding potential impacts to the white-tailed kite and other raptors, see response to Comment I-11 in Chapter IV of this response to comments document. Regarding potential impacts to the yellow warbler, see response

to Comment I-7 in Chapter IV of this response to comments document. See also revised Table IV.

Response GGG-3 See Master Response 1 (at the beginning of Chapter IV of this response to comments document).

Response GGG-4 See response to Comment Y-2 in Chapter IV of this response to comments document.

Response GGG-5 Comment noted. See response to Comment D-5 in Chapter IV of this response to comments document.

Response GGG-6 See response to Comment D-5 in Chapter IV of this response to comments document.

Response GGG-7 See response to Comment Z-15 in Chapter IV of this response to comments document.

Commenter HHH-1: Cathy Chen

Response HHH-1 See Master Response 1 (at the beginning of Chapter IV of this response to comments document).

Response HHH-2 See Response to Comment W-2 in Chapter IV of this response to comments document.

Commenter III-1: Mary Gomes

Response HHH-1 See response to Comment Q-1 in Chapter IV of this response to comments document.

Commenter JJJ-1: Justin Stoddard

Response JJJ-1 All potential impacts of the project to hydrology and water quality, and biological resources are assessed in Section IV.C, Hydrology and Water Quality, and Section IV.H, Biological Resources, respectively, in the DEIR. Implementation of Mitigation Measures C.1 through C.6, and H.1 through H.5 in the DEIR would mitigate all potentially significant impacts of construction and operation of the project to hydrology, water quality, and biological resources to a less than significant level. See also See Master Response 1 (at the beginning of Chapter IV of this response to comments document).

Response JJJ-2 See response to Comment JJJ-1 in Chapter IV of this response to comments document.

Response JJJ-3 See response to Comment JJJ-1 in Chapter IV of this response to comments document.

Response JJJ-4/5 See response to Comment I-17 in Chapter IV of this response to comments document.

Response JJJ-6 See response to Comment I-17 in Chapter IV of this response to comments document.

Response JJJ-7 To improve emergency access, two fire lanes are proposed within the landscaped area of the site for the Center for the Musical Arts, which would also serve as travel ways for University maintenance vehicles as well. These fire lanes would extend outside the Creek Buffer Zone, except for a small piece of the segment of the fire lane that would extend between the internal vehicular road and the special function facility. The fire lanes extending through landscape would employ either "turf-paver" or "gravel-pave" system. See Master Response 1.

Commenter KKK-1: Leita Allen

Response KKK-1 All potential impacts of the project to biological resources, including wetlands on the site, are assessed in Section IV.H, Biological Resources, in the DEIR. Implementation of Mitigation Measures H.1 through H.5 in the DEIR would mitigate all potentially significant impacts of construction and operation of the project to biological resources to a less than significant level. See also Master Response 1 (at the beginning of Chapter IV of this response to comments document).

Response KKK-2 Comment noted.

Response KKK-3 See Master Response 1.

Response KKK-4 Comment noted. See response to Comment I-17 in Chapter IV of this response to comments document.

APPENDIX A

COPELAND CREEK ECOLOGICAL RESOURCE PROTECTION PLAN

COPELAND CREEK ECOLOGICAL RESOURCE PROTECTION PLAN

The intent of this plan is to provide a basis for preservation and protection of the creek corridor so that native biodiversity can be maintained, and increased were possible. This plan addresses 1) Preservation, 2) Restoration, and 3) Operations and Management.

1 GOALS AND OBJECTIVES

The design concept for protection of Copeland Creek ecological resources is based in part on measures that have been developed for other riparian areas (i.e. the Laguna de Santa Rosa, Santa Rosa Creek) that have undergone review and input for public participants as well as resource agencies. The themes for this plan are: to maintain and enhance native biodiversity; to protect plant and animal species of concern; to preserve habitats of concern (wetlands, riparian woodlands, and aquatic habitats) and to restore native plant communities. A task force made up of university faculty, staff, and students, along with local agency input, will be formed to develop and manage this plan and will include an ongoing reviewing responsibility. The task force will set up a program to study and monitor the quality of Copeland Creek overtime; monitoring habitat and physical parameters to provide valuable information on cumulative effect of development and restoration opportunities.

1.1 PRESERVATION OF COPELAND CREEK HABITATS

The following management recommendations are designed to protect sensitive ecological resources from degradation or disturbances. Similar measures are frequently employed where urban uses interface with preservation of ecological resources (Sedway Cook Assoc., 1986; Zentner, 1988; Jones and Stokes, 1989) and have been adopted locally at the Sebastopol Laguna de Santa Rosa Park Master Plan (Hyden and Golden Bear Biostudies, 1993).

1.1.1 PRESERVATION OF THE COPELAND CREEK RIPARIAN WOODLAND

Objective: Protect and enhance existing sensitive riparian habitats.

Policy 1.1.1.1 Designate a Copeland Creek Preservation Area which corresponds with the "dripline" of the trees in the riparian woodland.

Policy 1.1.1.2 Restrict uses in the Preservation Area to scientific study, ecological enhancement and restoration.

Policy 1.1.1.3 Allow for the construction of vehicle and pedestrian bridges provided they minimize adverse impacts and mitigate for losses within the creek Preservation Area or Buffer Area.

1.1.2 BUFFER AREAS

Buffer areas minimize the potential exposure to harm (Josselyn and Buchholz, 1984: Hynson et all, 1985: OTA, 1987) and can expand or protect important habitats adjacent to wetlands.

Objective: Avoid or minimize potential adverse ecological effects to the creek preservation area.

Policy 1.1.2.1: Designate a zone originating at the top of bank and extending laterally for 150 feet (average) at a minimum as the Copeland Creek
Buffer Area. Within this buffer, no development would be allowed that does not meet the goals of this objective.

Policy 1.1.2.2: Allow the Buffer Area to be a receptor site for mitigation, including wetland creation and restoration for biological impacts generated by development activities.

Policy 1.1.2.3: Restrict uses in the Buffer Area to scientific study, ecological enhancement and restoration, so long as they are consistent with the provisions in Policy 1.1.2.2.

---

2 RESTORATION AND ENHANCEMENT PROGRAM

Develop detailed measures for implementation of the Preservation Plan.

Objective: Preserve, Restore and Enhance:
- Riparian Woodland
- Freshwater Marsh
- Vernal Pools
- Oak Woodlands
- Rare or Endangered Species

3 REFERENCES

Hyden Associates and Golden Bear Biostudies. 1993. Sebastopol-Laguna de Santa Rosa Park Master Plan. Vols. 1 and 2. Prepared for City of Sebastopol.

Hynson, R. J., P. R. Adamus, J.O. Elmer, T. DeWan and F. D. Sheilds. 1985. Environmental Features for Streamside Levee Projects. U. S. Army Engineer Waterways Experiment Station, Environmental Laboratory, Vicksburg, Mississippi.

Jones and Stokes Associates, Inc. 1989. Wetland and Riparian Mitigation Plan for the A.G. Spanos Park Development. Prepared for A.G. Spanos Development Co., Stockton, California.

Josselyn, M. and J. Buchholz. 1984. Marsh Restoration in San Francisco Bay: a Guide to Design and Planning. Paul F. ROmberg Tiburon Center for Environmental Studies. Tiburon, California. Technical Report No. 3. 103 pp.

Sedway Cooke Associates. 1986. Draft Environmental Impact Report for the Union City 511 Area General Plan Amendment and Specific Plan. Prepared for Community Development Department, City of Union City, California.

United States Congress, Office of Technology Assessment. 1987. Technologies to Maintain Biological Diversity. OTA-F-330. U. S. Government Printing Office. Washington DC

Zentner, J. 1988. Wetland Restoration in Urbanized Areas: Example from Coastal California. In: J.A. Kusler, S. Daly and G. Brooks (Eds.). Proceedings of the National Wetlands Symposium: Urban Wetlands. Association of State Wetland Managers, Berne New York. 402 pp.

APPENDIX B

ATTACHMENT TO COMMENT LETTER CC

Sonoma State University-Facility Services
Attn: Debra DuVall-Director of Planning
1801 East Cotati Avenue
Rohnert Park, CA 94928

9/30/99

Re: Sonoma State's Master Plan and EIR

Dear Ms. DuVall, as per our telephone conversation, County Planning staff Bob Geiser has suggested I forward to you the enclosed materials related to Rohnert Park's proposed General Plan and existing regional traffic impacts.

Because of the existing severe traffic impacts in the Penngrove environs please have this information considered in the University's Master Plan and EIR.

Thank you for your consideration.

Respectfully, Rick Savel (Chairman)

Penngrove Area Plan Committee
PO Box 227
Penngrove, CA 94951-0227
707-795-4326
Email# books@sonic.net

City Of Rohnert Park-Ad Hoc General Plan Oversight Committee 9/21/99
6750 Commerce Blvd.
Rohnert Park, CA 94928

Re: **County of Sonoma adopted regional traffic circulation plans and policies**

In 1984 the Penngrove Specific Plan was adopted and set policies on land use and regional traffic impacts with projections to the year 2000. Traffic impacts were considered and evaluated for north/south access to Petaluma Hill Rd. resulting from Hwy. 101 being widened to only six lanes to the south (1990) and Rohnert Park and the Hewlett Packard plant to the north (1995).

The EIR for Hewlett Packard indicated that major traffic impacts would occur once the plant reached 6000 employees in 1995 and assumed that that all of the circulation improvements proposed in the County General Plan would take place. An updated EIR was required by Rohnert Park before the plant could exceed 6000 employees. At that time Rohnert Park and Hewlett Packard were to contribute to the cost of improvements to mitigate offsite traffic impacts to County roads.

Planning, Public Works and the Penngrove Committee identified, studied and evaluated 6 mitigation alternatives to be implemented as traffic impacts increased to year 2000. Staff recommendation #1 from the Penngrove Plan was adopted in the 1989 General Plan and the four lane designation was removed from Petaluma Hill Rd. However, since 1989 the traffic "LOS" at the Adobe Rd./Petaluma Hill Rd. intersection in Central Penngrove has become unacceptable and experiences far higher traffic impacts than the year 2000 projections for the following reasons;

1) Hwy. 101 was not widened to six lanes and growth in Sonoma County.
2) The Hewlett Packard plant workforce remained below 6000 employees. A circulation alternative along with improvements to Railroad Ave. and the "proposed south Bodway extension" was not completed.
3) The east/west traffic on Adobe Rd. is now at 300% of the year 2000 projection. It's anticipated that there will be another 600+ cars per day, per year hereafter without considering Rohnert Park's new General Plan.

During peak commute, the combination of the east/west and the north/south traffic to Petaluma Hill Rd. compromises the Fire Dept. and Paramedic services, the school, Post Office and other businesses on Main St. The Highway Patrol is working with Penngrove in areas where commuters use residential streets at high speeds, there has already been a child hit and run on Woodward Avenue and many other close calls.

Supervisor Kerns has authorized the Penngrove Area Plan Committee to hold town meetings to reach consensus on which mitigation alternative will be implemented to relieve the traffic impacts now being experienced. Based on recent Committee reviews and staff input alternatives #1 - 3 are not viable. Penngrove's prefered 1984 alternative was #5 combined with the Railroad Ave./Hwy 101 interchange and the Bodway extension. Alternative #5 combines the use of diverters and restraints to channelize northbound traffic from Main St., southbound diverters will be considered as traffic increases.

Public Work's prefered alternative is #4 which would use diverters and restraints to channelize northbound traffic from Main St., southbound diverters will be considered as traffic increases. Alternative #4 would provide a parallel arterial to the Bodway extension and connect Redwood Hwy. to E. Cotati Ave. to tie into Rohnert Park's internal circulation plan. Both alternatives #4 and #5 require the Bodway extension. As per the staff recommendations in the adopted plans for alternatives #4 and #5 the required improvements to align the Adobe Rd. and Penngrove Ave. intersections with Redwood Hwy. are under construction at this time.

Although north/south regional traffic impacts were evaluated in the 1984 plan the increase of the east/west Adobe Rd. traffic was not considered. Public Works will be conducting a study to consider a new roadway north of Penngrove from Corona Rd. to Railroad Ave. It is anticipated that there will be opposition to this roadway alternative for the following reasons;

1) Estimated cost of $15 million dollars, the study will produce the final cost estimates.
2) The ranching, farming and environmental communities will not supprort it.
3) A new roadway within the Sonoma Mountain Plan could be growth inducing.

In considering the selection of a circulation alternative Penngrove intends to shift the north/south traffic west to provide;

1) Traffic impact relief to Main St., emergency services, and traffic safety controls in Central Penngrove.
2) Channelize and relieve the access to Petaluma Hill Rd. to favor the Adobe Rd. east/west regional traffic.
3) North/south circulation and coordination with Rohnert Park's proposed General Plan and development.

While attending Rohnert Park's 9/7 Council-Commission meeting I examined the General Plan Diagram - Figure 2.2-1. Although the Bodway extension is shown on the map there was discussion of it's removal from the plan. Additionally, the diagram depicts a proposed widening of Petaluma Hill Rd. from to 4 -6 lanes. The comments indicated that it is anticipated the improvements would be funded by developers.

The Board of Supervisors has recommended that Rohnert Park extend the city limit to Petaluma Hill Rd. and maintain the "LOS" on that roadway. However, it is clear that they did not intend for Petaluma Hill Rd. to be widened and that the "LOS" on that roadway is to be maintained in the context of a 2- lane configuration while using a circulation alternative for local traffic as consistent with the EIR and adopted County plans and policies with respect to traffic impacts in the subject areas.

The city proposes to annex lands adjacent to the the Hewlett Packard plant to the east and north. The resulting traffic impacts generated by development in that region, the circulation alternatives and required roadway improvements have already been identified and well documented in the 1984 EIR and the adopted County plans. Rohnert Park proposes a build-out in excess of 4000 units over the next 20 years. PRMD environmental staff estimates each new unit equals an additional 10 trips per day on the roadways. Rohnert Park's proposed general plan will be adding an additional 40,000 trips per day.

The Penngrove Area Plan Committee respectfully submits to the City of Rohnert Park that we would appreciate the opportunity to support the city's General Plan with a coordinated circulation plan.

However we believe that the current proposal of a transportation element that disconnects the Bodway extension as identified in the EIR, the adopted County plans, policies and regional circulation alternatives combined with the substitution of widening Petaluma Hill Rd. from to 4 -6 lanes is not supportable by Penngrove, the residents of unincorporated areas outside of Penngrove or the 30,000+ commuters that travel through this area daily.

In the effort to support the city's General Plan we recommend the following to be taken into consideration by the Ad Hoc General Plan Oversight Committee;

1) Retain the "proposed south Bodway extension" in the General Plan to coordinate with regional circulation.
2) Removal of the 4 -6 lane designation depicted for Petaluma Hill Rd.
3) Rohnert Park work with the developers to contribute to the cost of improvements to mitigate offsite traffic impacts to the other County roads identified in the regional circulation plans.
4) Do not allow any direct roadway access to Petaluma Hill Rd. between Railroad Ave. to E. Cotati Ave.

I know it is always a great source of laughter whenever I suggest that goverments work as a unified whole. However these circulation improvements will effect four jurisdictions; Petaluma, Cotati, Rohnert Park and the County of Sonoma. Penngrove and 30,000+ commuters have waited 15 years for these improvements and we believe that Rohnert Park's General Plan process could be an great opportunity to coordinate and make a real difference in this region!

Thank you for your consideration!

Respectfully, Rick Savel (Chairman)

Penngrove Area Plan Committee

County Road Standards are included as "Exhibit B" in the appendix. All reconstruction and new roads will adhere to these standards and the County Subdivision Ordinance. As the community considers sidewalks to be an unwanted urban intrusion, the sidewalk requirement is waived for most residential developments. They are required for any residential or commercial development along Main Street. Projects within the sewer district boundaries on Petaluma Hill Road and Adobe Road shall provide pathways as a substitute for sidewalks.

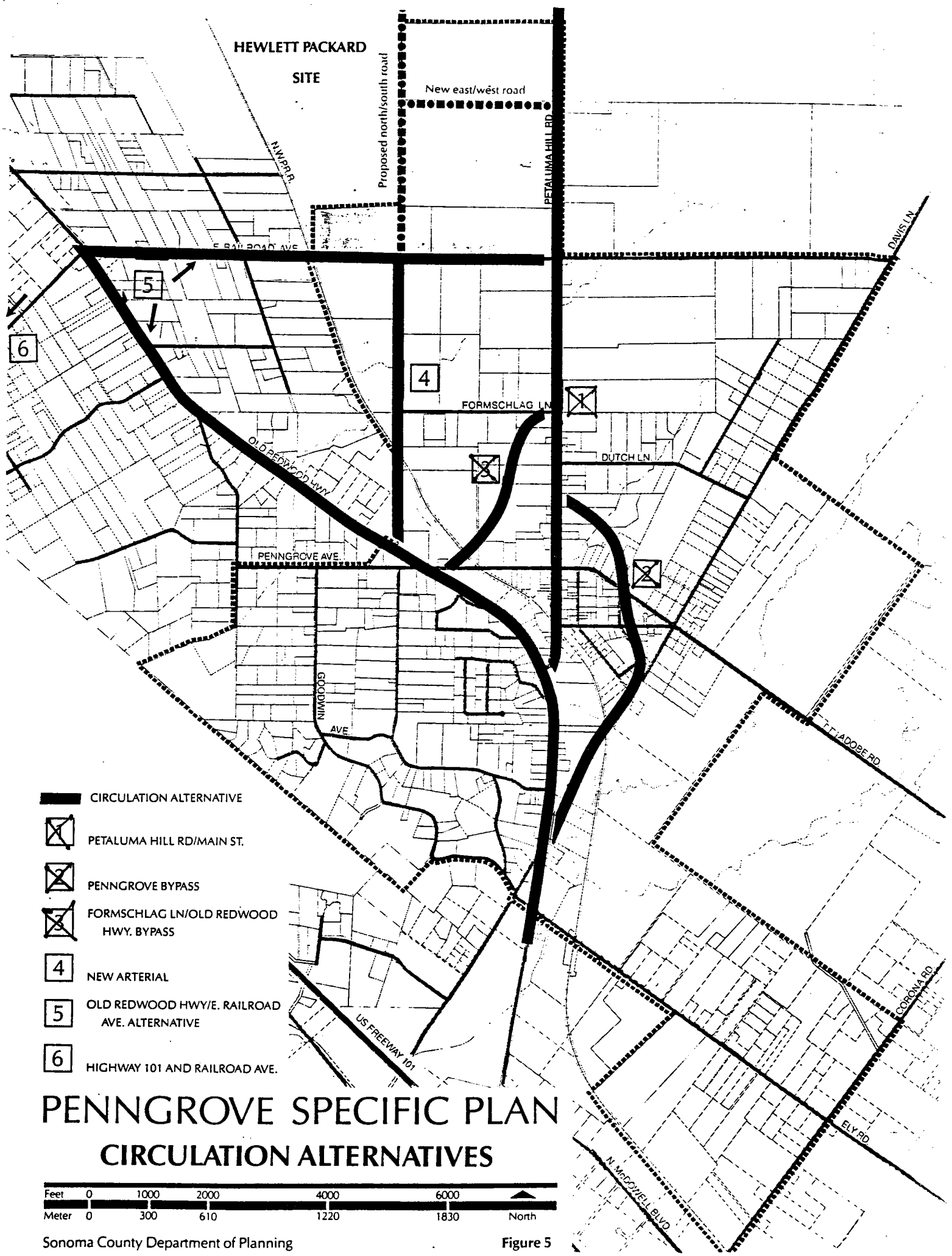
5.22 Traffic Impacts of the New Hewlett-Packard Facility

The Hewlett-Packard plant, now under construction, at full capacity will have substantial traffic impacts on roads in the Penngrove environs, as indicated in Table 5-2. Two new road connections will be constructed as part of the new Hewlett Packard development in Rohnert Park. An east/west road will connect the plant site to Petaluma Hill Road and a north/ south road will tie East Cotati Avenue into East Railroad Avenue. Both roads will have a 116 foot right-of-way. (Figure 5) The east/west road will be four lanes and will require traffic signals and a left turn lane on Petaluma Hill Road by 1985. The north/south road will be three lanes, with a continuous left turn lane. Signalization will be required at the Petaluma Hill Road-East Railroad Avenue intersection by the year 2000. The City of Rohnert Park's conditions of approval require Hewlett Packard to pay for the necessary improvements.

Hewlett-Packard originally proposed 12,000 employees on the site and the project EIR is based on that figure. The maximum plant site approved by the City was 8,000 with an updated EIR required before the plant can exceed 6,000 employees. The City reserved the right to impose additional conditions when the plant reaches 3,000 employees. Proposed phasing is as follows:

YEAR	EMPLOYEES
1983	600
1985	1,200
1989	2,300
1990	3,000
1993	4,500
1994	5,400
1995	6,000
1996	6,900
1997	8,000

The EIR foresees the major traffic impacts occurring once the Hewlett Packard workforce reaches 6,000 employees. Projected traffic impacts are indicated in Table 5-2. The EIR assumes that all of the circulation improvements proposed in the Sonoma County General Plan will take place. Descriptions of roadway "level of service" ratings are shown in Table 5-3.



PENNGROVE SPECIFIC PLAN

CIRCULATION ALTERNATIVES

Sonoma County Department of Planning

Figure 5

5.23 PETALUMA HILL ROAD ALTERNATIVES

*see staff recommendation *1 page 46

Petaluma Hill Road is ~~proposed~~ in the General ~~Plan to be widened to four lanes~~ to provide a north/south route parallel to Highway 101, which would be widened to six lanes. When the Sonoma County Transportation Study was done, this alternative was selected over an alternative of eight lanes on Highway 101 due to constraints in Petaluma and Santa Rosa which require a six lane highway and parallel routes. The report noted that there would be substantial rural impacts, especially on Penngrove, and that the route could create additional growth pressures. As part of the specific plan process, staff and the Public Works Department worked with the Citizen's Advisory Committee to find an alternative solution. Six potential routes were identified and are illustrated in Figure 5. Preliminary cost estimates and impacts were analyzed for each route.

Alternative 1 - Petaluma Hill Road

The County owns a right-of-way with a total width of 60 feet through Penngrove. A four lane road would consist of four traffic lanes with each 12 feet wide, two bike lanes four feet wide, and two four-foot sidewalks. Total cost would be approximately $700,000. While this would provide the most direct route, it would have the greatest social impacts and would significantly affect the business district. This is the route designated on the General Plan.

Alternative 2 - Bypass east of Penngrove

While this is shown as an alternate route in the Sonoma County Transportation Study, new homes have been constructed within the proposed route alignment. The road would disrupt existing roadways and parcels and create substantial environmental and social impacts. The estimated cost would be $1.5 million. This is no longer a viable alternative.

Alternative 3 - Formschlag Lane/Old Redwood Highway

The route is indirect, the future intersection alignments are clumsy, and the route would not divert traffic without traffic diverters in the core area. Environmental constraints include a flood plain and creek crossing. The estimated cost is $500,000.

Alternative 4 - New road from Old Redwood Highway to East Railroad Avenue

This would provide a direct route to the Hewlett Packard site and could be designed to tie into the internal circulation system of Rohnert Park. Signalization would be required at the intersection of this road with East Railroad Avenue and at Old Redwood Highway. Total cost would be around one million dollars. This road would provide an attractive alternative in terms of travel

time for trips with a destination at the Hewlett Packard plant and would affect a relatively low-density area. Constraints include an archaeological site, flood plain, and creek crossing. The project could have growth inducing impacts.

Alternative 5 - Old Redwood Highway and East Railroad Avenue

This is the longest route and would require the use of traffic diverters in Penngrove. The Cotati area could be adversely affected by this alternative.

Alternative 6- Highway 101 to East Railroad Avenue and West Railroad Avenue

Substantial improvements would be required to Railroad Avenue and a new on-ramp would have to be constructed. Estimated cost is $2.5 Million. State funding is required from Caltrans and timing could be a problem.

A petition with approximately 800 names was submitted opposing the first five alternatives. If the County wishes to retain a parallel route, Alternative 4 would be the most attractive route.

Alternatives 3 through 6 would require a General Plan Amendment and environmental review. Improving the Highway 101 corridor, the Railroad Avenue interchange, and Railroad Avenue could divert traffic from central Penngrove and help retain the rural character of the community. This should be further studied as the preferred route.

Recommendations *amended to two lane designation in the 1989 General Plan

1. Initiate a study to determine the effects of an amendment to the Circulation Element of the General Plan which would remove the four-lane designation for Petaluma Hill Road.

2. Work with Hewlett-Packard and the City of Rohnert Park to have the company contribute to the cost of mitigating off-site impacts on County roads and any improvements which may be necessary to the Railroad Avenue interchange.

3. Most of the roads within the study area are designated as scenic corridors. Road projects shall be designed to retain the basic rural character of the roads.

References:

Sonoma County General Plan, Sonoma County Department of Planning, 1979

Sonoma County Transportation Study, Technical Report, Phase 1-4, September 1974-December 1975.

Larry Pollard, P.E., Sonoma County Department of Public Works

COUNTY OF SONOMA
DEPARTMENT OF PUBLIC WORKS

117A ADMINISTRATION BUILDING
575 ADMINISTRATION DRIVE
SANTA ROSA, CALIFORNIA 95401

DONALD B. HEAD
DIRECTOR OF PUBLIC WORKS

AREA CODE (707)
ROADS - - - - 527-2231
TRANSPORTATION 527-2231
SANITATION - 527-2351
REFUSE - - - - 527-2974
WASTEWATER
OPERATIONS - - 527-2351

DATE: March 22, 1983

TO: Sheila Lee, Planning Department

FROM: Larry Pollard, Public Works Department

SUBJECT: Penngrove Traffic Alternatives

Alternative 1

Petaluma Hill Road may be the most direct route to the new Hewlett Packard plant but it will cause numerous traffic problems in the Penngrove environs. The County owns a right of way with a total width of 60 feet through Penngrove. The right of way lines exist almost from door to door of the "downtown" businesses. A four lane roadway would consist of four lanes 12 feet wide and two bike lanes four feet wide for a total width of 52 feet. This will allow a four foot wide sidewalk on each side of the roadway. The ultimate capacity of this road would be about 36,000 vehicles per day.

Currently our department receives many complaints of speeders through the core district despite the 25 m.p.h. speed zone. Traffic problems will only increase as traffic volumes increase. Total costs for the construction between Old Redwood Highway and Adobe Road would be in the neighborhood of $700,000. The total impact upon the core district is unknown since most of the negative impacts would be social impacts.

Alternative 2

A new road to the east of the core area would disrupt existing roadways and existing parcels. I do not consider this a viable alternative. Purchase of right of way and construction costs would be unreasonable.

Negative impacts would be from environmental, social and actual construction concerns. Total costs would exceed 1.5 million dollars.

Alternative 3

The Formschlag Lane/Old Redwood Highway by-pass does not have any attractive values. The route would be indirect , the future intersection alignments are clumsy, the route would not divert traffic without traffic diverters in the core area and there are many environmental concerns. The costs would be over $500,000 for this alternative.

Alternative 4

The new road from Old Redwood Highway to East Railroad Avenue is the most favored alternative. This new road will provide a direct access from Old Redwood Highway to the Hewlett Packard proposed north/south road.

Changes in the road system will consist of about nine tenths of a mile of a new road, realignment of Penngrove Avenue and Adobe Road at Old Redwood Highway intersections, signalization of the Penngrove Avenue/Old Redwood Highway intersection and signalization of the new road/East Railroad Avenue intersection. The total cost of this proposal would be around one million dollars.

The attractiveness of this alternative is that the Penngrove core area is bypassed with a more direct route, traffic is diverted through a nonresidential area and proper intersection alignments can be achieved. This alternative has a low impact on existing homes. The road should be designed without any access from adjoining parcels. This would reduce any growth potential while maintaining a maximum level of service on the roadway. The new road would impact an existing flood plain and creek but these impacts should be able to be mitigated. The Cotati Hub, Petaluma Hill Road and Penngrove will all benefit from this alternative with reduced traffic growth pressures.

Alternative 5

The useage of Old Redwood Highway and East Railroad Avenue is the least expensive in construction dollars, the longest route and impacts existing residential areas.

In order to alleviate traffic problems in the Penngrove core, some type of traffic diverters or restraints would have to be built. Assuming this is accomplished three things may happen; East Railroad Avenue would take a great percentage of the traffic through its residential area, Adobe Road will experience some increase in traffic and speeds despite the school zone and the skewed intersection with Old Redwood Highway, and the Cotati Hub may experience larger traffic volumes from those that chose to use the Highway 101 to Cotati route.

Overall, Alternative 4 seems to be the best route with the greatest benefit to the Rohnert Park/Cotati/Penngrove area for future flow and control of traffic.

If you have any other questions, please feel free to contact me.

DONALD B. HEAD
DIRECTOR OF PUBLIC WORKS

Larry Pollard, PE
Traffic Engineer

LP:js

Attn: Vicki Hill-General Plan Coordinator
City of Rohnert Park
6750 Commerce Blvd.
Rohnert Park, CA 94928-2486
(707) 588-2226

11/10/99

Re: Agency review of Rohnert Park's proposed General Plan and EIR

County of Sonoma adopted traffic circulation plans and policies with respect to Rohnert Park's proposed General Plan. Please refer to sheet #1 in the reference packet figure 4.1-1 "Master Street Plan." The city proposes to annex a portion of Petaluma Hill Rd., into the city limit, from Rohnert Park Expressway to Valley House Drive and superimpose a widening of 4-6 lanes.

a) The "Master Street Plan" depicts a widening on Petaluma Hill Rd. to 4-6 lanes from 1,500 feet north of Keiser all the way to south of Railroad Ave. which is far beyond the proposed city limits into the County's jurisdiction.

b) Petaluma Hill Rd. is a two lane designation in the So. Co. General Plan, not 4-6 lanes.

Penngrove is entering into town meetings to review traffic circulation alternatives #4, #5, and #6 from the adopted Area Plan for north/south traffic relief. This is being considered to relieve the east/west Adobe Rd. traffic which is 300% of the year 2000 projection and has now surpassed the north/south traffic volume. Facility improvements at the intersections of Redwood Hwy., Adobe Rd. and Penngrove Ave. are now underway at a cost of $750,000.- These improvements are consistent with the staff recommendations for the circulation alternatives from the adopted Area Plan.

c) The Penngrove Area Plan policy states; evaluate alternative routes for the Petaluma Hill Road arterial which would **divert traffic around central Penngrove**.

The city proposes to route traffic, "**into central Penngrove**" with a 4-6 lane widening, tapering into two, which is inconsistent with the Penngrove Area Plan circulation alternatives and the facility improvements already under construction at this time. The EIR also states that; there is some disagreement as to how the widening would affect the segments to the north and south where the road would narrow from four to two lanes.

The city's engineer has made it very clear that he needs control of Petaluma Hill Rd. and that the widening of that roadway is required to maintain the "level of service" for the city's General Plan. One mitigation noted in the EIR would be: to widen Petaluma Hill Rd. to four lanes through central Penngrove to maintain the "level of service." The minimum right of way for 4 lanes is 86', the existing right of way on Main St. in central Penngrove is **60' at 0' clearance to the buildings in the historical district**.

Refer to the information already made available to the ad hoc General Plan Oversight Committee on 9/21 and the City Counsel as referenced in the draft EIR. Circulation alternatives related to the projected traffic impacts of the Hewlett Packard development in the subject area have already been identified and documented in the 1984 EIR and adopted County Plans.

My recommendation, with respect to Petaluma Hill Rd., Penngrove and the city's plan, is that the city of Rohnert Park come into "**regional compliance**" with the adopted circulation plans and policies of the County of Sonoma and operate in a coordinated manner.

(Sheet 2) Adobe Rd., Petaluma Hill Rd., and Main St. intersection configurations and "level of service" evaluations **from the 1999 analysis**. Note the "level of service" evaluations for the various lane configurations by the year 2005.

#1 shows the existing lane configuration in the intersection and depicts the "level of service", based on the existing 1998 "PM peak hour volumes", and the delay in seconds. Only #4 and #5 began to meet the "level of service" evaluation for the year 2005 but **required the removal of homes along Adobe Road**.

(Sheet 3) Table depicting the existing 1998 "PM peak hour volumes" at the intersections of Adobe Rd., Petaluma Hill Rd. and Main St. in Penngrove. These existing "PM peak hour volumes" were projected through the year 2005.

(Sheet - 4) Modeling results for the city's level of service evaluation as produced by their consultant. Bear in mind Rohnert Park's General Plan suggests that an additional 70,000 trips will be added to the regional roadway systems and the traffic model depicts the "PM peak hour volume" to roadways in the subject areas at full buildout by year 2020.

(Sheet - 3) Note that the existing "PM peak hour" volume for the intersection in Penngrove indicates a 1998 existing northbound count of 1457 that will be 1716 by the year 2005.

(Sheet - 4) Compare the projected, "PM peak hour" volume in Penngrove, with the city's traffic model. The lower right corner shows the "PM peak hour" volume northbound on Petaluma Hill Rd., leaving Penngrove, at a count of 1610, at full General Plan buildout, by the year 2020.

The city's modeling assumptions would suggest that; an additional 70,000 trips to the regional roadway systems will result in **less traffic** in the intersection in Penngrove **by the year 2020**, than we will have by the year 2005 without the city's General Plan buildout.

(Sheet - 4) Note the southbound "PM peak hour" volume, south of Railroad Ave., of 1905 at full General Plan buildout by year 2020.

Now take the following into consideration; typically, south of Railroad Ave., the southbound Petaluma Hill Rd. "PM peak hour" volume is 40-50% of the northbound "PM peak hour volume." Please note the city's traffic model suggests that this is no longer the case on Petaluma Hill Rd. south of Railroad Ave? Further, as we look to the west, the modeling suggests that this is not the case on Redwood Hwy., or Hwy. 101 as well?

The city's modeling assumptions would suggest that; traffic circulation **will be reversed by the year 2020**, and that southbound "PM peak hour" volume in the region will surpass northbound "PM peak hour" volume.

(Sheet - 4) Note that there is no "PM peak hour" volume depicted for **Railroad Ave. east of Petaluma Hill Rd**. This "PM peak hour" volume must also be incorporated into the traffic model. Also note that **Roberts Road and the East Canon Manor roads are missing from the model altogether**? These roadways and "PM peak hour" volume values must also be incorporated into the traffic model.

Traffic modeling is reliant on the roadway assumptions given to the consultant. The "PM peak hour volumes" are greatly the result of those roadway assumptions and determine the "level of service" on the roadways.

(Sheet 5) Section 4.3 of city's EIR transportation element. Under the heading: Existing roadway conditions; read the first line of the last paragraph. Turn over to next page, read from the second line.)

LIST OF ROADWAY MODELING ASSUMPTIONS

Re: information for consideration regarding the "modeling assumptions and calibration" in the preparation of Rohnert Park's EIR and "LOS evaluations."

The model used for the evaluation was the 1995 SCTA model. The model was run in 1997 and was calibrated to the transportation element CT-6g from the 1989 Sonoma County General Plan.

The CT-6g "existing roadway network" modeling assumptions made by the consultant are;

a) Hwy. 101 - 6 lanes (includes a "directional 1-way HOV lane")
b) Redwood Hwy. - 4 lanes from Hwy. 101 to Cotati
c) Ely Road - 4 lanes from Redwood Hwy. to Casa Grande.
d) Petaluma Hill Road - 2 lanes from Penngrove to Santa Rosa
e) Adobe Road - 2 lanes from Frates Rd. to Redwood Hwy.

In part, these roadway assumptions may explain the conflict between, the existing "PM peak hour volumes" and the factual data we have, vs. the city's modeling results which were calibrated for an "existing roadway network" with roadway improvements, that do not exist.

The modeling assumptions and calibration determine the "PM peak hour volumes"
The "PM peak hour volumes" determine the "level of service evaluations."
The "level of service evaluations" in the city's plans are based on assumptions that are not real.

The question is, what effect will there be, to the Petaluma Hill Rd. "level of service" when the current "existing roadway network" data is calibrated and run on the model.

In my opinion, when properly calibrated, using the correct existing roadway configurations, the model may reflect a "PM peak hour" volume of well over 3000 cars northbound from the Petaluma Hill Rd. intersection in Penngrove. Additionally, when this correction is carried through northbound, on Petaluma Hill Rd., the model will also reflect, different "PM peak hour" volumes and "level of service" evaluations along that roadway.

These are exactly the type of assumptions that were made in Penngrove's Plan 15 years ago about Hwy. 101 widening, that have put us in the position, we are in today, and it's a mistake that we cannot afford to make again. By any measurement, we are already in a damage control situation at best.

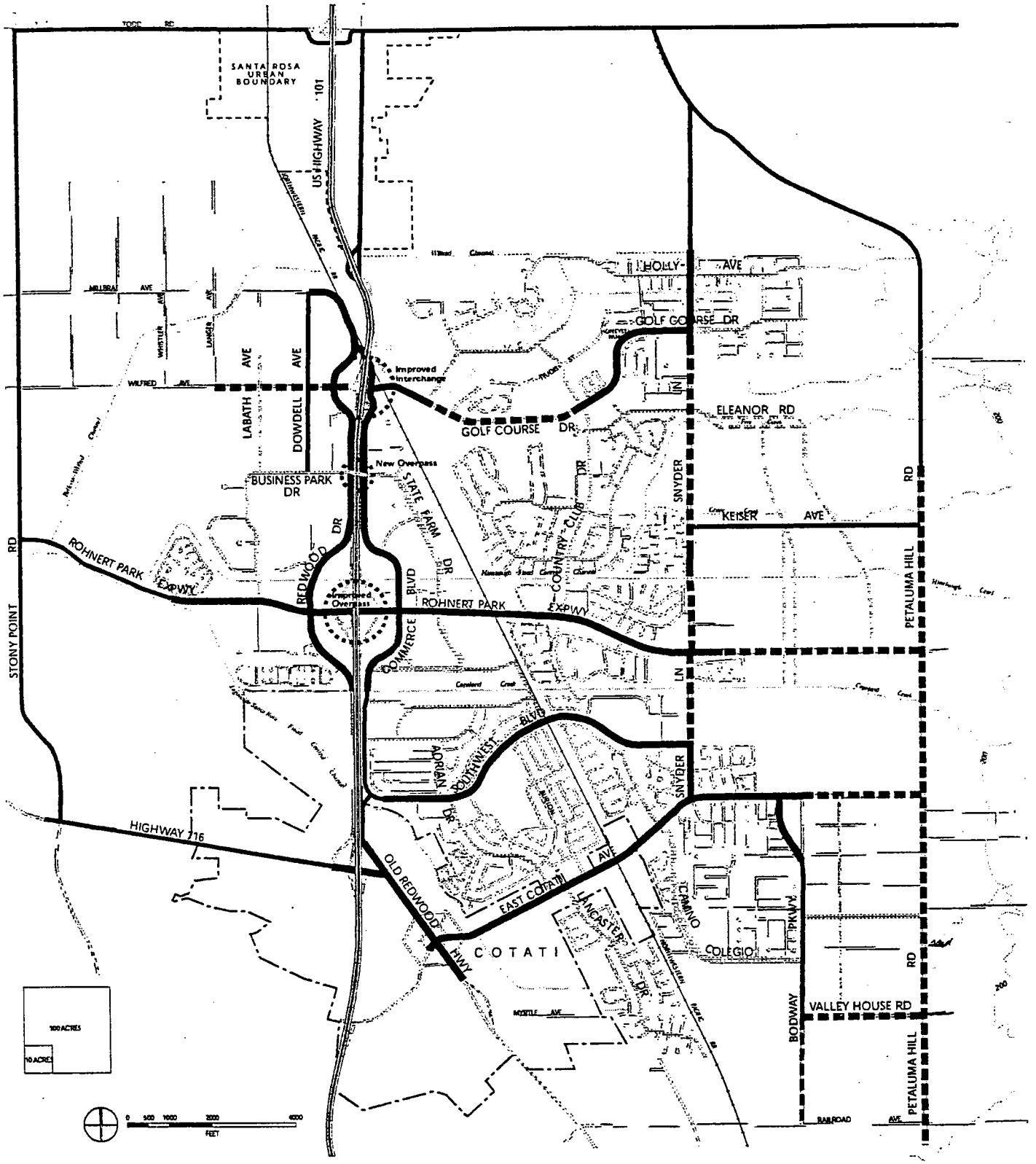
Thank you for your consideration.

Rick Savel, vice chairman
ad hoc Penngrove Area Plan Advisory Committee
P.O. Box 251; Penngrove, CA 94951
E-mail Soenke@sonic.net

cc: all interested agencies and individuals

Enclosures:

1) Figure 4.1-1 Master Street Plan.
2) Adobe Rd., Petaluma Hill Rd., and Main St. intersection configurations and "level of service" evaluations from the 1999 intersection analysis.
3) 1998 "PM peak hour volumes" at Adobe Rd., Petaluma Hill Rd., and Main St. intersection.
4) Rohnert Park year 2020 projection "PM peak hour volumes" at full General Plan buildout.
5) Section 4.3 of Rohnert Park's EIR transportation element.
6) Existing "ADT" data of record from the Sonoma County Department of Transportation.
7) Draft mitgation needs assessment recommendations from So. Co. Dept. of Transporatation.
8) Conceptual drawings of roadway circulation alternatives related to Petaluma Hill Rd.



EXISTING PROPOSED

- Major Arterial (4 or 6 lanes)
- Minor Arterial (2 lanes)
- Major Collector (4 lanes)
- Minor Collector (2 lanes)

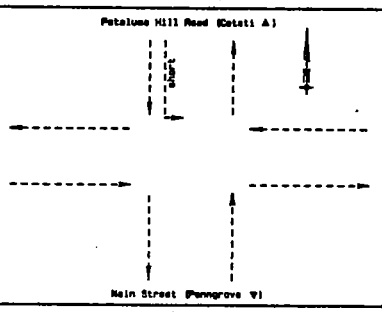
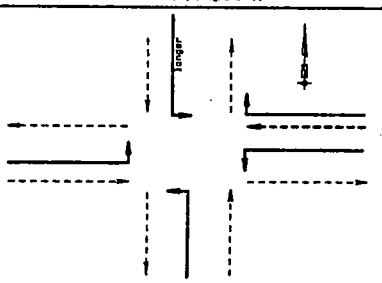
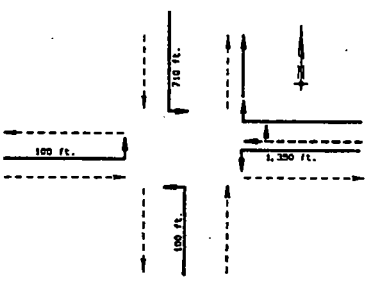
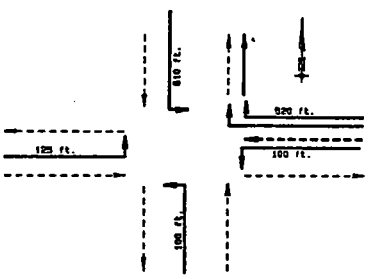
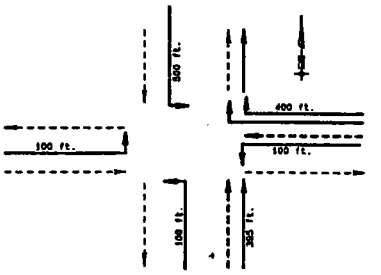
Figure 4.1-1

Master Street Plan

Urban and Regional Planners

ADOBE ROAD AT PETALUMA HILL ROAD INTERSECTION DESIGN CONCEPTS

Each year since 1985, the traffic on Adobe Road has been increasing by 600 vehicles per day. Assuming that traffic continues to increase at this same rate in the future, the time that vehicles will be delayed is estimated to be as shown below.

Concept Number	Lane configuration with turn lane storage length	Delay to traffic in seconds - 1998 volumes P.M. PEAK	Expected delay at intersection after improvements have been completed (2005 ±) P.M. PEAK	Funding availability
1 Existing lane configuration		LOS F 186 seconds	Not Applicable	Not Applicable
2		LOS D 49 seconds	LOS F 118 seconds	No
3		LOS C 32 seconds	LOS F 112 seconds	No
4		LOS C 21 seconds	LOS D 42 seconds	Possibly
5		LOS B 13 seconds	LOS B 16 seconds	Yes

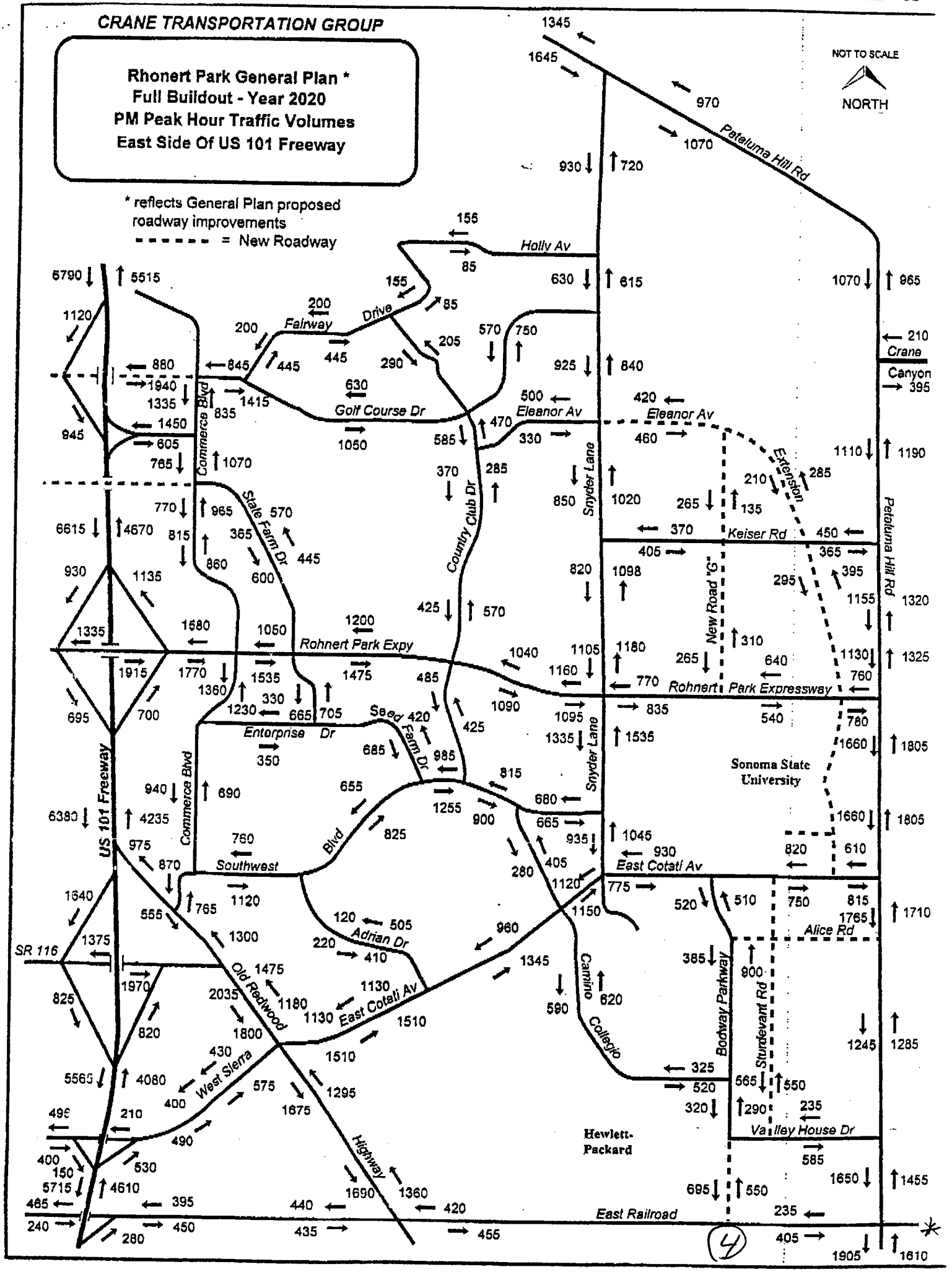
Intersection of
Adobe Road and Petaluma Hill Road/Main Street
Evening Peak Hour Volumes
for
Level of Service Evaluation

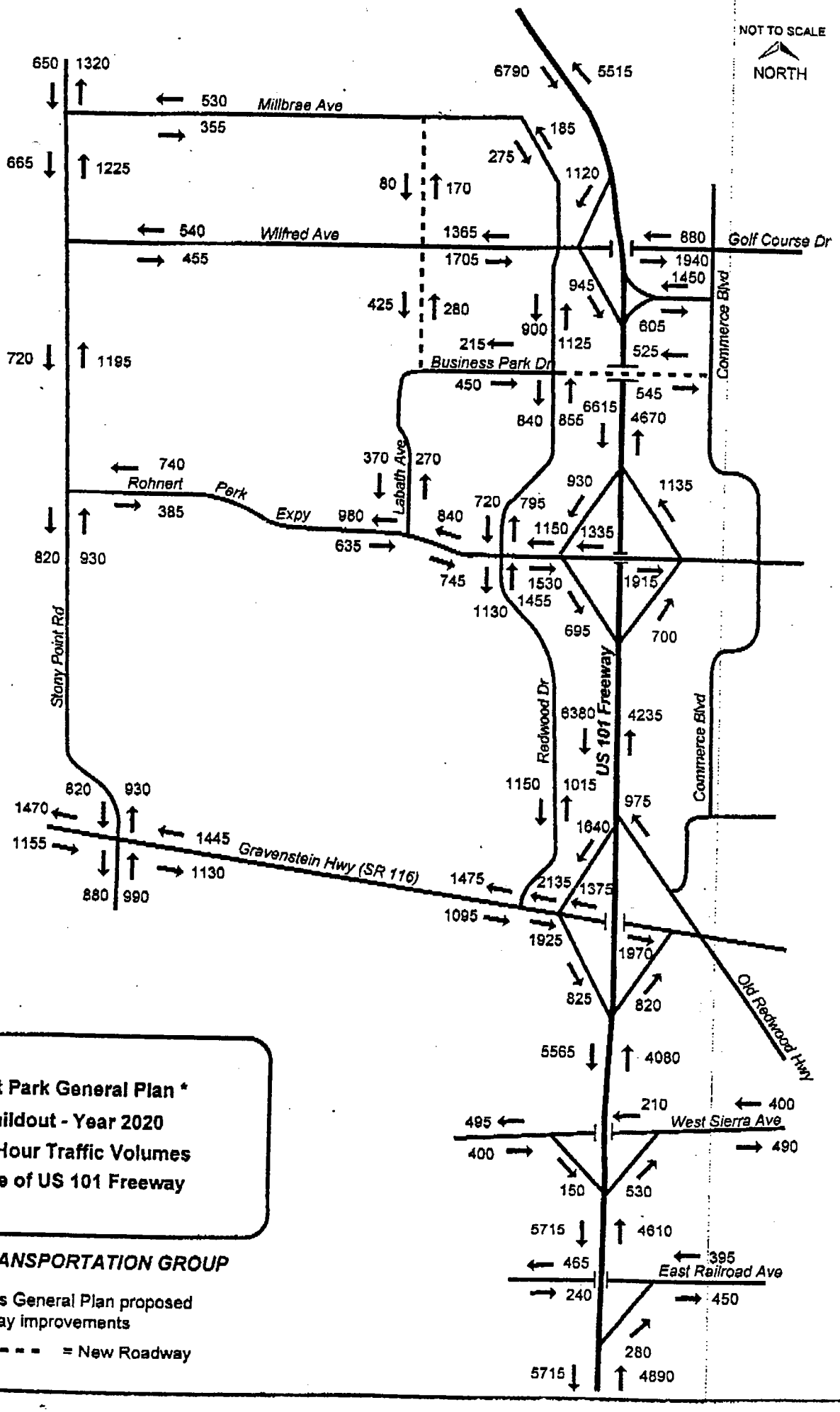
	Current (1998)	Future (2005)
SB Left (L)	354	425
SB through (T)	304	365
SB Right (R)	18	20
EBL	47	52
EBT	97	116
EBR	28	31
NBL	9	10
NBT	660	726
NBR	14	15
WBL	8	9
WBT	182	364
WBR	750	938
Total northbound PM peak hour volumes	**1457**	**1716**

CRANE TRANSPORTATION GROUP

Rhonert Park General Plan *
Full Buildout - Year 2020
PM Peak Hour Traffic Volumes
East Side Of US 101 Freeway

* reflects General Plan proposed roadway improvements
- - - - - - = New Roadway





Rohnert Park General Plan *
Full Buildout - Year 2020
PM Peak Hour Traffic Volumes
West Side of US 101 Freeway

CRANE TRANSPORTATION GROUP

* reflects General Plan proposed roadway improvements

- - - - - - - = New Roadway

4.3 TRANSPORTATION

ENVIRONMENTAL SETTING

Rohnert Park's street network—including existing streets, roadway improvements, and new street—is shown on Figure 4.1-1. US 101 bisects the city and serves as the main connection to cities to the north and south. Petaluma Hill Road and Stony Point Road are partially used as bypass routes for trips between Santa Rosa and Petaluma. State Route (SR) 116 connects Rohnert Park with Sebastopol and the Russian River area to the west, with Petaluma to the south, and the wine country to the east.

In addition to regional streets, Rohnert Park has a hierarchical street system of City streets—characteristic of post-war suburban development—which separates fast-moving through-traffic from slow-moving local traffic. Arterial and collector streets provide circulation between and through neighborhoods, activity centers, and highways and other regional routes, and are characterized by higher traffic volumes and speeds and fewer curb cuts. In contrast, local streets have lower traffic volumes and speeds and provide curb cuts for most adjacent sites.

Level of Service Standards

The standard used for evaluating traffic flow is called level of service (LOS), which is a grade level assigned to volume/capacity ratios. As shown in Table 4.3-1, roadway LOS describes the quality of flow, ranging from free flow (LOS A) to extreme congestion associated with over-capacity conditions (LOS F). Table 4.3-2 shows LOS standards for intersections, which measures the degree of delay at intersections.

Existing Traffic Conditions

Traffic in Rohnert Park flows relatively smoothly along most street segments. Although traffic has increased over the course of the City's 45-year history, in conjunction with new development, most streets in Rohnert Park were designed with excess capacity and have been able to absorb the traffic increases. The fact that most streets have a low traffic level suggests that the roadway system can accommodate additional traffic volumes without significant increases in delay in most places.

A traffic model of the existing roadway network was conducted in September 1997, and found that Petaluma Hill Road was the only roadway with LOS D or worse. Segments along the length of Petaluma Hill Road from Crane Canyon Road to East Cotati Avenue, had an LOS of D or E. Traffic segments operating at LOS C were:

- Commerce Boulevard, between Old Redwood Highway and Southeast Boulevard;
- Snyder Lane, between Keiser Avenue and Rohnert Park Expressway.

5

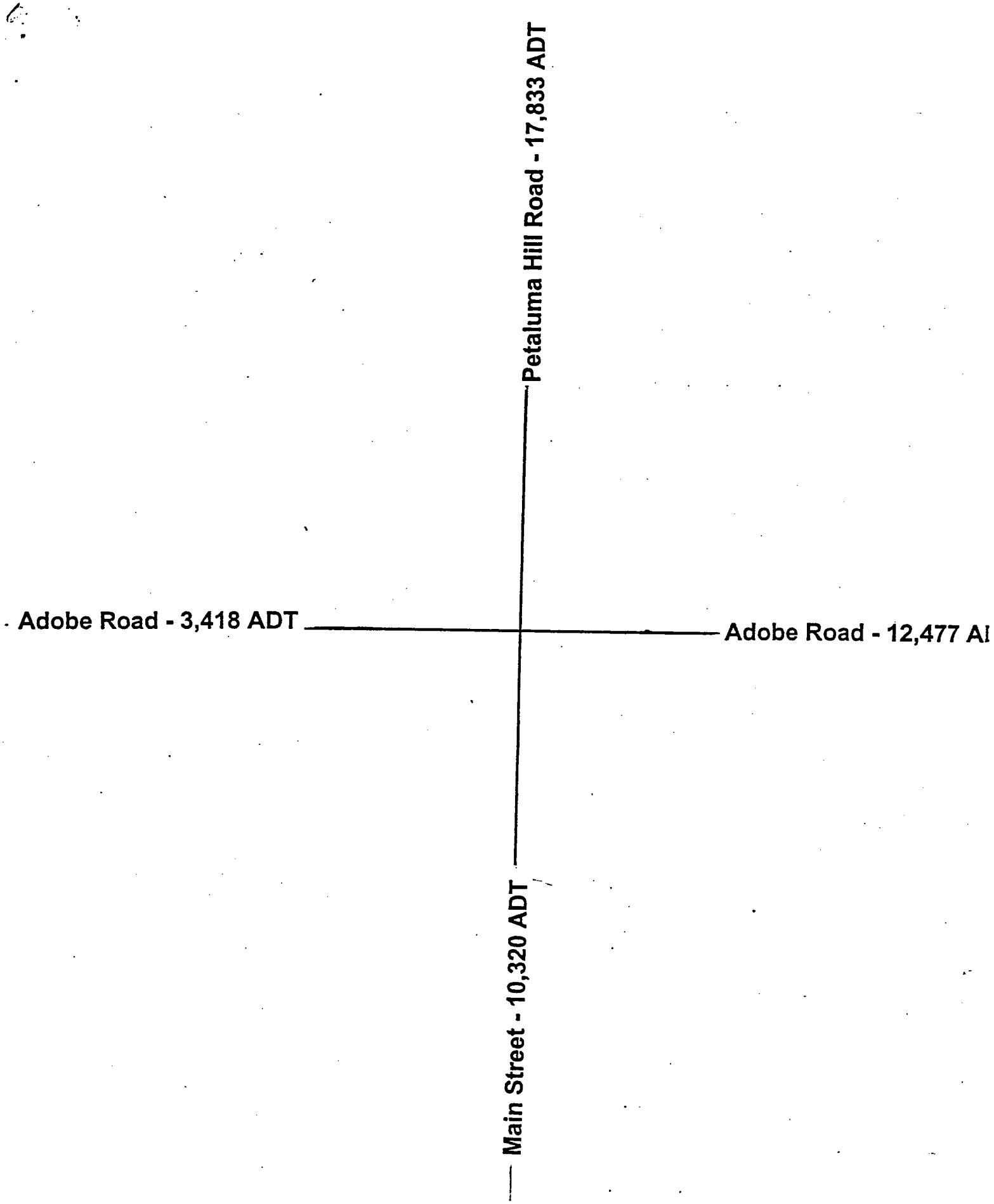
Because Rohnert Park has experience little development since 1997 (the city has been almost entirely buildout since the early 1990's), the results of the 1997 traffic model run are still indicative of current traffic flows and congestion. Some changes in traffic distribution may be occurred as the result of the new development that has taken place, as well as roadway improvements, but generally, the roadway segment identified as having LOS C or worse in 1997 still experiences congestion:

Passed on anecdotal evidence, other congestion between that did not show up in the PM peak hour model run include:

- US 101 interchange at the Rohnert Park Expressway;
- Rohnert Park Expressway-Commerce Boulevard intersection;
- US 101 interchange at Wilfred Avenue;
- Commerce Boulevard between Golf Course Drive and Redwood Drive; and
- Snyder Lane, between Southwest Boulevard and the Rohnert Park Expressway.

Table 4.3-1:
Traffic Level of Service (LOS) Definitions

LOS	*Traffic Flow Conditions*	*Max Volume/ Capacity Ratio*
A	***Free flow.*** No traffic-related restrictions on vehicle maneuverability or speed. Drivers' desires, speed limits, and physical roadway conditions determine speed.	0.6
B	***Stable flow.*** Operating speeds beginning to be restricted creating little or no restrictions on maneuverability from other vehicles. Slight delays.	0.7
C	***Stable flow.*** Speeds and maneuverability more closely restricted. Occasional backups behind left-turning vehicles at intersections. Acceptable delays.	0.8
D	***Approaching unstable flow.*** Queues develop. Temporary restrictions on speed may cause extensive delays. Little freedom to maneuver. Comfort and convenience low. Delays at intersections may exceed one or more signal changes.	0.9
E	***Unstable flow.*** Stoppages of momentary duration. Low operating speeds. Maneuverability severely limited. Intolerable delays.	1.0
F	***Forced flow.*** Grid lock conditions. Stoppages for long periods. Low operating speeds. Delays at intersections average 60 seconds or more.	>1.0



Dates information gathered: late June and early July 1998

12,477 ADT

3,418 AD

ROAD NAME	RD#	P.M.	LOCATION	DIR	DATE	DAY	24 Hr Vol	AM PEAK	PM PE
Adobe Rd	5602	10.07	E/Old Redwood Hwy N	E/B	09/24/97	Wed	1,578	183 @0700	139 @170
Adobe Rd	5602	10.07	E/Old Redwood Hwy N	W/B	09/24/97	Wed	1,814	137 @0800	180 @160
Adobe Rd	5602	10.07	E/Old Redwood Hwy N	E/B	07/31/96	Wed	1,613	173 @0800	119 @160
Adobe Rd	5602	10.07	E/Old Redwood Hwy N	W/B	07/31/96	Wed	1,681	122 @0800	175 @170
Adobe Rd	5602	10.08	E/Old Redwood Hwy N	E/B	08/02/95	Wed	1,594	148 @0700	128 @170
Adobe Rd	5602	10.08	E/Old Redwood Hwy N	W/B	08/02/95	Wed	1,688	96 @0800	189 @170
Adobe Rd	5602	10.08	E/Old Redwood Hwy N	E/B	06/23/98	Tue	1,730	245 @0600	122 @170
Adobe Rd	5602	10.08	E/Old Redwood Hwy N	W/B	06/23/98	Tue	1,688	86 @0700	203 @160
Adobe Rd	5602	10.10	W/Petaluma Hill Rd	E/B	07/14/94	Thu	1,420	114 @0600	99 @170
Adobe Rd	5602	10.10	W/Petaluma Hill Rd	W/B	07/14/94	Thu	1,678	89 @0800	191 @160
Adobe Rd	5602	11.63	W/Corona Rd	E/B	07/31/96	Wed	4,995	549 @0700	384 @170
Adobe Rd	5602	11.63	W/Corona Rd	W/B	07/31/96	Wed	5,635	257 @0800	783 @170
Adobe Rd	5602	11.69	W/Corona Rd	E/B	06/23/98	Tue	6,093	802 @0700	429 @170
Adobe Rd	5602	11.69	W/Corona Rd	W/B	06/23/98	Tue	6,384	344 @0700	997 @170
Adobe Rd	5602	11.87	W/Corona Rd	W/B	10/25/94	Tue	5,349	346 @0700	861 @170
Adobe Rd	5602	11.87	W/Corona Rd	E/B	10/25/94	Tue	4,965	663 @0700	374 @160
Adobe Rd	5602	14.80	E/East Washington St	W/B	10/25/94	Tue	5,393	431 @0700	713 @170
Adobe Rd	5602	14.80	E/East Washington St	E/B	10/25/94	Tue	5,406	612 @0700	432 @160
Adobe Rd	5602	14.80	E/East Washington St	E/B	08/06/96	Tue	5,178	582 @0700	384 @170
Adobe Rd	5602	14.80	E/East Washington St	W/B	08/06/96	Tue	5,320	306 @0700	744 @170
Adobe Rd	5602	14.80	E/East Washington St	E/B	06/23/98	Tue	6,290	814 @0700	457 @170
Adobe Rd	5602	14.80	E/East Washington St	W/B	06/23/98	Tue	6,222	424 @0700	828 @170
Adobe Rd	5602	16.39	E/Frates Rd	E/B	10/25/94	Tue	6,645	627 @1700	646 @150
Adobe Rd	5602	16.39	E/Frates Rd	E/B	10/09/96	Wed	7,295	585 @0700	674 @170
Adobe Rd	5602	16.39	E/Frates Rd	E/B	07/15/98	Wed	7,842	657 @0700	655 @170
Adobe Rd	5602	16.63	E/Frates Rd	W/B	10/25/94	Tue	6,753	534 @0700	646 @160
Adobe Rd	5602	16.63	E/Frates Rd	W/B	10/09/96	Wed	7,196	619 @0700	729 @170
Adobe Rd	5602	16.63	E/Frates Rd	W/B	07/15/98	Wed	7,411	552 @0700	670 @150
Agua Caliente Rd	6601	10.20	E/Arnold Dr	E/B	08/19/97	Tue	1,396	71 @1100	189 @170
Agua Caliente Rd	6601	10.20	E/Arnold Dr	W/B	08/19/97	Tue	1,247	101 @0900	82 @160
Agua Caliente Rd	6601	10.21	0.2 Mi E/Arnold Dr	E/B	10/13/94	Thu	1,483	123 @0800	150 @170
Agua Caliente Rd	6601	10.21	0.2 Mi E/Arnold Dr	W/B	10/13/94	Thu	1,315	141 @0700	91 @160
Airport Blvd	8803A	10.28	W/Laughlin Rd	E/B	09/13/95	Wed	1,208	72 @1100	121 @160
Airport Blvd	8803A	10.48	E/Skylane Blvd	E/B	10/23/96	Wed	3,547	243 @1100	444 @160
Airport Blvd	8803A	10.48	E/Skylane Blvd	W/B	10/23/96	Wed	3,576	404 @0700	278 @150
Airport Blvd	8803A	10.48	E/Skylane Blvd	E/B	09/02/98	Wed	3,844	290 @1100	447 @160
Airport Blvd	8803A	10.48	E/Skylane Blvd	W/B	09/02/98	Wed	3,844	428 @0800	319 @130
Airport Blvd	8803A	10.82	E/Brickway Blvd	W/B	09/15/95	Fri	4,227	484 @0700	366 @130
Airport Blvd	8803A	10.82	E/Brickway Blvd	W/B	09/13/95	Wed	4,118	497 @0700	356 @130
Airport Blvd	8803A	11.00	W/Regional Parkway	E/B	09/14/95	Thu	4,520	315 @1100	648 @160
Airport Blvd	8803A	11.00	E/Concourse Blvd	E/B	09/13/95	Wed	4,463	315 @1100	581 @160
Airport Blvd	8803A	11.16	E/RR Tracks	E/B	09/19/95	Tue	5,477	410 @1100	721 @160
Airport Blvd	8803A	11.16	E/RR Tracks	W/B	09/19/95	Tue	5,508	700 @0700	438 @130
Airport Blvd	8803A	11.16	E/RR Tracks	E/B	09/09/97	Tue	5,977	408 @1100	818 @160
Airport Blvd	8803A	11.16	E/RR Tracks	W/B	09/09/97	Tue	6,125	759 @0700	470 @120
Airport Blvd	8803A	11.18	E/RR Tracks	E/B	08/14/96	Wed	6,002	422 @1100	775 @160
Airport Blvd	8803A	11.18	E/RR Tracks	W/B	08/14/96	Wed	5,954	732 @0700	476 @130
Airport Blvd	8803A	11.18	E/RR Tracks	E/B	06/18/98	Thu	6,277	455 @1100	756 @160
Airport Blvd	8803A	11.18	E/RR Tracks	W/B	06/18/98	Thu	6,172	767 @0700	496 @130
Airport Blvd	8803A	11.41	E/Aviation Blvd	W/B	09/15/95	Fri	7,159	799 @0700	586 @130
Airport Blvd	8803A	11.41	E/Aviation Blvd	W/B	09/13/95	Wed	7,095	828 @0700	575 @130
Airport Blvd	8803A	11.86	W/Fulton Rd	E/B	11/14/95	Tue	2,232	144 @1100	256 @170
Airport Blvd	8803A	11.86	W/Fulton Rd	W/B	11/14/95	Tue	3,241	334 @0700	268 @130
Airport Blvd	8803A	11.86	W/Fulton Rd	E/B	09/03/97	Wed	2,875	183 @0800	294 @170
Airport Blvd	8803A	11.86	W/Fulton Rd	W/B	09/03/97	Wed	3,627	385 @0700	278 @150
Airport Blvd	8803A	11.86	W/Fulton Rd	E/B	08/14/96	Wed	2,657	188 @1100	273 @170
Airport Blvd	8803A	11.86	W/Fulton Rd	W/B	08/14/96	Wed	3,879	375 @0700	292 @120
Airport Blvd	8803A	11.91	W/Fulton Rd	E/B	06/18/98	Thu	2,881	194 @1100	294 @170
Airport Blvd	8803A	11.91	W/Fulton Rd	W/B	06/18/98	Thu	4,115	392 @0700	290 @140
Airport Blvd	8803A	11.98	@ Fulton Rd	W/B	08/26/96	Mon			329 @163
Airport Blvd	8803A	11.98	@ Fulton Rd	E/B	08/13/96	Tue			302 @163

17,833 ADT

ROAD NAME	RD#	P.M.	LOCATION	DIR	DATE	DAY	24 Hr Vol	AM PEAK	PM PEAK
Pepper Rd	5801	12.58	W/Mecham Rd	E/B	03/02/94	Wed		103 @0700	
Pepper Rd	58023	12.60	E/Mecham Rd	W/B	03/02/94	Wed		62 @0700	
Pepper Rd	58023	13.56	E/Mecham Rd	E/B	07/30/98	Thu	1,160	106 @0900	82 @1400
Pepper Rd	58023	13.56	E/Mecham Rd	W/B	07/30/98	Thu	985	63 @0700	85 @1700
Pepper Rd	58023	14.64	W/Jewett Rd	E/B	02/23/94	Wed	1,267	133 @0800	100 @1300
Pepper Rd	58023	14.68	E/Jewett Rd	W/B	02/23/94	Wed	1,252	76 @0800	118 @1700
Pepper Rd	58023	15.69	W/Stony Point Rd	E/B	06/16/98	Tue	1,665	133 @1000	134 @1600
Pepper Rd	58023	15.69	W/Stony Point Rd	W/B	06/16/98	Tue	1,272	81 @0900	99 @1700
Pepper Rd	58023	15.85	W/Stony Point Rd	E/B	03/03/94	Thu	1,262	112 @0700	110 @1600
Pepper Rd	58023	15.85	W/Stony Point Rd	W/B	03/03/94	Thu	1,083	59 @0700	117 @1600
Pepper Rd	58023	15.85	W/Stony Point Rd	E/B	03/02/94	Wed	1,329	119 @0800	110 @1600
Pepper Rd	58023	15.85	W/Stony Point Rd	W/B	03/02/94	Wed	1,048	64 @1000	106 @1700
Petaluma Ave	56018	10.19	E/Arnold Dr	E/B	09/23/97	Tue	3,049	260 @0800	270 @1500
Petaluma Ave	56018	10.19	E/Arnold Dr	W/B	09/23/97	Tue	2,787	205 @0800	248 @1700
Petaluma Ave	56018	10.19	E/Arnold Dr	E/B	09/10/96	Tue	2,980	235 @0800	243 @1400
Petaluma Ave	56018	10.19	E/Arnold Dr	W/B	09/10/96	Tue	2,807	213 @1100	284 @1700
Petaluma Ave	56018	10.19	E/Arnold Dr	E/B	07/14/98	Tue	3,086	215 @0800	251 @1700
Petaluma Ave	56018	10.19	E/Arnold Dr	W/B	07/14/98	Tue	2,962	191 @0800	262 @1600
Petaluma Ave	56018	10.19	E/Arnold Dr	E/B	06/06/95	Tue	3,061	247 @0800	273 @1600
Petaluma Ave	56018	10.19	E/Arnold Dr	W/B	06/06/95	Tue	2,811	191 @0800	263 @1700
Petaluma Ave	56018	10.62	@ Riverside Dr	E/B	09/06/96	Fri			279 @1630
Petaluma Blvd N	5712A	12.26	N/Skillman Ln	N/B	08/18/98	Tue	9,813	596 @1100	1006 @1700
Petaluma Blvd N	5712A	12.26	N/Skillman Ln	S/B	08/18/98	Tue	10,379	743 @0700	825 @1600
Petaluma Hill Rd	5710B	10.75	N/Adobe Rd	N/B	10/01/96	Tue	9,075	575 @0700	1252 @1600
Petaluma Hill Rd	5710B	10.75	N/Adobe Rd	S/B	10/01/96	Tue	8,423	937 @0700	624 @1600
Petaluma Hill Rd	5710B	10.75	N/Adobe Rd	N/B	09/24/97	Wed	9,523	624 @0700	1230 @1700
Petaluma Hill Rd	5710B	10.75	N/Adobe Rd	S/B	09/24/97	Wed	8,849	985 @0700	630 @1600
Petaluma Hill Rd	5710B	10.75	N/Adobe Rd	N/B	08/17/95	Thu	9,133	397 @0700	1327 @1700
Petaluma Hill Rd	5710B	10.75	N/Adobe Rd	S/B	08/17/95	Thu	8,203	910 @0700	539 @1700
Petaluma Hill Rd	5710B	10.75	N/Adobe Rd	N/B	06/30/98	Tue	9,222	464 @0700	1208 @1700
Petaluma Hill Rd	5710B	10.75	N/Adobe Rd	S/B	06/30/98	Tue	8,611	937 @0700	601 @1600
Petaluma Hill Rd	5710B	11.36	S/E. Railroad Ave	N/B	09/08/94	Thu	8,629	458 @0800	1217 @1700
Petaluma Hill Rd	5710B	11.36	S/E. Railroad Ave	S/B	09/08/94	Thu	8,228	948 @0700	605 @1600
Petaluma Hill Rd	5710B	12.53	N/Roberts Rd	N/B	11/08/95	Wed	9,116	578 @0700	1235 @1700
Petaluma Hill Rd	5710B	12.53	N/Roberts Rd	S/B	11/08/95	Wed	8,613	949 @0700	639 @1600
Petaluma Hill Rd	5710B	12.55	N/Roberts Rd	N/B	09/08/94	Thu	9,824	528 @0800	1308 @1700
Petaluma Hill Rd	5710B	12.60	N/Roberts Rd	N/B	10/10/96	Thu	8,937	568 @0700	1205 @1700
Petaluma Hill Rd	5710B	12.60	N/Roberts Rd	S/B	10/10/96	Thu	8,365	845 @0700	645 @1600
Petaluma Hill Rd	5710B	12.60	N/Roberts Rd	N/B	10/07/97	Tue	8,971	562 @0700	1149 @1700
Petaluma Hill Rd	5710B	12.60	N/Roberts Rd	N/B	09/17/97	Wed	9,529	626 @0700	1208 @1700
Petaluma Hill Rd	5710B	12.60	N/Roberts Rd	N/B	06/30/98	Tue	8,923	451 @0700	1203 @1700
Petaluma Hill Rd	5710B	12.60	N/Roberts Rd	S/B	06/30/98	Tue	8,181	819 @0700	628 @1600
Petaluma Hill Rd	5710B	12.76	N/Roberts Rd	S/B	09/08/94	Thu	9,364	1021 @0700	692 @1600
Petaluma Hill Rd	5710B	13.20	N/East Cotati Ave	N/B	11/14/95	Tue	8,326	539 @0700	1175 @1700
Petaluma Hill Rd	5710B	13.20	N/East Cotati Ave	N/B	10/14/96	Mon	8,445	495 @0700	1179 @1600
Petaluma Hill Rd	5710B	13.20	N/East Cotati Ave	N/B	09/24/97	Wed	9,035	557 @0700	1226 @1700
Petaluma Hill Rd	5710B	13.20	N/East Cotati Ave	S/B	09/24/97	Wed	7,882	916 @0700	627 @1700
Petaluma Hill Rd	5710B	13.20	N/East Cotati Ave	N/B	06/30/98	Tue	8,713	470 @0700	1160 @1700
Petaluma Hill Rd	5710B	13.20	N/East Cotati Ave	S/B	06/30/98	Tue	7,161	689 @0700	585 @1700
Petaluma Hill Rd	5710B	13.43	N/East Cotati Ave	N/B	08/30/94	Tue	8,791	458 @0700	1290 @1600
Petaluma Hill Rd	5710B	13.47	N/East Cotati Ave	S/B	11/14/95	Tue	8,207	1030 @0700	647 @1700
Petaluma Hill Rd	5710B	13.47	N/East Cotati Ave	S/B	10/14/96	Mon	8,217	947 @0700	608 @1700
Petaluma Hill Rd	5710B	13.52	N/East Cotati Ave	S/B	08/30/94	Tue	7,901	907 @0700	576 @1700
Petaluma Hill Rd	5710B	14.18	S/Crane Canyon Rd	S/B	08/30/94	Tue	6,508	785 @0700	514 @1700
Petaluma Hill Rd	5710B	14.26	S/Crane Canyon Rd	N/B	08/30/94	Tue	6,826	389 @0700	1064 @1600
Petaluma Hill Rd	5710B	14.31	S/Crane Canyon Rd	N/B	10/01/96	Tue	7,231	383 @0700	1196 @1600
Petaluma Hill Rd	5710B	14.31	S/Crane Canyon Rd	S/B	10/01/96	Tue	5,978	732 @0700	527 @1700
Petaluma Hill Rd	5710B	14.31	S/Crane Canyon Rd	N/B	09/24/97	Wed	7,858	450 @0700	1135 @1700
Petaluma Hill Rd	5710B	14.31	S/Crane Canyon Rd	S/B	09/24/97	Wed	6,449	832 @0700	541 @1700
Petaluma Hill Rd	5710B	14.31	S/Crane Canyon Rd	N/B	08/17/95	Thu	7,021	357 @0700	1096 @1700
Petaluma Hill Rd	5710B	14.31	S/Crane Canyon Rd	S/B	08/17/95	Thu	5,686	534 @0700	484 @1700

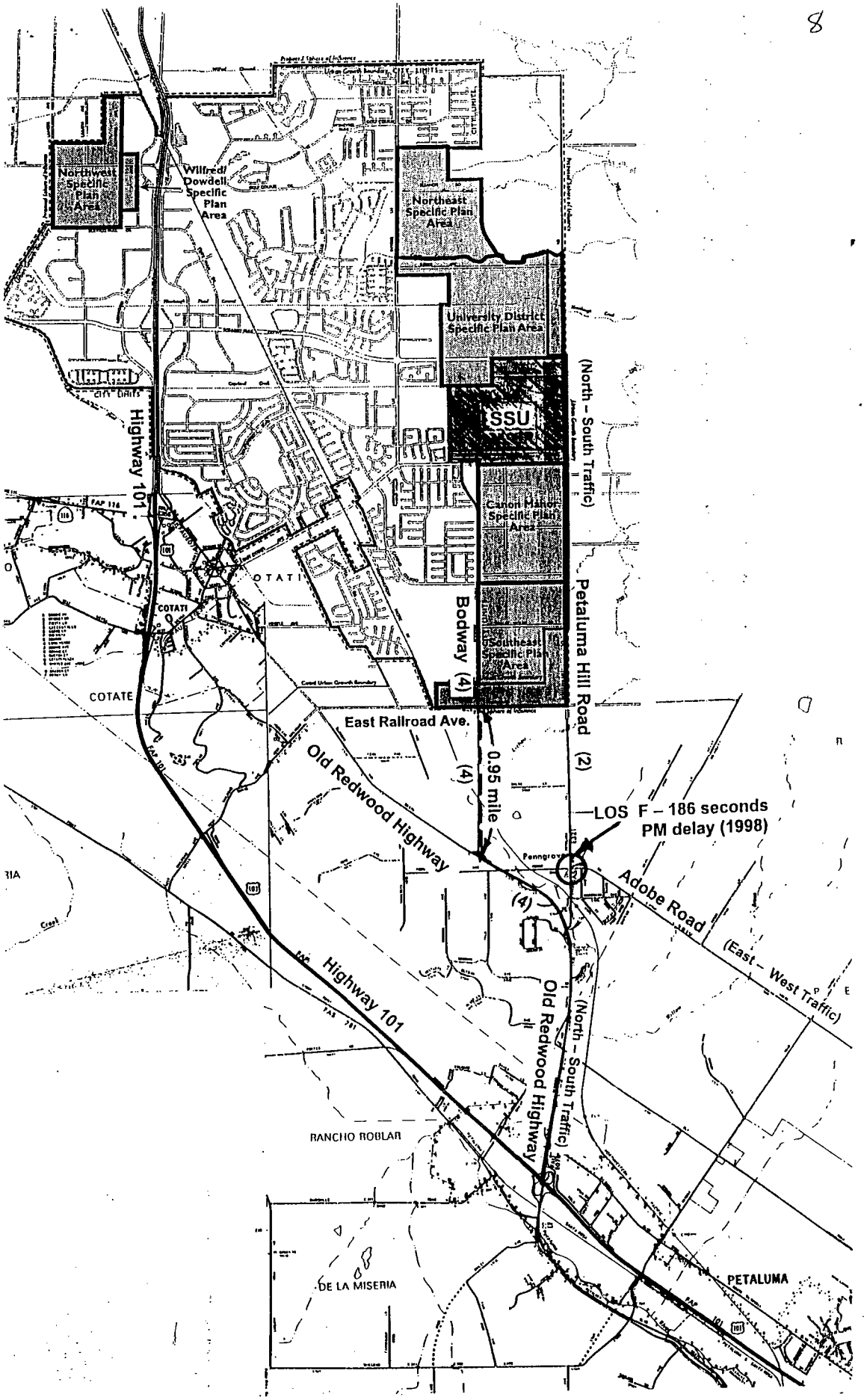
10,32

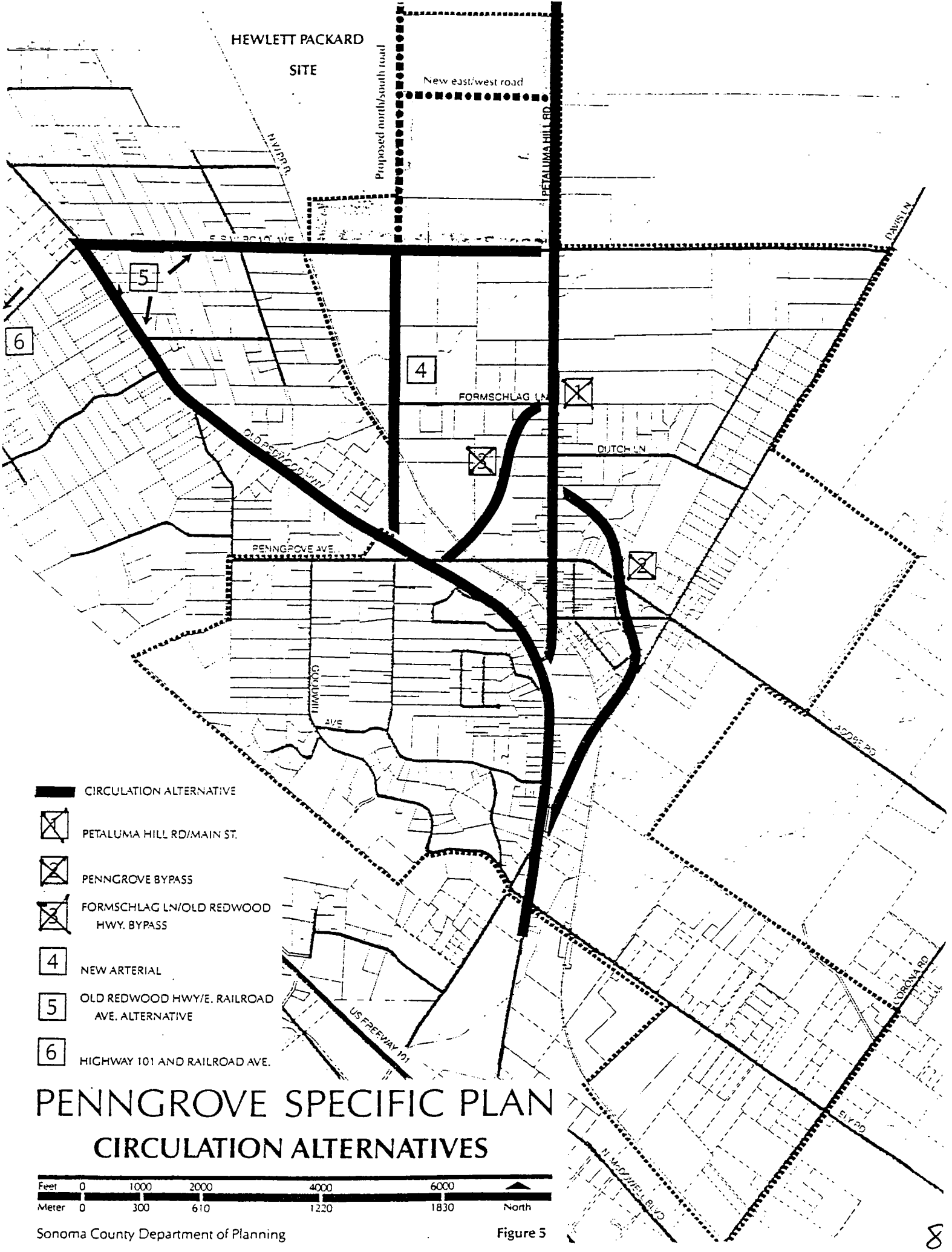
ROAD NAME	RD#	P.M.	LOCATION	DIR	DATE	DAY	24 H Vol	AM PEAK	PM PEA
Main St	5710A	10.38	S/Adobe Rd	N/B	07/01/98	Wed	5,292	256 @1100	653 @1700
Main St	5710A	10.38	S/Adobe Rd	S/B	07/01/98	Wed	5,028	509 @0700	397 @1400
Main St	5710A	10.39	S/Adobe Rd	N/B	10/07/97	Tue	5,385	251 @0700	710 @1700
Main St	5710A	10.39	S/Adobe Rd	S/B	10/07/97	Tue	4,991	515 @0800	329 @1600
Main St	5710A	10.39	S/Adobe Rd	S/B	08/06/96	Tue	4,851	507 @0700	297 @1600
Main St	5710A	10.42	S/Adobe Rd	S/B	10/25/94	Tue	4,813	534 @0700	314 @1600
Main St	6002B	18.91	N/Tyrone Rd	N/B	08/19/98	Wed	843	43 @1100	85 @1700
Main St	6002B	18.91	N/Tyrone Rd	S/B	08/19/98	Wed	840	62 @0700	60 @1600
Main St	6002B	18.91	N/Tyrone Rd	N/B	08/23/95	Wed	833	53 @1100	81 @1700
Main St	6002B	18.91	N/Tyrone Rd	S/B	08/23/95	Wed	819	59 @1000	65 @1400
Mark West Springs Rd	8801A	10.25	E/Hwy 101	E/B	10/16/97	Thu	9,372	890 @0800	783 @1700
Mark West Springs Rd	8801A	10.25	E/Hwy 101	W/B	10/16/97	Thu	10,711	1038 @0800	865 @1500
Mark West Springs Rd	8801A	10.25	E/Hwy 101	E/B	08/28/96	Wed	9,223	628 @0700	757 @1700
Mark West Springs Rd	8801A	10.25	E/Hwy 101	W/B	08/28/96	Wed	10,507	867 @0700	814 @1700
Mark West Springs Rd	8801A	10.25	E/Hwy 101	E/B	08/05/98	Wed	8,776	600 @0800	789 @1700
Mark West Springs Rd	8801A	10.25	E/Hwy 101	W/B	08/05/98	Wed	9,917	713 @0700	699 @1600
Mark West Springs Rd	8801A	11.10	E/Ursuline Rd	E/B	11/28/95	Tue	5,543	336 @0800	597 @1700
Mark West Springs Rd	8801A	11.10	E/Ursuline Rd	W/B	11/28/95	Tue	5,408	603 @0700	416 @1600
Mark West Springs Rd	8801A	11.10	E/Ursuline Rd	E/B	10/16/97	Thu	6,144	409 @0800	587 @1700
Mark West Springs Rd	8801A	11.10	E/Ursuline Rd	W/B	10/16/97	Thu	5,817	572 @0800	453 @1500
Mark West Springs Rd	8801A	11.10	E/Ursuline Rd	E/B	08/27/96	Tue	5,675	301 @0700	637 @1700
Mark West Springs Rd	8801A	11.10	E/Ursuline Rd	W/B	08/27/96	Tue	5,703	555 @0700	449 @1600
Mark West Springs Rd	8801A	11.10	E/Ursuline Rd	E/B	08/05/98	Wed	5,893	301 @0800	577 @1700
Mark West Springs Rd	8801A	11.10	E/Ursuline Rd	W/B	08/05/98	Wed	5,658	460 @0700	417 @1500
Mark West Springs Rd	8801A	11.77	W/Riebli Rd	E/B	11/03/94	Thu	5,431	322 @0700	589 @1700
Mark West Springs Rd	8801A	11.79	W/Riebli Rd	W/B	11/03/94	Thu	5,286	562 @0700	404 @1500
Mark West Springs Rd	8801A	14.20	W/Mark West Spgs Lodge	E/B	10/29/98	Thu	3,621	218 @0700	349 @1600
Mark West Springs Rd	8801A	14.20	W/Mark West Spgs Lodge	W/B	10/29/98	Thu	3,402	320 @0700	290 @1700
Mark West Springs Rd	8801A	15.17	W/Mark West Spgs Lodge	W/B	11/03/94	Thu	3,078	292 @0700	265 @1500
Mark West Springs Rd	8801A	15.19	W/Mark West Spgs Lodge	E/B	11/03/94	Thu	3,248	205 @0700	300 @1600
Mark West Station Rd	89010	10.10	E/Trenton-Hlbg Rd	E/B	05/14/98	Thu	120	10 @1000	16 @1500
Mark West Station Rd	89010	10.10	E/Trenton-Hlbg Rd	W/B	05/14/98	Thu	126	15 @1000	17 @1400
McMinn Ave	78064	10.34	S/Sunset Ave	N/B	06/13/96	Thu	804	40 @0900	96 @1800
McMinn Ave	78064	10.34	S/Sunset Ave	S/B	06/13/96	Thu	920	58 @1100	104 @1700
McNear Ave	47007	10.48	CALTRANS count S/Pet Blvd S	N/B	07/22/97	Tue	1,477	100 @0800	113 @1800
McNear Ave	47007	10.48	CALTRANS count S/Pet Blvd S	S/B	07/22/97	Tue	790	44 @0800	80 @1800
Mecham Rd	5802	10.01	N/Pepper Rd	S/B	03/02/94	Wed		133 @0700	
Mecham Rd	5802	10.30	N/Pepper Rd	N/B	06/16/98	Tue	1,024	70 @0800	114 @1600
Mecham Rd	5802	10.30	N/Pepper Rd	S/B	06/16/98	Tue	1,274	123 @0700	90 @1400
Mecham Rd	5802	10.67	S/Hammel Rd	N/B	03/07/94	Mon	1,196	83 @1000	153 @1600
Mecham Rd	5802	10.67	S/Hammel Rd	S/B	03/07/94	Mon	1,346	135 @0700	102 @1300
Mecham Rd	5802	10.67	S/Hammel Rd	N/B	03/06/94	Sun	1,074	104 @1100	104 @1500
Mecham Rd	5802	10.67	S/Hammel Rd	S/B	03/06/94	Sun	1,240	111 @1000	130 @1300
Mecham Rd	5802	10.67	S/Hammel Rd	N/B	03/05/94	Sat	1,034	88 @1100	107 @1400
Mecham Rd	5802	10.67	S/Hammel Rd	S/B	03/05/94	Sat	1,165	113 @1100	124 @1300
Mecham Rd	5802	10.67	S/Hammel Rd	N/B	03/04/94	Fri	1,250	90 @1000	108 @1600
Mecham Rd	5802	10.67	S/Hammel Rd	S/B	03/04/94	Fri	1,389	138 @0700	114 @1200
Mecham Rd	5802	10.67	S/Hammel Rd	N/B	03/03/94	Thu	1,287	93 @1000	158 @1600
Mecham Rd	5802	10.67	S/Hammel Rd	S/B	03/03/94	Thu	1,413	142 @0700	101 @1400
Mecham Rd	5802	10.67	S/Hammel Rd	N/B	03/02/94	Wed	1,222	93 @1100	152 @1600
Mecham Rd	5802	10.67	S/Hammel Rd	S/B	03/02/94	Wed	1,408	129 @0700	107 @1300
Mecham Rd	5802	10.67	S/Hammel Rd	N/B	03/01/94	Tue	1,195	85 @0700	153 @1600
Mecham Rd	5802	10.67	S/Hammel Rd	S/B	03/01/94	Tue	1,295	140 @0700	91 @1500
Mecham Rd	5802	11.09	N/Refuse Rd	N/B	03/07/94	Mon	1,935	171 @1000	200 @1500
Mecham Rd	5802	11.09	N/Refuse Rd	S/B	03/07/94	Mon	2,385	247 @1000	233 @1300
Mecham Rd	5802	11.09	N/Refuse Rd	N/B	03/06/94	Sun	1,801	200 @1100	216 @1200
Mecham Rd	5802	11.09	N/Refuse Rd	S/B	03/06/94	Sun	2,285	262 @1100	325 @1200
Mecham Rd	5802	11.09	N/Refuse Rd	N/B	03/05/94	Sat	1,730	173 @1100	201 @1200
Mecham Rd	5802	11.09	N/Refuse Rd	S/B	03/05/94	Sat	1,966	204 @1100	222 @1300
Mecham Rd	5802	11.09	N/Refuse Rd	N/B	03/04/94	Fri	1,991	181 @1000	214 @1400
Mecham Rd	5802	11.09	N/Refuse Rd	S/B	03/04/94	Fri	2,352	219 @0700	225 @1300

Rohnert Park General Plan
Mitigation Needs Assessment

Features / Recommendations of future studies

- Intersection function tends to govern traffic flow on Petaluma Hill Road. Please determine intersection LOS rather than mid-section LOS
- Calibrate model so that the model reflects recently observed conditions at the intersection of Petaluma Hill Road / Adobe Road / Main Street (i.e., LOS F, PM delay of 186 seconds in 1998.
- Since this intersection is already LOS F, there is nothing gained by determining that it will be LOS F in the future.
- Instead, determine the increase in delay at this intersection in seconds, without the expansion of Rohnert Park and without the expansion of Sonoma State University.
- Then determine the increase in delay at this intersection in seconds, with the expansion of Rohnert Park and with the expansion of Sonoma State University.
- Use the model to test the impact of completing and extending Bodway between East Cotati Avenue and Old Redwood Highway with both a 2-lane and 4-lane configuration.
- Use the model to test the impact of improving Railroad Avenue between Petaluma Hill Road and improved Bodway.
- Consider the combination of retaining Petaluma Hill Road at 2-lane configuration and Bodway extended to Old Redwood Highway with 2 or 4 lane configuration.


Northwest Specific Plan Area
Wilfred/ Dowdell Specific Plan Area
Northeast Specific Plan Area
University District Specific Plan Area
SSU
Canon Manor Specific Plan Area
Southeast Specific Plan Area
Highway 101
(North – South Traffic)
Petaluma Hill Road (2)
Bodway (4)
East Railroad Ave.
0.95 mile
Old Redwood Highway
(4)
LOS F – 186 seconds
PM delay (1998)
Adobe Road
(East – West Traffic)
Highway 101
Old Redwood Highway
(North – South Traffic)
COTATE
RANCHO ROBLAR
DE LA MISERIA
PETALUMA

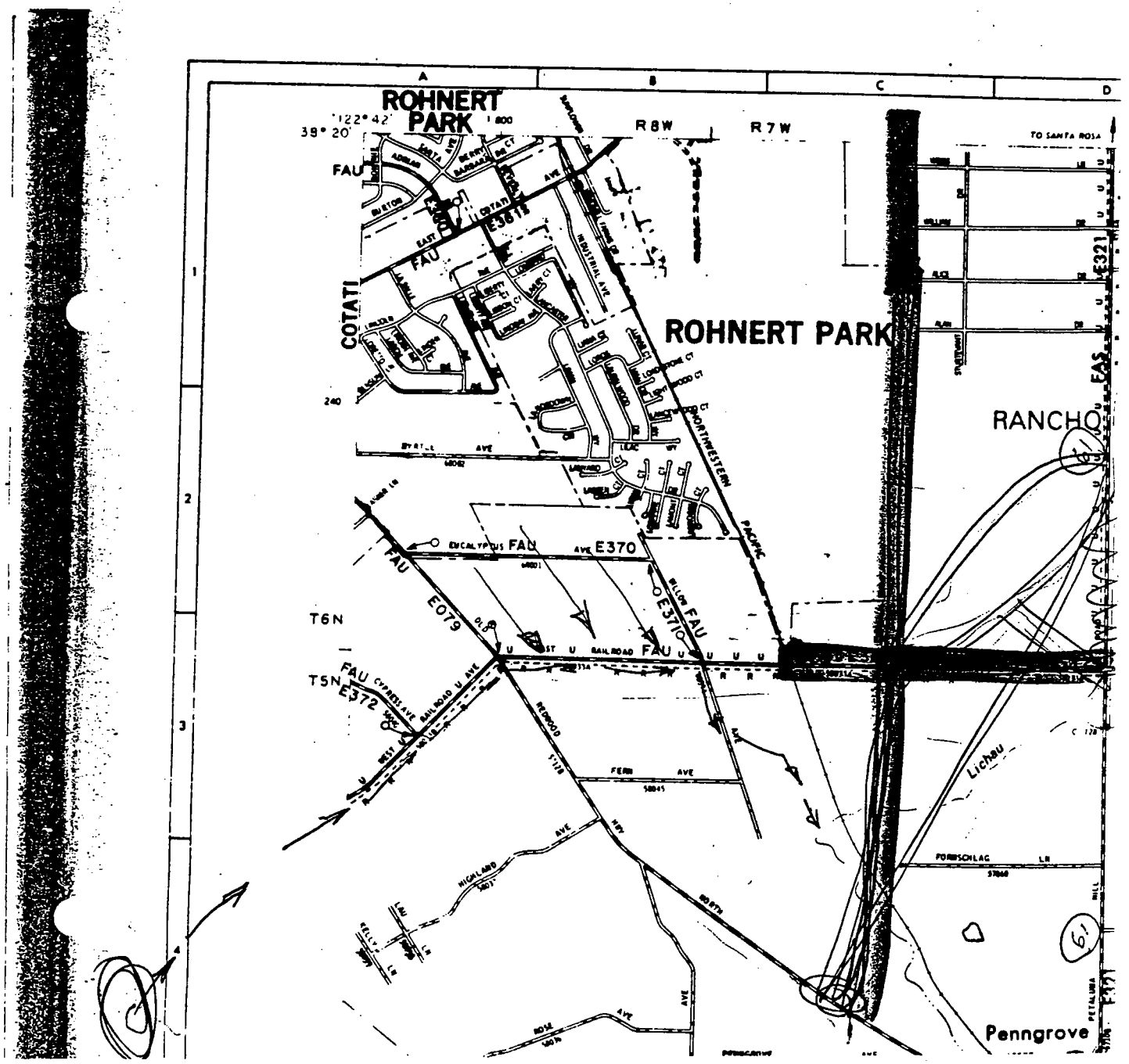


PENNGROVE SPECIFIC PLAN

CIRCULATION ALTERNATIVES

Sonoma County Department of Planning

Figure 5


ROHNERT PARK
122° 42'
38° 20'
R8W
R7W
TO SANTA ROSA
FAU
COTATI
E381
EAST
ROHNERT PARK
NORTHWESTERN PACIFIC
RANCHO
E321
EAS
EUCALYPTUS FAU
AVE E370
FAU E079
E3710
T6N
T5N
FAU CYPRESS AVE RAILROAD
E372
RAILROAD FAU
REDWOOD
FERN AVE
HIGHLAND AVE
Lichau
Penngrove
PETALUMA
A
B
C
D
1
2
3
4