

FINAL ENVIRONMENTAL IMPACT REPORT  
RESPONSE TO COMMENTS

Wilfred/Dowdell Village Specific Plan  
City of Rohnert Park, California

State Clearinghouse No. 1998072036

Prepared for:

**City of Rohnert Park**  
Department of Planning and Community Development  
6750 Commerce Boulevard  
Rohnert Park, California 94928

Prepared by:

**MACTEC Engineering and Consulting, Inc.**  
5341 Old Redwood Highway, Suite 300  
Petaluma, CA 94954 - (707) 793-3800

MACTEC Project No. 4085040507-2.2

August 20, 2008



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## 1.0 INTRODUCTION

This is the Final Environmental Impact Report (FEIR) on the proposed Wilfred/Dowdell Village Specific Plan. The FEIR includes the Draft Environmental Impact Report (DEIR) which is separately bound and incorporated by reference.

### **Purpose of the FEIR**

The combined DEIR and FEIR Response to Comments are intended to provide the City of Rohnert Park with the information it needs to make an informed decision on the proposed Wilfred/Dowdell Village Specific Plan.

### **Contents of the FEIR**

The FEIR includes written responses to comments on the DEIR made by the City of Rohnert Park Planning Commissioners (meeting minutes), public agencies, and individuals. The FEIR contains responses to comments on the DEIR which were received by the City of Rohnert Park during a 45-day public comment period. The City prior to certification of the FEIR will consider the comments and responses.

The FEIR includes a Mitigation Monitoring Program, which describes the responsibilities for implementation of adopted mitigation measures for each identified significant impact, and the timing of the mitigation.

## 2.0 COMMENTS AND RESPONSES

### Comments Received

The DEIR was released on February 13, 2008 for public review. The City of Rohnert Park received comments during the required 45-day public comment period, ending March 28, 2008. Oral testimony on the DEIR was received at a public hearing held by the Planning Commission on March 13, 2008.

### Comments Requiring Responses

The FEIR contains written responses to public comments which raise questions about the adequacy of the DEIR in defining likely impacts and reasonable mitigation measures (CEQA Guidelines, Section 15151).

### Organization of Comments

Photocopies of transcribed oral comments and the full text of letters that were received are listed below. Individual comments within letters are bracketed and numbered. Responses by the authors of the DEIR are provided following each of the photocopied transcriptions and letters.

To facilitate reading the responses to comments, a verbatim copy or summary of each comment is inserted in bold just prior to each response. The responses are prepared in answer to the full text of all original comments.

### Comment Letters Received on the Draft EIR

Letter	Name	Company/Organization	Date
1		Rohnert Park Planning Commission Hearing Transcription Minutes	March 13, 2008
2	Lisa Carboni	California Department of Transportation	March 28, 2008
3	Lisa Carboni	California Department of Transportation	April 1, 2008
4	Patrick Moezinger	California Department of Fish and Game	March 21, 2008
5	Marilee Taylor Montgomery	Santa Rosa Citizen	March 17, 2008

## Letter 1: City Comments

### **Comment 1-1: Tom Roberts has voiced a concern that annexation of his property will trigger mandatory building permit requirements.**

Response 1-1: No additional building permits would be required for existing structures as a result of the annexation of the area or the adoption of the Wilfred/Dowdell Village Specific Plan. In addition, the City of Rohnert Park employs the same Building Codes (California Building Codes) as the County of Sonoma, so there should not be any changes to existing permits.

### **Comment 1-2: Tom Roberts has voiced a concern that annexation of his property will trigger Assessment District fees**

Response 1-2: There is no existing assessment district in the area and this project will not create one. If an assessment district is proposed by the City in the future, property owners will have the right to vote on its creation, and any assessments will be proportional to the benefits received by a particular property.

### **Comment 1.3: Tom Roberts communicated that the community separator issue remains unresolved from early meetings.**

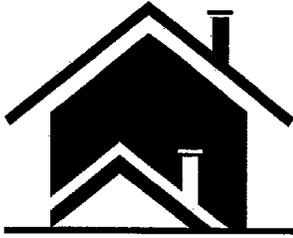
Response 1-3: The County of Sonoma is scheduled to meet in September 2008 at which time they are anticipated to amend the General Plan to remove the Wilfred/Dowdell Village Specific Plan area (as well as the Northwest Specific Plan area) from the community separator. (

### **Comment 1-4: Tom Roberts indicated the written items presented in previous public meetings are relevant and should be produced.**

Response 1-4: Mr. Roberts' previous correspondence with the City is maintained by the City; and available for review.

### **Comment 1-5: Tom Roberts requested a resolution from the City that protects his interests as a homeowner in the Specific Plan Area.**

Response 1-5: This comment is not within the scope of CEQA review.



**ROHNERT PARK PLANNING COMMISSION  
MINUTES  
THURSDAY, March 13, 2008**

The Planning Commission of the City of Rohnert Park met this date in a regular session commencing at 7:00 p.m. in the City Council Conference Room, 6750 Commerce Blvd., with Chairperson Ahanotu presiding.

<b>Call To Order</b>	Chairperson Ahanotu called the meeting of the regular session to order at approximately 7:00 p.m. with Community Development Director Bendorff leading the pledge.
<b>Roll Call</b>	<p><b>Present</b> (4) Commissioners: Chairperson Ahanotu, Commissioner Callinan, Commissioner Kilat and Commissioner Armstrong were present. Commissioner Adams was excused.</p> <p>Community Development Director, Ron Bendorff, Senior Planner, Maureen Rich and Recording Clerk, Suzie Azevedo were present.</p>
<b>Approval of Minutes</b>	Upon motion by Commissioner Kilat, seconded by Commissioner Armstrong, the Minutes of February 14, 2008 were approved as presented by a 5-0 vote.
<b>Acknowledgement of Public Noticing</b>	Chairperson Ahanotu acknowledged the posting of the Agenda of this meeting in three (3) public places, per the requirements of the Brown Act.
<b>Unscheduled Public Appearances</b>	None.
<b>Tentative Map</b> <b>File No. PL2007-028TM</b> <b>GJ Harmina c/o Steven LaFranchi and Associates</b>	<p>Senior Planner, Maureen Rich, gave the staff report. She stated that the property owner, Professional Center LLC, et.al, has requested a Tentative Map in order to condominiumize the two existing buildings located at 150 and 170 Professional Center Drive. The proposed Tentative Map would result in the creation of 15 airspace units for nonresidential uses, two common areas within each building, and a common parcel beneath the buildings. It would provide for the sale and transfer of the units to individual owners. Ms. Rich gave a brief history of the property and discussed the regulatory process relating to this type of subdivision. She noted that the regulations of California Government and Civil Codes and the Rohnert Park Municipal Code would apply as the City's Condominium Conversion Ordinance applies only to multifamily residential properties. Ms. Rich provided a summary of the applicable provisions and detailed the findings for each. Based on the findings, Ms. Rich stated that the proposal is consistent with the Subdivision Map Act and the Rohnert Park Municipal Code as well as the General Plan and Zoning Code guidelines/requirements and recommended that the Commission recommend to the City Council approval of the Tentative Map as proposed and conditioned in Resolution No. 2007-32.</p> <p>Commissioner Ahanotu opened the public hearing.</p>

Jim McCalligan, owner, was recognized. He praised staff for their diligence in working with them on seeing the project through. He stated that this type of project favors the small business owner who wants to own and operate his business.

Commissioner Kilat asked if he has received interest from current tenants to purchase the space they are currently operating from. Mr. McCalligan responded that he has received very favorable responses.

Commissioner Ahanotu closed the public hearing.

A motion was made by Commissioner Kilat, seconded by Commissioner Callinan, to recommend that the Planning Commission recommend to the City approval of the Tentative Map as proposed and conditioned. The motion passed with a 4-0 vote.

**Use Permit**

**File No. PL2007-030UP  
(Amended)**

**Siamak Taromi/Aston  
Asset Management  
Group**

Ron Bendorff reported that the applicant, Siamak Taromi, is requesting an amendment to an existing use permit to allow the operation of all eight (8) of the commercial tenant spaces within an existing mixed use project ("The Vineyards") within the Neighborhood Commercial District. He explained that the project was originally designed and constructed as live/work, which requires the residents who live upstairs to work in the commercial spaces below. Due to a lack of interest in the live/work units, the applicant submitted a use permit application to convert the project to a "mixed use" operation, which would allow the residential and commercial units to be rented independently of one another. In reviewing the application, staff commissioned a parking study to help determine the true parking need for the project. On January 24, 2008, the Planning Commission considered the requested use permit. In approving the use permit the Commission noted that the site can only accommodate 27 parking spaces, therefore the approval was conditioned to allow only four (4) of the commercial units to be operated as such. Mr. Bendorff reported that in the interim, the applicant has entered into a Parking License Agreement with the owner of the adjacent "Mountain Shadows Plaza" shopping center to utilize ten (10) of the center's parking spaces, thereby increasing the amount of parking available to the project so that all eight (8) of "The Vineyards" commercial tenant spaces should be adequately served. Mr. Bendorff said the applicant is requesting that the Planning Commission consider amending the existing use permit to reflect this change.

Mr. Bendorff reviewed the Agreement and sections of the Municipal Code regarding shared parking. While the proposed off-site parking spaces meets a majority of the criteria mandated, the parking agreement itself, entered into by the two parties, does not conform to Section 17.16.070C of the Rohnert Park Municipal Code. A condition has been added to the resolution of approval requiring that the final agreement be consistent with this section.

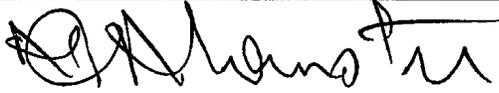
Based on the findings of his report, Mr. Bendorff, recommended that the Planning Commission by motion adopt Planning Commission Resolution No. 2008-9, approving the Amendment to File No. PL2007-030UP, as conditioned.

Commissioner Ahanotu opened the public hearing.

	<p>There being no further comment, Commissioner Ahanotu closed the public hearing.</p> <p>A motion was made by Commissioner Kilat, seconded by Commissioner Callinan to adopt Planning Commission Resolution No. 2008-9, approving the Amendment to File No. PL2007-030UP, as conditioned. The motion passed with a 4-0 vote.</p>
<p><b>Comment Session                  Wilfred/Dowdell Specific                  Plan Draft EIR</b></p> <p>1-1                  1-2                  1-3                  1-4                  1-5</p>	<p>Ron Bendorff reported that Staff has prepared a revised draft of the Wilfred/Dowdell Village Specific Plan. He noted that a Draft Environmental Impact Report (EIR) was originally prepared for this project in the late 1990's however it was never adopted. In the interim, the City determined that a Revised EIR would be required for the project and retained a consultant, MACTEC Engineering and Consulting, Inc. to prepare this document. The Draft EIR was released for the required 45-day public review period on February 13, 2008. A Notice of Availability was issued on February 11, 2008. The 45 day public review period is scheduled to end on March 28, 2008 and comments on the Draft EIR may be submitted to the City by 5:00 p.m. on that date. Although it is not required, staff feels that a public meeting to receive comments on the DEIR would allow an additional opportunity for beneficial input. The comment session also is the Planning Commission's opportunity to listen to public comment on the Draft EIR.</p> <p>Commissioner Ahanotu opened the floor for public comment.</p> <p>Tom Roberts, 4649 Dowdell Ave., Santa Rosa. He offered comments on the following:</p> <ul style="list-style-type: none"> <li>• Annexation will trigger mandatory building permits.</li> <li>• Assessment District; does not want to be saddled with fees.</li> <li>• Community Separator</li> <li>• All written items presented in previous public meetings are relevant and should be produced</li> <li>• Requests Resolution to protect interests</li> </ul> <p>A brief discussion was held by staff and the Commission. It was noted that the comments received are not to be debated this evening, rather they are to be addressed in the "Response" document that the EIR consultant will subsequently prepare. No action by the Commission is, therefore, required at this time.</p>
<p><b>Matters From                  Commissioners</b></p>	<p>Commissioner Armstrong gave a brief update on the Creeks Masterplan Committee. He commented that the Southern Laguna Watershed document is near completion and will be published soon.</p> <p>Commissioner Kilat reported on the General Plan Update Steering Committee meeting.</p>
<p><b>Matters from Planning                  Staff</b></p>	<p>Mr. Bendorff informed the Commission on upcoming items. He noted the following:</p> <ul style="list-style-type: none"> <li>• Next Meeting: North Bay Center Color Palette; Use Permit for Tattoo Parlor; Auto Wholesale Use Permit</li> <li>• Next meeting of the General Plan Update Steering Committee will be held on April 3, 2008.</li> </ul>

**Adjournment**

There being no further business, Chairperson Ahanotu adjourned the meeting at 7:50 PM until Thursday, March 27, 2008.



Chairperson



Recording Clerk

**Letter 2: March 28, 2008 Caltrans Letter**

**Comment 2-1: Pages 3-80/81: Please clarify the land use assumptions used for this study. Reading the pages referenced here, it is not clear which assumption were applied.**

Response 2-1: For the analysis, it was assumed that “Area B” of the Northwest Specific Plan (south of Wilfred Avenue) would be developed to include 495 multi-family residential units and 495,000 square feet of retail uses. Area “A” (north of Wilfred Avenue) was assumed to include 58 single family homes, 292 multi-family residential units, 173,900 square feet of retail, 48,700 square feet of office, 194,970 square feet of light industrial, and a 128-room hotel. The Stadium Area was assumed to include 312 multi-family residential units and 175,000 square feet of retail uses. The potential casino was assumed to be 450,000 square feet with a 300-room hotel, and located on Wilfred Avenue near Stony Point Road.

**Comment 2-2: Page 2-1, second bullet: Clarify which assumption was used to project traffic. Is it the 28 FAR or is it based on a hotel project?**

Response 2-2: The project as evaluated included 297,100 square feet of retail space and a 5,000 square foot fast food restaurant. The potential hotel land use was not used as the basis of the evaluation. If a hotel with more than 100 rooms is selected in place of the retail use for the parcel, a supplemental traffic study will be conducted.

**Comment 2-3: Table 3-6-5 Trip Generation: 27 percent pass-by deduction is used for the Shopping Center and 47 percent for Fast Food with Drive Thru. Typically, the Department uses 15 percent for pass-by deduction. Please provide a justification for the higher deduction rates.**

Response 2-3: Pass-by rates were based on information contained in the *Trip Generation Handbook*, 2<sup>nd</sup> Edition, Institute of Transportation Engineers. The average applied rates of 27 and 47 percent are lower than the averages indicated for both uses, with published pass-by rates of 34 and 50 percent for the shopping center and fast food restaurant uses respectively. These rates are based on actual data collection at sites throughout the Country, with literally hundreds of surveys included in the development of the shopping center rate, and reflect current standard practice for traffic impact studies. Given that the published rates are even higher than the applied rates, the analysis would appear to already be conservative, and use of the Department’s extremely low rates would be expected to overstate traffic impacts considerably.

**Comment 2-4: AM peak hour analysis under various scenarios should be included in the document.**

Response 2-4 The Project is predominantly a retail development, and would be expected to generate less than one-quarter the number of trips during the morning peak hour that it does during the evening peak hour. Given that the volume of traffic added is so much less, the impacts would similarly be less, so it appears unlikely that any additional impacts would be identified through an AM analysis. One was therefore deemed unnecessary.

**Comment 2-5: The document should address any freeway mainline impacts as well as the adequacy of off-ramp storage and turn lanes on intersection approaches. Inadequate turn-lane storage may have a negative impact on intersection operations. It should be also noted that the Department's requirement for left-turn storage is that the lanes should be long enough that there is a 95 percent probability that it can accommodate randomly distributed traffic arrivals. Left-turn lanes should be designed to meet this requirement.**

Response 2-5: To determine the Project's potential impacts on freeway mainline operation, data published in the *University District Specific Plan EIR*, Jones & Stokes, April 2006, was consulted. This document indicates that even with the addition of HOV lanes, some segments of US 101 will continue to operate unacceptably under Future (2030) volumes, with LOS E and F projected for the segments near and through the City of Rohnert Park. This EIR goes on to indicate that these unacceptable operating conditions are expected to occur with or without the addition of traffic generated by the Southeast Specific Plan area, and deems this impact significant and unavoidable. It is noted that the City of Rohnert Park, County of Sonoma, and Sonoma County Congestion Transportation Authority have all recognized that US 101 will continue to experience congestion into the foreseeable future since major capacity enhancements beyond those already planned are unlikely. Given that this deficiency has already been identified under volumes that are projected at build-out of the City of Rohnert Park, including the Project, the impact is already known to be significant and unavoidable. Further analysis was deemed unnecessary.

It is understood that the concern regarding queuing is relevant only to the intersections at the Wilfred Avenue interchange, so only the results for the links at the interchange were reviewed. Though the 85<sup>th</sup> percentile queues are shown in the output from TRAFFIX provided in Appendix C of the Draft EIR, to address potential impacts of spillback, further analysis was performed using the Synchro and Simtraffic software. Lane configurations were based on the most recent information available regarding the planned interchange project together with the mitigation measures proposed for the Project, particularly at Redwood Drive/Wilfred Avenue.

Five simulation runs were completed, and the maximum queue on each approach determined under 2020 Buildout and 2020 plus Project volumes. This information together with the available storage lengths are shown in the table below. The queuing output is provided in the attached Technical Appendix.

**PROJECTED PM PEAK HOUR QUEUES AT WILFRED INTERCHANGE**

Approach	Wilfred Avenue Redwood Drive to U.S. 101 South Ramps		Wilfred Avenue U.S. 101 South Ramps to Commerce Boulevard	
	Westbound at Redwood	Eastbound at South Ramps	Westbound at South Ramps	Eastbound at Commerce
Available Storage	378	378	354	354
Maximum Queue on Approach	2020 392	2020 388	2020 184	2020 339
	2020 + Project 396	2020 + Project 402	2020 + Project 226	2020 + Project 321

At Redwood Boulevard/Wilfred Drive the westbound queue is projected to exceed the available storage length under 2020 conditions, with or without the project. The Project will increase the queue by about only a few feet, and based on an assumed vehicle length of 25 feet, the stacking area would be short by one vehicle length, with or without the Project. In the eastbound direction on this same link between Redwood Boulevard and US 101 South Ramps, the queue in the right-turn lane is projected to exceed the available storage length, again with or without the Project. As was the case for the westbound direction, the design queue would be one vehicle longer than the available stacking space, with or without the Project.

Since the design for this interchange has not yet been completed and is under the control of Caltrans, any changes that may be necessary to accommodate traffic associated with build out under adopted plans but without the Project would be the responsibility of Caltrans. The need for more stacking space is expected without the Project, and the Project does not result in any increased stacking required in terms of the number of vehicles, so the impact is less-than-significant.

**Comment 2-6: Provide analysis of impacts of traffic queues on turning movements. Please submit Synchro HCM reports and turning movement queue analysis for each intersection.**

Response 2-6: See Response 2-5.

**Comment 2-7: Page 3-86, Table 3.6-7 and Page 3-87, Table 3.6-8: Why do some intersections have a better LOS or less delay under “With Project” scenarios than under “Without Project” scenarios if there is no mitigation proposed?**

Response 2-7: The resulting delay indicated in Tables 3.6-7 and 3.6-8 is the weighted average delay for the intersection overall. Projects that add trips predominantly to movements or approaches that have available capacity and/or are operating with delay that is below the average may result in a net reduction in overall average delay. Though this result is

counterintuitive, it occurs when traffic becomes better balanced between demand and supply.

**Comment 2-8: TRAFFIX software was used to perform intersection analysis. The Commerce Blvd northbound on/off-ramp intersection, the Commerce Blvd/Golf Course intersection, the Golf Course/Roberts Lake intersection, the southbound Wilfred Ave On/Off-Ramp intersection and the Wilfred Ave/Redwood Drive intersection are closely spaced. In a study previously conducted by the Department, these intersections would operate at capacity even without adding the casino traffic. The TRAFFIX software may seriously distort the results in situations where intersections are very closely spaced, because the software does not address the queuing interaction between intersections. Another software should be used to address spill-back potential from the downstream intersection to the upstream intersection, effects of downstream queues on the upstream saturation flow rate, and the unusual platoon dispersion or compression between intersections.**

Response 2-8: See Response 2-5.

**Comment 2-9: Figures 3.63 and 3.64: Intersections 3 and 4 are assumed to be connected for the 2009 condition. This will not occur until the Wilfred Interchange project is completed.**

Response 2-9: The horizon year of 2009 was chosen as the anticipated time by which the project would be completed. At this point, it appears that the Project will not be complete until at least 2012, so it still appears feasible that the interchange project will be complete prior to occupation of the Project.

**Comment 2-10: Figures 3.6.3 and 3.6.5: It is not clear if these two figures include the Project and the projected traffic volumes.**

Response 2-10: These two figures reflect volumes without the Project.

**Comment 2-11: Figure 3.6.5 Future 2020 Traffic Volumes: There are inconsistencies among traffic volumes along Wilfred Ave and Rohnert Park Expressway:**

- a. **Intersection #4 Wilfred Ave/Golf Course Drive:**  
In the eastbound direction, there are 1988 vph coming from intersection #3 (Wilfred Ave/US 101 Southbound Ramps) toward intersection #4, but the figure only shows 1675 vph approaching intersection #4. In the northbound direction, 1482 vph are coming from the Commerce Blvd/US 101 Northbound Ramps intersection (#5), but only 1310 vph are shown on the northbound approach.
- b. **Intersection #7 Rohnert Park Expressway/Redwood Drive:**  
There are about 200 vehicles missing on the westbound approach (2388 vehicles from upstream intersection #8 only 2146 vehicles arrive at the intersection).

Response 2-11: The Commerce Boulevard/Golf Course Drive and Wilfred Avenue/U.S. 101 South Ramps intersections will have a substantially different future configuration than their existing configuration. The process of accounting for redistributed traffic volumes upon completion of the Wilfred Avenue “punch through” and closure of Commerce Boulevard under US 101 was conducted manually for the traffic analysis. Upon review of the applied future volumes, it appears that approximately 250 right turning vehicles from eastbound Wilfred Avenue onto southbound Commerce Boulevard were inadvertently excluded from the future volume projections, resulting in the unbalanced traffic flow noted in the comment. The 2020 buildout calculations have been checked to see if an additional 250 right turning vehicles would result in changes to the level of service, and it was found that the intersection would continue to operate acceptably at LOS C.

The discrepancy in northbound volumes on Commerce Boulevard between the US 101 North Ramp and Golf Course Drive is relatively minor and appears to be the result of normal daily traffic fluctuations in the existing traffic volume counts, which are used in the process of determining future volumes.

The discrepancy of 200 westbound vehicles on Rohnert Park Expressway between the US 101 South Ramps and Redwood Drive is a result of the analysis’s conservative approach in disallowing any traffic volume decreases between the City traffic model’s 2002 base and 2020 future model runs. The 2020 model showed a decrease of nearly 200 left turning vehicles on westbound Rohnert Park Expressway at Redwood Drive. When developing the applied future traffic volumes, this decrease was disregarded, with the resultant volumes being about 200 vehicles higher than volumes exiting the adjacent intersection.

**Comment 2-12: Page 1-13 Traffic and Circulation [1] 3.6-1: Internal Synchro analysis shows that the Wilfred Ave/Redwood Drive intersection has a LOSE and will require additional mitigation for the westbound left-turn and the southbound left-turn movements where queues are long for the Baseline 2009 plus Project Conditions.**

Response 2-12: See Response 2-5. With the added lanes included as mitigation for the Project, LOS D operation is projected using the Synchro software. Copies of the LOS calculations for this intersection are provided in the attached Technical Appendix.

**Comment 2-13: Figure 3.6.4 Project 2009 and 2020 Lane Configurations: What are these lane configurations based on? If they are based on the Department’s Wilfred Interchange project, it appears that they are not adequate to accommodate future traffic.**

Response 2-13: The lane configurations shown in Figure 3.6.4 reflect the recommendations contained in the mitigation measures. It should be noted that the Department had not yet chosen a design alternative for the interchange at the time the analysis was completed.

**Comment 2-14: Page 3.91 [M] 3.6.2: The mitigation measures listed here for the Future 2020 plus Project Conditions (3.6.2) are inconsistent with the ones discussed on Page 3.81 (Future 2020 conditions). Please reconcile this inconsistency.**

Response 2-14: The lane configurations indicated on Page 3.81 are based on the traffic demand *without* the Project, while Mitigation 3.6.2 reflects the configuration needed to accommodate the Project as well as other anticipated growth.

**Letter 3: April 1, 2008 Caltrans Letter**

**Comment 3-1: Page 3-80, 2nd paragraph: Please provide data to support the following statement as Table 3.6-5 (Trip Generation) does not address this issue: “The proposed siting of the casino in the Northwest area, displaced the residential, commercial, and light industrial uses assumed to occupy this land, resulting in some doubling up of potential trips as both the casino and the displaced uses are included in the modeling, which adds conservatism to the analysis.”**

Response 3-1: The statement refers to the fact that the Northwest Specific Plan “Area B” was assumed in the traffic projections to be developed with 495 multi-family residential units and 495,000 square feet of retail uses. “Area B” is now being considered as one of the potential sites for the casino and hotel, which has also been included in the traffic projections and is shown in the Draft EIR as being developed on Wilfred Avenue near Stony Point Road. If the casino and hotel are alternatively developed in “Area B” replacing the development shown in the City’s General Plan for “Area B”, the traffic analysis will have included considerably more development than is likely to occur. If, however, the casino is located at one of the alternative sites on Wilfred Avenue, the “Area B” parcels could still potentially develop with the multi-family and retail uses. The traffic analysis should therefore be considered conservative and representative of worst-case conditions.

**DEPARTMENT OF TRANSPORTATION**

111 GRAND AVENUE  
P. O. BOX 23660  
OAKLAND, CA 94623-0660  
PHONE (510) 622-5491  
FAX (510) 286-5559  
TTY 711



Letter2

*Flex your power!  
Be energy efficient!*

March 28, 2008

SON101904  
SON-101-15.02  
SCH # 1998072036

Ron Bendorff, Director of Community Development  
The City of Rohnert Park  
6750 Commerce Blvd  
Rohnert Park, CA 94928

Dear Mr. Bendorff:

**Wilfred/Dowdell Village Specific Plan – Draft Environmental Impact Report (DEIR)**

Thank you for including the California Department of Transportation (Department) in the environmental review process for the project referenced above. Our comments below are based on the review of the DEIR. As lead agency, the City of Rohnert Park is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, and implementation responsibilities as well as lead agency monitoring should be fully discussed for all proposed mitigation measures and the project's traffic mitigation fees should be specifically identified in the environmental document. Any required roadway improvements should be completed prior to issuance of certificate of occupancy. An encroachment permit is required when the project involves work in the State's right of way (ROW). The Department will not issue an encroachment permit until our concerns are adequately addressed. Therefore, we strongly recommend that the lead agency ensure resolution of the Department's CEQA concerns prior to submittal of the encroachment permit application; see the end of this letter for more information regarding the encroachment permit process.

***Trip Generation***

- 2.1 1. Pages 3-80/81: Please clarify the land use assumptions used for this study. Reading the pages referenced here, it is not clear which assumptions were applied.
- 2.2 2. Page 2-1, second bullet: Clarify which assumption was used to project traffic. Is it the 28 FAR or is it based on a hotel project?
- 2.3 3. Table 3-6-5 Trip Generation: 27 percent pass-by deduction is used for the Shopping Center and 47 percent for Fast Food with Drive Thru. Typically, the Department uses 15 percent for pass-by deduction. Please provide a justification for the higher deduction rates.

Ron Bendorff/ City of Rohnert Park  
March 28, 2008  
Page 2

Letter 2

### *Traffic Operations*

- 2.4 1. AM peak hour analysis under various scenarios should be included in the document.
- 2.5 2. The document should address any freeway mainline impacts as well as the adequacy of off-ramp storage and turn lanes on intersection approaches. Inadequate turn-lane storage may have a negative impact on intersection operations. It should also be noted that the Department's requirement for left-turn storage is that the lanes should be long enough that there is a 95 percent probability that it can accommodate randomly distributed traffic arrivals. Left-turn lanes should be designed to meet this requirement.
- 2.6 3. Provide analysis of impacts of traffic queues on turning movements. Please submit Synchro HCM reports and turning movement queue analysis for each intersection.
- 2.7 4. Page 3-86, Table 3.6-7 and Page 3-87, Table 3.6-8: Why do some intersections have a better LOS or less delay under "With Project" scenarios than under "Without Project" scenarios if there is no mitigation proposed?
- 2.8 5. TRAFFIX software was used to perform intersection analysis. The Commerce Blvd northbound on/off-ramp intersection, the Commerce Blvd/Golf Course intersection, the Golf Course/Roberts Lake intersection, the southbound Wilfred Ave On/Off-Ramp intersection and the Wilfred Ave/Redwood Drive intersection are closely spaced. In a study previously conducted by the Department, these intersections would operate at capacity even without adding the casino traffic. The TRAFFIX software may seriously distort the results in situations where intersections are very closely spaced, because the software does not address the queuing interaction between intersections. Another software should be used to address spill-back potential from the downstream intersection to the upstream intersection, effects of downstream queues on the upstream saturation flow rate, and unusual platoon dispersion or compression between intersections.
- 2.9 6. Figures 3.6.3 and 3.6.4: Intersections 3 and 4 are assumed to be connected for the 2009 condition. This will not occur until the Wilfred Interchange project is completed.
- 2.10 7. Figures 3.6.3 and 3.6.5: It is not clear if these two figures include the Project and the projected traffic volumes.
- 2.11 8. Figure 3.6.5 Future 2020 Traffic Volumes: There are inconsistencies among traffic volumes along Wilfred Ave and Rohnert Park Expressway:
  - a. Intersection #4 Wilfred Ave/Golf Course Drive:  
In the eastbound direction, there are 1988 vph coming from intersection #3 (Wilfred Ave/US 101 Southbound Ramps) toward intersection #4, but the figure only shows 1675 vph approaching intersection #4. In the northbound direction, 1482 vph are coming from the Commerce Blvd/US 101 Northbound Ramps intersection (#5), but only 1310 vph are shown on the northbound approach.

Ron Bendorff/ City of Rohnert Park  
March 28, 2008  
Page 3

Letter 2

b. Intersection #7 Rohnert Park Expressway/Redwood Drive:

There are about 200 vehicles missing on the westbound approach (2388 vehicles from upstream intersection #8 only 2146 vehicles arrive at the intersection)

**Impact Mitigation**

- 2.12 1. Page 1-13 Traffic and Circulation [I] 3.6-1: Internal Synchro analysis shows that the Wilfred Ave/Redwood Drive intersection has a LOS E and will require additional mitigation for the westbound left-turn and the southbound left-turn movements where queues are long for the Baseline 2009 plus Project Conditions.
- 2.13 2. Figure 3.6.4 Project 2009 and 2020 Lane Configurations: What are these lane configurations based on? If they are based on the Department's Wilfred Interchange project, it appears that they are not adequate to accommodate future traffic.
- 2.14 3. Page 3.91 [MI] 3.6.2: The mitigation measures listed here for the Future 2020 plus Project Conditions (3.6.2) are inconsistent with the ones discussed on Page 3.81 (Future 2020 conditions). Please reconcile this inconsistency.

**Encroachment Permit**

Any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by the Department. See the following website link for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the address listed below:

Julie Hsu, Office of Permits  
CA Department of Transportation, District 4  
P.O. Box 23660  
Oakland, CA 94623-0660

Should you require further information or have any questions regarding this letter, please call or email Ina Gerhard of my staff at (510) 286-5737 or [ina\\_gerhard@dot.ca.gov](mailto:ina_gerhard@dot.ca.gov).

Sincerely,

*Signed for Christian Bushong*

LISA CARBONI  
District Branch Chief  
IGR/CEQA

c: State Clearinghouse

**DEPARTMENT OF TRANSPORTATION**

111 GRAND AVENUE  
P. O. BOX 23660  
OAKLAND, CA 94623-0660  
PHONE (510) 622-5491  
FAX (510) 286-5559  
TTY 711



Letter 3

*Flex your power!  
Be energy efficient!*

April 1, 2008

SON101904  
SON-101-15.02  
SCH # 1998072036

Ron Bendorff  
Director of Community Development  
The City of Rohnert Park  
6750 Commerce Blvd  
Rohnert Park, CA 94928

**RECEIVED**

APR 2 2008

**CITY OF ROHNERT PARK**

Dear Mr. Bendorff:

**Wilfred/Dowdell Village Specific Plan - Supplemental Comments on the Draft Environmental Impact Report (DEIR)**

Thank you for including the California Department of Transportation (Department) in the environmental review process for the project referenced above. We already provided comments on the DEIR in our letter dated March 28, 2008. However, we would like to add the following comment from our Forecasting unit regarding the assessment of trips generated in the Northwest Area that is now proposed as location for the casino:

- 3.1 Page 3-80, 2<sup>nd</sup> paragraph: Please provide data to support the following statement as Table 3.6-5 (Trip Generation) does not address this issue: "The proposed siting of the casino in the Northwest area displaced the residential, commercial, and light industrial uses assumed to occupy this land, resulting in some doubling up of potential trips as both the casino and the displaced uses are included in the modeling, which adds conservatism to the analysis."

Should you require further information or have any questions regarding this letter, please call or email Ina Gerhard of my staff at (510) 286-5737 or [ina\\_gerhard@dot.ca.gov](mailto:ina_gerhard@dot.ca.gov).

Sincerely,

*Lisa Carboni*

LISA CARBONI  
District Branch Chief  
IGR/CEQA

c: State Clearinghouse

**Letter 4: March 21, 2008 Department of Fish and Game E-mail**

**Comment 4-1: The City of Rohnert Park needs to consult, as soon as possible, with the US Fish and Wildlife Service (USFWS) regarding the potential take of the federally endangered California Tiger salamander (*Ambystoma californiense*). Our records show that Tiger salamanders are documented in the vicinity of the project site and consultation will be required with the USFWS to determine appropriate mitigation measures. The applicant should contact Vincent Griego, USFWS biologist, at (916) 414-6493 for further information on California tiger salamander surveys.**

Response 4-1: On behalf of the City, MACTEC completed a biological assessment for the Site in January 2005. The assessment was completed at this time to meet the timing of preparing the Draft EIR. Marginally suitable habitat for the California tiger salamander was observed at the Project site and at the adjacent Labath Creek; however, California Tiger Salamanders were not observed during the survey. Prior to implementation of the project, the project applicant will contact local USFWS to open up consultation and coordinate with California Division of Fish and Game (CDFG) and USFWS to assess the appropriate mitigation measures.

**Comment 4-2: Rare plant surveys should be conducted this spring by a qualified plant biologist. Federally/state endangered plants are documented in the vicinity of the project area. Some of these plant species are currently in bloom in the project vicinity. The DEIR's California Natural Diversity Database query is not a substitute for plant and animal surveys conducted by a qualified biologist.**

Response 4-2: On behalf of the City, MACTEC completed a biological assessment for the Site in January 2005. The assessment was completed at this time to meet the timing of preparing the Draft EIR. While no federally-Threatened or Endangered plant species were detected during the survey, marginally suitable habitat was observed at the project site for five special-status plants. Prior to implementation of the project, the project applicant will conduct an addition plant survey in the areas previously identified as being marginally suitable habitat to verify the findings of the initial survey. This survey will be conducted in the spring during the wet season. Appropriate mitigation measures would be implemented upon completion of this survey.

**From:** Patrick Moeszinger [PMOESZINGER@dfg.ca.gov]  
**Sent:** Tuesday, March 25, 2008 11:14 AM  
**To:** Bendorff, Ron  
**Cc:** Liam Davis; Vincent\_Griego@fws.gov  
**Subject:** Draft EIR for Wilfred/Dowdell Village Specific Plan

Date: March 21, 2008  
 To: Ron Bendorff, City Planner  
 From: Patrick Moeszinger, Environmental Scientist  
 RE: Wilfred/Dowdell Village Specific Plan Draft EIR, SCH#1998072036 / comments by DFG

Mr. Bendorff,

Regarding our conversation, as you are aware, the California Department of Fish and Game (DFG) is a trustee agency having jurisdiction by law over natural resources held in trust for the people of the State of California under Section 15386 of the California Environmental Quality Act. Because of this, and after reviewing the draft environmental impact report (DEIR) for the proposed Wilfred/Dowdell Village Specific Plan, DFG has the following comments and concerns as we are unable to make an environmental evaluation because of the lack of pertinent biological information.

- 4.1 1. The City of Rohnert Park needs to consult, as soon as possible, with the US Fish and Wildlife Service (USFWS) regarding the potential take of the federally endangered California Tiger salamander (*Ambystoma californiense*). Our records show that Tiger salamanders are documented in the vicinity of the project site and consultation will be required with the USFWS to determine appropriate mitigation measures. The applicant should contact Vincent Griego, USFWS biologist, at (916) 414-6493 for further information on California Tiger salamander surveys.
- 4.2 2. Rare plant surveys should be conducted this spring by a qualified plant biologist. Federally/state endangered plants are documented in the vicinity of the project area. Some of these plant species are currently in bloom in the project vicinity. The DEIR's California Natural Diversity Database query is not a substitute for plant and animal surveys conducted by a qualified biologist.

Thank You

Patrick Moeszinger  
 Environmental Scientist  
 California Department of Fish and Game  
 Bay Delta Region  
 Terrestrial Conservation Planning Unit  
 P.O. Box 47  
 Yountville, Ca 94599

Physical Address:  
 7329 Silverado Trail  
 Napa, CA 94558

voice: (707) 944-5596  
 fax: (707) 944-5563  
 pmoeszinger@dfg.ca.gov

**Letter 5: Mach 17, 2008 Letter from Marilee Taylor Montgomery**

**Comment 5-1: WATER: The DEIR relies on the Rohnert Park Water Supply Assessment (WSA), which has been found invalid in a court of law, and thus the DEIR is fatally flawed, and the environmental review process must be halted until legally valid water supply data is available.**

Response 5-1: The Rohnert Park Water Supply Assessment has not been found invalid by the California courts; a decision on its legality is pending the appellate court. The DEIR does not rely on the results of the WSA for the analysis of available water supply. Other sources of data utilized to evaluate available water supply included the City's Urban Water Management Plan (UWMP), the SCWA 2005 Urban Water Management Plan, and the CH2MHILL and Winzler & Kelly 2004 Incremental Recycled Water Program: Recycled Water Master Plan. It should also be noted that permitted water rights, not hydrology, are the primary limiting factor on the City's supply, its water supply is highly stable under all hydrologic conditions. The City is planning that recycled water supply will be expanded by 300 AFY in accordance with the Subregional System's Incremental Recycled Water Master Plan and ERI. No other water supply expansion projects are included in the City's 2005 Urban Water Management Plan, although the Agency is currently planning a supply expansion project. It should also be noted, that this Project does not include land uses that meet any of the criteria requiring preparation of a separate WSA, however the Project was included in the City's 2005 UWMP.

**Comment 5-2: OPEN SPACE: The DEIR does not address the potential loss of 180 acres of Community Separator that may result from the proposed Graton Rancheria casino site be taken into trust by the federal government. It is unknown what the casino developers will ultimately use this 180 acres for, but as a federally recognized "tribe", the developers can use it for any purpose they choose. The project's DEIR needs to be re-worked with this potential loss in mind, using 'worst case' scenarios that should include, among other things, a two to ten acre sewage treatment plant and water treatment plant for the casino, as well as an RV park, housing, and golf course.**

Response 5-2: The DEIR reflects the best information available at the time of the analysis and the Graton Rancheria proposed use scenarios are speculative at best. At this time the proposed casino is located within the Northwest Specific Plan area which is currently in preparation. The County of Sonoma is scheduled to meet in September 2008 at which time they are anticipated to amend the General Plan to remove the Wilfred/Dowdell Village Specific Plan area (as well as the Northwest Specific Plan area) from the community separator.

**Comment 5-3: TRAFFIC: The DEIR fails to mention a proposed shopping center to be built in conjunction with the casino, on land that would be immediately adjacent to the Project and bordered by Dowdell Lane (west), Wilfred Avenue (north), Labath Avenue (east) and Business Park Drive (south). The DEIR should be re-worked to include traffic from this shopping center.**

**The DEIR uses outdated information on the Graton Rancheria casino project, now located within Rohnert Park’s Urban Growth Boundary. The size of the casino has almost doubled over the figure used in the DEIR (450,000 square feet vs. current 760,000 square feet – see [www.gratoneis.com](http://www.gratoneis.com)). Traffic projection for the casino need to be re-worked with the larger casino, and the projections should use the traffic analysis developed for another Bay Area casino project, the San Pablo Casino, entitled “San Pablo Casino Traffic Analysis” (March 2005), produced by KOA Corp [http://www.stopthecasino101.com/sitebuildercontent/sitebuilderfiles/koa\\_sanpablotrafficstudy.pdf](http://www.stopthecasino101.com/sitebuildercontent/sitebuilderfiles/koa_sanpablotrafficstudy.pdf)**

**The DEIR fails to make mention of the current lawsuit against Caltrans and the U.S. Department of Transportation, alleging flawed environmental analysis for the Wilfred Avenue Overpass project. This lawsuit has the potential to delay construction of the Overpass or prevent it altogether. The Project DEIR should discuss the potential effect of this litigation on the Project, and include a “worst case” scenario for traffic should the Overpass not be built in a timely fashion, or not be built at all.**

Response 5-3: The DEIR reflects the best information available at the time of the analysis, and the shopping center component of the casino project had not been proposed when the analysis was performed. As noted in Response 3-1, however, the traffic projections do include residential and retail generated traffic associated with the Northwest Area “B” parcels. If the casino is constructed at this same location, the resulting double-counting of trips would be likely to capture the bulk of potential impacts created by the potential casino shopping center. It is assumed that impacts associated with the proposed casino project would be evaluated in the framework of other known or anticipated developments, including the Project, as part of a Cumulative scenario. As for the Wilfred Avenue Overpass (also known as the “Wilfred Avenue Overpass” project), the project will still be built, though its design may need to be modified in response to the pending lawsuit, which had not been filed when the analysis was performed. Analysis of the impacts of this lawsuit would be speculative, at best.

**Comment 5-4: RECYCLED WASTEWATER: There is significant controversy in the scientific community with regard to the safety of recycled water. Treated sewage intended for reuse contains a multitude of hazardous substances, including infectious pathogens and other pollutants. Current, valid studies suggest that multi-drug resistant bacteria such as MRSA and that pharmaceuticals and phthalates are finding their way into our drinking water in part from the use of recycled wastewater for irrigation. In 2004, the Water Environment Research Foundation (“WERF”) published a study that discovered significant loads of infectious pathogens in recycled water. The real concern with this study, aside from the fact that disease-causing organisms of any kind survive sewage treatment, is that the recycled water where they were discovered satisfied all existing criteria specified in regulations adopted by the state.**

**The DEIR should contain a discussion of the potential for risk to human health from the use of the anticipated recycled water supply. The recycled water that would be available to the Project should be tested to determine what, if any, contaminants it contains, and what risks the contaminants would pose to the public.**

Response 5-4: Recycled water for the entire City is supplied by the City of Santa Rosa Subregional System (Subregional System) of which the City is a member of. The water is treated and tested to meet both Federal and Stated guidance and is currently used for irrigation of parks and school grounds south of Golf Course Drive, the North and South Rohnert Park Municipal Golf courses, and various commercial and industrial sites. Continuous analyses of discharge water have not identified risks to human health from the use of the recycled water supply. Because testing is required as part of the discharge requirements for the recycled water, no additional testing for the Project water would be necessary.

**Marilee Taylor Montgomery**  
152 Wilfred Avenue ~ Santa Rosa, CA 95407

March 17, 2008

City of Rohnert Park  
Planning Division  
6750 Commerce Blvd.  
Rohnert Park, CA 94928

**RECEIVED**

**MAR 21 2008**

**CITY OF ROHNERT PARK**

re: Comments, Wilfred/Dowdell Specific Plan Draft Environmental Impact Report

Dear Sirs:

Please find herein my Comments on the Wilfred/Dowdell Specific Plan (Project) Draft Environmental Impact Report (DEIR).

**5.1 WATER:** The DEIR relies on the Rohnert Park Water Supply Assessment (WSA), which has been found invalid in a court of law, and thus **the DEIR is fatally flawed, and the environmental review process must be halted until legally valid water supply data is available.**

**5.2 OPEN SPACE:** The DEIR does not address the potential loss of 180 acres of Community Separator that may result from the proposed Graton Rancheria casino site be taken into trust by the federal government. It is unknown what the casino developers will ultimately use this 180 acres for, but as a federally recognized "tribe", the developers can use it for any purpose they choose.. The project's DEIR needs to be re-worked with this potential loss in mind, using 'worst case" scenarios that should include, among other things, a two to ten acre sewage treatment plant and water treatment plant for the casino, as well as an RV park, housing, and golf course.

**5.3 TRAFFIC:** The DEIR fails to mention a proposed shopping center to be built in conjunction with the casino, on land that would be immediately adjacent to the Project and bordered by Dowdell Lane (west), Wilfred Avenue (north), Labath Ave (east) and Business Park Drive (south). The DEIS should be re-worked to include traffic from this shopping center.

The DEIR uses outdated information on the Graton Rancheria casino project, now located within Rohnert Park's Urban Growth Boundary. The size of the casino has almost doubled over the figure used in the DEIR (450,000 square feet vs. current 760,000 square feet – see [www.gratoneis.com](http://www.gratoneis.com) ). Traffic projections for the casino need to be re-worked with the larger casino, and the projections should use the traffic analysis developed for another Bay Area casino project, the San Pablo Casino, entitled 'San Pablo Casino Traffic Analysis" (March 2005), produced by KOA Corp [http://www.stopthecasino101.com/sitebuildercontent/sitebuilderfiles/koa\\_sanpablotrafficstudy.pdf](http://www.stopthecasino101.com/sitebuildercontent/sitebuilderfiles/koa_sanpablotrafficstudy.pdf)

The DEIR fails to make mention of the current lawsuit against Caltrans and the U.S. Department of Transportation, alleging flawed environmental analysis for the Wilfred Avenue Overpass project. This lawsuit has the potential to delay construction of the Overpass or prevent it altogether. The Project DEIR should discuss the potential effect of this litigation on the Project, and include a "worst case scenario for traffic should the Overpass not be built in a timely fashion, or not be built at all.

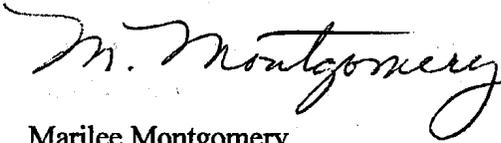
5.4

**RECYCLED WASTEWATER:** There is significant controversy in the scientific community with regard to the safety of recycled water. Treated sewage intended for reuse contains a multitude of hazardous substances, including infectious pathogens and other pollutants. Current, valid studies suggest that multi-drug resistant bacteria such as MRSA and that pharmaceuticals and phthalates are finding their way into our drinking water in part from the use of recycled wastewater for irrigation. In 2004, the Water Environment Research Foundation ("WERF") published a study that discovered significant loads of infectious pathogens in recycled water. The real concern with this study, aside from the fact that disease-causing organisms of any kind survive sewage treatment, is that the recycled water where they were discovered satisfied all existing criteria specified in regulations adopted by the state.

The DEIR should contain a discussion of the potential for risk to human health from the use of the anticipated recycled water supply. The recycled water that would be available to the Project should be tested to determine what, if any, contaminants it contains, and what risks the contaminants would pose to the public.

Thank you for providing me with the opportunity to comment on this Project.

Sincerely,

A handwritten signature in cursive script that reads "M. Montgomery".

Marilee Montgomery

### 3.0 MITIGATION MONITORING PROGRAM

#### 3.1 Background

The legal basis for the development and implementation of mitigation measures lies in the California Environmental Quality Act (CEQA). Pursuant to Section 21002 of CEQA, public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available, which would substantially lessen the significant environmental effects of such projects. Subsection 21002.1 further requires that each public agency shall mitigate or avoid the significant effects on the environment of projects it approves or carries out whenever it is feasible to do so.

Public Resources Code 21081.6 provides.

When making the findings required by subdivision (a) of Section 21081 or when adopting a negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21081, the public agency shall adopt a reporting or monitoring program for the changes to the Project which it has adopted or made a condition of Project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during Project implementation. For those changes which have been required or incorporated into the Project at the request of an agency having jurisdiction by law over natural resources affected by the Project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.

The reporting or monitoring program must be adopted when a public agency makes its findings under CEQA so that the program can be made a condition of Project approval in order to mitigate significant effects on the environment.

#### 3.2 Purpose

The Mitigation Monitoring Program is designed to serve as a tool for the evaluation of Project compliance with mitigation measures approved by the City from the Wilfred/Dowdell Village Specific Plan Environmental Impact Report (EIR). The basic objectives of the Mitigation Monitoring Program are to achieve the following:

- To report to the Planning Commission, the City Council, and the public, information regarding compliance with the EIR mitigation measures; and
- To provide assurance and documentation that the studies and actions called for in the mitigation measures are being performed as planned.

### 3.3 Administration

The Director of Community Development for Rohnert Park will be responsible for overall implementation and administration of the Mitigation Monitoring Program for the Wilfred/Dowdell Village Specific Plan Project. In order to carry out the mitigation monitoring program, the Director of Community Development will designate a staff person to serve as coordinator among the various agencies and departments. This person (Coordinator) will ensure that each mitigation measure is implemented to the standards specified in the EIR and is completed in a timely manner. If current staffing within the Department cannot absorb the work demand to implement the program, a private contractor will be hired to manage and coordinate the mitigation monitoring and reporting program. The contractor will serve under the direction of the Director of Community Development.

Administration of the Mitigation Monitoring Program will include the following:

- Documentation of permit approvals by other agencies;
- Documentation of compliance with conditions of Project approval;
- Routine inspections and reporting activities;
- Plan checks;
- Coordination of activities of consultants hired by the City when such expertise and qualifications are necessary;
- Coordination with applicable agencies that have mitigation monitoring and reporting responsibilities (if any);
- Follow-up and response to citizens' complaints;

- Development of a work plan and schedule for monitoring activities;
- Maintenance of a mitigation monitoring checklist or other suitable mitigation compliance summary;
- Implementation of corrective actions or enforcement measures, as needed;
- Preparation of reports of the status of implementation and monitoring of mitigation measures; and
- Monitoring of financial resources associated with the program.

### 3.4 Implementation

Each responsible individual or agency listed as a “Monitoring Agency” in the Mitigation Monitoring Program will be responsible for determining whether the mitigation measures contained within the monitoring program have been implemented. A Monitoring Agency may submit a Verification Report Form or other verification report to the Coordinator that documents compliance with each of the mitigation measures for which they are responsible. Based on the information provided by the reports, the Coordinator will maintain a mitigation-monitoring checklist that documents the completion status of all required mitigation measures. Prior to issuance of grading or building permits, the Coordinator will review the mitigation monitoring program checklist to ensure that the Project design is in compliance with all mitigation measures that are required to be implemented as a condition of the permit.

### 3.5 Enforcement

If a responsible individual or agency determines that compliance has not been achieved, a written notice shall be delivered to the applicant and Director of Community Development or Coordinator describing the non-compliance and requiring compliance within a specified period of time. Construction may be halted pending compliance and other remedies may be required at the discretion of the Director of Community Development or the City Attorney.

### 3.6 Approval and Changes

This Mitigation Monitoring Program is adopted in conjunction with the Final EIR and Project approvals for the Wilfred/Dowdell Village Specific Plan Project. Subsequent changes to the Mitigation Monitoring Program may be approved by the Director of Community Development if deemed to accomplish the

purpose of said mitigation. Modifications shall be documented in a revised Mitigation and Monitoring Program.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
<b>LAND USE</b>			
<p>Development of the project will be clustered and concentrated to maintain the visual quality of the separator. The commercial center in Village North will be sited near existing buildings and Village South is to be concentrated in buildings at the center of its site. The Project perimeter will be heavily landscaped opposite the community separator on the west side of Dowdell Avenue and will provide bicycle and pedestrian access to the separator</p> <p>Prior to approval of an application for development of any portion of the Project site that is designated in the Sonoma County General Plan as part of the Community Separator, then one of the following measures shall be implemented.</p> <p>[M] 3.1-1a Acquisition of a similar amount of land designated for development elsewhere, which is adjacent to a community separator, and place it in a community separator through a General Plan amendment.</p> <p>[M] 3.1-1b Provision of compensation for the loss of land in the separator by a cash payment to the Sonoma County Agricultural Preservation and Open Space District, to purchase open space on a similar amount of land.</p> <p>[M] 3.1-1c Purchase or transfer development rights from a similar amount of land adjacent to the separator to allow it to be retained in open space.</p> <p>[M] 3.1-1d Purchasing of conservation open space easements on</p>	Community Development	Incorporate mitigation measures related to obtaining land (M3.1-1b) or conservation easements that would satisfy this mitigation (M 3.1-1d).	Prior to development. (Note: The removal of this Wilfred/Dowdell area from the Community Separator is anticipated in September 2008 during the County's adoption of its General Plan Update. This would eliminate the need for this mitigation.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
developable land that would enhance or strengthen the community separator development.			
<p>[M] 3.1-2a: Comply with LAFCO procedures to consider annexations of land in a community separator.</p> <p>[M] 3.1-2b: The County is undertaking an update of its General Plan. As a part of this, the appropriateness of the Community Separator at the Project Site may be considered. If this site is removed from the Community Separator, the impact would no longer exist..</p>	Community Development	Incorporate mitigation measures related to obtaining land (M3.1-1b) or conservation easements that would satisfy this mitigation (M 3.1-1d).	Prior to development. (Note: The removal of this Wilfred/Dowdell area from the Community Separator is anticipated in September 2008 during the County's adoption of its General Plan Update. This would eliminate the need for this mitigation.
[M] 3.1-5: The Project shall comply with mitigation measures defined to reduce traffic, dust, noise, and night lighting as described in Sections 3.6, 3.7, 3.8 and 3.9 of the EIR, respectively.	Community Development/Engineering/P W Inspector	Incorporate required mitigation measures to reduce traffic, dust, noise and night lightning as described in Sections 3.6, 3.7, 3.8 and 3.9 of the EIR, respectively.	Prior to approval of grading permit.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
<b>GROUND HAZARDS</b>			
[M] 3.2-1: The contents of buildings in the proposed Project shall be secured to the extent feasible. All shelving shall be secured to structural elements of the floor, wall, or ceiling. Heavy display items and merchandise shall be placed on lower shelves and secured to building elements where possible. A certificate of occupancy shall not be issued until compliance with these requirements.	Community Development/Building Inspector	Inspect businesses.	Prior to the opening of the business.
[M] 3.2-2: A geotechnical study acceptable to the City shall be conducted by a California Certified Geologist prior to site development. This study shall evaluate liquefaction potential at the Project site prior to issuance of a grading permit. Recommendations shall be provided, as necessary, to prevent damage to Project facilities and compliance with these recommendations shall be required as a condition of development at the Project site. This impact will be less than significant because engineering techniques to mitigate for poor ground conditions are incorporated into building codes with which the Project will have to comply.	Community Development/Engineering	Review and approve the final grading plan and identify geotechnical specifications as a condition of grading permit approval.  Conduct inspection of the Project site to verify implementations of geotechnical specifications.	Prior to approval of a grading permit. Weekly throughout the grading period.
[M] 3.2-3: A geotechnical study acceptable to the City shall be conducted to determine the location and extent of expansive soils at the Project site prior to issuance of a grading permit. The study will include recommendations regarding the treatment and/or remedy of onsite soils, and the structural design of foundations and underground utilities, and compliance with these recommendations shall be required as a condition of future development at the Project Site	Community Development/Engineering/Building Inspector/PW Inspector	Review and approve the final grading plan and identify geotechnical specifications as a condition of grading permit approval.  Conduct inspection of the Project site to verify implementations of geotechnical specifications.	Prior to approval of a grading permit.  Weekly throughout the grading period.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
[M] 3.2.5: Any domestic wells associated with the 7 houses on the site and two houses west of the intersection of Wilfred/Dowdell Avenues shall be properly destroyed. If wells locations are not destroyed prior to the initiation of grading permits, well locations shall be shown on grading plans. A California licensed C-57 well driller shall destroy any wells.	Engineering/ Sonoma County Department of Environmental Health	Inspect well sites prior to removal.	Prior to approval of a grading permit.
<b>HYDROLOGY AND WATER QUALITY</b>			
[M] 3.3-1: The Project developer shall prepare a site-specific hydrology and drainage study acceptable to the City showing the increase in storm water runoff that would result from development of the Project site. Based upon the results of this study, the developer shall design and construct a storm drain system in accordance with Sonoma County Water Agency <i>Flood Control Design Criteria</i> (latest revision), specific to the Project.	Engineering/PW Inspector	Review and approve final storm drainage plans.	Prior to approval of a grading permit.
[M] 3.3-2a: The Project developer shall develop and implement a site-specific storm water pollution prevention plan acceptable to the City that identifies best management practices for effectively reducing discharges of storm water containing sediment and construction wastes resulting from site construction activities. The applicant shall comply with all other requirements set forth in NPDES General Permit CAS000002.  [M] 3.3-2b: The developer shall design and construct storm drainage improvements to remove oil and grease from discharges from parking lots, including directing runoff to vegetated swales or areas, consistent with best management practices (BMPs).	Engineering/PW Inspector	Review and approve final storm drainage plans.  Verify proper installation of off-site drainage facilities	Prior to approval of a grading permit.  Prior to approval of a grading permit.
The Project developer will prepare a "Preliminary Storm Water Mitigation Plan", for each phase of development pursuant to Guidelines for the Standard Urban Storm Water Mitigation Plan, Storm Water Best Management Practices for New Development and Redevelopment, For	Engineering	Review and approve final Storm Water Mitigation	Prior to approval of a grading permit.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
the Santa Rosa Area and Unincorporated Areas around Petaluma and Sonoma, June 3, 2005.		Plan.	
<b>BIOLOGICAL RESOURCES</b>			
<p>[M] 3.4-3a: A pre-construction survey of ruderal seasonal wetland habitat shall occur prior to, but no earlier than 30 days prior to the commencement of grading and/or construction activities. This survey shall be conducted within the blooming period of all five special-status plants identified as having the potential to be present on the Project site. If one or more of these species is observed during the survey, then appropriate alternative measures should be executed.</p> <p>[M] 3.4-3b: If special-status plant species are determined to occur on the project site, they shall be avoided to the extent feasible. For those plants that cannot be avoided, the following mitigation measure shall be implemented.</p> <ol style="list-style-type: none"> <li>1) All plants within the construction footprint (including staging areas) shall be transplanted to a mitigation site approved by CDFG and the USFWS.</li> <li>2) Lost plant habitat shall be replaced at a ratio of two acres of replacement habitat for each acre of special- status plant habitat lost. The success of the transplantation program shall be evaluated to have been achieved if 80% or more of the transplanted plants have survived five years after transplantation.</li> <li>3) Mitigation projects will be monitored annually for five years using success criteria developed in coordination with the CDFG and USFWS.</li> </ol>	<p>Community Development/CDFG/USFWS</p>	<p>If special-status plants are present, monitor the site for compliance with mitigation measures.</p> <p>Monitor transplantation program in cooperation with CDB&amp;G and USFWS.</p>	<p>Prior to, but no earlier than 30 days prior to the commencement of grading as a condition of approval of the grading permit.</p>

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
<p>[M] 3.4-3c: Where complete avoidance is not feasible, pre-construction surveys shall be conducted to flag the limits of areas where special-status plant species occur.</p> <p>[M] 3.4-3d: The City of Rohnert Park and the developer should establish an ongoing and aggressive weed abatement program to prevent the spread and establishment of exotic weeds along established habitat on the site or habitat subject to further invasion of seed stock resulting from grading and development activities.</p> <p>[M] 3.4-3e: The City’s General Plan (<i>City of Rohnert Park, 2000</i>) contains goals and policies related to the preservation of trees and native vegetation. Two of them should be noted by the Developer: 1) Goal EC-D: “Maintain existing native vegetation and encourage planting of native plants and trees”; 2) Policy EC-12: “Protect oaks and other native trees that are of significant size through the establishment of a Heritage Tree Preservation Ordinance.” Native plants and vegetation shall be utilized in the perimeter landscape.</p>			
<p>[M] 3.4-4a: A formal consultation should be initiated with the USFWS regarding the California Tiger Salamander (CTW). Based on the ensuing Biological Opinion provided by the USFWS as part of the consultation, further measures may be necessary by the USFWS before initiation of any grading and construction activities would be permitted to begin.</p> <p>[M] 3.4-4b: A CTS protocol survey could be one of the USFWS’s recommendations, based on the consultation. CTS survey protocol guidelines appear in a publication produced by the USFWS (<i>USFWS, 2004</i>).</p> <p>[M] 3.4-4c: Any active CTS must not be disturbed. If CDFG</p>	Community Development /CDFG/USFWS	Upon consultation with the USFWS, implement any measures that would be necessary before initiation of any grading and construction activities.	Prior to, but no earlier than 30 days prior to the commencement of grading as condition of approval of a grading permit.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
determines that CTS habitat will be lost because of development, the developer/applicant shall provide compensation for habitat loss to be determined in consultation with the CDFG.			
<p>[M] 3.4-6a: The applicant shall retain a qualified biologist, acceptable to the City to conduct nest surveys on the site and within 200 feet of its borders prior to construction or site preparation activities occurring during the nesting/breeding season raptor species (typically February through August). The surveys shall be conducted no earlier than 30 days prior to commencement of construction/restoration activities.</p> <p>[M] 3.4-6b: If active raptor nests are present in the construction zone or within 200 feet of these areas, a fence shall be erected at a minimum of 50 feet around the nest site and remain until the end of the nesting season or until the biologist deems necessary. This temporary buffer may be greater depending on the identification of the bird species and construction activity elements, as determined by the biologist.</p> <p>[M] 3.4-6c: If an active raptor nest is located on or adjacent to the project site, tree removal, grading, and other project-related disturbances shall be prohibited within 200 feet of the active raptor nest until the young have fledged. Prior to disturbance within 200 feet of an active raptor nest, the project developer shall retain a qualified biologist or ornithologist, acceptable to the City to confirm that the young have fledged. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure the safety of raptors at peril.</p>	PW Inspector	<p>Review results of the pre construction survey.</p> <p>If a nest is present, monitor the site for compliance with mitigation measures.</p>	Prior to issuance of a grading permit, but no earlier than 30 days prior to commencement of construction/restoration activities.
[M] 3.4-8a: The project design shall be written so that avoidance or minimization of wetland impacts occurs on the site through realignment and special design or construction features. In accordance with the federal Clean Water Act Section 404(b)(1) guidelines (40 CFR 230 et	Community Development /CDFG/USFWS/USACE	Verify that applicant has obtained appropriate USACE permit and has implemented the required	Prior to issuance of a grading permit.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
<p>seq.), avoidance and then minimization must be given first consideration in the sequence for mitigating wetlands impacts.</p> <p>[M] 3.4-8b: In the event construction on the site impacts any portion or all of the documented wetland habitat, mitigation standards mandated by the USFWS, CDFG, and USACE for fill of wetlands and Waters of the U.S will be required. These measures will involve either the restoration of wetlands at a ratio of 1.5:1 or the creation of new wetlands at a ratio of 2:1. If up-front mitigation is provided (wetlands are restored or created prior to the fill of project site wetlands), a 1:1 mitigation ratio is accepted. A final determination of these restoration ratio totals shall be established in consultation with the USFWS, CDFG and/or USACE.</p> <p>[M] 3.4-8c: The developer will incorporate provisions of the 1601 Streambed Alteration Agreement to include appropriate Best Management Practices (BMPs) or erosion control methods to ensure that erosion and sedimentation resulting from construction activities will be minimized into Labath Creek. Examples of these types of measures for alterations to creeks or streambeds that have been implemented on other projects include: construction during the dry season when flows are at a minimum; and construction of a coffer dam to reroute flows during construction. Specific measures for alterations to Labath Creek will be developed after CDFG's review.</p>		<p>compensatory wetland mitigation measures.</p>	
<p>[M] 3.4-9a: Areas identified as current or potential vernal pool habitat shall be avoided to the extent feasible by all construction related activities. If avoidance of current and potential vernal pool habitat is not possible, either of mitigation measure 3.4-9b or 3.4-9c below shall be implemented to reduce the impact to a less-than-significant.</p> <p>[M] 3.4-9b: The Project developer will establish a CDFG/USFWS-</p>	<p>Community Development/PW Inspector</p>	<p>Verify that applicant has obtained a CDFG/USFWS-approved mitigation bank and they reconstruct necessary vernal pool habitat if avoidance of current and potential vernal</p>	<p>Prior to issuance of a grading permit.</p>

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
<p>approved mitigation bank. The project developer will reconstruct offsite vernal pool habitat at a replacement ratio of 1:1 for vernal pool habitat creation and 2:1 for vernal pool habitat preservation for each acre of vernal pool habitat impacted.</p> <p>[M] 3.4-9c: The Project developer will permanently protect the agreed-upon acreage of vernal pool habitat within the mitigation bank via a CDFG/USFWS approved conservation easement, to be held by a CDFG/USFWS-approved entity.</p>		pool habitat is not possible.	
<p>[M] 3.4-12a: Prior to the removal of any vegetation within 100 feet from Labath Creek, the developer shall prepare a Riparian Restoration Erosion Control Plan. The plan shall incorporate measures such as silt fencing, wattling (wattling is hay encased in mesh netting to inhibit and prevent soil erosion), and staked hay bales. The plan shall be subject to approval by the City and the CDFG.</p> <p>[M] 3.4-12b: During construction, herbicides/pesticides shall not be applied within the riparian zone associated with Labath Creek without the approval of the type of herbicide/pesticide to be used and the application by which it would be applied by the USFWS, CDFG, and National Marine Fisheries (NMFS).</p>	Community Development/CDFG/PW Inspector	<p>Verify that applicant has prepared a Riparian Restoration Erosion Control Plan.</p> <p>Verify that developer has appropriate agency approval if application of a herbicide/pesticide is necessary.</p>	Prior to issuance of a grading permit.
<b>CULTURAL RESOURCES</b>			
<p>[M] 3.5-1: A cultural resources field survey of the Project site shall be performed prior to construction activities. All prehistoric and historic archaeological and historic architectural properties identified during the field survey shall be recorded to State of California, Department of Parks and Recreation standards on 523 (DPR 523) series forms.</p>	Community Development	Verify Completion of the field survey and its recordation with the State.	Prior to approval of a grading permit.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
<p>[M] 3.5-2a: If any cultural resources are discovered during ground-disturbing activities, work in the immediate area shall stop and a qualified archaeologist brought in to evaluate the resource and to recommend further action, if necessary. Construction crews shall be directed by holder of the grading permit to be alert for cultural resources which could consist of, but not be limited to: artifact of stone, bone, wood, shell, or other materials; features, including hearths, structural remains, or dumps; areas of discolored soil indicating the location of fire pits, post molds, or living area surfaces.</p> <p>[M] 3.5-2b: In the event that human remains are discovered, all work in the area shall stop immediately, and the applicant shall contact the County Coroner. If the remains are determined to be of Native American origin, both the Native American Heritage Commission and any identified descendants shall be notified and recommendations for treatment solicited pursuant to CEQA Section 15064.59(e).</p>	Community Development/PW Inspector	<p>Verify Completion of the field survey by a qualified archaeologist and its recordation with the State.</p> <p>Presence of a qualified archaeologist to ensure that construction workers comply with mitigation measures consistent with State and Federal law.</p>	<p>Prior to approval of a grading permit.</p> <p>On-going during demolition, excavation and grading.</p>
<b>TRAFFIC AND CIRCULATION</b>			
<p>[M] 3.6-1a: In conjunction with the Project, a traffic signal shall be installed at the Redwood Drive/Business Park Drive intersection which would result in acceptable LOS B operation and reduce the impact to less than significant.</p> <p>[M] 3.6-1b: In conjunction with the Project, a right-turn overlap shall be installed on the westbound Rohnert Park Expressway approach which would result in acceptable LOS C operation at Redwood Drive/Rohnert Park Expressway, and reduce the impact to less than significant.</p>	Engineering/PW Inspector	Review construction documents for the intersection improvements.	Prior to issuance of building permit.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
[M] 3.6-2: In conjunction with the Project, a fourth lane shall be installed along the eastbound Wilfred Avenue approach to Redwood Drive so that three through lanes and a left-turn lane can be provided. Modification of the striping on the eastbound Rohnert Park Expressway approach to Redwood Drive shall include dual left-turn lanes and dual through lanes in place of the existing single left-turn lane and three through lanes which would result in acceptable LOS C operation and reduce the impact to less than significant.	Engineering/PW Inspector	Review construction documents for the intersection improvements.	Prior to issuance of building permit.
[M] 3.6-4: No street connections or driveways from the Project site along Wilfred Avenue shall be allowed which would reduce the impact to less than significant.	Engineering/PW Inspector/ Community Development	Review construction documents for the recommended improvements.	Prior to issuance of building permit.
[M] 3.6-5a: Signalization of the intersection of Redwood Drive/Willis Avenue would reduce the impact to less than significant.  [M] 3.6-5b: To address potential conflicts with traffic from the In-n-Out restaurant, the owners of the adjacent parcel should attempt to negotiate with the owners of the In-N-Out site to arrive at a solution that will allow drive-through traffic to queue up entirely off the public roadway and reduce the impact to less than significant.	Department Community Development – Planning Division	Review construction documents for the intersection improvements documents for the recommended improvements.	Prior to issuance of building permit.
[M] 3.6-6a: Site design which shall include sidewalks on all street frontages as well as pedestrian pathways and crossings connecting on-site activity centers would reduce the impact to less than significant  [M] 3.6-6b: Design of street improvements along Redwood Drive and Wilfred Avenue shall include bicycle lanes as indicated in the City of Rohnert Park’s General Plan which would reduce the impact to less than significant  [M] 3.6-6c: The project will provide bicycle racks on-site to allow safe	Engineering/PW Inspector Community Development	Review construction documents for the recommended improvements.	Prior to issuance of building permit.

<b>Mitigation Monitoring Program</b>			
<b>Mitigation Measure</b>	<b>Monitoring Agency</b>	<b>Monitoring Action</b>	<b>Timing</b>
and convenient storage of bikes for employees and customers which would reduce the impact to less than significant.  [M] 3.6-6d: The project developer shall asses the need for a covered transit stop and/or bus pullouts along the site's frontage on Redwood Drive with the Sonoma County Transit to determine if a stop is needed or not.			
[M] 3.6.7: The site design shall include adequate fire lanes and other emergency facilities as deemed appropriate which would reduce the impact to less than significant.	Engineering/Public Safety	Review construction documents for the intersection improvements.	Review construction documents for the intersection improvements.
<b>AIR QUALITY</b>			
[M] 3.7-3: The mitigation measures listed under [M] 3.7-3 are incorporated in the Project to reduce the temporary impacts of construction dust emissions to a less-than-significant level. These are the applicable control measures recommended by the BAAQMD for construction areas larger than four acres that are located near sensitive receptors.	Engineering/PW Inspector	Review construction documents and perform periodic visual inspections to verify applicable control measures are being implemented.	Prior to approval of a grading permit and on-going during construction.
No mitigation measures are available to reduce the VMT associated with the General Plan and the Project Specific Plan; therefore, this impact would be significant and unavoidable.	Not Applicable	Not Applicable.	Not Applicable.
<b>NOISE</b>			
[M] 3.8-4: The Project shall comply with the City's Municipal Code, including hours of construction. All equipment shall be adequately	Community Development	Review construction documents and perform	Prior to approval of a grading permit

<b>Mitigation Monitoring Program</b>			
<b>Mitigation Measure</b>	<b>Monitoring Agency</b>	<b>Monitoring Action</b>	<b>Timing</b>
muffled and properly maintained. Construction equipment noise levels shall be monitored to move, muffle and/or shield equipment to minimize noise impacts.		periodic visual inspections to verify applicable control measures are being implemented.	and on-going during construction.
<b>VISUAL RESOURCES</b>			
[M] 3.9-2: Refer to mitigation measures [M]3.1-1 and [M] 3.1-2 for the mitigation measures required to reduce the identified land use and visual impacts to less than significant levels.	Community Development	Incorporate mitigation measures related to obtaining land (M3.1-1b) or conservation easements that would satisfy this mitigation (M 3.1-1-dd).	Prior to development. (Note: The removal of this Wilfred/Dowdell area from the Community Separator is anticipated in September 2008 during the County's adoption of its General Plan Update. This would eliminate the need for this mitigation.
[M] 3.9-3: The Project shall comply with municipal code section 17.12.050 that requires that exterior lighting be designated to avoid spillover lighting onto adjacent properties.	Community Development/ PW Inspector	Review construction documents to verify specification are being met.	Prior to issuance of building permit.

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
[M] 3.9-4: Implementation of polices in the General Plan EIR will be required as part of the project design. The polices to mitigate visual impacts on the City’s Westside including planting and setbacks that ensure the edge of the urban uses results in a “soft” view will reduce these impacts to a less than significant level..	Community Development	Review construction documents to verify policies are being met.	Prior to approval of a grading permit.
<b>PUBLIC SERVICES AND UTILITIES</b>			
[M] 3.10-1: The Project will contribute to the need for additional public safety officers associated with growth of the City. As part of future development, a public safety station is identified in the stadium area specific plan and would also be funded by the Federated Indians of the Graton Rancheria as part of the proposed Casino as well as through capital improvements approved by the Redevelopment Agency and through the Public Facilities Financing Plan (PFFP). Development of the station would reduce the impact to less than significant.	Public Safety/ Finance	As an interim action, Station One on Rohnert Park Expressway will be expanded into a fully-operational station to provide better response to this area until funds have been approved to fund this station. This station would continue be staffed to support the west side of Highway 101 until a new public safety is developed in the Stadium Specific Plan Area.	In conjunction with development of this project, Station One on Rohnert Park Expressway will be expanded into a fully-operational station.
[M] 3.10-2: The Project applicant shall provide funds for the purchase of equipment needed to outfit the additional Public Safety Officer required as a result of Project development. The amount shall be determined and agreed upon by the Chief of Public Safety and the Finance Director of the City of Rohnert Park. In addition, as part of future development, a public safety station is identified in the stadium area specific plan area and would also be funded by the Graton Rancheria as part of the proposed Casino as well as through capital	Public Safety/Finance	As an interim action, Station One on Rohnert Park Expressway will be expanded into a fully-operational station to provide better response to this area until appropriate funds have been approved to	In conjunction with development of this project, Station One on Rohnert Park Expressway will be expanded into a fully-

<b>Mitigation Monitoring Program</b>			
Mitigation Measure	Monitoring Agency	Monitoring Action	Timing
improvements approved by the Redevelopment Agency and through the PFFP. This funding would reduce the impact to less than significant.		fund this station. This station would continue be staffed to support the west side of Highway 101 until a new public safety is developed in the Stadium Specific Plan Area.	operational station.