

**Notice of Determination**

21-2025-191

**Appendix D**

**To:**

Office of Planning and Research  
U.S. Mail: P.O. Box 3044  
Sacramento, CA 95812-3044  
Street Address: 1400 Tenth St., Rm 113  
Sacramento, CA 95814

County Clerk  
County of: Marin  
Address: 3501 Civic Center Dr #234  
San Rafael, CA 94903

**From:**

Public Agency: Sonoma-Marín Area Rail Transit  
Address: 5401 Old Redwood Highway, ste 200  
Petaluma, CA 94954

Contact: Bill Gamlen, P.E. Chief Engineer

Phone: (707) 794-3049

Lead Agency (if different from above):

Address:

Contact:

Phone:

**FILED**

DEC 19 2025

SHELLY SCOTT  
MARIN COUNTY CLERK  
BY: *[Signature]*, Deputy

**SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.**

State Clearinghouse Number (if submitted to State Clearinghouse): 2002112033

Project Title: Healdsburg Extension Project Modifications Environmental Impact Report Addendum

Project Applicant: Sonoma-Marín Area Rail Transit District (SMART)

Project Location (include county): Sonoma County, City of Healdsburg

**Project Description:**

This Addendum considers minor project refinements to extend passenger rail along approximately 9 miles of the SMART corridor from the intersection of Lytton Springs Road and Healdsburg Avenue, south to the intersection of the tracks and Windsor River Road, north of the Town of Windsor. Construction would include trackwork, bike/ped infrastructure, bridge replacement and staging area refinements. Project modifications are not proposed within Marin County.

This is to advise that the SMART Board of Directors  Lead Agency or  Responsible Agency has approved the above

described project on 12/17/2025 (date) and has made the following determinations regarding the above described project.

1. The project  will  will not have a significant effect on the environment.
2.  An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.  A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures  were  were not made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan  was  was not adopted for this project.
5. A statement of Overriding Considerations  was  was not adopted for this project.
6. Findings  were  were not made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the negative Declaration, is available to the General Public at:

SMART District office: 5401 Old Redwood Highway, Suite 200, Petaluma, CA 94954

Signature (Public Agency): *[Signature]* Title: CHIEF ENGINEER

Date: Dec 19, 2025 Date Received for filing at OPR:

Original  
Files  
270874

<b>TO:</b> County Clerk, County of Sonoma 2300 County Center Drive, Suite B177 Santa Rosa, CA 95403	<b>FROM:</b> Sonoma-Marín Area Rail Transit District (SMART) 4040 Civic Center Drive San Rafael, CA 94903
County Clerk, County of Marin Hall of Justice, Marin County Civic Center, Rm. 247 San Rafael, CA 94913	

**Subject:** Filing of Notice of Determination in compliance with Section 21152 of the Public Resources Code

**FILED**

**Project Title:** Sonoma-Marín Area Rail Transit Project

JUL 21 2006

**State Clearinghouse Number:** SCH #2002112033

MICHAEL J. SMITH  
MARIN COUNTY CLERK  
*By: J. Whitney, Deputy*

**Project Location:** District-wide, within Counties of Marin and Sonoma

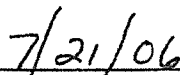
**Project Description:** Adoption of Retail Transactions and Use Tax Ordinance, subject to voter approval, to implement passenger rail service and a parallel bicycle/pedestrian pathway on the Northwestern Pacific (NWP) right-of-way within the Counties of Marin and Sonoma, and imposing ¼-cent retail transactions and use tax (sales tax) to provide funding for the project.


This is to advise that on July 19, 2006, the Board of Directors of the Sonoma-Marín Area Rail Transit District, as the lead agency under CEQA, approved the above-described project and has made the following determinations regarding the above-described project:

1. The project will have a significant effect on the environment.
2. An Environmental Impact Report was prepared and certified for this project pursuant to the provisions of CEQA.
3. Mitigation measures were made a condition of the approval of this project.
4. A Mitigation Monitoring Plan was adopted for this project.
5. A Statement of Overriding Considerations was adopted for this project.
6. Findings were made pursuant to the provisions of CEQA.

This to certify that the Final Environmental Impact Report with comments and responses and record of project approval may be examined at the Sonoma-Marín Area Rail Transit District offices at 4040 Civic Center Drive, Suite 200, San Rafael, CA 94903.

  
Lillian Hames, General Manager  
Sonoma-Marín Area Rail Transit District (SMART)

  
Date

<p><b>Public Hearing Date:</b>  <b>July 19, 2006</b>  <b>San Rafael City Council Chambers</b>  <b>City Hall</b>  <b>1400 Fifth Street, San Rafael, CA</b>  <b>6:00 PM to 9:00 PM</b></p> <p>Copies of the Final EIR and related documents are available as of June 30, 2006 for review at:</p> <p>Sonoma-Marín Area Rail Transit District  4040 Civic Center Drive, Suite 200  San Rafael, CA 94903  (415) 492-2857 or website: <a href="http://sonomamarintrain.org">sonomamarintrain.org</a></p> <p>Civic Center Library  3501 Civic Center Drive, Room #414  San Rafael, CA 94903 (415)499-6051</p> <p>Metropolitan Transportation Commission Library  Joseph P. Bort MetroCenter  101 8<sup>th</sup> Street  Oakland, CA 9460 (510)817-5836</p> <p>Santa Rosa Central Library  211 E Street  Santa Rosa, CA 95404 (707)545-0831</p>	<p>June 30, 2006</p> <p>To Interested Parties:</p> <p>SMART has prepared a Final Environmental Impact Report for the Sonoma-Marín Area Rail Transit Project (SCH 2002112033). This report analyzes the implementation of passenger rail service on the existing Northwestern Pacific (NWP) railroad right-of-way and construction of an ancillary bicycle/pedestrian pathway to provide alternative modes of transportation along the Highway 2020 corridor in Sonoma and Marin Counties. The project would include 14 rail stations, passing sidings, rail maintenance facility, shuttle service at selected rail stations, and a combination of Class I and Class II bicycle/pedestrian facilities connecting the rail stations. Please contact Nina West at 415-492-2857 for more information</p> <p>Sincerely,</p> <p></p> <p>Lillian Hames, General Manager  SMART</p>
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To:

Ms. Wonder Woman USA  
12345 Yes You Can Circle  
Miracle Worker, CA 56788

SMART, 4040 Civic Center Drive, Ste. 200, San Rafael, CA 94903



STATE OF CALIFORNIA - THE RESOURCES AGENCY  
 DEPARTMENT OF FISH AND GAME  
 ENVIRONMENTAL FILING FEE CASH RECEIPT  
 DFG 753.5a (6-03)

270874

Lead Agency: San Joaquin Water Agency Date: 7/21/06  
 County / State Agency of Filing: Mariposa Co. Clerk Document No.:         
 Project Title: TRANSIT RAIL PROJECT  
 Project Applicant Name: San Joaquin Water Agency Phone Number:         
 Project Applicant Address: 1000 N. MAIN ST. MARIPOSA  
 Project Applicant (check appropriate box) Local Public Agency  School District  Other Special District   
 State Agency  Private Entity

**CHECK APPLICABLE FEES:**

<input checked="" type="checkbox"/> Environmental Impact Report	\$850.00	\$ <u>850.00</u>
<input type="checkbox"/> Negative Declaration	\$1,250.00	\$ _____
<input type="checkbox"/> Application Fee Water Diversion (State Water Resources Control Board Only)	\$850.00	\$ _____
<input type="checkbox"/> Projects Subject to Certified Regulatory Programs	\$850.00	\$ _____
<input checked="" type="checkbox"/> County Administrative Fee	\$30.00	\$ <u>30.00</u>
<input type="checkbox"/> Project that is exempt from fees		
<b>TOTAL RECEIVED</b>		\$ <u>880.00</u>

Signature and title of person receiving payment: [Signature]

WHITE: PROJECT APPLICANT      YELLOW: DFG/FASB      PINK: LEAD AGENCY      GOLDENROD: STATE AGENCY OF FILING

RECEIVED  
 7/21/06  
 270874

This notice was posted on JUL 21 2006  
and will remain posted for a period of thirty days  
until 08/20/06

06-0721-2

EEVE T. LEWIS, Co. Clerk  
BY C. FARIAS  
DEPUTY CLERK

435734

TO: County Clerk, County of Sonoma 2300 County Center Drive, Suite B177 Santa Rosa, CA 95403	FROM: Sonoma-Marín Area Rail Transit District (SMART) 4040 Civic Center Drive San Rafael, CA 94903
County Clerk, County of Marin Hall of Justice, Marin County Civic Center, Rm. 247 San Rafael, CA 94913	

Subject: Filing of Notice of Determination in compliance with Section 21152 of the Public Resources Code

Project Title: Sonoma-Marín Area Rail Transit Project

State Clearinghouse Number: SCH #2002112033

Project Location: District-wide, within Counties of Marin and Sonoma

Project Description: Adoption of Retail Transactions and Use Tax Ordinance, subject to voter approval, to implement passenger rail service and a parallel bicycle/pedestrian pathway on the Northwestern Pacific (NWP) right-of-way within the Counties of Marin and Sonoma, and imposing 1/2-cent retail transactions and use tax (sales tax) to provide funding for the project.

This is to advise that on July 19, 2006, the Board of Directors of the Sonoma-Marín Area Rail Transit District, as the lead agency under CEQA, approved the above-described project and has made the following determinations regarding the above-described project:

1. The project will have a significant effect on the environment.
2. An Environmental Impact Report was prepared and certified for this project pursuant to the provisions of CEQA.
3. Mitigation measures were made a condition of the approval of this project.
4. A Mitigation Monitoring Plan was adopted for this project.
5. A Statement of Overriding Considerations was adopted for this project.
6. Findings were made pursuant to the provisions of CEQA.

This to certify that the Final Environmental Impact Report with comments and responses and record of project approval may be examined at the Sonoma-Marín Area Rail Transit District offices at 4040 Civic Center Drive, Suite 200, San Rafael, CA 94903.

Lillian Hames  
Lillian Hames, General Manager  
Sonoma-Marín Area Rail Transit District (SMART)

Date 7/21/06  
[Signature]



STATE OF CALIFORNIA - THE RESOURCES AGENCY  
DEPARTMENT OF FISH AND GAME  
ENVIRONMENTAL FILING FEE CASH RECEIPT  
DFG 763.6a (8-03)

270874

Lead Agency: Marin Area Rail Transit Date: 7/2/06  
 County / State Agency of Filing: Marin Co. Calif. Document No.: \_\_\_\_\_  
 Project Title: TRANSIT RAIL PROJECT  
 Project Applicant Name: Marin Area Rail Transit Phone Number: \_\_\_\_\_  
 Project Applicant Address: 1000 MARIN ST. CA 94923  
 Project Applicant (check appropriate box): Local Public Agency  School District  Other Special District   
 State Agency  Private Entity

CHECK APPLICABLE FEES:

- Environmental Impact Report \$850.00 \$ 850.00
- Negative Declaration \$1,250.00 \$ \_\_\_\_\_
- Application Fee Water Diversion (State Water Resources Control Board Only) \$850.00 \$ \_\_\_\_\_
- Projects Subject to Certified Regulatory Programs \$850.00 \$ \_\_\_\_\_
- County Administrative Fee \$25.00 \$ 25.00
- Project that is exempt from fees

TOTAL RECEIVED: \$ 850.00

Signature and title of person receiving payment: \_\_\_\_\_

WHITE-PROJECT APPLICANT YELLOW-DPS/FASS PINK-LEAD AGENCY GOLDENROD-STATE AGENCY OF FILING



STATE OF CALIFORNIA - THE RESOURCES AGENCY  
DEPARTMENT OF FISH AND GAME  
ENVIRONMENTAL FILING FEE CASH RECEIPT  
DFG 763.6a (8-03)

(SMART)

272342

Lead Agency: Sonoma-Marin Area Rail Transit Dist. Date: 07/2/06  
 County / State Agency of Filing: Sonoma County Document No: 06-0721-2  
 Project Title: Sonoma-Marin Area Rail Transit Project  
 Project Applicant Name: SONOMA-MARIN AREA RAIL TRANSIT DISTRICT Phone Number: (415) 492-2857  
 Project Applicant Address: 4040 CIVIC CENTER DR. SAN RAFAEL CA 94903  
 Project Applicant (check appropriate box): Local Public Agency  School District  Other Special District   
 State Agency  Private Entity

CHECK APPLICABLE FEES:

- Environmental Impact Report \$850.00 \$ 850.00
- Negative Declaration \$1,250.00 \$ \_\_\_\_\_
- Application Fee Water Diversion (State Water Resources Control Board Only) \$850.00 \$ \_\_\_\_\_
- Projects Subject to Certified Regulatory Programs \$850.00 \$ \_\_\_\_\_
- County Administrative Fee \$25.00 \$ 35.00
- Project that is exempt from fees

TOTAL RECEIVED \$ 35.00

Signature and title of person receiving payment: \_\_\_\_\_

WHITE-PROJECT APPLICANT YELLOW-DPS/FASS PINK-LEAD AGENCY GOLDENROD-STATE AGENCY OF FILING

# **Sonoma-Marín Area Rail Transit District Healdsburg Extension Project Modifications Environmental Impact Report Addendum**

December 2025

Prepared for:  
Sonoma-Marín Area Rail Transit District  
5401 Old Redwood Highway, Suite 200  
Petaluma, CA 94954

Prepared by:  
Stantec Consulting Services Inc.  
300 Montgomery Street, Suite 1200  
San Francisco, CA 94104-1914



POSTED 12-19-25 to 1-18-26

## Table of Contents

<b>1</b>	<b>Introduction.....</b>	<b>1</b>
1.1	Previous CEQA Documents.....	11
1.2	Existing Conditions and Operations.....	12
1.3	Addendum to EIR.....	14
1.4	Scope of Environmental Review.....	15
1.5	Addendum Organization.....	16
<b>2</b>	<b>Modified Project Description.....</b>	<b>18</b>
2.1	Russian River Railroad Bridge/Staging Area.....	18
2.2	Bicycle/Pedestrian Bridges.....	20
2.3	Bicycle/Pedestrian Pathway.....	20
2.4	Other Refinements.....	20
2.4.1	Trackwork.....	20
2.4.2	Culvert Replacements.....	21
2.4.3	Utility Relocations and Fencing.....	21
<b>3</b>	<b>Environmental Factors Potentially Affected.....</b>	<b>22</b>
3.1	Geology, Soils and Seismicity.....	24
3.1.1	Previous Environmental Documents Summary.....	25
3.1.2	Project-Specific Impacts.....	25
3.1.3	Conclusion.....	28
3.2	Water Resources.....	28
3.2.1	Previous Environmental Documents Summary.....	29
3.2.2	Project-Specific Impacts.....	30
3.2.3	Conclusion.....	33
3.3	Hazardous Materials.....	33
3.3.1	Previous Environmental Documents Summary.....	34
3.3.2	Project-Specific Impacts.....	35
3.3.3	Conclusion.....	37
3.4	Air Quality.....	37
3.4.1	Previous Environmental Documents Summary.....	38
3.4.2	Project-Specific Impacts.....	38
3.4.3	Conclusion.....	41
3.5	Transportation.....	41
3.5.1	Previous Environmental Documents Summary.....	42
3.5.2	Project-Specific Impacts.....	43
3.5.3	Conclusion.....	47
3.6	Noise.....	48
3.6.1	Previous Environmental Documents Summary.....	48
3.6.2	Project-Specific Impacts.....	49
3.6.3	Conclusion.....	52
3.7	Energy.....	53
3.7.1	Previous Environmental Documents Summary.....	53



**Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
Table of Contents  
December 2025

3.7.2	Project-Specific Impacts .....	53
3.7.3	Conclusion .....	54
3.8	Biological Resources.....	55
3.8.1	Previous Environmental Documents Summary.....	56
3.8.2	Project-Specific Impacts .....	57
3.8.3	Conclusion .....	69
3.9	Parks and Recreation.....	70
3.9.1	Previous Environmental Documents Summary.....	70
3.9.2	Project-Specific Impacts .....	70
3.9.3	Conclusion .....	72
3.10	Land Use and Planning .....	72
3.10.1	Previous Environmental Documents Summary.....	73
3.10.2	Project-Specific Impacts .....	73
3.10.3	Conclusion .....	75
3.11	Public Facilities and Safety.....	75
3.11.1	Previous Environmental Documents Summary.....	76
3.11.2	Project-Specific Impacts .....	76
3.11.3	Conclusion .....	79
3.12	Visual/Aesthetics.....	80
3.12.1	Previous Environmental Documents Summary.....	80
3.12.2	Project-Specific Impacts .....	81
3.12.3	Conclusion .....	83
3.13	Historic Resources.....	84
3.13.1	Previous Environmental Documents Summary.....	84
3.13.2	Project-Specific Impacts .....	85
3.13.3	Conclusion .....	87
3.14	Archaeological Resources.....	87
3.14.1	Previous Environmental Documents Summary.....	87
3.14.2	Project-Specific Impacts .....	88
3.14.3	Conclusion .....	91
4	<b>References .....</b>	<b>92</b>
5	<b>List of Preparers .....</b>	<b>94</b>

**List of Tables**

Table 3-1. Impacts Comparison and Modified Project Required Mitigation Measures .....	22
Table 3-2: Project Construction Air Quality Emissions .....	39
Table 3-3: Project Construction GHG Emissions .....	39

**List of Figures**

Figure 1-1. Project Location.....	2
Figure 1-2. Modified Project Area.....	3



## **List of Appendices**

Appendix A: 2006 EIR Mitigation Measures Referenced

Appendix B: Air Quality and Greenhouse Gas Modeling

Appendix C: SMART Healdsburg Extension Project Biological Resources Technical Report

Appendix D: Russian River Bridge Cultural Resources Constraints Memorandum

Appendix E: SMART Healdsburg Extension Project Cultural Resources Study Report



## **Acronyms / Abbreviations**

ABAG	Association of Bay Area Government
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CEQA	California Environmental Quality Act
CNPS	California Native Plant Society
CO	carbon monoxide
dBA	A-weighted decibels
DMU	Diesel Multiple Unit
DPM	diesel particulate matter
EIR	Environmental Impact Report
FRA	Federal Railroad Administration
GHG	greenhouse gas
IS/MND	Initial Study/Mitigated Negative Declaration
L <sub>dn</sub>	day-night sound level
LSAA	Lake and Streambed Alteration Agreement
MTC	Metropolitan Transportation Commission
MP	milepost
mph	miles per hour
NSCAPCD	Northern Sonoma County Air Pollution Control District
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OMF	operations and management facility
PM	particulate matter
ROW	right-of-way
SEIR	Supplemental Environmental Impact Report
SMART	Sonoma-Marin Area Rail Transit District
SMHM	salt-marsh harvest mouse
SMP	Site Mitigation Plan
SWPPP	stormwater pollution prevention plan



**Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
Acronyms / Abbreviations  
December 2025

USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
V/C	volume-to-capacity
VHT	vehicle hours of travel
VMT	vehicle miles travelled



# 1 Introduction

In July 2006, the Sonoma-Marín Area Rail Transit District (SMART) certified an Environmental Impact Report (EIR (State Clearinghouse No. 2002112033) under the *California Environmental Quality Act* (CEQA). The 2006 EIR evaluated passenger rail service along approximately 70 miles of the existing rail corridor from Cloverdale in Sonoma County to Larkspur in Marin County, with 14 rail stations; a bike/pedestrian pathway, including a combination of Class I and Class II facilities; a rail maintenance facility; and shuttle service at select locations (original project) (Figure 1. Project Location). The NWP Railroad was acquired in the late 1990s to provide transportation benefits for future residents, and the SMART District was formed to oversee the system. A 2008 Supplemental EIR (2008 SEIR) reviewed project changes, including adding weekend service (see Section 1.4).

Approximately 48 miles of SMART's rail system has been constructed between Windsor and Larkspur and is in operation for both passenger and limited freight service. Existing stations from north to south are located in Windsor, the Sonoma County Airport area, Santa Rosa, Rohnert Park, Cotati, Petaluma, Novato, San Rafael, and Larkspur. SMART's existing system also includes approximately 9.5 miles of pathway, of which approximately 29.5 miles are Class I facilities in the railroad right-of-way (ROW) (SMART 2025a).

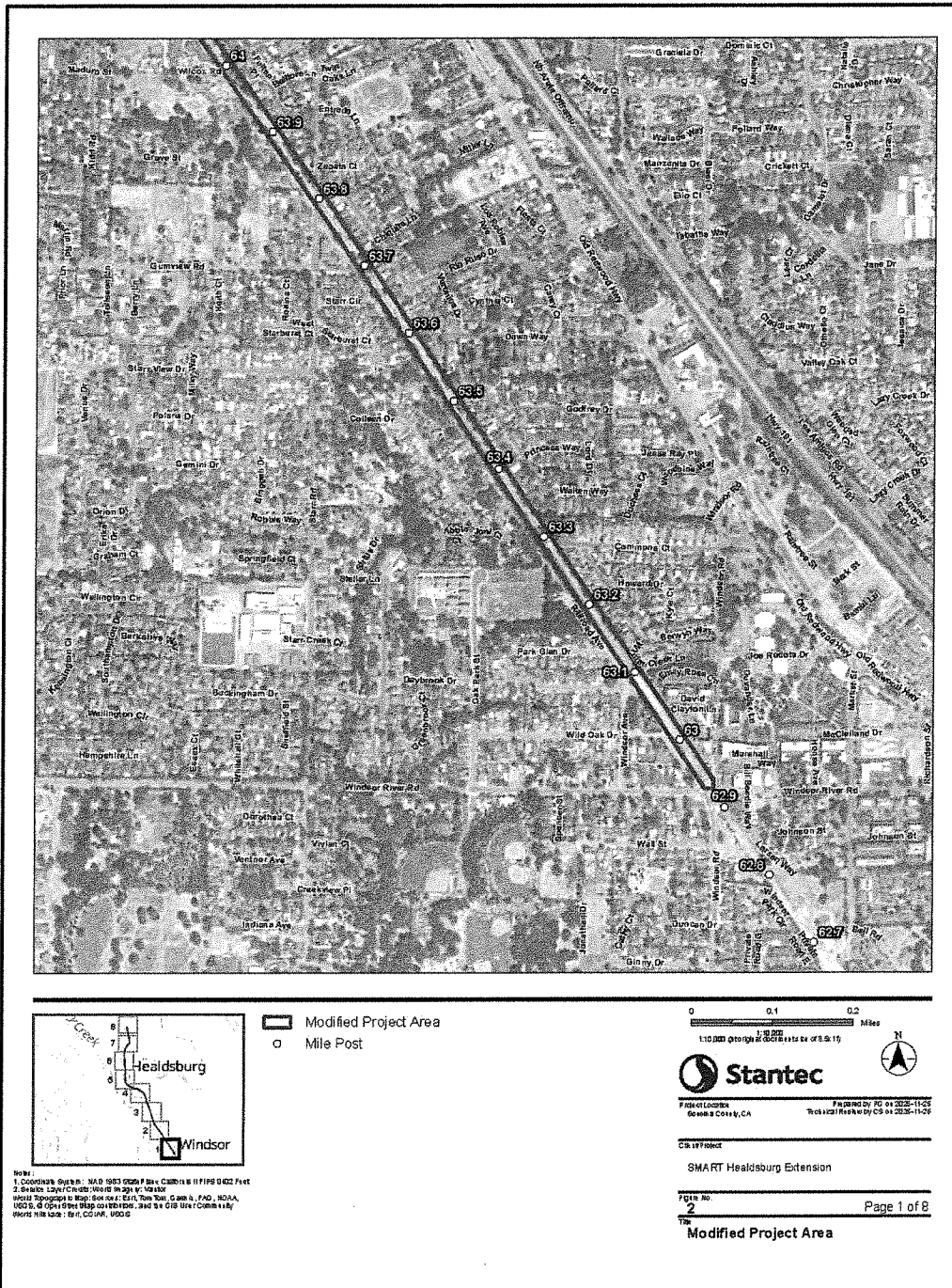
SMART is proposing to construct the next approximately 9 miles contemplated in the 2006 EIR between milepost (MP) 72.00, located at the intersection of Lytton Springs Road and Healdsburg Avenue, north of the City of Healdsburg, south to MP 62.94, located approximately at the intersection of the tracks and Windsor River Road, north of the Town of Windsor (Figure 2, Modified Project Area). SMART has made modifications and refinements to the project design (modified project) as described in Section 2.0. The project modifications are intended to enhance operational efficiency, safety, and multimodal connectivity. As further described in Section 1.3, this Addendum evaluates the modifications and refinements to the project design and the updated construction schedule.





**Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
 Section 1: Introduction  
 December 2025

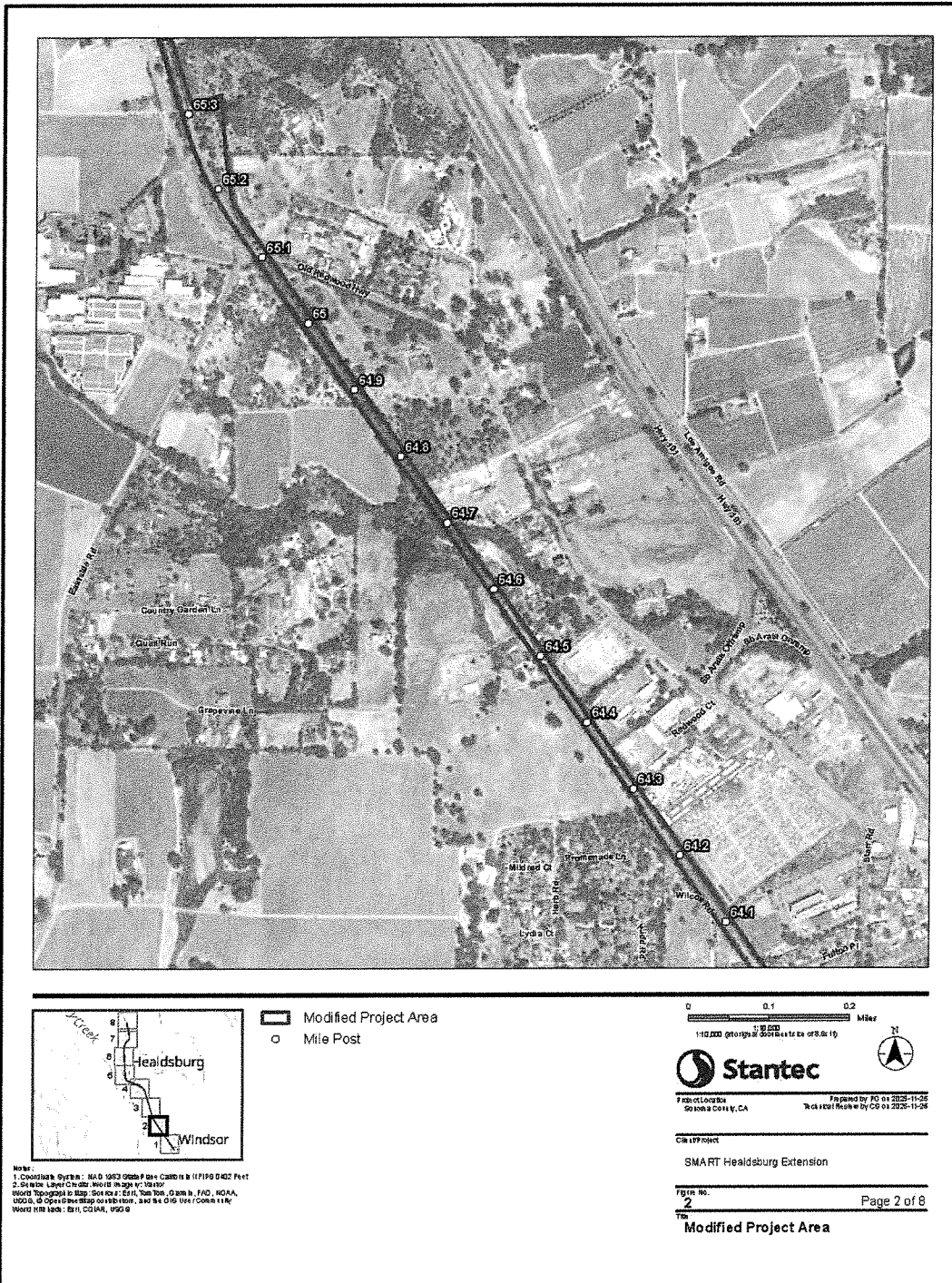
Figure 1-2. Modified Project Area



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**Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
 Section 1: Introduction  
 December 2025

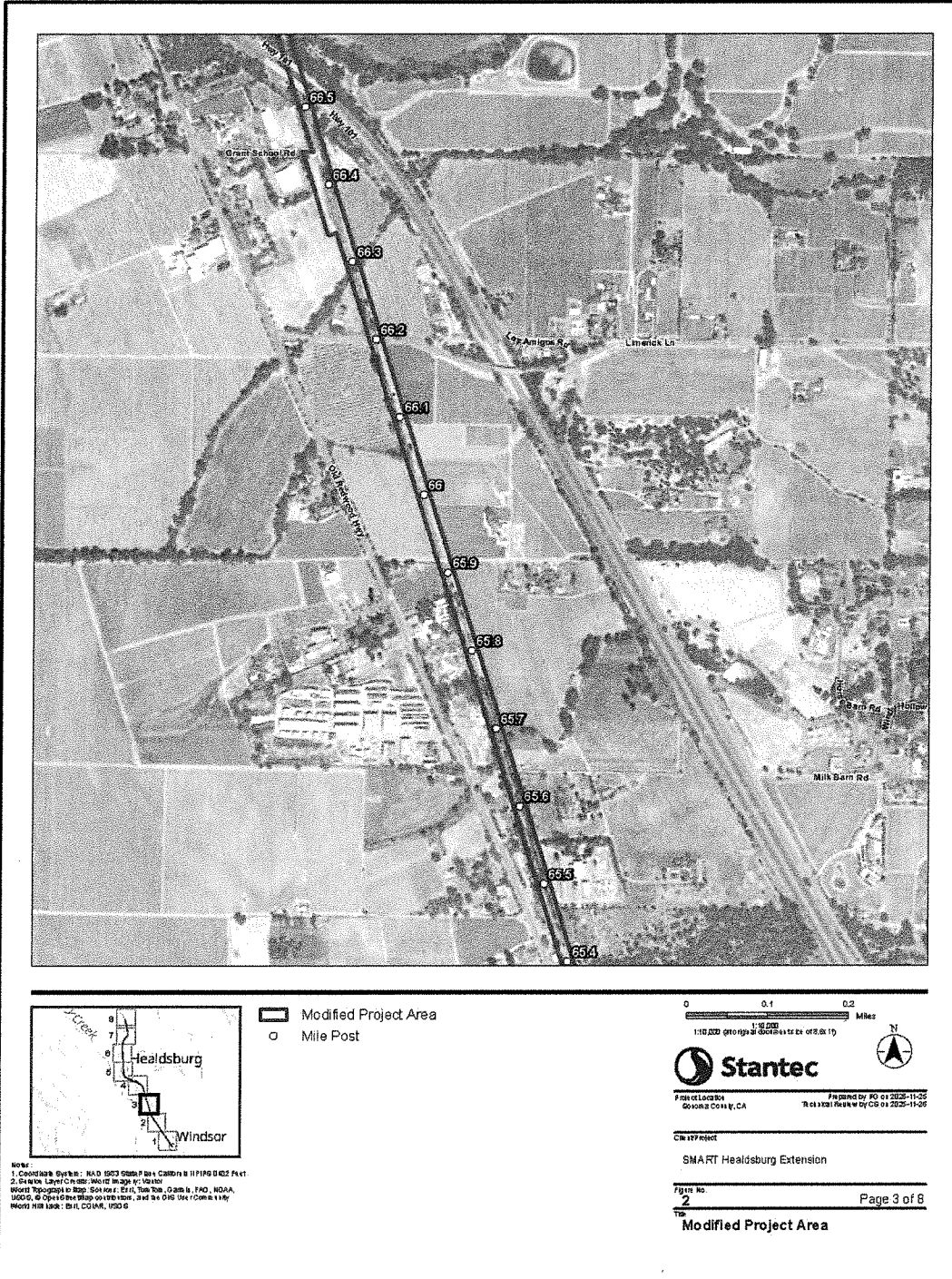


Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications  
 Environmental Impact Report Addendum  
 Section 1: Introduction  
 December 2025

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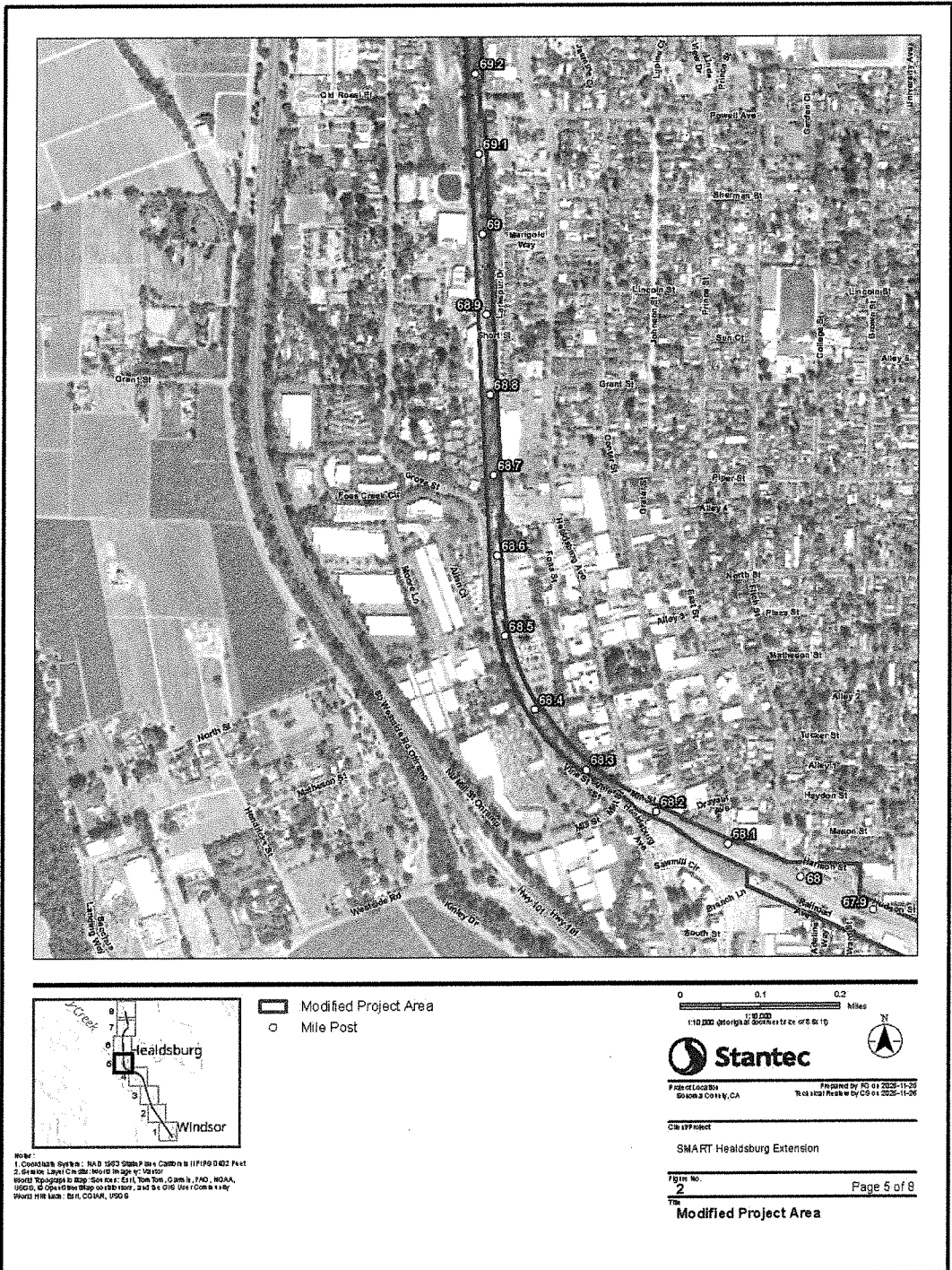
**Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
 Section 1: Introduction  
 December 2025



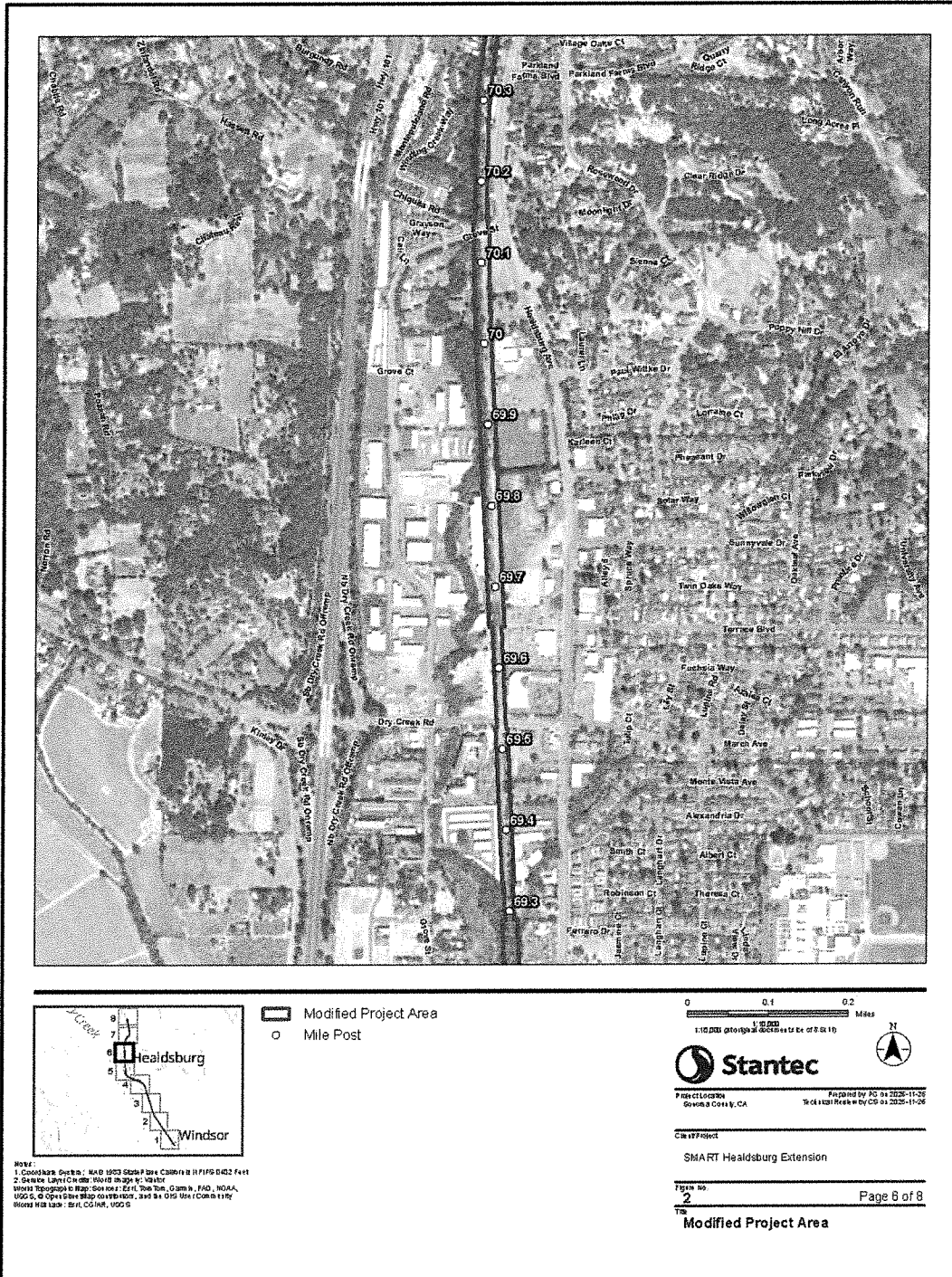
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**Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
 Section 1: Introduction  
 December 2025



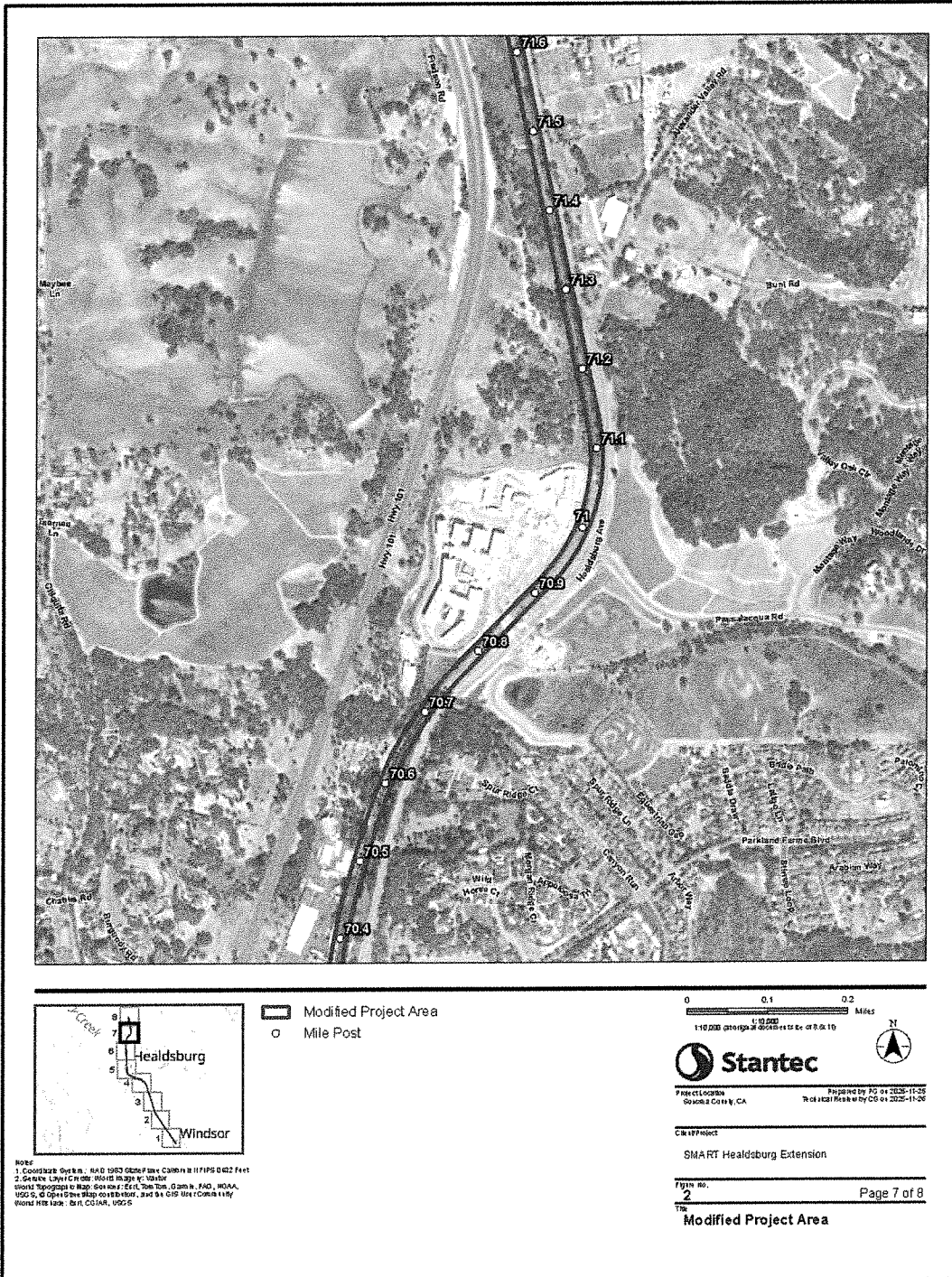
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Disclaimer: Stantec and its affiliates do not warrant the accuracy or completeness of the data. The scope of this work is limited to the project and does not include any other work not specifically stated in the contract.



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NOTE:  
 1. Coordinate System: NAD 83 UTM Zone 18N  
 2. Scale: 1 inch = 100 feet  
 3. Data Source: Aerial Imagery, GIS Data, USGS, etc.  
 4. Date: 11/25/25

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## 1.1 Previous CEQA Documents

All below documentation is posted under the Sonoma-Marin Area Rail Transit (SMART) Project, State Clearinghouse number 2002112033.

**2005–2006 Systemwide Draft and Final EIR:** The SMART Board of Directors approved and certified the EIR in July 2006. The EIR included the following components:

- passenger rail service on weekdays along the 70-mile SMART corridor
- 14 rail stations: Cloverdale, Healdsburg, Windsor, Jennings Avenue (Santa Rosa), Santa Rosa Railroad Square, Rohnert Park, Cotati, Corona Road (Petaluma), Downtown Petaluma, Novato North, Novato South, Marin Civic Center, Downtown San Rafael, and Larkspur
- train passing sidings, trestle bridge replacements, drainage improvements, and rail maintenance facility
- bicycle/pedestrian pathway generally within or adjacent to the rail corridor, including 54 miles of a Class I pathway and 17 miles of Class II pathway improvements
- cumulative impacts of passenger and freight rail service

The original project analyzed in the 2006 Final EIR would provide a maximum total of 13 daily (Monday through Friday) passenger rail roundtrips between the following cities: 4 daily roundtrips between Cloverdale and Larkspur, 2 daily roundtrips between Healdsburg and Larkspur, 3 daily roundtrips between Windsor and Larkspur, 2 daily roundtrips between Petaluma and Larkspur, and 2 daily roundtrips between Healdsburg and Petaluma.

**2008 Supplemental EIR:** The SMART Board of Directors approved and certified a Supplemental EIR (SEIR) in July 2008. The SEIR evaluated the original project components that changed or were added since certification of the 2006 Final EIR, including:

- potential addition of weekend passenger rail service
- potential use of light Diesel Multiple Unit (DMU) rail vehicles instead of heavy DMUs
- potential alternative locations for the Novato South station in addition to the site analyzed in the SMART 2006 Final EIR
- modified cumulative impacts scenario, due to a change in the level of projected future freight rail service on the SMART corridor compared to the level of freight service that was projected and evaluated in the SMART 2006 Final EIR.

**2012 Initial Study/Mitigated Negative Declaration:** The SMART Board of Directors approved an Initial Study/Mitigated Negative Declaration (IS/MND) in 2012. The 2006 EIR evaluated the entire rail and pathway project, including two alternative sites for an operations and management facility (OMF); however, another potential site was identified in 2009. This new OMF site at Todd Road, southwest of



Santa Rosa in Sonoma County, was evaluated in this IS/MND. Additionally, the change in the location of the SMART North Santa Rosa station site from Jennings Avenue to Guerneville Road in Santa Rosa was evaluated and approved in this IS/MND.

**2012 Initial Study/Mitigated Negative Declaration:** The SMART Board of Directors approved an IS/MND in 2012. The IS/MND evaluated a new OMF on Airport Boulevard and evaluated the limited use of a secondary site on Fulton Road. The 2006 EIR evaluated two alternative OMF locations, both located north of the City of Santa Rosa in Sonoma County.

**2014 Addendum:** The SMART Board of Directors approved an Addendum on February 19, 2014. The Addendum evaluated minor project modifications related to the Haystack Landing. The 2006 EIR analyzed the impacts associated with replacing the Haystack Landing Bridge; however, during subsequent bridge design, the footprint of the bridge project was slightly modified, and additional components were included.

## **1.2 Existing Conditions and Operations**

The modified project area considered in this Addendum is between MP 72.00 to MP 62.94, and the width of the ROW ranges from 60 feet to 250 feet. At the northern project extent of Lytton Springs Road and Healdsburg Avenue, the SMART rail corridor crosses a mix of land uses, including urban cities and towns, suburban residential areas, and agricultural land used for grazing and crop production. North of Healdsburg, the corridor is predominantly rural, characterized by vineyards, wineries, and undeveloped agricultural land, with private railroad crossings serving agricultural operations. As the corridor approaches Healdsburg, the land uses transition to residential and commercial, and passes Healdsburg Station. South of Healdsburg, the corridor crosses the Russian River and continues through mixed industrial and agricultural areas before entering Windsor, where land use becomes increasingly suburban residential. Several open spaces and parks, such as Healdsburg Veterans Memorial Beach and Windsor Ranch Soccer Park, are located adjacent to the project area. Sensitive environmental features include riparian areas, wetlands, and woodlands, particularly near the Russian River and Foss Creek.

Freight and passenger rail service historically occurred along the rail corridor; therefore, existing track, bridges, trestles, sidings, at-grade crossings, and other infrastructure remains in place, but has since fallen into various states of disrepair with overgrown vegetation. Freight and passenger services run on the active mainline tracks south of the modified project area, but the modified project area has not served any rail since 2001.

SMART began to operate rail service in 2017 between Sonoma County Airport and San Rafael, which has since expanded to include 48 miles between Windsor and Larkspur, and currently operates both passenger and freight service. Due to increased ridership demand since the 2006 EIR and 2008 SEIR, service levels have increased to provide more trip options during the day, creating flexibility for riders. This adjustment is an operational modification to an existing and approved transit system, not a new project under CEQA. The existing SMART system, including track infrastructure, stations, maintenance facilities, and operational parameters, was previously evaluated in a certified EIR, as summarized in Section 1.1. The EIR analyzed environmental effects such as noise, vibration, air emissions, traffic



interactions, and overall service levels along the corridor. The increased train frequency falls entirely within the physical and operational scope analyzed in the prior EIR. No new or expanded track, station improvements, guideway alterations, or supporting infrastructure are required. As a result, no new discretionary approvals or permits are necessary, and this action is not considered a new CEQA “project” under Public Resources Code §21065.

According to Public Resources Code §21166 and CEQA Guidelines §§15162–15164, further environmental review is only required if a subsequent discretionary action results in: (1) substantial changes to the approved project; (2) substantial changes to the circumstances under which the project is undertaken; or (3) new information indicating new or more severe impacts. The increase in train trips does not introduce new significant impacts beyond those evaluated in the certified EIR and does not exceed the previously analyzed operational capacity. Therefore, none of the conditions requiring subsequent or supplemental environmental review are met.

Moreover, even if considered independently, the service frequency increase could also qualify for the Existing Facilities exemption (CEQA Guidelines §15301), which covers ongoing operation of existing public facilities without physical expansion if no exceptions apply per CEQA Guidelines §15300.2. Increasing operational frequency on an existing rail line continues the same use, not an expansion. Increased operations of passenger rail service would not require new disturbance areas that would potentially impact sensitive resources or critical habitat based on location. Since the footprint would not change, there would be no new impact to scenic highways, known hazardous waste sites, historic resources, or sensitive receptors.

The increase in service would result in less vehicle trips per day; therefore, while the additional train travel would result in additional emissions from the DMU engine, these emissions would be offset by the reduction in vehicle trips. The 2006 EIR evaluated the potential health risk to sensitive receptors within 30 feet of the train alignment and was well under the impact threshold. The distance to sensitive receptors has not changed with increased operations, and the DMU engine has since been upgraded to a USEPA Tier 4 engine, which emits less nitrogen oxides (NOx) and particulate matter (PM) as compared to older engine tiers. The average gate down time for each passenger train pass-by has not changed, and the intervals between passenger trains would continue to be 30 minutes within the same daily hours of operation. Therefore, the intensity of the noise exposure and traffic congestion for each passenger train pass-by (operational noise, horn blowing, and delay) would not change. The increase in service overall would also support an alternative to driving the congested roadway during weekday commute peak period. Accordingly, the increase in operations would not result in significant or cumulative effects.

In summary, the increase in train frequency is an operational change within the scope of the prior environmental analysis and does not necessitate a new or supplemental CEQA document. The SMART District can rely on its previously certified EIR, and no further CEQA review is required.

SMART service includes 21 round trips per weekday and 8 round trips on the weekends. On weekdays, the schedule includes 42 single-pass trips, equivalent to 21 round trips, while weekends feature 16 single-pass trips or 8 round trips. To support this service, SMART has a fleet of 18 DMUs, allowing for greater operational flexibility and resilience. Each SMART DMU is a self propelled individually powered passenger car. These cars can be linked, creating trains appropriately sized to accommodate ridership



demand. To maintain consistent service, SMART accounts for equipment reserves—at any given time, five, two-car trains would be in active service, with the remaining trains on standby or undergoing maintenance to ensure adequate coverage and reliability. DMUs have a maximum speed of 79 miles per hour (mph) as regulated by Federal Railroad Administration (FRA).

Per the SMART Ridership Reports (SMART 2025c), riders for fiscal year 2025 are anticipated to number approximately 1.12 million annually. Development of the SMART train is a regional priority identified in Plan Bay Area 2050 (MTC 2021), the City of Healdsburg General Plan Transportation Element, and the Sonoma County General Plan Circulation and Transit Element (Sonoma County 2016). SMART continues to work closely with municipalities and transit agencies located along the rail corridor to ensure services are aligned with existing and future planning efforts to serve riders, with the overarching goals to provide an alternative mode of transportation and improve multi-modal connectivity within the region.

### **1.3 Addendum to EIR**

As described in CEQA Guidelines Section 15164, a lead agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described below for preparation of a subsequent EIR have occurred (CEQA Guidelines Section 15162):

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
2. *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*
  - a. *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
  - b. *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
  - c. *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project but the project proponents decline to adopt the mitigation measure or alternative; or*



- d. *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

Based on the analysis conducted and provided herein, this Addendum concludes that the modified project does not warrant subsequent environmental review as required by Section 15162. The modified project does not include substantial changes to assumed improvements to the SMART systemwide project pursuant to the previous environmental documents, and no other circumstances have changed that would meet the criteria set forth in CEQA Guidelines Section 15162 that would require the preparation of a subsequent EIR. Therefore, a subsequent EIR is not required for the modified project, and preparation of an Addendum to the certified EIR is appropriate pursuant to CEQA.

## **1.4 Scope of Environmental Review**

This Addendum evaluates whether the modified project would result in new or substantially more severe significant environmental impacts compared to the impacts disclosed in the 2006 EIR and 2008 SEIR in accordance with the evaluation required by CEQA Guidelines Section 15162(a). The 2006 EIR and 2008 SEIR analyzed all topics, and all topics are included in this Addendum. Together, the two documents are referred to as the SMART EIRs.

The SMART EIRs determined that implementation of the rail system would have significant and unavoidable impacts on Transportation (service levels on local streets) and Noise (permanent ambient exterior noise levels, cumulative ambient noise levels).

The SMART EIRs determined that implementation of the rail system would result in beneficial impacts related to Water (potential to improved water quality and stormwater management), Air Quality (reduction of greenhouse gas [GHG]), Transportation (reduction of vehicle miles travelled [VMT] and vehicle hours of travel [VHT], decrease peak hour demand on SR-101 corridor, service level improvements on local streets, enhanced regional mobility).

The SMART EIRs determined that all other resource topics would result in a less than significant impact or less than significant impact with mitigation. Specifically, the SMART EIRs identified mitigation measures for the following for the entire 70-mile systemwide original project:

- **Geology, Soils and Seismicity:** Dewatering during construction, ground failure, surface runoff, earthquake susceptibility, fault rupture, liquefaction, landslides, expansive soils and corrosion in areas south of Windsor and north of the Petaluma River.
- **Water Resources:** Increase in surface erosion during construction, pollutant release during construction, increase in runoff, development in 100-year floodplain.
- **Hazards and Hazardous Materials:** Potential to encounter contaminants during construction, shallow or perched groundwater contamination potential, lead based paint and asbestos in bridges.



- **Transportation and Circulation:** Lowered service level on local streets, downtown San Rafael level of service decrease in peak hours.
- **Noise and Vibration:** Temporary construction noise, permanent operation noise, maintenance facility operational noise, train horns, cumulative noise.
- **Biological Resources:** Damage to sensitive upland vegetation and wildlife habitat within temporary work areas; temporary disturbance of wetlands/Waters of the United States; impacts to nesting birds during construction; spread of noxious weeds; permanent impacts to wetlands/Waters of the United States; loss or alteration of vernal pools; loss or alternation of riparian vegetation; loss or alternation of oak woodlands and removal of individual protected trees; obstruction of wildlife corridors; loss of individuals or habitat of special-status plant and wildlife species; train collisions with wildlife; disturbance to stream zones, special-status species, and nesting birds during railway maintenance activities; cumulative biological effects.
- **Visual Quality:** Temporary visual disturbance, new sources of nighttime lighting, bike and pedestrian path in open space areas, soundwall relocation would affect private views.
- **Historic Resources:** Historic Healdsburg Station disruption, Santa Rosa Square Station landscaping could disrupt the Railroad Square Historic District, Petaluma Station historic integrity, historic trackwork, Russian River Railroad Bridge rehabilitation, Petaluma River Haystack Bridge replacement, bike path impedes views on historic resources, cumulative historic impacts.
- **Archaeological Resources:** high probability of archaeological deposits, subsurface archaeological deposits for Coast Miwok, Marin County Civic Center cultural resources, trackwork impacts on prehistoric sites between Marin/Somona County line to Haystack Bridge, in-stream bridge construction activities, staging area unanticipated discovery of cultural resources, cumulative impacts to cultural resources.

## 1.5 Addendum Organization

This document is organized as follows pursuant to the requirements of the CEQA Guidelines:

- **Section 1.0: Introduction.** This section introduces the project, summarizes the conclusions of the previous environmental documents, and provides the purpose and organization of this document.
- **Section 2.0: Modified Project Description.** This section provides an overview of the project modifications and refinements, describing the changes since the SMART EIRs within the modified project area.
- **Section 3.0: Environmental Factors Potentially Affected.** This section evaluates whether the project modifications and refinements would result in new or substantially more severe significant environmental impacts compared with the impacts disclosed in the SMART EIRs.



**Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
Section 1: Introduction  
December 2025

- **Section 4.0: References.** This section lists the documents used during preparation of the Addendum.
- **Section 5.0: List of Preparers.** This section identifies the report preparers.



## 2 Modified Project Description

This Addendum considers minor project refinements (modified project) to extend passenger rail along the approximately 9 miles of the SMART corridor from MP 72.00 at the intersection of Lytton Springs Road and Healdsburg Avenue, located north of the City of Healdsburg, south to MP 62.94, located approximately at the intersection of the tracks and Windsor River Road, north of the Town of Windsor (modified project area). Mileposts are approximate and, where applicable, described from the project's northern terminus to the project's southern terminus. Construction would occur over approximately 3 years.

The modified project includes the following, as further described below:

- Russian River Railroad Bridge reconstruction clarification and refinements. New staging area proposed at an industrial yard located at approximately MP 67.60 outside SMART's ROW.
- Four new bicycle/pedestrian pathway bridges located at Norton Creek Tributary (MP 70.34), the Russian River (MP 67.72), Sargent Road Crossing (MP 65.68), and Old Redwood Highway (MP 65.10).
- Bicycle and pedestrian pathway relocations. From MP 71.3 to MP 70.14 and MP 67.8 to MP 63.7, the pathway would be constructed east/northeast of the track alignment instead of west of the track alignment to align with the Foss Creek pathway in Healdsburg.
- Minor refinements across the approximately 9-mile alignment related to utility relocations, culverts, construction schedule, and trackwork.

### 2.1 Russian River Railroad Bridge/Staging Area

The existing Russian River Railroad Bridge (existing bridge) is an approximately 565-foot span crossing the Russian River between MP 67.72 and MP 67.46, south of the City of Healdsburg. The 2006 EIR considered both rehabilitation and reconstruction of the existing bridge. Technical evaluation has determined the existing bridge no longer meets modern design and regulatory standards. Replacing the existing bridge is necessary to enable service north of the Russian River. Accordingly, the engineering design and construction planning for the replacement has progressed and the modified project addresses related clarifications and refinements. As outlined in the 2006 EIR, construction would continue to involve the use of heavy equipment, installation of piles for the new concrete bridge piers, and use of the planned staging area at MP 67.8 for equipment storage.

The existing bridge span is composed of 11 spans of timber stringers, two 100-foot spans, and one 200-foot span of through trusses. The existing bridge would be removed and demolished. The new Russian River Railroad bridge (new bridge) would be constructed and lifted into place over the Russian River. The new bridge would be similar in size and character to the existing bridge and would be replaced in the same location. This action would require construction of a temporary rock pad to provide foundation



access. Reconstruction of the new bridge would occur over two years from approximately summer 2026 to fall 2028 and require in-water work during the dry season. Replacement of the existing bridge would include the addition of a bike and pedestrian path parallel to the main line on the northeast side of the bridge tracks, which would be approximately 12 feet wide.

Site preparation would include delineating construction work areas and installing environmentally sensitive area fencing around temporary work areas. Clearing, grubbing, and vegetation and tree removal would be necessary for site access and construction. A new approximately 0.55-acre staging area and a 1.44-acre access area for equipment storage, construction materials, and fuels would be located at an industrial yard located east of the existing bridge (approximately MP 67.60) outside SMART's ROW. Another staging area would be located within SMART's ROW from MP 68.1 to 67.8, but the staging area at MP 67.8 was previously included in the 2006 EIR. All staging areas are located on previously disturbed or developed land.

Construction would start with site preparation and installation of a temporary rock pad to allow for equipment access. Wooden crane mats would be placed on top of the temporary rock pad. Existing bridge components, including the track, ties, decking, and railings, would be removed, and demolition of the approximately 162-foot timber trestle would occur. Removal of spans would occur via winches and cranes and demolition of pier walls. Dewatering would occur in limited areas along each side of the Russian River's banks to allow for demolition of the existing in-channel piers and for construction of the new foundations without cutting off water flow through the central channel. Dewatering equipment would include steel frac tanks to let total suspended solids settle before being discharged into water trucks for use in dust abatement. The temporary rock pad would be removed, and the work area would be restored when this stage of work is complete.

The next stage of construction would include installation of the new replacement piers and would begin with site preparation and re-installation of the temporary rock pad to allow for equipment access. Wooden crane mats would be placed on top of the temporary rock pad. Excavation is proposed to the water table, which would allow for installation of sheet pile cofferdams. Dewatering would allow for pile driving of approximately two piers. The new foundation would be constructed around these piles, and sequential rebar installation and concrete pouring would occur. Upon completion, the columns would be backfilled to the established riverbed elevation using fill material. The sheet pile would then be removed and the dewatering apparatus would be removed. The temporary rock pad would be removed, and the work area would be restored when this stage of work is complete.

The final stage of construction would install the new bridge span and would begin with site preparation, and re-installation of the temporary rock pad to allow for equipment access. Wooden crane mats would be placed on top of the temporary rock pad. The new bridge span would be lifted and set into place using cranes and the self-propelled modular transporter. The temporary rock pad would be removed, and the work area would be restored.

Tree and vegetation removal would occur on the east and west sides of the bridge. On the northwest side, trees along Front Street within SMART's ROW would be cleared for the new bridge. Temporary traffic management would be coordinated with local agencies should any lane closures or detours be required. On the southeast side of the existing bridge, trees and vegetation would be removed along the



railroad corridor and within the proposed construction staging area and access routes. Typical construction equipment would be used and includes hydraulic hammers, hauling trucks, loaders, excavators, dozers, drill rigs, cranes, forklifts, concrete trucks, self-propelled modular transporter (for large, new bridge installation), and soil compactors. As outlined in the 2006 EIR, minimization measures for construction management, including watering construction areas twice per day.

## **2.2 Bicycle/Pedestrian Bridges**

The modified project includes several additional bicycle/pedestrian pathway bridges, which are proposed at Norton Creek Tributary (MP 70.34), the Russian River (MP 67.72), Sargent Road Crossing (MP 65.68), and Old Redwood Highway (MP 65.1) as further summarized below.

At MP 65.68, a new bicycle/pedestrian bridge crossing would be constructed at Sargent Road, north of the Town of Windsor. New foundations for the pathway bridges would be installed east of the tracks, designed to accommodate a single-span bicycle/pedestrian bridge structure. The bridge structure would be prefabricated offsite to reduce construction time and impacts on local traffic. Upon delivery the span would be lifted into place using cranes, followed by installation of railings, decking, and approach ramps. Final grading and landscaping would restore the surrounding area.

At MP 65.1, new bicycle/pedestrian bridge structure would also be installed east of the tracks at Old Redwood Highway, designed to accommodate a single-span bicycle/pedestrian bridge structure. The bridge structure would be prefabricated offsite to reduce construction time and impacts on local traffic. Upon delivery the span would be lifted into place using cranes, followed by installation of railings, decking, and approach ramps. Final grading and landscaping would restore the surrounding area.

## **2.3 Bicycle/Pedestrian Pathway**

Within the modified project area, the bicycle and pedestrian pathway proposed from MP 71.3 to MP 70.14 and MP 67.8 to MP 63.7 would be constructed east of the track alignment. The 2006 EIR evaluated this section of pathway on the west side of the track alignment, within SMART's ROW. Shifting the pathway to the east of the track would align with the Foss Creek pathway in Healdsburg, thereby minimizing the need to construct retaining walls and import fill material, resulting in the removal of fewer trees.

## **2.4 Other Refinements**

### **2.4.1 Trackwork**

No new sidings are proposed within the modified project area, except for at Healdsburg Station. New track would meet Class 4 specifications. Gauntlet track is proposed at Healdsburg Station to allow freight sufficient clearance to pass the station. Two of the three spurs, located on both sides of the track, would be removed as part of project implementation. Spur tracks are short sections of railroad line that diverge from the main line and terminate at properties along the main line. These spur tracks no longer



accommodate businesses for which they were originally built and were abandoned. At MP 67.4, the tracks cross an industrial materials yard. An existing turnout would be removed at this location.

As described in the 2006 EIR, operational enhancements were proposed at and around Healdsburg Station (MP 68.2 to MP 67.75) to support expanded rail service and improve passenger accessibility and safety and continue to apply to the modified project area. The Healdsburg Station platform location may slightly shift based on final design but would continue to be located near the Depot buildings, as previously evaluated in the 2006 EIR. A bumping post will be installed to enhance safety at the end of track segments. Manual and control switches would be added at strategic points within the station limits. Pedestrian access would be improved through the development of two new at-grade crossings at each end of the station platform, which would connect passengers directly to the loading platform. The existing vacant Healdsburg Station and Depot buildings and nearby turntable would not be modified.

### **2.4.2 Culvert Replacements**

New standards for culvert replacements typically require replacement diameters of a minimum 36 inches. All culverts within the modified project area are assumed to be replaced in kind or widened to the minimum diameter. Culvert replacement requires vegetation clearing and temporary staging areas for construction equipment.

### **2.4.3 Utility Relocations and Fencing**

In the modified project area, an abandoned telecommunication line runs the length of the alignment on the west side of the tracks. All wires between these poles have been removed, but the poles remain. Several active overhead telecommunications lines owned by AT&T cross the ROW in the modified project area and require relocation to accommodate the development of siding and gauntlet tracks. All existing poles and overhead telecommunications lines within the ROW that may require relocation throughout the segment.

South of the proposed Healdsburg Station site, perimeter fencing is proposed for site security and to delineate work zones. An existing loading dock would be removed to clear space for staging and access. Approximately four 20-foot rolling gates would be installed and existing office space, measuring approximately 40 feet by 50 feet, would be reconstructed and repurposed as a field office for the duration of construction. These improvements would require removal of three trees within the project footprint.



### 3 Environmental Factors Potentially Affected

This Addendum evaluates the potential for the modified project to result in new or substantially more severe significant impacts compared to the impacts disclosed in the certified 2006 EIR and 2008 SEIR.

As explained in Section 1.0, the analysis has been undertaken pursuant to the provisions of CEQA Guidelines Sections 15162 and 15164 to provide SMART with the factual basis for determining whether any of the changes identified as part of the modified project would result in changes in circumstances or introduce new information that would constitute a substantial change from the analysis described in the 2006 EIR and 2008 SEIR.

Each environmental resource topic is discussed in the following subsections to evaluate the modified project and determine if it would result in a changed environmental effect (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect) (CEQA Guidelines Section 15162). Each subsection is organized as follows:

- **EIR Summary:** Provides a summary of the impact analysis and findings of the previous environmental documents, with the 2006 EIR and the 2008 SEIR as most relevant.
- **Project-Specific Impacts:** Provides a discussion of the impacts associated with the modified project, how the modified project relates to the previous analyses of the original project, and identifies how mitigation measures previously identified would apply to the proposed project.
- **Conclusion:** Provides a conclusion of the potential impacts associated with the modified project and the applicable mitigation measures.

A comparison of the impacts previously identified and the impacts associated with the modified project is provided in Table 3-1.

Table 3-1. Impacts Comparison and Modified Project Required Mitigation Measures

Would the Project Impact	2006 SMART EIR	2008 SMART SEIR	2025 Addendum	Mitigation Measures Applicable to the Modified Project
Geology, Soils and Seismicity	Significant Mitigable	N/A	No Change	<ul style="list-style-type: none"> <li>• 2006 SMART EIR MM G-1 through MM G-9</li> </ul>
Water Resources	Significant Mitigable	N/A	No Change	<ul style="list-style-type: none"> <li>• 2006 SMART EIR MM WR-1a through MM WR-2</li> </ul>
Hazardous Materials	Less Than Significant with Mitigation	N/A	No Change	<ul style="list-style-type: none"> <li>• 2006 SMART EIR MM HM-1 through MM HM-3</li> </ul>



**Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
Section 3: Environmental Factors Potentially Affected  
December 2025

Would the Project Impact	2006 SMART EIR	2008 SMART SEIR	2025 Addendum	Mitigation Measures Applicable to the Modified Project
Air Quality	Less Than Significant	Less Than Significant	No Change	• None
Transportation	Significant and Unavoidable	Less Than Significant	No Change	• 2006 SMART EIR MM T-1
Noise	Significant and Unavoidable	Significant and Unavoidable	No Change	• 2006 SMART EIR MM N-1 and MM N-5
Energy	Less Than Significant	Less Than Significant	No Change	• 2006 SMART EIR MM E-1
Biological Resources	Significant Mitigable	N/A	No Change	• 2006 SMART EIR MM BR-1a-1b, BR-2a, BR-2b, BR-2c, BR-3a, BR-4, BR-5a, BR-6, BR-8a, BR-8b, BR-9a, BR-9b, BR-11, BR-13, BR-14
Parks and Recreation	Less Than Significant	N/A	No Change	• None
Land Use and Planning	Less Than Significant	N/A	No Change	• None
Public Facilities and Safety	Less Than Significant	Less Than Significant	No Change	• None
Visual/Aesthetics	Significant Mitigable	N/A	No Change	• 2006 SMART EIR MM V-1 through MM V-3
Historic Resources	Significant Mitigable	N/A	No Change	• 2006 SMART EIR MM HR-1, HR-2, HR-4, HR-5, and HR-7
Archaeological Resources	Significant Mitigable	N/A	No Change	• 2006 SMART EIR MM AR-1 through MM AR-4, and MM AR-6

Notes:  
EIR = Environmental Impact Report

As shown in Table 3-1, the analysis indicates the previously identified EIR mitigation measures would reduce impacts from the modified project to less than significant levels. Subsequent or supplemental



review of the modified project is not warranted and the conclusions of the 2006 EIR and 2008 SEIR are valid and applicable. The 2006 EIR concluded no potential impacts to mineral resources. As described in Section 2.0, the modified project includes a new staging area located adjacent to the Russian River Railroad Bridge, on an aggregate materials yard. While staging and construction activities would occur within the vicinity of the aggregate materials yard, operation, access, and production would not be disrupted as a result of the modified project. Implementation of the original project was found to not burden the existing utility and service systems in place. Any additional electricity, water, wastewater, and waste collection would be nominal. The modified project proposes minor refinements and clarifications to the original project, mostly related to construction activities and would be consistent with the 2006 EIR.

Cumulative impacts were evaluated in the 2006 EIR and 2008 SEIR, and it was determined that the original project would have a considerable contribution to a cumulative impact for several resource topics, as described in Section 3.0. The modified project would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. As further described in Section 3, potential impacts from the modified project would mostly occur during construction. Construction-related impacts would be temporary and localized as work progresses along the tracks, and impacts would only have the potential to combine with similar impacts of other projects if they occur at the same time and in close proximity. Mitigation measures and project minimization measures would ensure the modified project would not result in a considerable contribution to a cumulative impact.

The mitigation measures that are applicable to the modified project are provided in the following sections. SMART would be required to implement the identified mitigation measures to ensure impacts would be reduced to less than significant level where feasible. The 2006 EIR Mitigation Measures are replicated in Appendix A for reference.

### 3.1 Geology, Soils and Seismicity

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive or corrosive soils creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 3.1.1 Previous Environmental Documents Summary

The 2006 EIR identified several significant impacts related to construction activities based on geologic, soil, and seismic conditions. Groundwater pumping associated with excavations may encounter shallow or perched groundwater which could require dewatering. In addition, dewatering activities could induce ground failure and settlement to adjacent structures. Portions of the rail alignment were found to be susceptible to erosion from surface runoff, particularly sloping areas adjacent to drainage swales and creeks and rivers. Fault rupture, liquefaction, expansive and corrosive soils, and landslides have high potential to occur in the original project area and represent significant mitigable impacts. While there are no Alquist-Priolo faults in the original project area, the original project is subject to strong seismic ground shaking, which represents a significant unavoidable impact.

To mitigate potentially significant impacts identified in the 2006 EIR, several mitigation measures were proposed, including implementation of best management practices (BMPs) during construction, erosion control measure measures, and preparation of project-specific subsurface geotechnical investigations. The subsurface geotechnical investigation would identify potentially unsuitable soil conditions, including potential exposure to fault rupture hazards, ground shaking, slope stability, liquefaction, subsidence, lateral spreading, and collapse as part of the final design process.

### 3.1.2 Project-Specific Impacts

- a) *Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
  - i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*



The 2006 EIR evaluated construction and operation of the entire SMART rail system as the original project. The modified project includes construction and operational activities at a similar intensity in the modified project area and would continue to involve trackwork, replacement of bridges, and creation of a bicycle/pedestrian pathway, with some minor refinements as described in Section 2.0. There are no Alquist-Priolo Fault Zones in the modified project area (Sonoma County 2025a); however, the 2006 EIR identified a potentially active segment of the Healdsburg Fault, which crosses the rail alignment at MP 71.2 north of Healdsburg in the modified project area.

Geologic conditions have not changed since the preparation of the 2006 EIR and the modified project do not propose new components to be placed within an Alquist-Priolo Earthquake Fault Zone. Therefore, with implementation of **2006 EIR Mitigation Measure G-4** and **Mitigation Measure G-5**, potential impacts from the modified project would remain the same as analyzed in the 2006 EIR, as these measures would require a site-specific geotechnical report and an evaluation of fault rupture.

**ii. Strong seismic ground shaking?**

The modified project is susceptible to strong seismic ground shaking, as identified in the 2006 EIR. The Association of Bay Area Government (ABAG) Hazard Viewer classifies the modified project area's probabilistic earthquake shaking hazard as severe, and in the southern modified project area as violent (ABAG 2025). The 2006 EIR concluded that strong groundshaking could cause derailment of moving or stopped trains, resulting in injuries or death. The modified project includes construction and operational activities at a similar intensity in the modified project area and are described as minor changes compared to the 2006 EIR. Section 2.0 clarifies refinements, including work seasons and phasing, for the replacement of the Russian River Railroad Bridge. All project components and structures would be designed to meet California Building Code seismic requirements as a uniformly applied development standard.

While train operations would be extended to the Healdsburg Station, an increase train operation frequency is not proposed and the risk of experiencing strong seismic groundshaking has not changed. As geologic conditions have not changed and the modified project refinements do not represent major changes to construction or operation, implementation of **2006 EIR Mitigation Measure G-4** would require preparation of a site-specific geotechnical investigation report to include seismic design parameters, including for pile-supported structures (such as the Russian River Railroad Bridge), which would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.

**iii. Seismic-related ground failure, including liquefaction?**

The 2006 EIR evaluated liquefaction potential and noted the southern portion of the Russian River Railroad Bridge and industrial yard, located approximately at MP 67.60, as an area susceptible to lateral spreading, a secondary effect of liquefaction. Per the ABAG Hazard Viewer, earthquake liquefaction susceptibility ranges from low to high throughout the modified



project area (ABAG 2025). Compliance with the California Building Code and implementation of **2006 EIR Mitigation Measure G-6** would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR. This measure would require a subsurface investigation of liquefaction potential as part of **Mitigation Measure G-4**.

**iv. Landslides?**

Per the ABAG Hazard Viewer, rainfall-induced landslide hazards in the modified project area range from flat land (no hazard) to most landslides in the area north of the City of Healdsburg, and the southern terminus of the modified project area at MP 62.94 (ABAG 2025). Compliance with the California Building Code and implementation of **2006 EIR Mitigation Measure G-7** would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR, as it would require review of slope stability and installation of rock fall netting, soil nails, or rock bolts as necessary to minimize slope disturbance.

**b) Result in substantial soil erosion or the loss of topsoil?**

The 2006 EIR evaluated soil erosion and loss of topsoil as a result of implementation of the original project. Areas that had embankment fill slopes leading to bridge crossings in Healdsburg were specifically identified as being susceptible to long-term erosion impacts. Similarly to the original project, the modified project would likely require dewatering bridge replacements throughout the modified project area to install piers for the bicycle/pedestrian pathway bridges and the Russian River Railroad Bridge.

Potential impacts related to erosion and loss of topsoil from implementation of the modified project would be mitigated by compliance with BMPs identified in the stormwater pollution prevention plan (SWPPP). BMPs typically include sediment control measures, such as silt fences, straw wattles, or sediment traps during construction, and the installation of soil stabilization measures, including erosion control blankets, slope drains with outlet protection, and establishment of vegetative cover. Implementation of **2006 EIR Mitigation Measure G-1**, **Mitigation Measure G-2** and **Mitigation Measure G-3** would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.

**c) Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

The modified project area is subject to seismic shaking, and discussions of impacts related to liquefaction and landslides are in items (iii) and (iv), above. Lateral spreading occurs when soils liquefy during an earthquake, and the liquefied soils, along with the overlying soils, move laterally to unconfined spaces, causing horizontal ground displacements. The 2006 EIR noted the Russian River Railroad Bridge and industrial yard located approximately at MP 67.60 as an area susceptible to lateral spreading. Subsidence is the sudden sinking or gradual downward settling of the ground's surface with little or no horizontal motion. As identified in the 2006 EIR, the



original project had the potential to reduce slope stability; however, implementation of **2006 EIR Mitigation Measure G-6** and **Mitigation Measure G-7**, requiring a subsurface investigation of liquefaction and slope stability. This mitigation would also apply to the modified project and ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.

**d) Be located on expansive or corrosive soils creating substantial direct or indirect risks to life or property?**

The 2006 EIR evaluated expansive and corrosive soils in the original project area and identified that stations south of Windsor and north of the Petaluma River would be susceptible to expansive soils corrosion. New pilings, bridges, and exposed concrete structures would be susceptible to these impacts. The modified project area does not include these areas; however, compliance with the California Building Code and 2006 EIR mitigation measures continue to apply to the modified project. Implementation of **2006 EIR Mitigation Measure G-8** and **Mitigation Measure G-9**, which would require incorporation of coatings or soil treatment to neutralize corrosive soils should they be encountered, would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.

### 3.1.3 Conclusion

Based on review of the analysis, findings, and conclusions in the 2006 EIR, implementation of the modified project would not result in new or substantially greater impacts related to geology, soils, and seismicity from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The 2006 EIR identified **2006 EIR Mitigation Measure G-1** through **Mitigation Measure G-9** related to geology and soils, and all mitigations would continue to apply to the modified project. This resource does not require further study in a subsequent EIR.

## 3.2 Water Resources

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 3.2.1 Previous Environmental Documents Summary

The 2006 EIR found several significant impacts related to construction activities, including disturbance of surface soils, sedimentation, and stream erosion due to earthmoving equipment. Significant mitigatable long-term impacts were identified in 100-year floodplains, where the risk of a substantial increase in flooding could be significant. However, the mitigation applies to stations located in the southern area of the rail system, and do not fall within the modified project area.

To mitigate potentially significant impacts identified in the 2006 EIR, several mitigation measures were proposed, including compliance with the SWPPP, Lake and Streambed Alteration Agreement (LSAA) (where applicable), and National Pollutant Discharge Elimination System (NPDES) permit. Additional requirements include implementation of BMPs during construction and preparation of project-specific hydrological studies for proposed stations in the southern system area to identify potential for flood level increase as part of the final design process.



Construction and operation of the original project could potentially result in adverse effects based on hydrologic conditions. The construction of the proposed transportation facilities could potentially place facilities in areas susceptible to flooding. All impacts were mitigated to a less than significant level by compliance with SWPPP requirements, LSAA, and NPDES permits as applicable. No cumulative impacts were identified.

### 3.2.2 Project-Specific Impacts

**a) *Violate any water quality standards or waste discharge requirements?***

The 2006 EIR evaluated water quality standards throughout the original project area. As part of the Project Description, minimization measures were included to lessen environmental impacts. As part of the original project, the contractor would be required to develop bio-filtration swales or other appropriate pollutant runoff controls to accommodate surface runoff from the rail improvements, stations, maintenance facility, and park-and-ride facilities, where appropriate. Additionally, the 2006 EIR noted that the original project would disturb an area exceeding 1 acre in size and would be subject to NPDES permit requirements. NPDES permit conformance requires that the project applicant file a Notice of Intent and prepare a SWPPP for the Regional Water Quality Control Board. Where appropriate, an LSAA would be required for work completed along surface water bodies.

Like the original project, the modified project would disturb an area exceeding 1 acre in size and would be subject to NPDES permit, LSAA, and SWPPP requirements. The SWPPP would contain a list and implementation plan for the stormwater BMPs that would be implemented during construction of the modified project to minimize erosion, sedimentation, and water contamination, and permanent post-construction BMPs. The previously identified minimization measures apply to the modified project as a project design feature. The modified project does not represent a major change in land use or development intensity, and therefore, the modified project would be required to comply with all uniformly applied development standards and water quality permits as outlined in the 2006 EIR.

Additionally, implementation of **2006 EIR Mitigation Measures WR-1a and WR-1b** require that the modified project comply with NPDES, LSAA, and SWPPP requirements. Compliance with these permits and the minimization measures would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.

**b) *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?***

Similar to the original project evaluated in the 2006 EIR, the modified project would not result in the extraction of groundwater and would not have long-term impacts on groundwater supplies or the production rates of wells in the vicinity of the modified project. However, in the location of



water crossings and for the Russian River Railroad Bridge replacement, dewatering would be required to access bridge foundations and ensure compliance with Regional Water Quality Control Board requirements. Dewatering sandy soil can cause ground settlement and damage to structures and underground utilities. These impacts and required mitigation measures are discussed in Section 3.1(b) Geology, Soils and Seismicity.

The modified project does not include a major change in land use or development intensity, and therefore, the modified project would be required to comply with all uniformly applied development standards as outlined in the 2006 EIR. Implementation of **2006 EIR Mitigation Measure G-1**, which requires implementation of soil erosion BMPs, **Mitigation Measure G-2**, which requires shoring during excavation, and **Mitigation Measure G-3**, which requires repairing drainage structures and hydroseeding, would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.

**c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off-site?***

The 2006 EIR evaluated the increase of impervious surfaces and concluded that the original project would involve construction of approximately 125 acres of new impervious surface throughout the 70-mile system. The impervious surface is required for development of the bicycle/pedestrian pathway and parking within the proposed stations and maintenance facility. This impact was found to be less than significant, and impacts would be lessened through implementation of minimization measures and BMPs during construction and operation.

The modified project includes relocation of a bicycle/pedestrian pathway within the railroad ROW, a new staging area, and design clarifications for the reconstructed Russian River Railroad Bridge, and minor refinements related to utility relocations, culverts, and trackwork near Healdsburg Station. The modified project does not propose additional impervious surface beyond what was evaluated in the 2006 EIR. The 2006 EIR evaluated both rehabilitation and replacement of the Russian River Railroad Bridge, as described in Section 2.0. Since preparation of the 2006 EIR, the bridge has been recommended as not historically eligible (Section 3.13), and investigation of the bridge concluded that reconstruction and replacement of the bridge would be required to meet current safety and structural requirements. As part of the Russian River Railroad Bridge replacement, work in the Russian River would be required and an LSAA would be needed.

Bridge replacements were analyzed in the 2006 EIR as part of the original project. Replacement of the Russian River Railroad Bridge would result in temporary alteration of the Russian River drainage. However, **2006 EIR Mitigation Measures WR-1a and WR-1b** require that the modified project comply with NPDES, LSAA, and SWPPP requirements. **2006 EIR Mitigation Measures WR-2** requires that structures would not raise flood levels and require specific hydrologic studies. Compliance with mitigation measures, BMPs, and minimization measures would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.



**d) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?***

The 2006 EIR concluded that constructing bridges, levees, rail and road embankments, and buildings, that encroach on floodplains may reduce the flood-carrying capacity and increase flood elevations, but most of the potential impacts were related to the proposed stations. As part of the original project, culverts would be cleared, resized, or reconstructed, as necessary, to re-establish hydrologic connections and minimize potential flooding and sediment delivery to the waterbodies. The modified project activities propose minor refinements from the original project, including design clarifications to the Russian River Railroad Bridge and new bicycle/pedestrian bridges at Norton Creek Tributary (MP 70.34), Russian River (MP 67.72), Sargent Road Crossing (MP 65.68), and Old Redwood Highway (MP 65.1). As described in the 2006 EIR, reconstruction of the Russian River Railroad Bridge would be completed within the original footprint, continuing to avoid potential impacts on the floodplain. The new bicycle/pedestrian bridge structures would be prefabricated and lifted into place using cranes to reduce construction time and disturbance areas and would avoid impact to a floodplain.

Culvert width requirements have changed since development of the 2006 EIR. New culvert sizing, as part of the modified project, would require replacement of smaller culverts to a minimum of approximately 36 inches. All culverts in the modified project area are assumed to need replacement in kind, or to the minimum size. The additional sizing would allow for greater capacity of stormwater systems, minimize the potential for clogging, and reduce the severity of potential flooding.

As outlined in Section 3.2.2(a), the modified project would disturb more than 1 acre and would require development of a NPDES permit and SWPPP. An LSAA would be required for the modified project during bridge replacement activities and in-water work.

Uniformly applied development standards would require that no permanent alteration to drainage patterns would occur, and implementation of post-construction BMPs would also ensure runoff is minimized. However, **2006 EIR Mitigation Measures WR-1a and WR-1b** require that the modified project comply with NPDES, LSAA, and SWPPP requirements. Additionally, implementation of **2006 EIR Mitigation Measure WR-2** would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.

**e) *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

The modified project includes relocation of a bicycle/pedestrian pathway within the railroad ROW, a new staging area, and design clarifications for the reconstructed Russian River Railroad Bridge, and minor refinements related to utility relocations, culverts, and trackwork near Healdsburg Station. The modified project also proposed new bicycle/pedestrian bridges at Norton Creek Tributary (MP 70.34), Russian River (MP 67.72), Sargent Road Crossing (MP 65.68), and Old Redwood Highway (MP 65.1). Similar to the 2006 EIR, runoff water would be intercepted with bio-



filtration swales or other appropriate containment devices and would be dispersed in accordance with the measures required under the SWPPP. Temporary staging areas were also previously evaluated to potentially release pollutants such as oil, grease, and chemicals into the drainage system. As outlined in Section 3.2.2(a), the modified project would disturb more than 1 acre and would require development of a NPDES permit and SWPPP.

The **2006 EIR Mitigation Measures WR-1a and WR-1b** require that the modified project comply with NPDES, LSAA, and SWPPP requirements. Implementation of **2006 EIR Mitigation Measure WR-2** would ensure potential impacts from the modified project would not be more severe than analyzed in the 2006 EIR.

### 3.2.3 Conclusion

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR, implementation of the modified project would not result in new or substantially greater impacts related to water resources from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The 2006 EIR identified **Mitigation Measures WR-1a and WR-1b** and **Mitigation Measure WR-2** related to water resources. Additionally, implementation of geology and soils **Mitigation Measure G-1**, **Mitigation Measure G-2**, and **Mitigation Measure G-3** would continue to apply to the modified project. This resource does not require further study in a subsequent EIR.

### 3.3 Hazardous Materials

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to <i>Government Code Section 65962.5</i> and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 3.3.1 Previous Environmental Documents Summary

The 2006 EIR found that construction-related impacts were expected to include phenol, creosol, or aerially deposited lead in soil due to existing creosote-treated railroad ties and potential contamination near road crossings. Activities such as track improvements, shoulder re-grading, and bridge excavations could have exposed workers to these compounds, while public exposure was considered unlikely with proper BMPs. To address these risks, the 2006 EIR proposed a mitigation measure that involved soil sampling and analysis. If contamination was confirmed, a Site Mitigation Plan (SMP) would be required. Rail components were required to be recycled or reused in compliance with AB 939.

The 2006 EIR also found that in areas where soil excavation or excavation to shallow or perched groundwater was anticipated, there was a low to moderate potential to encounter contaminated soil and groundwater. Several properties near the original project area documented releases of contaminants. Although most sites had been remediated, grading or excavation could have exposed workers to hazardous materials and posed a risk of additional releases. Public exposure was considered unlikely with proper security and construction BMPs. To address these risks, the 2006 EIR proposed a mitigation measure where soil and groundwater sampling was planned prior to excavation, and an SMP would have been prepared if contamination was found. If naturally occurring asbestos were encountered, compliance with California Air Resources Board Asbestos Airborne Toxic Control Measures would have been required, including an approved dust mitigation plan. BMPs, such as daily safety meetings, site security, and dust control, would have minimized exposure and prevented offsite migration of contaminants.

The 2006 EIR also found that bridges along the corridor had the potential to contain lead-based paint and asbestos. Bridges scheduled for upgrade or replacement could have released these materials to air or water during construction, posing health risks to workers or the public without proper handling. Federal and state regulations mandate specific procedures for handling these materials. To address these risks, the 2006 EIR proposed a mitigation measure where sampling was planned in areas where asbestos or lead-based paint were anticipated to confirm hazards and determine necessary precautions. If friable asbestos was found, removal and disposal would have followed OSHA and local air district requirements.

The 2006 EIR also identified that construction and operation of the project would involve limited use of hazardous materials, such as fuels and solvents for equipment and vehicles, and small-scale storage at the proposed maintenance facility. However, the potential for release of these materials and public exposure was considered very low due to their limited use and compliance with existing regulations. In



In addition to the project's spill prevention program, federal and state requirements, and BMPs, the original project was not anticipated to create a significant hazard to the public or the environment, and any potential effect was considered less than significant.

The 2006 EIR concluded with cumulative impacts, and concluded that adherence to existing regulations, including soil and groundwater sampling, preparation of an SMP, and use of trained workers, would have ensured impacts to remain less than significant.

### 3.3.2 Project-Specific Impacts

**a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

The 2006 EIR identified that construction and operation of the original project would involve the intermittent transport, use, and disposal of potentially hazardous materials, including fuels and lubricants, paints, solvents, and other common materials. As proposed in the modified project, replacement of the Russian River Railroad Bridge and trackwork would continue to necessitate the need for intermittent transport, use, and disposal of potentially hazardous materials. The Russian River Railroad Bridge is proposed for replacement, which would require the demolition of the existing bridge, disposal of the bridge materials, excavation and dewatering for foundation work, and reconstruction of the bridge in the same location. This proposed refinement does not represent a major change in hazardous materials handling as discussed in the 2006 EIR, and implementation of the following BMPs and regulatory compliance would continue to apply.

To maintain the health and safety of the public and environment during construction and operation, any onsite hazardous materials that may be used, stored, or transported would be in accordance with Sonoma County Department of Health, Department of Toxic Substances Control, Regional Water Quality Control Board, and Environmental Protection Agency requirements, and as required in the construction documents would minimize the potential for accidental releases or emissions from hazardous materials.

During operation, project use, storage, transport, and disposal of hazardous materials would be subject to applicable local, state, and federal regulations, which specify standards and protocols for hazardous materials. Therefore, the potential threat to public health and safety would not be greater than previously evaluated in the 2006 EIR.

**b) *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

The 2006 EIR previously noted that there is potential for accidental release of hazardous materials that could be transported, used, and disposed of during project demolition and construction. While there is potential for an accidental release of fuel during construction equipment refueling, the original project includes BMPs and spill prevention measures as part of



project design. A resulting release is not considered to have the potential to create a significant hazard to the public or the environment.

The modified project refinements do not represent major changes to construction or operation over the conditions evaluated in the 2006 EIR. The possibility that construction workers could encounter hazardous materials through handling bridge infrastructure, soil and groundwater during excavation, demolition, and building would require the implementation of **2006 EIR Mitigation Measure HM-1**, which requires sampling of soil and groundwater in locations where phenol, creosol, or aerially deposited lead have been identified, and preparation of an SMP, which would include soil treatment BMPs. Implementation of **Mitigation Measure HM-3** would require soil sampling in locations where asbestos containing materials or lead based paint is found, and proper containment methods deployed. Implementation of these mitigation measures, project BMPs, and local, state, and federal regulations would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.

**c) *Emit hazardous emissions or handle hazardous or acutely-hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

The 2006 EIR evaluated the project activities in proximity to schools. In the modified project area, the closest school is Healdsburg Middle School located at 33 Healdsburg Ave H, approximately 0.15 mile (800 feet) southwest of Healdsburg Station improvements; however, implementation of project BMPs and local, state, and federal hazardous materials requirements would ensure potential impacts would be less than significant. As concluded in the 2006 EIR, no mitigation measures are proposed as the impact related to hazardous emissions within 0.25 mile of an existing school is less than significant. The impact would not be greater than those evaluated in the 2006 EIR.

**d) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

The 2006 EIR identified several hazardous materials sites with low or moderate potential to affect the original project. The following databases were reviewed on November 5, 2025. Sites within the modified project area are listed below.

- Envirostor: No sites identified (DTSC 2025).
- Geotracker:
  - MP 69.1 Southern Pacific - Oliveto Stat. #T0609793572. Perchloroethylene was discovered in 1996, and the site is currently open as part of the Cleanup Program (SWRCB 2025).
  - MP 68.4 Old Coal Gas Plant #T0609793291. Heating and fuel oil contamination was discovered in 1992. In July 2004, 3,000 tons of impacted soil was excavated from the



site, and in August 2004, groundwater monitoring wells were installed. The site is currently open as part of the Cleanup Program (SWRCB 2025).

While these sites represent new additions to the online databases from the 2006 EIR, the potential impact for construction worker safety does not represent an increase in severity from the original project. Project refinements, including trackwork in the areas near the two new listed sites, would be consistent with the project analyzed in the 2006 EIR. Implementation of project BMPs and local, state, and federal regulations, including **2006 EIR Mitigation Measure HM-2**, which requires sampling of soil and groundwater, preparation of an SMP, and daily health and safety meetings where contaminated soil is identified, would ensure potential impacts from the modified project remain the same as analyzed in the 2006 EIR.

### 3.3.3 Conclusion

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR, implementation of the modified project would not result in new or substantially greater impacts related to hazards and hazardous materials from what was identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The modified project would be required to implement **2006 EIR Mitigation Measures HM-1 through HM-3** to reduce impacts related to the release and exposure of hazardous materials to a less than significant level. No additional mitigation measures are required. Therefore, this resource does not require further study in a subsequent EIR.

## 3.4 Air Quality

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 EIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 EIR	New Significant Impact
a) Exceed a pollutant emission threshold established by the BAAQMD or NSCAPCD?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a substantial increase of greenhouse gases (measured as carbon dioxide)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Violate any air quality standard or contribute substantially to an existing or projected air quality violation (as determined by comparison of significance thresholds for ROG, NO <sub>x</sub> , and PM <sub>10</sub> , and a localized analysis for CO)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a cumulatively considerable net increase of any non-attainment pollutant?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 EIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 EIR	New Significant Impact
f) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 3.4.1 Previous Environmental Documents Summary

The 2006 EIR found that construction-related impacts, including the generation of dust and other criteria air pollutant emissions, such as NO<sub>x</sub> and diesel particulate matter (DPM), were found to be less than significant due to standard dust and equipment exhaust control measures that were incorporated into project design. Long-term impacts from the project were also found to be less than significant because the project did not exceed pollutant thresholds established by the Bay Area Air Quality Management District (BAAQMD) or Northern Sonoma County Air Pollution Control District (NSCAPCD), and did not conflict with or obstruct implementation of air quality plans.

The 2006 EIR also concluded that, while the original project would expose sensitive receptors to additional pollutant concentrations, the impact would be less than significant because pollutants would not have been concentrated in one area for an extended period of time. A DPM concentrations and cancer risk assessment was conducted and concluded that health risks were low. The original project was also found to not contribute to ozone production and would not violate any existing or projected carbon monoxide (CO) standards set by BAAQMD and NSCAPCD. The 2006 EIR concluded that the original project would reduce overall PM emissions and result in a decrease of GHG due to the use of diesel-fueled engines, in addition to the projected reduction of motor vehicle use in the study area. No mitigation measures were proposed and no cumulative impacts were identified.

The 2008 SEIR evaluated weekend service, compared to the 2006 EIR, which evaluated DMUs. Weekend service would not involve additional construction-related dust or other criteria pollutant emissions. No cumulative impacts were identified in the 2008 SEIR.

### 3.4.2 Project-Specific Impacts

**a) Exceed a pollutant emission threshold established by the BAAQMD or NSCAPCD?**

The 2006 EIR concluded that during construction, emissions would primarily be generated from diesel-fueled construction equipment and dust. At the time of the analysis, neither the BAAQMD nor NSCAPCD had established construction thresholds, but the 2006 EIR determined that impacts would be less than significant. Standard dust and equipment exhaust environmental compliance measures would be implemented. The 2006 EIR calculated the long-term air quality emissions from project operation based on the reduction in vehicle trips anticipated under project conditions and determined that impacts were less than significant. The 2008 SEIR evaluated the



**Sonoma-Marin Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
Section 3: Environmental Factors Potentially Affected  
December 2025

operational emissions from adding weekend service and the potential use of light DMUs. Emissions were found to fall below BAAQMD and NSCAPCD thresholds and impacts would continue to be less than significant.

Since the release of the 2006 EIR, the BAAQMD has adopted construction-level thresholds. NSCAPCD has not adopted standards of significance for project emissions, but recommends the thresholds and guidance from BAAQMD be used instead. Therefore, construction emissions for the proposed 9-mile extension were calculated within the California Emissions Estimator Model and compared to both BAAQMD construction thresholds to determine the impact for informational purposes. As shown in Table 3-2, construction emissions would fall below BAAQMD thresholds. Modeling inputs and assumptions are included in Appendix B.

*Table 3-2: Project Construction Air Quality Emissions*

Year	ROG	NOx	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1</sup>
Average Daily Emissions (lbs/day) <sup>2</sup>	1.46	9.74	0.42	0.38
BAAQMD Thresholds (lbs/day)	54	54	82 (exhaust)	54 (exhaust)
Exceed?	No	No	No	No

Source: Appendix B

Notes:

<sup>1</sup> PM<sub>10</sub> and PM<sub>2.5</sub> exhaust only emissions.

<sup>2</sup> Average daily emissions calculated based on a total construction duration of three years.

As discussed in the 2006 EIR and 2008 SEIR, the trains would result in less vehicle trips per day, as people have an alternative option for travel. Moreover, since the release of the 2006 EIR and 2008 SEIR, the DMU engine has been upgraded to a USEPA Tier 4 engine, which emits less NOx and PM as compared to older engine tiers. Therefore, the impact would not be greater than those evaluated in the 2006 EIR.

**b) Result in a substantial increase of greenhouse gases (measured as carbon dioxide)?**

The 2006 EIR and 2008 SEIR concluded that, due to the net decrease in vehicle trips, there would be a net decrease in GHG emissions. Since the release of the 2006 EIR and 2008 SEIR, BAAQMD has recommended that projects disclose the construction GHG emissions but has not adopted a construction GHG threshold. Therefore, construction GHG emissions for the proposed 9-mile extension were calculated within the California Emissions Estimator Model and compared to both BAAQMD construction thresholds to determine the impact for informational purposes Table 3-3. Modeling inputs and assumptions are included in Appendix B.

*Table 3-3: Project Construction GHG Emissions*

Source	MT CO <sub>2</sub> e
Total	1,884



Source: Appendix B

As discussed in the 2006 EIR and 2008 SEIR, the trains would result in less vehicle trips per day, as people have an alternative option for travel. The modified project would continue to result in a net decrease in GHGs and the impact would not be greater than those evaluated in the 2006 EIR.

**c) *Conflict with or obstruct implementation of an applicable air quality plan?***

The 2006 EIR and 2008 SEIR determined that there would not be a conflict with the air quality plan, as emissions did not exceed thresholds. Similarly, as discussed under Section 3.4.2(a), emissions would not exceed BAAQMD construction and operational emissions and therefore would not conflict with or obstruct implementation of the applicable air quality plan. The impact would not be greater than those evaluated in the 2006 EIR and 2008 SEIR.

**d) *Violate any air quality standard or contribute substantially to an existing or projected air quality violation (as determined by comparison of significance thresholds for ROG, NOx, and PM10, and a localized analysis for CO)?***

The 2006 EIR and 2008 SEIR concluded that the original project would not violate any air quality standards or substantially contribute to any ozone, PM, or CO violations, as the project would reduce the amount of vehicle trips, which would offset the additional DMU emissions.

As shown in Section 3.4.2(a), emissions would fall below construction thresholds for the BAAQMD. Moreover, the modified project would continue to offset the number of vehicle trips by providing rail trips to the area. Therefore, reactive organic gases, NOx, and PM emissions would not contribute to an air quality violation. For CO, the 2006 EIR evaluated the potential for localized CO at access roads to the proposed rail stations. According to the BAAQMD, a project would result in a less than significant impact if project-generated traffic would not increase traffic volumes at affected intersections to no more than 44,000 vehicles per hour (BAAQMD 2022). The modified project would not result in an additional 44,000 vehicles per hour at any single intersection because an increase in operational service is proposed, and there would be a less than significant localized CO impact. The impact would not be greater than those evaluated in the 2006 EIR or 2008 SEIR.

**e) *Result in a cumulatively considerable net increase of any non-attainment pollutant?***

The 2006 EIR and 2008 SEIR determined that the original project would not exceed thresholds and therefore would not result in a cumulatively considerable net increase of any non-attainment pollutant. Similarly, as discussed under Section 3.4.2(a), the construction and operational impacts would be less than significant and fall below thresholds. The impact would not be greater than those evaluated in the 2006 EIR or 2008 SEIR.

**f) *Expose sensitive receptors to substantial pollutant concentrations?***

The 2006 EIR conducted a quantitative health risk assessment for the nearest residential receptor and found that impacts would be less than significant when environmental compliance



measures, such as the use of catalyzed diesel particulate filters and limiting idling time to 15 minutes, were applied. The 2008 SEIR also determined the increase from weekend travel would not exceed health risk thresholds and risks were less than significant.

During construction, the modified project would emit toxic air contaminants, including DPM, from off-road equipment and vehicle travel. The overall project alignment is linear and construction would not stay in any one place for an extended period of time. While the Russian River Railroad Bridge construction would take place for several years, the construction of the bridge would be seasonal. Construction would be required to comply with applicable district rules and regulations, including construction BMPs for fugitive dust. The impact would not be greater than those evaluated in the 2006 EIR and 2008 SEIR.

**g) Create objectionable odors affecting a substantial number of people?**

The 2006 EIR and 2008 SEIR found that construction may result in temporary odor from diesel fuel that would dissipate quickly. During operation, it was concluded that the original project was not known to emit objectionable odors by the BAAQMD and impacts were found to be less than significant. Similar to the findings in the 2006 EIR and 2008 SEIR, the modified project may result in temporary odors during construction that would dissipate quickly and is not considered a facility that emits objectionable odors. The impact would not be greater than those evaluated in the 2006 EIR or the 2008 SEIR.

**3.4.3 Conclusion**

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR and 2008 SEIR, implementation of the modified project would not result in new or substantially greater impacts related to air quality from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. No mitigation measures were proposed and no additional mitigation measures are required. Therefore, this resource does not require further study in a subsequent EIR.

**3.5 Transportation**

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Cause a substantial increase in traffic and transportation, such that proposed project traffic conditions exceed either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
highways or established by general plan standards and measures for local jurisdictions. In areas where the level of service is already below the established standard, a project-related impact is considered significant if it results in a lower level of service, a substantial increase in V/C ratio for roadway segments, or a substantial increase in delay for intersections?			
b) Cause a substantial increase in motorist delay at at-grade railroad crossings, based on the frequency of grade crossing delays and duration of the delays?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate parking capacity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with adopted policies, plans or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Cause a substantial project-specific or cumulative increase in transit demand that cannot be accommodated by existing or proposed transit capacity, resulting in unacceptable levels of transit service??	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 3.5.1 Previous Environmental Documents Summary

The 2006 EIR found that construction-related impacts would be less than significant because the impacts would occur for a short period of time, during low traffic demand periods of the day, where construction would start during the morning peak and end before the evening peak period. SMART proposes a construction phasing/sequencing and traffic management plan that will be developed and implemented by the contractor to minimize impacts during construction.

The 2006 EIR concluded that long-term impacts on peak hour travel demands along segments of Highway 101 were less than significant. One significant and unavoidable impact was identified due to the decrease in service levels on several local streets and proposed mitigation involved restriping of existing roadways and traffic control improvements, such as signal timing and phasing modifications. If implementation of this mitigation measure would not improve level of service conditions to acceptable standards, the potential impact would have been significant and unavoidable.



The 2006 EIR identified a less than significant impact on travel time increases and queues for vehicles approaching at-grade crossings when the passenger rail train is present, with average wait times at the crossings to be under 40 seconds, which would have a less than significant impact.

The 2006 EIR also concluded that several cumulative impacts would occur in Sonoma County involving funding for transit, bicycle, and pedestrian improvements and local bus service enhancement, such as express routes and evening service.

The 2008 SEIR concluded that weekend service would not impact vehicle queuing and would have a beneficial impact on VMT. No cumulative impact from weekend service was identified in the 2008 SEIR.

### 3.5.2 Project-Specific Impacts

- a) *Cause a substantial increase in traffic and transportation, such that proposed project traffic conditions exceed either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways or established by general plan standards and measures for local jurisdictions. In areas where the level of service is already below the established standard, a project-related impact is considered significant if it results in a lower level of service, a substantial increase in V/C ratio for roadway segments, or a substantial increase in delay for intersections?*

The 2006 EIR and 2008 SEIR identified that the original project would have a significant unavoidable impact on service levels on several local streets. The intersection of Southbound Healdsburg Avenue (Old Redwood Highway) was identified to have a decrease in service operations (worsening) during the a.m. peak as the tracks cross this intersection (MP 68.25). Old Redwood Highway is one of the principal north-south thoroughfares in Healdsburg and, to access the proposed Healdsburg station, traffic would be required to travel through a five-legged intersection (intersection of Vine Street, Healdsburg Avenue, and Mill Street). Traffic demands would eventually redistribute or balance to other less traveled north-south routes, such as Center Street, thereby reducing demand and improving the operations and volume-to-capacity (V/C) ratio along Healdsburg Avenue. While there could be redistribution of traffic at this intersection, the 2006 EIR concluded that the impact was significant and unavoidable. **2006 EIR Mitigation Measure T-1** was identified to require restriping roadways and traffic control improvements, including traffic signal timing and sequencing coordination adjacent to station locations. South of this intersection, the project continues to propose replacement of the track bridge at Old Redwood Highway; however, the modified project proposes the addition of a new bicycle/pedestrian bridge structure, installed east of the tracks (approximately MP 65.1). The bridge structure would be prefabricated offsite to reduce construction time and impacts on local traffic and would occur as part of the overall construction. The modified project also includes relocation of a bicycle/pedestrian pathway within the railroad ROW, a new staging area, and design clarifications for the reconstructed Russian River Railroad Bridge, and minor refinements related to utility relocations, culverts, and trackwork near Healdsburg Station. Such modifications



would not result in additional trips generated or construction impacts beyond what has been evaluated in the previous environmental documents.

As noted in the 2006 EIR, SMART has committed to several avoidance and minimization measures to lessen environmental impacts related to transportation, which continue to apply to the modified project. The contractor would be required to develop and implement construction phasing/sequencing and traffic management plans to minimize traffic impacts during the construction period. This plan would include defining each construction operation, approximate duration, and necessary traffic controls to maintain access for vehicles; limiting offsite construction-related hauling and movement of heavy equipment to daytime hours and off-peak travel demand periods; providing alternative access and notice of detours to local neighborhoods; and encouraging construction workers to use public transportation and carpool in areas where limited parking is available.

The 2006 EIR stated that in 2000, the population in Sonoma County was approximately 458,600 persons and used 2025 as its projected build-out year. The 2006 EIR used 2000 as its base year because it matched the base year of the regional transportation plan update, and the decennial census. Projections for Sonoma County indicated the growth trend would continue, with a projected increase of approximately 22 percent between 2000 and 2025, resulting in a forecasted population of approximately 559,452 in 2025. Currently, the population of Sonoma County is 488,863 (US Census Bureau 2025), which is slightly above projected population projected for 2010, representing a slower rate of actual population growth over projections. The 2008 SEIR noted that data from the 2006 EIR was relevant because between these years, population had grown approximately 5 percent, and total jobs (at least through 2005) were roughly flat.

The 2008 EIR analyzed weekend service and concluded that the impact was found to be less than significant because weekend train service frequency would be lower than the weekday service. The 2008 SEIR also concluded that weekend service would decrease VMT and VHT by diverting trips that would otherwise be made on Highway 101. Assuming that 2,020 Saturday rail trips would be made, the reduction would be up to 11,000 VMT per day, or 573,000 annual VMT. The reduction on Sundays would be up to 5,400 VMT per day, or 308,000 annual VMT, assuming 57 Sundays and holidays per year. In total, the annual VMT reduction on Highway 101 due to weekend passenger rail service would be up to 758,000 miles.

While the population has increased since the 2006 EIR and 2008 SEIR, the slower-than-projected growth the region has experienced, combined with the modified project, would not result in a more significant increase in traffic to change level of service standards.

With implementation of mitigation measures; minimization measures, such as implementation of a traffic control plan; and signalization sequencing, the modified project impact would remain significant and unavoidable and does not represent a more significant impact as analyzed in the 2006 EIR and 2008 SEIR. Furthermore, subsequent to the preparation of the 2006 EIR and 2008 SEIR, the State adopted new CEQA guidelines that stipulate how automobile delay is not a



significant effect on the environment (New Section 15064.3). Under the current 2025 CEQA guidelines, the significant impacts identified in the 2006 EIR and 2008 SEIR would not occur.

**b) *Cause a substantial increase in motorist delay at at-grade railroad crossings, based on the frequency of grade crossing delays and duration of the delays?***

The 2006 EIR identified that travel times would increase on routes with at-grade crossings due to the passing of the passenger rail trains, and the average gate down time at urban at-grade crossings would be approximately 40 seconds. Vehicle queues would form along the more heavily used routes. This impact is further discussed in Section 3.11, related to emergency access. While there would be slight increase in delays, the required minimization measures to coordinate traffic signals in urban areas would reduce any increase in travel times, and the 2006 EIR concluded that the impact to vehicle queues would be less than significant.

Addition of weekend service was evaluated in the 2008 SEIR and concluded that traffic signal coordination in urban areas, proposed and described in the 2006 EIR, would ensure any vehicle delays would be less than significant. Additionally, weekend service would be less than weekday service and spaced over the daytime and early evening operating hours. Due to the less frequent levels of train service that would be provided on weekends, the 2008 SEIR concluded that the impact was less than identified for the weekday operations and no mitigation was required. The project overall would support an alternative to driving the congested roadway during weekday commute peak period.

As noted in Section 3.5.2(a), the modified project refinements would not result in additional trips generated or construction impacts beyond the original project conditions because the land uses have not changed. With required implementation of mitigation measures; minimization measures, such as implementation of a traffic control plan; and signalization sequencing, the impact would remain less than significant and does not represent a change in impact level as analyzed in the 2006 EIR and 2008 SEIR.

**c) *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

The 2006 EIR identified one hazardous intersection, which is located outside of the modified project area. As noted in the 2006 EIR, SMART has committed to several safety-related minimization measures as part of rail system and project design and must meet FRA safety requirements. For areas where the tracks cross roadways at-grade, trains and traffic would be controlled by bells, flashing gates, and in some locations, traffic signals at intersections. SMART is also required to maintain clearly defined access for non-motorized modes during construction. Where roadways and sidewalks are impassable for bicycles and pedestrians, signage and maintaining safe alternate routes and pathways during construction are required. Additionally, SMART has included standard safety measures at each rail crossing (for those crossings already constructed), including fencing, other physical safety structures, signage, and other physical impediments designed to promote safety and minimize pedestrian/train accidents. The 2006 EIR did not identify any hazardous design features within the modified project area. Safety



infrastructure to meet FRA safety requirements would not change and would be constructed as part of the original project. Trains and traffic would continue to be controlled by bells, flashing gates, and in some locations, traffic signals at intersections.

Because all minimization measures continue to apply to the modified project, and the modified project does not represent any changes in intersection design or propose a change to land use that would be incompatible, the impact is less than significant and does not represent an increase in severity of impacts analyzed in the 2006 EIR and 2008 SEIR.

**d) *Result in inadequate parking capacity?***

The 2006 EIR concluded that the original project would provide adequate parking, with a surplus of approximately 1,200 parking spots provided. In the modified project area, the Healdsburg Station was anticipated to provide an additional 31 parking spots over estimated demand and model outputs.

The 2008 SEIR analyzed weekday passenger service and parking. Because ridership would be lower on weekends than weekdays, impacts on parking (e.g., spillovers) would be negligible. The proposed weekend service would result in less roundtrips per day compared to weekday service levels. The 2008 SEIR found there would be no impact on parking capacity because the parking capacity has been designed to accommodate weekday service ridership.

The modified project does not include additional parking spaces or expansions compared to the original project. Additionally, the modified project does not include additional frequency of train service, which could increase demand over previously analyzed assumptions. Because the modified project does not represent a change to parking capacity or train service, there would be no impact to parking capacity over conditions analyzed in the 2006 EIR.

**e) *Conflict with adopted policies, plans or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?***

The 2006 EIR concluded that the original project would be consistent with regional and local policies, plans, and programs to reduce the dependency on the automobile and support alternative modes of transportation. Implementation of the original project provides a transportation mode other than driving personal automobiles and the proposed bicycle/pedestrian pathway would support the increased use of non-motorized modes of transportation.

Since development of the 2006 EIR, Plan Bay Area has been developed between ABAG and the Metropolitan Transportation Commission (MTC) as the regional long-range plan for the nine Bay Area counties. Development of the SMART train is a regional priority identified in Plan Bay Area 2050, and the modified project is consistent with this goal (MTC 2021). The Sonoma County Regional Transportation Authority has incorporated the SMART rail system into long-range planning documents, such as the 2016 Comprehensive Transportation Plan (SCTA 2016). Several projects related to the SMART rail system, including the bicycle/pedestrian pathway improvements and the Russian River Railroad Bridge project, have been identified and



highlighted in a “Local Benefits Case Study — Sonoma Marin Area Rail Transit (SMART) Pathway” in chapter 5 of the plan (SCTA 2016).

Because the modified project would continue to provide both a bicycle/pedestrian pathway and transit service, the modified project would continue to beneficially contribute to policies and plans to support alternative transportation. There would be no impact to policy conflicts, and the impact does not represent a change from the 2006 EIR conclusions.

- f) ***Cause a substantial project-specific or cumulative increase in transit demand that cannot be accommodated by existing or proposed transit capacity, resulting in unacceptable levels of transit service?***

The 2006 EIR concluded that the original project and development of the SMART rail system would provide an alternative transportation mode other than driving personal automobiles and the proposed bicycle/pedestrian pathway would support the increased use of non-motorized modes of transportation. As noted in Section 1.4, the project-related increase in ridership is below the ridership projected in the 2006 EIR and would not represent a significant increase in ridership or train use beyond what was analyzed in the 2006 EIR. The 2008 SEIR concluded that demand evaluated in the 2006 EIR, in addition to weekend service, could be accommodated with implementation of the modified project. The modified project and SMART rail system have capacity to accommodate additional riders in the modified project area’s surrounding communities. There would be no impact related to increase in transit demand, as analyzed in the 2006 EIR and 2008 SEIR.

### **3.5.3 Conclusion**

Based on an examination of the analysis, findings, and conclusions of the 2006 EIR and 2008 SEIR, implementation of the modified project would not result in new significant or substantially greater impacts related to transportation from what has been identified in the 2006 EIR or 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. **2006 EIR Mitigation Measure T-1** applies to the modified project. No additional mitigation measures are required. This resource does not require further study in a subsequent EIR.



### 3.6 Noise

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Exposure of persons to or generation of noise levels in excess of applicable standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project located within the vicinity of a private airstrip would the project expose people in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.6.1 Previous Environmental Documents Summary

The 2006 EIR found that construction-related impacts included temporarily causing increased noise levels associated with construction equipment; however, the impact would be temporary and localized to the vicinity of the improvements. The contractor would be required to comply with applicable local sound control and noise level rules, regulations, and ordinances to minimize potential impacts to sensitive receptors. Long-term impacts were identified related to an increase in ambient noise levels due to train operations in the project vicinity, particularly near proposed stations and at-grade crossings. While noise from train horns and warning devices is not regulated by local ordinance due to safety concerns, it can still be disturbing to residents.

The 2006 EIR found that train horns would cause a substantial increase in ambient noise levels in the project vicinity, and it deemed this impact to be significant and unavoidable due to the noise exposure levels exceeding the FTA noise impact criteria near several at-grade crossings along the corridor. Mitigation proposed establishing Quiet Zone designations for crossings along the corridor; however, the 2006 EIR acknowledged that SMART would not be able to guarantee Quiet Zone designation because the final authority lies with the FRA.



The 2008 SEIR concluded that adding weekend service would not involve additional construction-related noise. Weekend train operational noise would be less frequent than weekday service and the impact was found to be less than significant. Operationally, with the exception of train horn noise, the long-term impacts from adding weekend service would continue to be below applicable threshold levels and would be less than significant as described for the SMART project analyzed in the 2006 EIR. Therefore, the impact on noise would be less than significant, while impacts from the use of train horns would be significant and unavoidable. No cumulative impacts were identified.

### 3.6.2 Project-Specific Impacts

- a) *Exposure of persons to or generation of noise levels in excess of applicable standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The 2006 EIR evaluated noise impacts in accordance with 23 Code of Federal Regulations 771 and the FTA guidelines for the original project. The FTA mandates audible warning devices on trains, which represents a significant impact identified in the 2006 EIR under Impact N-5. Several residences in the vicinity of at-grade crossings would experience train horn noise exposures that would exceed the FTA Severe Noise Impact Criteria. The 2008 SEIR evaluated weekend train service and concluded that horn noise from each pass-by would continue to have the potential to affect residents and other sensitive land uses, including churches or parks, near at-grade crossings. Train horn noise would be temporary and periodic and would be limited to the hours between 5:00 a.m. and 8:00 p.m. As described in the 2008 SEIR, despite the lower frequency of weekend train horn noise compared to weekday service, the impact of the substantial noise increase caused by train horns was found to be significant and unavoidable.

Most communities where the SMART train is active have established Quiet Zones, where train horns will not routinely sound as they travel through crossings. In these areas, SMART has installed additional safety features at each railroad crossing, such as additional crossing gates or medians to prevent cars from driving around gates. These additional safety features assist local jurisdictions in establishing Quiet Zones (SMART 2025b). **2006 EIR Mitigation Measure N-5** was included to limit the use of train horns and warning devices. However, FRA has final jurisdiction over Quiet Zone applications, and SMART cannot commit to a Quiet Zone. As noted in the 2006 EIR and 2008 SEIR, SMART committed to working with local jurisdictions wanting to be designated Quiet Zones to cooperatively meet the requirements for designation.

The 2006 EIR determined that the noise exposure caused by passenger and freight train pass-bys would be less than 60 A-weighted decibels (dBA) day-night sound level ( $L_{dn}$ ) at 50 feet from the tracks. The level of 60 dBA  $L_{dn}$  is considered normally acceptable for outdoor use in residential areas. Buildings that are made of standard construction materials provide between 10 dBA and 20 dBA reduction of outdoor noise levels for interior spaces, depending on whether windows are open or closed. Therefore, indoor activities in buildings near the tracks would not be disrupted by train pass-bys. Since the preparation of the 2006 EIR and 2008 SEIR, additional residences have been constructed within the City of Healdsburg, increasing sensitive receptors in



the modified project area. The intensity of the noise exposure for each passenger train pass-by would not change, and the intervals between passenger trains would continue to be 30 minutes within the same daily hours of operation. The reintroduction of train service in the modified project area and additional sensitive receptors has been accounted for in long-range planning documents, including the City of Healdsburg Housing Element Background Report (City of Healdsburg 2010) and Sonoma County General Plan (Sonoma County 2012). SMART is exempt from local noise ordinances, including Sonoma County Noise Ordinance requirements, per Section 9.56.070C (Sonoma County 2025), City of Healdsburg Noise Ordinance requirements per Section 9.32.060E (City of Healdsburg 2025), and the Town of Windsor Noise Ordinance Requirements per 17.32.070I(2) (Town of Windsor 2025).

The modified project includes relocations of the proposed bicycle/pedestrian pathway within the SMART ROW between MP 71.3 to MP 70.14 and MP 67.8 to MP 63.7. The 2006 EIR evaluated this section of pathway on the west side of the track alignment, within SMART's ROW. The northern relocation of the pathway between MP 71.3 and MP 70.14 would lessen the impact on sensitive receptors, as the pathway relocation would be further away from hotel uses and sensitive receptors in this area. Between MP 67.8 and MP 63.7 the tracks pass through the City of Healdsburg, the Russian River Railroad Bridge, and rural residential areas as the tracks approach the Windsor Station. While receptors are located on both sides of the tracks in this area, the perceptible difference in noise between the bicycle/pedestrian pathway on the opposite side of the tracks would be minimal in comparison to train noise projected along the tracks.

Due to the long-range planning for the train reintroduction, the fact that passenger train service would not increase over the 30-minute intervals, and unchanged operational hours, potential impacts from the modified project would remain the same as analyzed in the 2006 EIR and 2008 SEIR and would be significant and unavoidable. Implementation of **2006 EIR Mitigation Measure N-5** would continue to apply to the modified project, and noise impacts remain significant and unavoidable as analyzed in the 2006 EIR.

***b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?***

The 2006 EIR evaluated groundborne noise and vibration and found that the original project would not exceed the FTA's vibration threshold of 0.01 inches per second root mean square (RMS) vibration velocity. A vibration velocity of less than 0.12 inches per second peak particle velocity (approximately 0.03 inches per second root mean square (RMS) vibration velocity) would not cause damage to fragile historic buildings. As described in Section 3.13, no new historic resources were identified to be eligible within the vicinity of the modified project area. Because the modified project does not propose substantially different train characteristics, such as weights or travel speeds, the impact would remain less than significant, as analyzed in the 2006 EIR.



**c) *A substantial permanent increase in ambient noise levels?***

The 2006 EIR noted that operation of the project would result in an increase in ambient noise levels, and the impact was found to be significant and unavoidable for train horns but less than significant for train operations.

The 2006 EIR concluded that ambient noise level increases related to train operations would not cause residents to experience severe noise impacts under the FTA guidelines, and impacts would be less than significant. The 2008 SEIR evaluated weekend service, which concluded that daily average noise levels caused by weekend service would be substantially less than those of the original project because fewer pass-bys would occur per day at most locations. For all locations 50 feet from the tracks and away from at-grade crossings, weekend service would cause noise levels of less than 54 L<sub>dn</sub>. Therefore, weekend service would cause a less than significant noise impact for all locations away from grade crossings. The intensity of the noise exposure for each passenger train pass-by would not change, and the intervals between trains would continue to be 30 minutes within the same daily hours of operation. The additional sensitive receptors have been accounted for in long-range planning. The modified project does not represent a change in train service or frequency, and the impact would remain less than significant.

The modified project does not represent a change in train service or frequency, and train horns would be required throughout the alignment when approaching grade crossings in compliance with FTA safety requirements. See Section 3.6.2(a), which discusses operational train noise.

Implementation of **2006 EIR Mitigation Measure N-5** would continue to apply to the modified project, and noise impacts remain significant and unavoidable, as analyzed in the 2006 EIR and 2008 SEIR.

**d) *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?***

During the construction period, there would be a substantial increase in ambient noise levels in the modified project vicinity. The modified project clarifies that the Russian River Railroad Bridge would need to be replaced to facilitate service to Healdsburg. The Russian River Railroad Bridge would be removed and demolished offsite, and the new bridge would be constructed offsite and lifted into place over the Russian River. As analyzed in the 2006 EIR, the modified project would continue to require the use of pile driving and other heavy machinery to replace the existing bridge. However, replacement and work on the bridge would occur intermittently in stages over approximately two years, as heavy construction and in-water work would occur during the dry season. At the beginning and end of each construction season, a temporary rock pad would be installed and removed along each side of the Russian River's banks to allow access to the bridge, which would cause temporary construction-related noise. Construction noise would be intermittent over the duration of the project and include the use of pneumatically powered, hydraulic, or electric impact tools and pile drivers. A new staging area for equipment storage would be located at an industrial yard east of the existing bridge (approximately MP 67.60)



outside SMART's ROW. However, the staging area would be used to store equipment, construction materials, and fuels, which would not generate a new long-term source of ambient noise.

The modified project includes several additional bicycle/pedestrian pathway bridges that are proposed at MP 70.34 (Norton Creek Tributary), the Russian River (MP 67.72), Sargent Road Crossing (MP 65.68), and Old Redwood Highway (MP 65.1); however, similar to the bicycle/pedestrian bridges analyzed in the 2006 EIR, these bridges would be prefabricated offsite to reduce construction time and noise. Trackwork and other refinements related to trackwork, utilities, and culvert replacements would occur as part of the overall construction and would be minor and of limited duration.

Implementation of **2006 EIR Mitigation Measure N-1** would require compliance with noise abatement measures, such as construction operating hours and equipment specifications. **Mitigation Measure N-1** would continue to apply to the modified project, and noise impacts remain less than significant as analyzed in the 2006 EIR and 2008 SEIR.

- e) ***For a project located within the vicinity of an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people in the project area to excessive noise levels?***

The Healdsburg Municipal Airport is located approximately 1.4 miles west of the railroad ROW at approximately MP 71.5. The southern extent of the project (MP 62.94) is located approximately 1.98 miles north-northeast of the Charles M Schultz Sonoma County Airport. The modified project is located within the Healdsburg airport Land Use Study Area but is outside of the referral area and all airport Safety Zones (Sonoma County ALUC n.d.). The 2006 EIR concluded that the original project would not substantially increase noise levels in the vicinity of these airports. Because the modified project would not increase train service or frequency, the potential impact would remain the same as analyzed in the 2006 EIR and is considered less than significant.

- f) ***For a project within the vicinity of a private airstrip, would the project expose people in the project area to excessive noise levels?***

The 2006 EIR did not identify any private airstrips within 2 miles of the original project and concluded that the original project would not substantially increase noise levels in the vicinity of these airstrips. Based on a review of land uses, there are no new private airstrips within 2 miles of the modified project. Because the modified project would not increase train service or frequency, the impact remains the same as analyzed in the 2006 EIR and is considered less than significant.

### **3.6.3 Conclusion**

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR and 2008 SEIR, implementation of the modified project would not result in new or substantially greater impacts related to noise from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative



impacts. The modified project would be required to implement **2006 EIR Mitigation Measures N-1 and N-5** to reduce impacts related to the train horns and construction noise. No additional mitigation measures are required. Therefore, this resource does not require further study in a subsequent EIR.

### 3.7 Energy

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Result in wasteful, inefficient, and unnecessary usage of energy?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in placement of a significant demand on regional energy supply or requirement for substantial additional capacity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.7.1 Previous Environmental Documents Summary

The 2006 EIR found that construction-related impacts included indirect energy consumption from construction and maintenance would be less than significant. The 2006 EIR established a mitigation measure which involved using energy-efficient measures at rail stations, such as solar panels, reducing idling of trucks delivering construction material, consolidating material delivery, and scheduling material delivery during off-peak hours for fuel-efficient travel.

The 2006 EIR found one long-term impact, where it reported that operation of the original project would require energy use; however, the original project would avoid wasteful or inefficient energy use while not requiring a substantial additional capacity of energy. No cumulative impacts were identified.

The 2008 SEIR concluded that weekend service would not involve additional energy during construction. Long-term operational energy use would be less than conditions analyzed in the 2006 EIR due to potential utilization of the light DMU cars. No cumulative impacts were identified in the 2008 EIR.

#### 3.7.2 Project-Specific Impacts

##### a) *Result in wasteful, inefficient, and unnecessary usage of energy?*

The 2006 EIR concluded that the original project would consume energy during construction, but consumption would not be wasteful or inefficient with implementation of **2006 EIR Mitigation Measure E-1** and found that during operation the original project would result in a net decrease in energy consumption from petroleum fuel. The 2008 SEIR concluded that no additional energy would be required during construction, and the addition of weekend service would continue to result in a net reduction in energy consumption.



The modified project would include relocation of a bicycle/pedestrian pathway and four new bridges within the railroad ROW, a new staging area, and design clarifications for the reconstructed Russian River Railroad Bridge, and minor refinements related to utility relocations, culverts, and trackwork near Healdsburg Station. The extension of the rail line to Healdsburg was previously evaluated in the 2006 EIR construction energy demand calculations. While reconstruction of the Russian River Railroad Bridge would result in additional energy demand during construction, technological advancements have been made since the release of the 2006 EIR that have increased the fuel efficiency of off-road equipment and on-road vehicles. Construction of the Russian River Railroad Bridge would continue to comply with **2006 EIR Mitigation Measure E-1** to reduce energy consumption during construction. Construction of the bridge is not anticipated to result in wasteful, inefficient, or unnecessary usage of energy.

**b) Result in placement of a significant demand on regional energy supply or requirement for substantial additional capacity?**

The 2006 EIR concluded that the original project would consume energy during construction, but consumption would not be wasteful or inefficient with implementation of **2006 EIR Mitigation Measure E-1**, and found that during operation the original project would result in a net decrease in energy consumption from petroleum fuel. The 2008 SEIR concluded that no additional energy would be required during construction and the addition of weekend service would continue to result in a net reduction in energy consumption. Project construction would utilize on-road vehicles that would meet all California Air Resources Board fleet requirements, including the 5-minute idling rule to reduce petroleum fuel consumption. The modified project would also comply with **2006 EIR Mitigation Measure E-1**. The demand during construction would be temporary and end upon project completion. Construction would not place a significant demand on regional energy supply. The impact would not be greater than those evaluated in the 2006 EIR or 2008 SEIR.

### **3.7.3 Conclusion**

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR and 2008 SEIR, implementation of the modified project would not result in new or substantially greater impacts related to energy from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The modified project would be required to implement **2006 EIR Mitigation Measures E-1** to reduce impacts related to construction energy consumption to a less than significant level. No additional mitigation measures are required. Therefore, this resource does not require further study in a subsequent EIR.



### 3.8 Biological Resources

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any wildlife species identified as endangered, threatened, candidate, sensitive or special-status by the USFWS, CDFG, CEQA, or CNPS or in local or regional plans, policies, or regulations??	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified by the USFWS or CDFG or in local or regional plans, policies, regulations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands or other Waters of the U.S. as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Conflict with the following federal and state laws and regulations			
a. The Migratory Bird Treaty Act;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. California Fish and Game Code Sections 3503 and 3503.5, which protect nesting birds and raptors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. California Fish and Game Code Section 1600 protections for fish and wildlife associated with streambed alteration activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Introduce or spread a noxious weed or substantially increase the dispersal and spread of existing populations of noxious weeds such that an existing plant community or wildlife habitat is substantially degraded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



### **3.8.1 Previous Environmental Documents Summary**

The 2006 EIR concluded that the original project had the potential to have substantial adverse effects to biological resources. The original project could cause temporary impacts on biological resources associated with the construction of the proposed transportation facilities, permanent loss of resources associated with facility siting, and periodic disturbance of biological resources associated with maintenance and operation of the rail line. However, all potential impacts were determined to be mitigated to a less-than-significant level through implementation of mitigation measures, environmental compliance measures as part of the project, and required consultation with the resource agencies.

The original project had the potential to have a substantial adverse effect on special status species. Mitigation Measures WR-1a, WR-1b, BR-2a, BR-2b, BR-2c, BR-9a, BR-9b, BR-11, and BR-13 would reduce potential impacts to special status species by collectively requiring preconstruction surveys, restricting in-water work to the dry season and tree trimming to the non-nesting season, requiring pumps to have fish screens, outlining best management practices for culverts and other in-water infrastructure, prescribing biological monitoring during critical construction periods, and requiring restoration of stream banks following construction.

The 2006 EIR concluded that the original project had the potential to have a substantial adverse effect on riparian habitats, sensitive natural communities, and federally protected wetlands or other Waters of the U.S. However, these impacts could be mitigated to less-than-significant through implementation of Mitigation Measures WR-1a, WR-1b, BR-2a, BR-2b, and BR-2c. MMs WR-1a and 1b call for a Storm Water Pollution Prevention Plan (SWPPP) and Streambed Alteration Agreement to reduce potential water quality impacts, in addition to gaining applicable federal and state waters permits. MM BR-2a limits instream construction to the dry season, minimizes dewatering, and requires pumps to have fish screens. MM BR-2b requires biological monitoring during construction in streams and wetlands and avoidance or relocation of special status species. MM BR-2c mandates post-construction restoration of streambanks and best management practices for soil retention, slope stabilization, and wetland vegetation reestablishment in wetland areas.

The original project had the potential to interfere with wildlife movement or impede the use of native wildlife nursery sites. However, these impacts could be mitigated to less-than-significant through implementation of Mitigation Measures BR-9a, which requires consultation with National Oceanic and Atmospheric Administration (NOAA) Fisheries and California Department of Fish and Wildlife (CDFW) to implement protection measures, and BR-9b, which limits in-stream work to between July 1 and October 15.

The original project could potentially conflict with local policies or ordinances protecting biological resources, specifically tree protection ordinances. However, these impacts could be mitigated to less-than-significant through implementation of Mitigation Measures BR-6, which requires a tree inventory, avoidance or replacement, and monitoring, where applicable.

The 2006 EIR concluded that the original project had the potential to conflict with the Migratory Bird Treaty Act and Section 3503 of the California Fish and Game Code through the potential to have a substantial adverse effect on migratory and nesting birds and raptors. However, these impacts could be



mitigated to less-than-significant through implementation of Mitigation Measure BR-3a and 3b, which requires trees to be trimmed outside the nesting season, preconstruction surveys that includes bridges, and avoidance or monitoring of active nests.

The 2006 EIR concluded that the original project had the potential to conflict with Section 1600 of the California Fish and Game Code due to the potential for impacts to CDFW-jurisdictional wetlands and associated riparian habitat. However, these impacts could be mitigated to less-than-significant through implementation of Mitigation Measure WR-1b, which requires the proposed project to comply with the requirements for a Streambed Alteration Agreement for those portions of the project that would be completed along the banks of various surface waterbodies.

The 2006 EIR concluded that the original project had the potential to spread noxious weeds in the project corridor. However, these impact could be mitigated to less-than-significant through implementation of Mitigation Measure BR-4, which requires SMART to minimize vehicle travel through weed-infested areas; minimize soil disturbance and the removal of existing vegetation; use only certified weed-free straw and mulch, native seed mixes, and native plants; and monitor all erosion-control and revegetation sites for weed infestations.

### **3.8.2 Project-Specific Impacts**

- a) *Have a substantial adverse effect, either directly or through habitat modifications, on any wildlife species identified as endangered, threatened, candidate, sensitive or special-status by the USFWS, CDFG, CEQA, or CNPS or in local or regional plans, policies, or regulations?*

Like the original project, the modified project has the potential to result in the loss of individuals or habitat of special status species due to construction activities, such as in-ROW work including relocation of the bicycle/pedestrian pathway, and utility relocations, culverts, and trackwork near Healdsburg Station. The modified project also proposes a new staging area at MP 67.60 outside SMART's ROW and new bicycle/pedestrian bridges at Norton Creek Tributary (MP 70.34), the Russian River (MP 67.72), Sargent Road Crossing (MP 65.68), and Old Redwood Highway (MP 65.1). For the original project, impacts to special status species were considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less than significant. Specific impacts to special status species are discussed in greater detail below along with applicable mitigation measures.

#### **Special Status Plants**

The 2006 EIR analyzed potential impacts to special status plant species. Although no state or federally listed plants were found during 2003 surveys, suitable habitat existed within the project corridor, and Burke's goldfields were observed nearby (SMART 2005). Results from literature reviews and three seasons of field surveys for the modified project returned similar results,



indicating that suitable habitat is present within the Project Study Area<sup>1</sup> for bristly sedge, Burke's goldfields, dwarf downingia, Gairdiner's yampah, Lobb's aquatic buttercup, many-flowered navarretia, Napa false indigo, papoose tarplant, Sebastopol meadowfoam, Sonoma sunshine, and streamside daisy. However, no special status plants were observed in the modified project area during surveys in 2023 through 2025 (Stantec 2025) (Appendix C).

Like the original project, the modified project has the potential to result in the loss of individuals or habitat of special status plant species due to construction activities. However, while project implementation may result in a loss of habitat for special status species, no special status plants were observed in the modified project area during surveys. Therefore, direct impacts to individual plants are unlikely.

For the original project, impacts to special status plants were considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less than significant. **2006 EIR Mitigation Measure BR-8a** requires two years of botanical surveys to detect special status plant species including Sonoma sunshine, Burke's goldfields, Sebastopol meadowfoam, and many-flowered navarretia.<sup>2</sup> If sensitive plants are found, **2006 EIR Mitigation Measure BR-8b** requires protective fencing with signage to be installed around populations not directly impacted by construction. For plants that could not be avoided, mitigation would include seed collection and transplanting for annuals, and nursery propagation and replanting for perennials. All restoration areas would be monitored for five years to ensure successful establishment. In cases where state or federally listed species are affected, consultation with resource agencies such as CDFW and USFWS would be required. With implementation of **2006 EIR Mitigation Measure BR-8a and 8b**, impacts to special status plants from construction of the modified project would be reduced to less-than-significant. The impact would not be greater than those evaluated in the 2006 EIR.

### **Special Status Wildlife**

The 2006 EIR analyzed potential impacts and presented mitigation for potential impacts to special status wildlife species including California linderiella,<sup>3</sup> Central California Coast coho salmon, California Coastal chinook salmon, and Central California Coast steelhead, Pacific lamprey, Russian River tule perch, Sacramento splittail, California tiger salamander, northwestern pond turtle, salt-marsh harvest mouse, California clapper rail, California black rail, and special-status bat species (SMART 2005). Results from literature reviews and three seasons of field surveys for the modified project indicate that suitable habitat is present within the Project Study Area for

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<sup>1</sup>The surveys covered approximately 103.5 acres and included the modified project area, which occurs mostly within the limits of SMART's right-of-way (ROW) from the north side the Windsor River Road traffic circle in the Town of Windsor at mile post [MP] 62.94 to just north of the City of Healdsburg at MP 72.00.

<sup>2</sup> Botanical surveys for the modified project between 2023 and 2025 achieve this portion of MM BR-8a.

<sup>3</sup> California linderiella is designated a "USFWS species of concern" which is not considered a special status species under CEQA and so is not analyzed further in this Addendum. Suitable habitat for this species is present within the modified project area.



special status species such as Crotch's bumble bee,<sup>4</sup> Chinook salmon, coho salmon, Russian River tule perch, steelhead, foothill yellow-legged frog, northwestern pond turtle, white-tailed kite, Townsend's big-eared bat, and North American river otter.<sup>5</sup> Steelhead and river otter were observed during surveys within the modified project area. (Stantec 2025).

The following species analyzed in the 2006 EIR are unlikely to occur in the modified project area due to a lack of suitable or low quality habitat and are therefore not analyzed further in this Addendum: Pacific lamprey, Sacramento splittail, California tiger salamander, salt-marsh harvest mouse, California clapper rail (now California Ridgway's rail), and California black rail.

### **Fish**

#### ***Central California Coast Coho Salmon, California Coastal Chinook Salmon, Central California Coast Steelhead***

Like the original project, the modified project could result in the potential loss or disturbance of Central California Coast coho salmon (federally endangered, state endangered), California Coastal chinook salmon (federally threatened), and Central California Coast steelhead (federally threatened, CDFW species of special concern) due to construction activities in the Russian River. As described in Section 2.0, the engineering design and construction planning for the replacement of the Russian River Railroad Bridge has progressed and the modified project addresses related clarifications and refinements. As outlined in the 2006 EIR, construction would continue to involve the use of heavy equipment and installation of in-water piles for the new concrete piers for the Russian River Railroad Bridge. Dewatering would occur in limited areas along each side of the Russian River's banks to allow for demolition of the existing in-channel piers and for construction of the new foundations without cutting off water flow through the central channel.

Construction activities related to reconstruction of the Russian River Railroad Bridge could cause mortality, harm or disturbance to salmon and steelhead if they are present in or near work areas. During construction, migratory passageways for adults or juveniles could be temporarily blocked. These species are not expected within the project corridor during spawning, but if juvenile fish are present they could be displaced by work activities, injured by construction equipment and pile-driving, or taken into pumps during dewatering of in-stream work areas. Construction-related increases in water turbidity or sedimentation could also adversely affect migrating or rearing fish. Among these species, steelhead have the greatest potential to be affected by the modified project because they were observed within the Russian River within areas which would be affected by construction.

For the original project, these impacts were considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006

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<sup>4</sup> The 2006 EIR did not contemplate impacts to Crotch's bumble bee because it was not considered a special status species at that time and therefore it is not analyzed further in this Addendum. See Appendix C for the history of this species' candidacy under CESA.

<sup>5</sup> Though not listed as threatened or endangered or considered a special status species, river otters are protected in California under CFR Title 14 Section 460.



EIR are adequate to reduce these impacts to less than significant. **2006 EIR Mitigation Measure BR-9a** requires consultation with National Oceanic and Atmospheric Administration (NOAA) Fisheries and CDFW to implement protection measures. **2006 EIR Mitigation Measure BR-9b** limits in-stream work to between July 1 and October 15. Implementation of these measures would reduce the impact to a less-than-significant level and the impact would not be greater than those evaluated in the 2006 EIR.

#### ***Russian River Tule Perch***

Like the original project, the modified project has the potential to result in the potential loss or disturbance of Russian River tule perch (CDFW species of special concern) due to activities related to the replacement of the Russian River Railroad Bridge. Impacts to Russian River tule perch would be similar to impacts described above for salmonids. Although construction would be temporary (during the dry season between 2026 and 2028) and limited in scope (confined to the Russian River), it still has the potential to disturb or harm a small number of individuals. For the original project, these impacts were considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less than significant. **2006 EIR Mitigation Measure WR-1a and b and 2006 EIR Mitigation Measures BR-2a, BR-2b, and BR-2c** would protect stream habitats by restricting in-water work to the dry season, requiring pumps to have fish screens, outlining best management practices for culverts and other in-water infrastructure, prescribing biological monitoring during critical construction periods, and requiring restoration of stream banks following construction. Implementation of these two measures would reduce this impact to a less than significant level and the impact would not be greater than those evaluated in the 2006 EIR.

#### **Reptiles**

Like the original project, the modified project has the potential to result in the potential loss or disturbance of individuals or habitat of the northwestern pond turtle (candidate for listing as federally threatened). Construction activities within the Russian River during bridge replacement could result in harm to adult turtles, juveniles, or nests. Turtles could be crushed by equipment, and nests or eggs destroyed during ground-disturbing activities along the Russian River's banks. The use of pumps could entrap individual turtles, and dewatering could strand turtles in the dewatered areas. For the original project, this impact was considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less-than-significant.

**2006 EIR Mitigation Measure BR-11** requires pre-construction surveys to be conducted within 14 days of work in suitable aquatic habitats such as the Russian River. If northwestern pond turtles are found near construction zones, exclusion zones would be established using temporary fencing and signage to protect occupied habitat. If avoidance is not feasible, and turtles are present, a qualified biologist would relocate individuals to a nearby suitable habitat outside the work area. Exclusion fencing would be installed to prevent re-entry, and monthly monitoring would be conducted throughout the duration of construction to ensure the effectiveness of these



measures. Implementation of these measures would reduce impacts to a less-than-significant level and impacts would not be greater than those evaluated in the 2006 EIR.

### **Amphibians**

The modified project has the potential to result in the potential loss or disturbance of individuals or habitat of the foothill yellow-legged frog (candidate for listing as federally threatened). This species has potential to occur within the modified project area within the Russian River. Impacts to this species would be similar to those for northwestern pond turtle. Implementation of **2006 EIR Mitigation Measure BR-2a**, which limits in-water construction to the dry season; **2006 EIR Mitigation Measure BR-2b**, which requires biological monitoring during construction in streams and wetlands; and **2006 EIR Mitigation Measure BR-2c**, which requires restoration of temporarily disturbed stream banks, would reduce these impacts to a less-than-significant level and the impacts would not be greater than those evaluated in the 2006 EIR.

### **Birds**

The modified project has the potential to result in the potential disturbance of individuals or habitat of the white-tailed kite (CDFW Fully Protected species). This species has potential to nest within the Project Study Area, particularly in riparian trees along the Russian River. Though not contemplated individually in the 2006 EIR, the original project analyzed potential impacts to nesting birds. Specifically, construction activities could affect raptors and other birds nesting in vegetation or on bridges or other built structures in or adjacent to work areas. Trimming or removal of vegetation could destroy or disturb active nests. Equipment noise, vibration, lighting and other human-related disturbance could disrupt nesting, feeding or other life cycle activities, and could cause nest abandonment or nesting failure.

For the original project, this impact was considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less-than-significant. **2006 EIR Mitigation Measure BR-3a** requires trees to be trimmed outside the nesting season. If infeasible, preconstruction surveys are required to identify active nests. A buffer of 300 feet would be enacted or the nest would be monitored during construction within that distance. Implementation of these measures would reduce impacts to a less-than-significant level and impacts would not be greater than those evaluated in the 2006 EIR.

### **Bats**

Like the original project, the modified project has the potential to result in the potential disturbance or injury to special status bat species due to demolition and construction activities at station sites and bridge structures along the project corridor, particularly the Russian River Railroad Bridge, which is suitable habitat for Townsend's big-eared bat. While most bridges and trestles lack suitable thermal cover for bat roosting, abandoned buildings and older structures with hidden cavities could serve as roosting or nursery sites. If bats are present, construction could cause mortality, force abandonment of roosts, or disrupt breeding activities, particularly if active nurseries are disturbed during the maternity season. For the original project, this impact



was considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less-than-significant.

**2006 EIR Mitigation Measure BR-13** requires pre-construction surveys to be conducted by a qualified biologist at locations with potential bat habitat. If bats are found, they would be flushed from roosts prior to demolition, but only during the non-breeding season (October 1 to March 31). During the maternity season (April 1 to September 30), surveys would determine the presence of active nurseries, and if found, construction would be delayed or modified to avoid disturbance. When flushing bats, structures would be moved carefully to allow torpid individuals time to awaken and safely exit. In addition, the reintroduction of rail operations within the modified project area would likely result in occasional collisions with wildlife through the corridor. **2006 EIR Mitigation Measure BR-14** would require a qualified biologist to conduct monitoring surveys along the entire corridor for wildlife collision impacts at least two times per year and results coordinated with the resource agencies if applicable. This measure would continue to apply to modified project. Implementation of these measures would reduce impacts to a less-than-significant level and impacts would not be greater than those evaluated in the 2006 EIR.

#### **Mammals**

The modified project has the potential to result in the loss or disturbance of individuals or habitat of North American river otter (protected under CFR Title 14 Section 460). This species has potential to occur within the Project Study Area, primarily within the Russian River. Impacts to this species would be similar to those for northwestern pond turtle and foothill yellow-legged frog, and the implementation of **2006 EIR Mitigation Measure BR-2a**, which limits in-water construction to the dry season; **2006 EIR Mitigation Measure BR-2b**, which requires biological monitoring during construction in streams and wetlands; and **2006 EIR Mitigation Measure BR-2c**, which requires restoration of temporarily disturbed stream banks, would reduce impacts to a less than significant level. Impacts would not be greater than those evaluated in the 2006 EIR.

- b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified by the USFWS or CDFG or in local or regional plans, policies, regulations?***

#### **Riparian Habitat**

The modified project has the potential to result in the loss of riparian habitat. Field studies confirmed the presence of riparian habitat (1.13 acres of Riparian Ruderal and 7.40 acres of Riparian Mixed Oak Forest and Woodland) within proposed construction areas. Within these areas, numerous individual riparian trees are planned for removal in order to accommodate construction. The 2006 EIR contemplated impacts to riparian habitats. Operation of vehicles and equipment in riparian areas could adversely affect wetland and stream habitat by disrupting soil and damaging or removing wetland and riparian vegetation. Removal of riparian vegetation could reduce potential nesting and cover sites for wildlife, reduce beneficial shading of watercourses, and potentially affect bank stability.



For the original project, this impact was considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less-than-significant. **2006 EIR Mitigation Measure WR-1b** requires compliance with conditions outlined in a CDFW Streambed Alteration Agreement, which would outline best management practices for spill prevention, work area restrictions, and sedimentation and erosion control. **2006 EIR Mitigation Measures BR-2c and BR-5a** require stream banks and other disturbed natural areas to be restored to their original contours and development of a habitat restoration plan to enhance wetland and riparian habitats in undeveloped portions of the ROW at a 1:1 ratio. Implementation of these measures would reduce impacts to a less-than-significant level and impacts would not be greater than those evaluated in the 2006 EIR.

#### **Sensitive Natural Communities**

CDFW ranks vegetation communities according to their rarity. Natural communities with ranks of 1-3 are considered sensitive (CDFW 2025). None of the 14 vegetation types delineated within the modified project area are classified as sensitive by CDFW; all rank 4 or 5 (Stantec 2025). However, field studies confirmed the presence of approximately 6.16 acres of aquatic or wetland vegetation types (Stantec 2025). These vegetation communities, in addition to wetlands and non-wetland waters formally delineated during the 2025 wetland delineation, which could be subject to the jurisdiction of USACE or CDFW as sensitive aquatic habitat. Impacts to wetlands and non-wetland waters are discussed further under Criteria (c) below.

- c) ***Have a substantial adverse effect on state or federally protected wetlands or other Waters of the U.S. as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means?***

The 2006 EIR determined the original project would result in the loss or alteration of wetlands and waterways of the United States from filling and bridge construction at 62 water crossings along the rail line and proposed bicycle/pedestrian pathway. Like the original project, the modified project could potentially result in the loss or alteration of wetlands and waterways of the United States. Field surveyors mapped a total of 6.195 acres of aquatic features. Potential Waters of the State included 2.403 acres of wetlands and 3.792 acres of non-wetland waters. Potential Waters of the U.S. included 0.061 acres of wetlands and 3.273 acres of non-wetland waters. (Stantec 2025).

Construction activities could impact wetlands and other waters at temporary work sites, including temporarily affected areas at stream crossings within and adjacent to the modified project area. Bridge and culvert construction, reconstruction, or rehabilitation would occur crossing sites within the modified project area. Operation of vehicles and equipment in these areas could adversely affect wetland and stream habitat by disrupting soil and damaging or removing wetland and riparian vegetation. Ground disturbance and other activities within and adjacent to stream zones could result in increased erosion, water turbidity and sediment transport into waterways. Oil, gas and other pollutants could also be released into water bodies. While these temporary effects would not result in net loss of wetlands or other waters, they could adversely affect aquatic



organisms in the vicinity of work areas. Suspended sediments can interfere with respiration, reduce visibility and affect feeding and other essential life cycle activities. Excess sediments can also bury eggs, fill pools and alter streambeds that provide important habitat.

For the original project, this impact was considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less-than-significant. **2006 EIR Mitigation Measure BR-2a** limits instream construction to the dry season, minimizes dewatering, and requires pumps to have fish screens. **2006 EIR Mitigation Measure BR-2b** requires biological monitoring during construction in streams and wetlands and avoidance or relocation of special status species. **2006 EIR Mitigation Measure BR-2c** mandates post-construction restoration of streambanks and best management practices for soil retention, slope stabilization, and wetland vegetation reestablishment in wetland areas. Implementation of these measures would reduce impacts to a less-than-significant level and impacts would not be greater than those evaluated in the 2006 EIR.

- d) ***Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

#### **Terrestrial Corridors and Nursery Sites**

The 2006 EIR contemplated impediments to wildlife movement and use of nursery sites. However, land-based construction of the modified project, including new and relocated bicycle/pedestrian pathways, utility relocations, culvert replacements, trackwork near Healdsburg Station, and a new construction staging area, would not impede terrestrial wildlife movement through migratory corridors or impede the use of native wildlife nursery sites beyond current conditions. With the exception of the new, temporary staging yard at MP 67.8, upland construction for the modified project would take place within the existing ROW. Culverts would be replaced with upgraded versions in the same locations as existing culverts, and no new, permanent infrastructure which could inhibit wildlife movement or use of nursery sites would be constructed outside the existing ROW. As a result, impacts would not be greater than those evaluated in the 2006 EIR.

#### **Aquatic Corridors and Nursery Sites**

The 2006 EIR identified the Russian River as a major habitat linkage. The 2006 EIR concluded that no substantial or long-term effect to wildlife movement or nursery sites was anticipated in the stream zone of the Russian River. However, the EIR noted that, during in-water construction, migratory passageways for adult or juvenile salmonids could be temporarily blocked. Salmonids are not expected to spawn within the project corridor, but if juvenile fish are present during in-water construction they could be displaced by in-water work activities.

For the modified project, replacement of the Russian River Railroad Bridge and associated in-water work has the potential to temporarily impact resident migratory fish and wildlife and affect any nursery sites which may overlap with construction areas within the river. Salmonid migratory



corridors could temporarily be blocked and adult and juvenile fish could be displaced. In addition, construction activities within the Russian River could harm adults, juveniles, or nests of foothill yellow-legged frogs and northwestern pond turtles, in the unlikely event they are present. These species could be crushed by equipment, and nests or eggs destroyed during construction activities in the river and along its banks.

For the original project, impacts to wildlife movement and nursery sites were considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less than significant. **2006 EIR Mitigation Measure BR-11** requires pre-construction surveys, and avoidance or relocation of northwestern pond turtles found within construction areas. **2006 EIR Mitigation Measure BR-2a** limits in-water construction to the dry season; **2006 EIR Mitigation Measure BR-2b** requires biological monitoring during construction in streams and wetlands and **2006 EIR Mitigation Measure BR-2c** requires restoration of temporarily disturbed stream banks. **2006 EIR Mitigation Measure WR-1a and b** requires pumps to have fish screens, outlines best management practices for culverts and other in-water infrastructure, and prescribes biological monitoring during critical construction periods such as in-water work. Implementation of these measures would reduce the impact to a less-than-significant level and the impact would not be greater than those evaluated in the 2006 EIR.

e) ***Conflict with any local policies or ordinances protecting biological resources?***

**Preventing the Spread of Invasive Species**

The Resource Conservation Element (Part 6, Section 5) of the *Sonoma County General Plan* sets forth policies to promote and maintain the county's natural biotic resources. These include objectives to reduce the spread of exotic plant species.

The 2006 EIR contemplated the potential for the original project to spread noxious weeds in the project corridor. Project construction and maintenance activities could inadvertently spread existing populations of invasive weeds and/or introduce new species from contaminated sources. The entire project corridor has exotic invasive plants, some of which are already widespread and others that occur in isolated patches or specific habitat types. Invasive plants could be introduced or spread at any time of year by transfer of seeds or plant fragments on vehicles and heavy equipment; through erosion control practices such as placement of hay bales, seeding or mulching; and during planting of landscaping or reestablishment of natural vegetation within the ROW.

Because this could conflict with the Sonoma County General Plan, the original project considered this impact to be potentially significant, but mitigable. The modified project could spread invasive weeds in the same ways as the original project. As a result, the impact conclusion remains the same for the modified project. Mitigation measures from the 2006 EIR are adequate to reduce these impacts to less-than-significant. **2006 EIR Mitigation Measure BR-4** requires SMART to minimize vehicle travel through weed-infested areas; minimize soil disturbance and the removal of existing vegetation; use only certified weed-free straw and mulch, native seed mixes, and



native plants; and monitor all erosion-control and revegetation sites for weed infestations. Implementation of these measures would reduce impacts to a less-than-significant level and impacts would not be greater than those evaluated in the 2006 EIR.

#### **Protection of Wildlife Habitats, Rare and Endangered Species, and Freshwater Fishery Resources; Protection of Vernal Pools**

A number of local ordinances set forth policies to protect wildlife habitats, oak woodlands, rare and endangered species, freshwater fishery resources, and vernal pools. These include the Resource Conservation Element (Part 6, Sections 5 and 6) of the *Sonoma County General Plan*, the *Santa Rosa Plain Conservation Strategy*, and the *City of Windsor's General Plan*.

The 2006 EIR contemplated the potential for the original project to conflict with local policies that protect wildlife species and habitats. Operation of vehicles and equipment in temporary construction access and staging areas, parking of vehicles and placement of equipment and materials in temporary laydown and storage areas could remove or crush vegetation, damage tree roots, compact soil, or collapse animal burrows. Accidental spill or release of a hazardous material could potentially harm wildlife and impair the recruitment and establishment of onsite vegetation. Temporary work areas would be located mostly in ruderal and developed areas, but may overlap small portions of other upland plant communities including oak woodland, mixed scrub, and non-native grassland.

The modified project has the potential to impact wildlife species and habitats protected by local ordinances in a similar way as the original project. Riparian, wetland, and vernal pool habitats have the potential to be directly affected, removed, or degraded by project construction in many portions of the ROW. Special status wildlife and fish species have the potential to be displaced, injured, or harmed as a result of construction activities in the Russian River, on its banks, and during rail rehabilitation and culvert replacement throughout the modified project.

For the original project, these impacts were considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less than significant. **2006 EIR Mitigation Measure BR-1a** requires construction access, staging, storage, and parking areas to be located on ruderal or developed lands and vehicle travel limited to existing roads and designated access paths. Sensitive natural communities (i.e., wetlands, waters, riparian zones and oak woodlands) must be conspicuously marked and work activities must be limited to outside the marked areas. **2006 EIR Mitigation Measure BR-1b** requires qualified biologists to monitor construction activities that could impact sensitive biological resources and conduct a worker education program about workers' responsibilities to protect sensitive habitats and special-status species within work zones. Implementation of these measures would reduce this impact to a less than significant level and the impact would not be greater than those evaluated in the 2006 EIR.

#### **Protection of Heritage Trees**

Four local ordinances include policies that govern the protection of certain trees and compensation for their removal. Chapter 26, Article 67 of the Sonoma County Code, Valley Oak



Habitat Combining District, provides for the protection and enhancement of valley oaks and valley oak woodlands and establishes guidelines for compensating for the removal of valley oaks. Sonoma County Code Chapter 26D, Heritage or Landmark Trees, provides for protection of individual trees that qualify for heritage or landmark status.

The Sonoma County Zoning Code Article 88, section 26-88-010(m) ordinance requires projects to be designed to minimize the destruction of protected trees that meet size criteria specified in the ordinance. Protected trees are big leaf maple (*Acer macrophyllum*), black oak (*Quercus kelloggii*), blue oak (*Quercus douglasii*), coast live oak (*Quercus agrifolia*), interior live oak (*Quercus wislizenii*), madrone (*Arbutus menziesii*), oracle oak (*Quercus morehus*), Oregon oak (*Quercus garryana*), redwood (*Sequoia sempervirens*), valley oak (*Quercus lobata*), California bay (*Umbellularia californica*), and their hybrids.

Goal E in the City of Healdsburg General Plan Policy Document sets a goal protecting heritage trees, defined in the City's Zoning Ordinance as any tree with a diameter of 30" measured two feet above ground level. The provisions of the Zoning Ordinance pertaining to heritage trees regulate the removal of such trees by requiring the approval of permits prior to removal or encroachment in areas immediately surrounding such trees.

The City of Windsor's General Plan emphasizes the protection and enhancement of natural resources as a core component of sustainable development. Tree preservation is a significant priority, with specific provisions for heritage trees and oak woodlands, ensuring that large, mature trees and significant stands are maintained. These measures are implemented through ordinances like Chapter 27.36, which governs tree protection and removal.

Similarly to the original project, trees are planned for removal during construction of the modified project, including those protected by one or more tree-protection ordinances outlined above. Trees will be removed within the Russian River Railroad Bridge construction areas, bicycle/pedestrian pathway relocation and new bicycle/pedestrian bridge, as well as rehabilitation of the rail alignment where trees have overgrown within the ROW. SMART will obtain all requisite permits for these and all tree removals subject to local protection ordinances, as applicable. In addition, **2006 EIR Mitigation Measure BR-6** requires SMART to complete a survey and obtain local tree removal permits as necessary. As a result, the modified project will be in compliance with local tree protection ordinances and the impact would not be greater than those evaluated in the 2006 EIR.

f) ***Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan***

As of December 2025, Sonoma County does not have an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP)<sup>6</sup>. The primary conservation-related plan

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<sup>6</sup> As of 2024, the County has initiated the process of planning and developing a county-wide HCP/NCCP which is to be called "Conservation Sonoma". SMART will monitor the progress of Conservation Sonoma as it progresses toward adoption.



operating within Sonoma County is the Santa Rosa Plain Conservation Strategy, which is neither a HCP or NCCP (see impact discussion under Criteria (e) for additional details about this plan). The 2006 EIR does not directly address potential impacts of the original project under this criterion, likely because there was no current or proposed HCP or NCCP adopted for Sonoma County at that time. Similarly, because there is still no adopted HCP or NCCP for Sonoma County, there would be no impact under this criterion for the modified project. As a result, impacts would not be greater than what was evaluated in the 2006 EIR.

***g) Conflict with the following federal and state laws and regulations:***

- i. The Migratory Bird Treaty Act? and***
- ii. California Fish and Game Code Sections 3503 and 3503.5, which protect nesting birds and raptors?***

The modified project has the potential to result in the potential loss or disturbance of nesting birds or raptors. Nesting birds and raptors have the potential to nest throughout the ROW. The 2006 EIR analyzed potential impacts to nesting birds. Specifically, construction activities could affect raptors and other birds nesting in vegetation or on bridges or other built structures in or adjacent to work areas. Trimming or removal of vegetation could destroy or disturb active nests. Equipment noise, vibration, lighting and other human-related disturbance could disrupt nesting, feeding or other life cycle activities, and could cause nest abandonment or nesting failure. The modified project has the potential to impact nesting birds and raptors in the same ways as the original project through construction activities. Because of the potential to impact nesting birds and raptors, the original project had the potential to conflict with California Fish and Game Code Sections 3503 and 3503.5 and the Migratory Bird Treaty Act.

For the original project, this impact was considered significant, but mitigable. The impact conclusion remains the same for the modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less-than-significant. **2006 EIR Mitigation Measure BR-3a** requires trees to be trimmed outside the nesting season. If infeasible, preconstruction surveys are required to identify active nests. A buffer of 300 feet would be enacted or the nest would be monitored during construction within that distance. Implementation of these measures would reduce impacts to a less-than-significant level and impacts would not be greater than those evaluated in the 2006 EIR.

- iii. California Fish and Game Code Section 1600 protections for fish and wildlife associated with streambed alteration activities?***

The 2006 EIR considered the original project's compliance with California Fish and Game Code Section 1600 in the context of obtaining a Streambed Alteration Agreement from CDFW for impacts to CDFW-jurisdictional wetlands and associated riparian habitat. For the original project, these impacts were considered significant, but mitigable. The modified project also has the potential to impact CDFW-jurisdictional wetlands and associated riparian habitat (see discussion under Criterion (c) for these specific impacts). The impact conclusion remains the same for the



modified project, and mitigation measures from the 2006 EIR are adequate to reduce these impacts to less than significant. **2006 EIR Mitigation Measure WR-1b** requires the proposed project to comply with the requirements for a Streambed Alteration Agreement for those portions of the project that would be completed along the banks of various surface waterbodies. Implementation of this measure would reduce this impact to a less than significant level and the impact would not be greater than those evaluated in the 2006 EIR.

- h) Introduce or spread a noxious weed or substantially increase the dispersal and spread of existing populations of noxious weeds such that an existing plant community or wildlife habitat is substantially degraded?*

#### **Preventing the Spread of Invasive Species**

The 2006 EIR contemplated the potential for the original project to spread noxious weeds in the project corridor. Project construction and maintenance activities could inadvertently spread existing populations of invasive weeds and/or introduce new species from contaminated sources. The entire project corridor has exotic invasive plants, some of which are already widespread and others that occur in isolated patches or specific habitat types. Invasive plants could be introduced or spread at any time of year by transfer of seeds or plant fragments on vehicles and heavy equipment; through erosion control practices such as placement of hay bales, seeding or mulching; and during planting of landscaping or reestablishment of natural vegetation within the ROW.

The original project considered this impact to be potentially significant, but mitigable. The modified project has the potential to spread invasive weeds in the same ways as the original project through ground disturbance in weed-infested areas, use of imported hay in sediment control devices, and the use of heavy equipment. As a result, the impact conclusion remains the same for the modified project. Mitigation measures from the 2006 EIR are adequate to reduce these impacts to less-than-significant. **2006 EIR Mitigation Measure BR-4** requires SMART to minimize vehicle travel through weed-infested areas; minimize soil disturbance and the removal of existing vegetation; use only certified weed-free straw and mulch, native seed mixes, and native plants; and monitor all erosion-control and revegetation sites for weed infestations. Implementation of these measures would reduce impacts to a less-than-significant level and impacts would not be greater than those evaluated in the 2006 EIR.

### **3.8.3 Conclusion**

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR, implementation of the proposed project would not result in new or substantially greater impacts related to biological resources from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The proposed project would be required to implement **2006 EIR Mitigation Measures BR-1a, BR-1b, BR-2a, BR-2b, BR-2c, BR-3a, BR-4, BR-5a, BR-6, BR-8a, BR-8b, BR-9a, BR-9b, BR-11, BR-13, BR-14, WR-1a, and WR-1b** to reduce impacts related to impacts to biological resources to a



less than significant level. No additional mitigation measures are required. Therefore, this resource does not require further study in a subsequent EIR.

### 3.9 Parks and Recreation

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Would the project result in the loss of a recreational facility or disruption to long-term function of the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.9.1 Previous Environmental Documents Summary

The 2006 EIR identified construction-related impacts had the potential to cause indirect, short-term impacts on recreational facilities located adjacent to the project corridor due to potential increases in noise, dust, and potential detours. However, construction activities would occur at specific locations for a much shorter time period as work progresses along the tracks. The average construction period would last several weeks at any one point. No cumulative impacts were identified. The 2006 EIR concluded that the original project's contribution to the cumulative increase in recreational demand was determined to be less than significant.

#### 3.9.2 Project-Specific Impacts

**a) *Loss of a recreational facility or disruption to long-term function of the facility?***

The 2006 EIR acknowledged that during construction, recreational facilities may experience temporary impacts as a result of increased noise, dust, and possible detours associated with construction activities. The modified project includes relocation of a bicycle/pedestrian pathway within the railroad ROW, a new staging area, and design clarifications for the reconstructed Russian River Railroad Bridge, and minor refinements related to utility relocations, culverts, and trackwork near Healdsburg Station.

As described in the 2006 EIR, several recreational facilities are located in vicinity of the Russian River Railroad Bridge, including the 0.6-acre Front Street Park (Railroad Park) in Healdsburg,



located on the western bank of the Russian River at Front Street and Healdsburg Avenue, and the 0.11-acre Healdsburg Veteran's Memorial Beach Park, located on the eastern bank of the river. Additionally, the modified project crosses over the Russian River, which is identified as a Waterway Trail in the Sonoma County 2020 General Plan (Sonoma County 2008).

As concluded in the 2006 EIR, the average construction period would last several weeks at any one point, with the exception of work associated with major bridges, such as the Russian River Railroad Bridge, which would occur over several months at a time. The identified parks located near the Russian River Railroad Bridge would not be physically disturbed or converted to non-parkland use, with the exception of some tree removal located on the west side of the bridge. Temporary construction impacts are discussed in Section 3.4 (Air Quality), Section 3.5 (Transportation), and Section 3.6 (Noise), accordingly. The 2006 EIR determined that no full closures of any park or recreational facility would be required, and all parks could remain open and accessible during the construction period.

A private recreational business is also located south of the Russian River Railroad Bridge on the eastern bank of the river. This business is accessed from Healdsburg Avenue, which would not be impacted by the modified project. The private business, and the general public accessing the Russian River, may experience some limitations to river access underneath the bridge span and along Front Street Park as bridge replacement activities occur. Replacement of the Russian River Railroad Bridge would require tree removal in the northern portion of Front Street Park. Tree removal is required in this location to meet safety guidelines and provide line-of-sight for the train operators, drivers along Front Street, and Front Street Park users. Trees proposed for removal are located within SMART's ROW, with the exception of around two trees. Temporary fencing would be installed around the construction area, allowing park users to access other areas of the park during construction.

Navigational access to the portion of the Russian River located adjacent to and below the existing bridge span would be impacted by construction. As the Russian River is a publicly accessible waterway, kayakers, swimmers, and paddleboarders pass below the existing span and exit at various points along the river. It should be noted that approximately 1,000 feet downstream of the existing Russian River Railroad Bridge, there is a small dam which includes a fish ladder and riprap. This dam blocks navigational access downstream past the swimming area for Veteran's Memorial Beach. Because navigational access is blocked approximately 1,000 feet past the Russian River Railroad Bridge, the temporary closure to recreation on the Russian River would result in minimal disruption to navigational access in the vicinity. The duration of the navigational restrictions would be minimized to the maximum extent possible. Additionally, the Russian River Railroad Bridge replacement is required for public safety and to meet modern design and regulatory standards.

No park facilities would be closed during construction, and no facilities are proposed to be converted to non-parkland use. Construction of the modified project would not result in long term disruption of park facilities. This potential impact would be the same as analyzed in the 2006 EIR.



**b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

The addition of the bicycle/pedestrian pathway could result in an increase in park usage; however, this increase was not expected to result in substantial physical deterioration of facilities. The modified project includes relocation of a bicycle/pedestrian pathway within the railroad ROW and several additional bicycle/pedestrian bridges. These components would continue to facilitate connectivity as described in the 2006 EIR. Potential physical impacts associated with modifications are analyzed within this Addendum and would not result in impacts beyond what has been previously evaluated in the 2006 EIR.

**3.9.3 Conclusion**

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR, implementation of the modified project would not result in new or substantially greater impacts related to parks and recreation from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The extension and connections of the existing bicycle/pedestrian path was found to be a benefit to parks and recreation. Impacts related to use of recreational facilities was found to be less than significant, and no mitigation measures are required. Therefore, this resource does not require further study in a subsequent EIR.

**3.10 Land Use and Planning**

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 3.10.1 Previous Environmental Documents Summary

The 2006 EIR found that potential impacts related to dividing an established community, conflicts with applicable land use plans or policies, and the conversion of Prime, Unique, or Statewide Important Farmland or *Williamson Act* lands would be less than significant. Construction would occur primarily within the SMART ROW and at SMART-owned station sites, which were exempt from local zoning regulations, with the exception of some temporary construction areas located outside the ROW.

The 2006 EIR identified a potential impact related to zoning inconsistencies at several proposed station sites, which was determined to be less than significant. At the time of review, six station locations including the Healdsburg Station, were zoned in a manner that did not explicitly permit transportation facilities. However, the proposed transit-related improvements were found to be consistent with local general plans and compatible with surrounding land uses. No cumulative impacts were identified. The 2006 EIR identified one less than significant impact related to a conversion of approximately 2.2 acres of farmland to accommodate the planned bicycle/pedestrian pathway.

### 3.10.2 Project-Specific Impacts

#### a) *Physically divide an established community?*

As noted in the 2006 EIR, passenger rail service on the existing tracks in the modified project area has been inactive since 2001. The reintroduction of rail service would not physically divide the communities, since communities in the modified project area were originally established around the railroad and stations. The modified project proposes relocation of a bicycle/pedestrian pathway and four new bridges within the railroad ROW, a new staging area, and design clarifications for the reconstructed Russian River Railroad Bridge, and minor refinements related to utility relocations, culverts, and trackwork near Healdsburg Station. Such modifications would occur as part of the overall construction and would be minor and of limited duration. As a result, the modified project doesn't propose any components that would limit access or divide a community. Therefore, the modified project would not result in additional construction impacts beyond what has been evaluated in the previous environmental documents. The potential impact would remain the same as analyzed in the 2006 EIR, and there would be no impact.



***b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?***

Since development of the 2006 EIR, Plan Bay Area has been developed between ABAG and MTC as the regional long-range plan for the nine Bay Area counties. Development of the SMART train is a regional priority identified in Plan Bay Area 2050, and the original and modified project is consistent with this goal (MTC 2021). The City of Healdsburg General Plan Transportation Element outlines goal T-D with policies to develop bicycle and pedestrian facilities, and goal T-E with policies to support development of a regional, coordinated transportation system (City of Healdsburg 2023). The Sonoma County General Plan Circulation and Transit Element has identified the stations and rail alignment proposed in the 2006 EIR and incorporated goal CT-5, which sets the goal to reduce future congestion along the Highway 101 corridor by developing the SMART rail corridor for passenger rail and freight use (Sonoma County 2016). SMART is exempt from local zoning regulations, and zoning inconsistencies would not be considered a significant impact. However, construction would occur primarily within the SMART ROW, with the exception of the temporary construction staging area located next to the Russian River Railroad Bridge outside the ROW. The modified project would not result in additional construction impacts beyond what has been evaluated in the previous environmental documents. Therefore, the potential impact would remain the same as analyzed in the 2006 EIR, and there would be no impact.

***c) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

The 2006 EIR evaluated farmland conversion through the original project, which analyzed the entire rail system. Of the original project, one farmland parcel was partially converted to allow for the railroad ROW development. This impact was considered less than significant and is located outside the modified project area.

The 2006 EIR evaluated additional ROW acquisitions to accommodate the bicycle/pedestrian pathway located outside of SMART's ROW. Within the modified project area, the bike and pedestrian pathway proposed north of Healdsburg between MP 71.3 to MP 70.14, and MP 67.8 to MP 63.7, would be constructed east/northeast of the tracks. The 2006 EIR evaluated this section of pathway on the west side of the tracks, within SMART's ROW. Shifting the pathway to the east of the track would align with the Foss Creek pathway in Healdsburg, thereby minimizing crossings of the tracks, eliminating the need to construct retaining walls and import fill material, and resulting in the removal of fewer trees. The modified project area would not require conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to other uses. Therefore, there would be no impact, and the conclusion remains the same as the 2006 EIR.



**d) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

As stated in the 2006 EIR, there were no parcels in the original project area required for acquisition under *Williamson Act* contracts. The modified project does not require property acquisitions and there would be no impact, as analyzed in the 2006 EIR.

**e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?**

See 3.10.2(a). There would be no impact, and the conclusion is the same as analyzed in the 2006 EIR.

**f) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

The 2006 EIR noted that one residential property would be required for acquisition to develop Corona Road Station Option 2 and was considered a less than significant impact. This property is located outside of the modified project area. The modified project does not include demolition of housing and would not displace a substantial number of existing housing, which would necessitate the construction of replacement housing elsewhere. There would be no impact, and not represent an increase in severity from the 2006 EIR.

### 3.10.3 Conclusion

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR, implementation of the modified project would not result in new or substantially greater impacts related to land use and planning from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. Impacts related to land use and planning conflicts was found to be less than significant, and no mitigation measures are required. Therefore, this resource does not require further study in a subsequent EIR.

### 3.11 Public Facilities and Safety

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Result in substantial increases in emergency response times?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other			



performance objectives for any of the following public services:			
– Fire protection and emergency response?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
– Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
– Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in the creation of a hazardous condition (e.g. pedestrian/train conflicts), with regard to safety of the public and schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 3.11.1 Previous Environmental Documents Summary

The 2006 EIR found that construction-related impacts relating to emergency response during original project construction were less than significant. While potential for delays in getting to school and the possible need to temporarily alter routes during the construction period was identified, SMART would coordinate with local emergency service providers in advance of construction activities, including road closures, and would have implemented alternative routing plans and appropriate signage to maintain emergency access.

The 2006 EIR identified a less than significant impact related to increased demand for emergency response services. However, emergency response travel delays are expected to be minimal, about 40 seconds, depending on traffic demands and location. Given the low frequency of commuter rail accidents and the implementation of the Emergency Preparedness Plan, as required by FRA, the potential impact on emergency service providers was considered less than significant.

The 2006 EIR found another long-term impact relating to potential pedestrian/train conflicts, particularly near schools. With the implementation of safety programs and infrastructure measures, the impact on public and school safety was considered less than significant. No cumulatively considerable impacts were identified related to public facilities or safety.

The 2008 SEIR concluded that the addition of weekend service would not change construction impacts over the conclusions of the 2006 EIR. Weekend service was not found to increase or worsen the approximately 40 second delay identified in the 2006 EIR, and potential impacts would remain less than significant.

### 3.11.2 Project-Specific Impacts

#### a) *Result in substantial increases in emergency response times?*

The 2006 EIR concluded that there is the potential for temporary delays in response times of fire and police vehicles due to increased traffic congestion and/or road closure during construction activities on at-grade crossings. During operation, emergency vehicles would experience delays at train crossings when the gates are down. The 2006 EIR concluded that, on average,



emergency response travel delays resulting from the original project were expected to be about 40 seconds, depending on traffic demands and location, resulting in a less than significant impact.

As noted in the 2006 EIR, SMART has committed to several minimization measures during construction and operation of the rail system. The contractor is required to develop and implement construction phasing/sequencing and traffic management plans to minimize traffic impacts during construction. This plan shall include defining each construction operation, approximate duration, and necessary traffic controls to maintain access for vehicles; limiting offsite construction-related hauling and movement of heavy equipment to daytime hours and off-peak travel demand periods; providing alternative access and notice of detours to local neighborhoods; and encouraging construction workers to use public transportation and carpool in areas where limited parking is available.

For train operations, the 2006 EIR concluded that train operators may further minimize emergency vehicle delays by remaining stopped at station platforms when emergency vehicles are in the area, slowing down or stopping to permit emergency vehicles to pass the train, or by proceeding as quickly as possible through the crossing. They also can coordinate with neighboring jurisdictions if at-grade crossings are blocked due to train-related incidents.

The modified project includes relocation of a bicycle/pedestrian pathway within the railroad ROW, a new staging area, and design clarifications for the reconstructed Russian River Railroad Bridge, and minor refinements related to utility relocations, culverts, and trackwork near Healdsburg Station. Such modifications would occur as part of the overall construction and would be minor and of limited duration. As a result, the modified project would not result in additional construction impacts beyond what has been evaluated in the previous environmental documents. Furthermore, all minimization measures continue to apply to the modified project, and potential impact to emergency response times would remain less than significant.

***b) Result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services.***

- ***Fire Protection, Police Service, and Emergency Response***

As noted in the 2006 EIR, SMART has committed to several minimization measures during construction and operation of the rail system. These measures apply to the project area and include several measures to enhance security and public safety, including:

Development of an Emergency Preparedness Plan, subject to approval by the FRA, prior to the start of passenger rail services. Presentation of a Safety Training, per the FRA rule of railroad personnel and those who interact with the railroad in emergency situations, including police, fire, and health emergency responders. A required training session for non-railroad personnel includes briefings in railroad and passenger train operations, right-of-way safety issues, equipment,



forcible entry and evacuation, train crew personnel, hazards, emergency exits, grade crossings, and bridges and tunnels.

The modified project would not result in additional construction impacts and would not increase train service frequency. All minimization measures would continue to apply to the modified project, and no new or physically altered governmental facilities would be required to maintain service rations or response times for fire, police, and emergency responders. The impact would remain less than significant, as analyzed in the 2006 EIR and 2008 SEIR.

- **Schools**

As analyzed in the 2006 EIR, implementation of the original project would not affect the ability of the school districts to adequately provide educational services to residents in the approved project area. Because the modified project does not include a residential component or introduction of new students into the project area, there would be no additional students in the school districts. Therefore, no new facilities would be necessary. The modified project would not result in additional construction impacts and would not increase train service frequency. The impact would be the same as analyzed in the 2006 EIR and 2008 SEIR.

**c) Result in creation of a hazardous condition (e.g. pedestrian/train conflicts), with regard to safety of the public and schools?**

As noted in the 2006 EIR and 2008 SEIR, SMART has committed to several safety-related minimization measures as part of rail system and project design. SMART is also required to maintain clearly defined access for non-motorized modes during construction and coordinate with local jurisdictions to maintain safe alternate routes and pathways during construction. Additionally, SMART has included standard safety measures at each rail crossing (for those crossings already constructed), including fencing, other physical safety structures, signage, and other physical impediments designed to promote safety and minimize pedestrian/train accidents. SMART has prepared a Safety Fact Sheet, which provides tips for motorists, pedestrians, and bicyclists and lists emergency notification numbers (SMART 2017). Also included on the fact sheet is information about Operation Lifesaver, which is a nationwide non-profit that shares information via a safety program dedicated to educating the public on how to reduce crashes, injuries, and fatalities at at-grade rail crossings and on railroad rights-of-way. The 2008 SEIR concluded that weekend service would have no adverse impact on schools, as schools do not operate on the weekends.

The modified project includes clarifications to the replacement of the Russian River Railroad Bridge to meet modern design and regulatory standards. The bridge crosses over the Russian River, which is a publicly accessible waterway. Kayakers, swimmers, and paddleboarders pass below the existing span and exit at various points along the river, and during the approximately 2-year construction period, access to this portion of the river would be limited to minimize potential of a hazardous condition for navigational access on the river. As required in the 2006 EIR as part of the minimization measures, SMART would coordinate construction phasing and sequencing



notifications with the local community. The duration of navigational restrictions would be minimized to the maximum extent possible.

The modified project would not result in additional construction impacts and would not increase train service frequency. As analyzed in the 2006 EIR, compliance with FRA requirements, other safety regulations, and safety minimization measures would continue to be required as part of the modified project. The potential impact would be less than significant and would not increase the severity of impacts analyzed in the 2006 EIR and 2008 SEIR.

**d) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

The 2006 EIR included minimization measures related to safety communication protocols during emergencies, which apply to the modified project. These minimization measures applied to the 2008 SEIR for the introduction of weekend passenger service.

Since certification of the 2006 EIR, several emergency events have taken place in Sonoma County. Sonoma County has prepared and adopted an Emergency Operations Plan, which is a guidebook for the Sonoma County Operational Area to utilize during phases of an emergency and includes preparedness, response, recovery, and mitigation (Sonoma County 2022). Sonoma County has also adopted a Multi-Jurisdictional Hazard Mitigation Plan – 2021 Update that includes mitigation strategies for local communities in the project area, including the City of Healdsburg and Town of Windsor (Sonoma County 2021). These long-range plans have noted that train operations occur in the respective study area. The modified project includes relocation of a bicycle/pedestrian pathway within the railroad ROW, a new staging area, and design clarifications for the reconstructed Russian River Railroad Bridge, and minor refinements related to utility relocations, culverts, and trackwork near Healdsburg Station. Construction of these components would occur as part of overall construction and would not conflict with the adopted emergency response plans.

Because the modified project does not represent an increase in train service frequency, all minimization measures continue to apply to the modified project, and train services have been acknowledged and accounted for in local emergency plans, impacts to emergency response plans would remain less than significant, as analyzed in the 2006 EIR and 2008 SEIR.

### **3.11.3 Conclusion**

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR and 2008 SEIR, implementation of the modified project would not result in new or substantially greater impacts related to public services and safety from what has been identified. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The previously identified minimization measures would continue to apply to the modified project. Impacts related to public facilities and safety were found to be less than significant, and no mitigation measures are required. Therefore, this resource does not require further study in a subsequent EIR.



### 3.12 Visual/Aesthetics

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.12.1 Previous Environmental Documents Summary

The 2006 EIR found that the presence of construction equipment would create a temporary visual disturbance but would be less than significant. Most work would have occurred within the existing rail corridor, minimizing disruption to surrounding land uses. However, construction at station sites, maintenance facilities, and bridge rehabilitation areas, some of which are located outside the ROW, could have resulted in short-term visual disturbances due to the presence of equipment, materials, and active work zones. These impacts would have been visible from adjacent properties but would not have resulted in long-term changes to the visual environment.

The 2006 EIR concluded that new sources of nighttime lighting to surrounding project areas was determined to be less than significant. Lighting would be incorporated into the design of these facilities to support visibility, safety, and security. The 2006 EIR proposed a mitigation measure where SMART would determine fixture types, cutoff angles, shields, lamp arm extensions, and pole heights in coordination with local jurisdictions during the design phase.

The 2006 EIR found that the installation of bicycle/pedestrian safety structures along the rail corridor would introduce a visually dominant feature in areas with open space and limited nearby development. This impact was considered significant but mitigable in some areas.

To reduce adverse visual impacts, the 2006 EIR proposed a mitigation measure that involved SMART designing safety structures to fit contextually with adjacent fencing and landscape features. Lastly, the 2006 EIR evaluated cumulative impacts and found that reasonably foreseeable projects along the corridor would have resulted in visual changes in areas transitioning from undeveloped or underdeveloped conditions to more urbanized settings. The project's contribution to cumulative impacts was determined to be less than significant.



### 3.12.2 Project-Specific Impacts

a) *Have a substantial adverse effect on a scenic vista?*

As noted in the 2006 EIR, the original project is located in an existing rail corridor. Similar to the original project, there have not been rail operations in the modified project area since 2001, and the modified project would not introduce a new linear feature into the landscape or unrelated uses in a transportation corridor.

The 2006 EIR included Visual Analysis Areas and Areas 3 through 6 cover the modified project area. The 2005 EIR found that in Visual Analysis Area 3: State Road 128 to Lytton Springs Road, no views of identified resources would be obstructed from view by bicycle/pedestrian pathway users and rail passengers. In Visual Analysis Area 4: Lytton Springs Road to Russian River Railroad Bridge, a short segment of safety structure east of Healdsburg could have obscured views of the scenic ridgeline for rail passengers. Views of Dry Creek Valley would not be interrupted. Visual Analysis Areas 5–6: Russian River Railroad Bridge to Windsor, notes that some views for rail passengers may have been briefly obscured, and pathway users would have retained distant views of scenic hills. Urban development and vegetation would have limited visibility of the safety structures from Highway 101. In the 2006 EIR, the impact to scenic vistas was considered significant mitigatable and required implementation of **2006 EIR Mitigation Measure V-3**, which would require designing safety structures associated with bicycle/pedestrian pathway to fit in contextually with adjacent nearby fencing via the use of different materials or landscaping in areas where there is no intervening landscaping or structure.

In addition to the mitigation measure, SMART has committed to minimization measures to reduce visual and aesthetic impacts as part of rail system design. The contractor is required to consult with adjacent property owners and local jurisdictions about the design details of the safety structures and landscaping along the rail ROW to ensure visual compatibility. Additionally, the contractor will utilize drought-tolerant native species for proposed landscaping/screening and use recycled water for landscaping requirements, where feasible.

The modified project does not represent a change in location for any bridge crossings, though additional bicycle/pedestrian crossings are proposed at Norton Creek Tributary (MP 70.34), the Russian River (MP 67.72), Sargent Road Crossing (MP 65.68), and Old Redwood Highway (MP 65.1). These features do not represent a change in development intensity, as development of the bicycle/pedestrian pathway was analyzed in the original project for the entire alignment.

The modified project mostly includes temporary construction-related impacts that would include the presence of construction equipment and vegetation removal. While these construction activities would be visible, these changes would be temporary and would not exceed the potential impacts evaluated as part of the original project. Because the modified project does not represent a change in development intensity, compliance with **2006 EIR Mitigation Measure V-3** and previously identified minimization measures would ensure impacts remain the same as concluded in the 2006 EIR.



**b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?***

The 2006 EIR concluded that stations were sited in urban locations where the introduction of station elements (i.e., platforms, waiting area shelters, parking lots, and bicycle facilities) would not change visual quality or interfere with scenic vistas. The 2006 EIR concluded that station and railway improvements would not conflict with views from designated scenic highways or roads, and the modified project is not located along a State scenic highway (Caltrans 2025). The impact was considered less than significant.

Development of the modified project would be located in scenic areas, including Community Separators, Scenic Landscape Units, and Scenic corridors as designated by Sonoma County (Permit Sonoma 2025), but would not be located within a State scenic highway.

The existing modified project area is heavily overgrown within the ROW and would require removal to accommodate passenger service. As part of the modified project, tree removal is proposed on the north and south ends of the Russian River Railroad Bridge for construction access and staging, and for the relocated bicycle/pedestrian pathway and bicycle/pedestrian bridges. As noted in the 2006 EIR, SMART would replant trees in visually sensitive areas, such as residential neighborhoods. Effects of the modified project on views of the landscape and oak woodlands, in particular, would be minor because no large, contiguous blocks of oak woodland are proposed to be removed.

While tree removal is proposed throughout the modified project area, no scenic resources would be damaged within a state scenic highway. With implementation of minimization measures, the impact would remain less than significant as concluded in the 2006 EIR.

**c) *Substantially degrade the existing visual character or quality of the site and its surroundings?***

The 2006 EIR noted several minimization measures to design rail facilities within the design standards and visual guidelines of the local communities, and rail stations would be designed to be visually compatible with the surrounding area. The 2006 EIR found that construction equipment and construction activities would create a temporary visual disturbance but would be less than significant due to the temporary nature of construction activities. While the impact is considered less than significant, **2006 EIR Mitigation Measure V-1** requires the contractor to install temporary fencing where views from adjacent residences would be adversely affected.

The contractors would be required to implement **2006 EIR Mitigation Measure V-1** as part of the modified project, and all minimization measures to lessen visual disturbance. The majority of the modified project construction activities would occur within the existing rail ROW except for some staging areas located outside the railroad ROW. Construction activities proposed as part of the modified project would be localized for a short period of time as construction moves along the alignment, with the greatest visibility near the Russian River Railroad Bridge area, as construction would occur over several years. Reconstruction of the Russian River Railroad Bridge would



require staging areas near the Healdsburg Station and aggregate materials yard adjacent to the bridge. Stored construction equipment could adversely affect the visual setting from nearby residences, and construction activities would be visible from some adjacent properties but would be temporary. The reconstructed bridge would be similar in size and character to the existing bridge and would be replaced in the same location. As part of the minimization measures identified during project planning, SMART and contractors would be required to consult with adjacent property owners and local governments about the design details of the safety structures and landscaping along the ROW, consult with local jurisdictions regarding rail station designs to ensure visual compatibility, and would use drought tolerant native species for proposed landscaping requirements, where feasible. Implementation of the minimization measures would ensure that the new bridge is contextually appropriate and fits community character. With implementation of minimization measures and **2006 EIR Mitigation Measure V-1**, the impact would remain less than significant and not represent a change from the 2006 EIR impact conclusions.

**d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

The 2006 EIR noted that new stations and park-and-ride lots would incorporate lighting that would introduce light and glare to undeveloped areas. Lighting for these facilities is required for visibility, safety, and security. The 2006 EIR also includes minimization measures for visual resources, and SMART has committed to designing all new sources of light to reduce glare on adjacent properties and protect nighttime views. The 2006 EIR also notes that residents on Harmon Street, north of the Healdsburg Station and within the modified project area, would be negatively affected by new lighting in the vicinity of the Healdsburg Station.

The modified project does not propose improvements that would change the intensity of land use or lighting, and as required in the 2006 EIR, all lighting would be downcast and directed in a manner to reduce light spillage offsite. Additionally, implementation of **2006 EIR Mitigation Measure V-2** requires SMART to consult with local jurisdictions to ensure impacts to nighttime light and glare are minimized. This mitigation measure applies to the modified project. With implementation of the minimization and mitigation measure, the impact remains significant mitigatable and does not represent a change from the 2006 EIR.

### 3.12.3 Conclusion

Based on an examination of the analysis, findings, and conclusions in the 2006 EIR, implementation of the modified project would not result in new or substantially greater impacts related to visual or aesthetic resources from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The modified project would be required to implement **2006 EIR Mitigation Measures V-1 through V-3** to reduce impacts related to construction visual impacts, nighttime lighting, and construction of bicycle/pedestrian pathway safety structures. No additional mitigation measures are required. Therefore, this resource does not require further study in a subsequent EIR.



### 3.13 Historic Resources

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Cause a substantial adverse change in the significance of a historical resource as identified in Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.13.1 Previous Environmental Documents Summary

The 2006 EIR found that rehabilitation activities near the historic Healdsburg and historic Santa Rosa Railroad Square Stations had the potential to be a significant impact. In addition, construction activities near the historic Healdsburg Station turntable could have resulted in significant but mitigable impacts. The 2006 EIR proposed a mitigation measure that required that all improvements would be designed in consultation with the local jurisdictions and follow local fencing and landscaping guidelines. A measure also included installing and maintaining exclusionary plastic mesh fencing to prevent equipment or workers from disturbing the turntable structure.

The 2006 EIR also found that rehabilitation of the Russian River Railroad Bridge could have significantly impacted its historic integrity. The bridge was considered potentially eligible for the National Register and required formal determination from the State Historic Preservation Office (SHPO). The 2006 EIR proposed a mitigation measure that involved rehabilitation using the Secretary of Interior (SOI) Standards, which would lessen the impact to less than significant. The 2006 EIR also concluded that replacement of the Petaluma River Haystack Bridge could have significantly impacted its historic value as the bridge was considered potentially eligible for the National Register due to its engineering design and materials. The 2006 EIR proposed a mitigation measure to submit prints and drawings to the Petaluma Museum.

The 2006 EIR also found that construction of bicycle/pedestrian pathway safety structures near historic properties could have resulted in significant but mitigable impacts. The mitigation measure proposed included ensuring consistency with local preservation policies and guidelines and incorporating landscaping or design treatments to better integrate safety structures into the historic setting.

The 2006 EIR concluded that cumulative impacts to historic resources could be mitigated with review of final designs by a qualified architectural historian for consistency with the Secretary of the Interior's Standards. The project's cumulative impact on historic resources was determined to be less than significant.



### 3.13.2 Project-Specific Impacts

e) *Cause a substantial adverse change in the significance of a historical resource as identified in Section 15064.5?*

The 2006 EIR evaluated historical resources and identified several significant mitigatable impacts. The historic Healdsburg Station Turntable located at MP 67.8 is an eligible resource and located adjacent to the proposed staging area for station improvements related to Healdsburg Station. Due to the resource's proximity to the proposed construction area, **2006 EIR Mitigation Measure HR-1** was applied, which required the contractor to install exclusionary plastic mesh fencing to prevent equipment from impacting the structure. Because the modified project would require the same staging area and work access, the impact remains significant mitigatable.

The 2006 EIR also required **2006 EIR Mitigation Measure HR-2**, which required that any new infrastructure would be designed in compliance with the local historic character and in consultation with the jurisdiction's Community Development Department and City Cultural Heritage Board, as applicable. The modified project proposes development of new bridge, track, pathway and mitigation to comply with the requirements of local jurisdiction community character would be required. The impact would remain significant mitigatable.

The 2006 EIR evaluated potential impacts to Healdsburg Station (MP 68), which is located within the modified project area. Healdsburg Station was identified as potentially eligible for the National Register of Historic Places (NRHP) in 2001. The project evaluated under the 2006 EIR found that the impact would be less than significant because no structural or internal modifications were proposed. Similarly to the 2006 EIR, the modified project would avoid this resource, and the impact would remain less than significant.

The 2006 EIR identified a significant mitigatable impact related to railroad trackwork that retains integrity. While the section identified in the impact discussion of the 2006 EIR is located outside of the modified project area, **2006 EIR Mitigation Measure HR-4** would be used should it be determined that parts of rail track that may retain integrity. The measure requires an architectural historical document the track with a large format camera and submit prints to state and local libraries. . Implementation of the modified project would comply with the mitigation measure if track that retains integrity is encountered. The impact remains significant mitigatable.

The 2006 EIR evaluated impacts to the Russian River Railroad Bridge, which is a steel Subdivided Warren Truss style structure built in 1901. The bridge has a timber pile trestle leading up to the steel bridge deck and superstructure on both sides. The substructure consists of four concrete piers that support the bridge. The 2006 EIR mentions the replacement of the Russian River Railroad Bridge (MP 67.60-67.7) in the Project Description as part of proposed activities. However, the mitigation measures related to historic resources (specifically Impact HR-6/ Mitigation Measure HR-5) assumed that bridge rehabilitation would occur. The 2006 EIR and identified that rehabilitation of the Russian River Railroad Bridge would result in a significant mitigatable impact with implementation of **2006 EIR Mitigation Measure HR-5**, which required documentation of the site by a professional photographer, and documentation in local museums.



Additionally, rehabilitation was required per SOI guidelines and standards. At the time of preparation of the 2006 EIR, SHPO had not been consulted, and the mitigation measures assumed the bridge was historic, requiring rehabilitation rather than replacement. On June 1, 2023, Stantec completed a constraints analysis for the bridge (Stantec 2023; Appendix D) and completed a Department of Parks and Recreation (DPR) Report, which is used to record and evaluate cultural resources under state and federal guidelines. Findings from that analysis concluded that the bridge is recommended not eligible for listing under state or federal criteria because of a lack of historical significance and overall integrity (Stantec 2023; Appendix D). As part of the modified project, the Russian River Railroad Bridge was clarified to require replacement to meet current structural and safety requirements. Bridge demolition and reconstruction would occur over an approximately 2-year period. The new bridge would be replaced in the same location, with the addition of the bicycle/pedestrian pathway on the northern side of the new bridge. With implementation of mitigation measures, the impact on the Russian River Railroad Bridge remains significant mitigatable.

The 2006 EIR noted that development of the proposed bicycle/pedestrian pathway could cause adverse visual impacts on adjacent historical resources, such as the Olivetto Winery located in the City of Healdsburg at MP 70.5. **2006 EIR Mitigation Measure HR-7** would require designing safety structures consistent with local historic preservation policies and guidelines. Because the modified project passes the Olivetto Winery on the winery's eastern frontage, and would require development of the bicycle/pedestrian pathway in this location. With implementation of mitigation measures, the impact remains significant mitigatable.

The 2006 EIR noted that there were nine previously identified historic resources within the modified project area, and eight historic resources identified through survey and reporting completed by Garcia and Associates in 2005. Of these 17 resources, 11 historic resources were previously recommended eligible for the NRHP, California Register of Historical Resources (CRHR), or local listing within the modified project area. Due to the time passing since studies were completed for the 2006 EIR, 89 additional built resources within or adjacent to the modified project area are within the 50-year threshold for evaluation and impact assessment. Per the Cultural Resources Study Report prepared by Stantec in November 2025, no new resources were determined or recommended to be eligible under the NRHP or CRHC and no new impacts were identified. Most of the resources that are now within the 50-year threshold are individual houses or housing developments from the 1970s and 1980s and industrial, largely prefabricated, warehouses along the alignment. None of these resources rise to a level of significance under any criteria of the NRHP or CRHR as they are largely unremarkable in their style or design and did not contribute significantly to the history of area. Table 4 in Appendix E contains the list of built environment historic resources within the modified project area.

No new resources were determined or recommended eligible under the NRHP or CRHC, and no new impacts to historical resources were identified. Previously surveyed resources with recommendations of eligibility remained unchanged. The impact is considered significant mitigatable with implementation of **2006 EIR Mitigation Measures HR-1, HR-2, HR-4, HR-5, and HR-7** and does not represent a change in severity from the 2006 EIR.



### 3.13.3 Conclusion

Based on review of the analysis, findings, and conclusions in the 2006 EIR, implementation of the modified project would not result in new or substantially greater impacts related to historic resources from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The 2006 EIR identified **Mitigation Measures HR-1, HR-2, HR-4, HR-5, and HR-7** related to historic resources, and all mitigations would continue to apply to the modified project. This resource does not require further study in a subsequent EIR.

## 3.14 Archaeological Resources

Would the Project:	Equal or Less Severity of Impact Identified in 2006 EIR and 2008 SEIR	Substantial Increase in Severity of Previously Identified Significant Impact in 2006 EIR and 2008 SEIR	New Significant Impact
a) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 3.14.1 Previous Environmental Documents Summary

The 2006 EIR identified several locations along the original project corridor with a high probability of containing historic or prehistoric archaeological deposits, resulting in potentially significant but mitigable impacts. The Cloverdale Rancheria of Pomo Indians requested notification of nearby work and offered to serve as Native American monitors between Cloverdale and Healdsburg. At the Healdsburg Station, the project area's proximity to the historic depot and ethnographic records suggested a high likelihood of encountering buried archaeological materials. The originally proposed bicycle and pedestrian pathway could have impacted both known and undiscovered sites near the railroad right-of-way, and the 2006 EIR proposed a mitigation measure that included Extended Phase I archaeological testing in areas of planned ground disturbance.

The 2006 EIR also found that subsurface historical archaeological deposits associated with the Coast Miwok ethnographic village north of Cotati could be impacted by construction and proposed a mitigation measure where archaeological and Native American monitoring was recommended during ground-disturbing activities.

The 2006 EIR found that eleven culturally sensitive historic and prehistoric sites between the Marin/Sonoma county line and Haystack Bridge south of Petaluma could have been impacted by trackwork. The Federated Indians of Graton Rancheria (FIGR) requested that any archaeological sites within this corridor be marked as "environmentally sensitive areas" on project maps and that maintenance



vehicles avoid the area until site boundaries were defined, evaluated, and capped if necessary. If avoidance was not feasible, the report called for boundary definition and evaluation to determine eligibility for listing on the NRHP or CRHR.

The 2006 EIR also found that site preparation and use of certain pre-construction staging areas could have impacted unknown but potentially significant cultural resources and required an archaeologist and a Native American monitor be present during all grading or ground-disturbing activities if avoidance was not possible.

The 2006 EIR concluded with finding that cumulative impacts on archaeological resources could result from the combined effects of the proposed project and nearby development. The project, in combination with all known proposed projects throughout the rail corridor cumulatively contribute to impacts on cultural resources, the 2006 EIR concluded that the mitigation measures proposed for the rail project would reduce the cumulative contribution to a less-than-significant level.

### 3.14.2 Project-Specific Impacts

**a) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

The 2006 EIR evaluated project impacts on archaeological resources and identified several significant mitigatable impacts. The Healdsburg Station area was identified as a location that has a high probability to contain archaeological deposits due to ethnographic information provided at the time of EIR preparation. Additional locations along SMART's ROW that would be impacted by development of the bicycle/pedestrian pathway also have the potential to result in impacts to previously unidentified archaeological resources. The impact was determined to be significant mitigatable with implementation of **2006 EIR Mitigation Measure AR-1**, which requires conducting Extended Phase 1 archeological testing, and **2006 EIR Mitigation Measure AR-2** which requires Native American and Archeological monitoring. Additional applicable mitigations include **2006 EIR Mitigation Measure AR-3**, which requires contractors to stop work in buried cultural materials are found, and **2006 EIR Mitigation Measure AR-4**, which requires that trackwork be conducted to limit ground disturbance beyond current track limits in culturally sensitive railroad segments, and the Federated Indians of Graton Rancheria (FIGR) have requested that archaeological sites be listed as sensitive areas. Additionally, **2006 EIR Mitigation Measure AR-6** requires that if ground disturbances are planned and staging areas cannot be avoided, an archaeologist shall be present for all grading or other ground disturbing activities planned in the staging areas.

A Cultural Resources Study Report was prepared in November 2025 and is included as Appendix E. Record searches were conducted for historical background information at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) at Sonoma State University, the California Native American Heritage Commission and local historical societies regarding the modified project. The NAHC is a state agency that maintains the SLF, an official list of sites that have cultural and religious importance to California Native



American tribes. Stantec contacted the NAHC on August 6, 2025, requesting a review of their SLF to determine if any Native American cultural resources are within the Project area. A positive result was received on August 11, 2025, indicating that sacred sites were identified, and a list of interested Native American individuals and organizations for further consultation was provided. Consultation letters were sent to FIGR, Lytton Rancheria, and Cloverdale Rancheria of Pomo Indians via certified mail and email on October 30, 2025. On November 13, 2025, SMART sent a consultation letter to the Dry Creek Rancheria of Pomo Indians.

On November 11, 2025, FIGR requested additional project information, and on November 14, 2025, responded that if no other tribes from the Healdsburg area engage, FIGR would send a tribal monitor. On November 18, 2025, FIGR requested that all artifacts found from the Extended Phase 1 testing be returned to FIGR to be buried at an undisclosed location.

On November 17, 2025, Lytton Rancheria responded and noted that the modified project falls within traditional Pomo territory and there is a potential for finding tribal cultural resources within the modified project area and that the Lytton Rancheria is interested in the protection and preservation of Pomo artifacts and sites that be encountered during the project. Lytton Rancheria requested a copy of any survey once completed and asked in the report that all resources (flakes, isolates, etc.) are noted even if they may not reach a level of significance under CEQA. Ongoing consultation regarding tribal concerns and coordination is expected to continue with tribes traditionally affiliated with the area surrounding the modified project.

As part of the Cultural Resources Study Report, a pedestrian survey of the modified project area was conducted by archaeologists between October 13 and 16, 2025. The archaeologists identified three new resources (SMART2025-SZBB-01, SMART2025-SZBB-02, and SMART2025-SZBB-03) during the field survey, which were all described as precontact lithic scatters. These resources are all considered to be sparse manifestations of precontact material, and none exhibit traits that would allow for cultural or temporal attribution. Stantec conducted Extended Phase I studies in compliance with **2006 EIR Mitigation Measure AR-1**, to define the vertical and horizontal limits of the site boundaries. On November 20, 21, and 24, 2025, archaeologists completed Extended Phase I studies with a FIGR tribal monitor per **2006 EIR Mitigation Measure AR-2**. Eleven shovel test pits were excavated manually within the three sites. The three sites are located in areas that are heavily disturbed due to agricultural use, and railroad and gas pipeline construction. The testing concluded that there is no subsurface component to the three resources are limited to surface material only. Since all three resources are precontact non-diagnostic sparse lithic scatters without intact subsurface components, SMART2025-SZBB-01, SMART2025-SZBB-02, and SMART2025-SZBB-03 are recommended as not eligible for listing in the NRHP or CRHR because the limited data potential has been exhausted through documentation.

The modified project includes approximately 9 miles of various track improvements, and development of a bicycle/pedestrian pathway has similar potential to disturb previously unknown archaeological resources as the project evaluated in the 2006 EIR. Modified project activities would require grading and earthwork and have the potential to encounter archaeological



resources. With implementation of mitigation measures, the impact of the modified project on these resources would be considered significant mitigatable and does not represent a change from the 2006 EIR threshold conclusions.

**b) *Disturb any human remains, including those interred outside of dedicated cemeteries?***

There are no known burial sites within the modified project area. However, there is the possibility of as-yet undiscovered remains or burials within the project's area of disturbance. The **2006 EIR Mitigation Measure AR-3** requires that if construction personnel locate buried cultural materials, work shall be halted or shifted to another area and a qualified archaeologist shall be contacted to determine proper treatment of the find. Additionally, **2006 EIR Mitigation Measure AR-6** requires that if ground disturbances are planned and staging areas cannot be avoided, an archaeologist shall be present for all grading or other ground disturbing activities planned in the staging areas. These impacts on unknown cultural materials were found to be significant mitigatable.

Construction of the modified project would require ground disturbance in areas that may have unknown resources or human remains. State law mandates that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make their determination within two working days from the time the person responsible for the excavation, or their authorized representative, notifies the coroner of the discovery or recognition of the human remains.

If the coroner determines that the remains are not subject to their authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that the remains are those of a Native American, they shall contact the NAHC by telephone within 24 hours.

Construction of the modified project would require ground disturbance in areas that may have unknown resources or human remains. **2006 EIR Mitigation Measure AR-3** and **2006 EIR Mitigation Measure AR-6** continue to apply to the modified project, in addition to state laws regarding inadvertent discovery. Compliance with existing laws and regulations would ensure that modified project impacts on unknown cultural resources remain significant mitigatable, and do not represent an increase in severity over the 2006 EIR conclusions.



### 3.14.3 Conclusion

Based on review of the analysis, findings, and conclusions in the 2006 EIR, implementation of the modified project would not result in new or substantially greater impacts related to archaeological resources from what has been identified in the 2006 EIR and 2008 SEIR. The project modifications addressed in this Addendum would not change the 2006 EIR and 2008 SEIR conclusions regarding cumulative impacts. The 2006 EIR identified **Mitigation Measure AR-1** through **Mitigation Measure AR-4** and **Mitigation Measure AR-6** related to archaeological resources, and all mitigations would continue to apply to the modified project. This resource does not require further study in a subsequent EIR.



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**Sonoma-Marín Area Rail Transit District Healdsburg Extension Project Modifications**  
**Environmental Impact Report Addendum**  
Section 4: References  
December 2025

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## 5 List of Preparers

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Michael Thill, Principal

### **SMART Staff**

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Michael Wiltermood, P.E., Senior Engineer



**Notice of Determination**

**Appendix D**

**To:**

Office of Planning and Research  
U.S. Mail: \_\_\_\_\_ Street Address: \_\_\_\_\_  
P.O. Box 3044 1400 Tenth St., Rm 113  
Sacramento, CA 95812-3044 Sacramento, CA 95814

County Clerk  
County of: Sonoma  
Address: 585 Fiscal Drive  
Santa Rosa, CA 95403

**From:**

Public Agency: Sonoma-Marín Area Rail Transit  
Address: 5401 Old Redwood Highway, ste 200  
Petaluma, CA 94954

Contact: Bill Gamlen, P.E. Chief Engineer

Phone: (707) 794-3049

Lead Agency (if different from above): \_\_\_\_\_

Address: \_\_\_\_\_

Contact: \_\_\_\_\_

Phone: \_\_\_\_\_

**SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.**

State Clearinghouse Number (if submitted to State Clearinghouse): 2002112033

Project Title: Healdsburg Extension Project Modifications Environmental Impact Report Addendum

Project Applicant: Sonoma-Marín Area Rail Transit District (SMART)

Project Location (include county): Sonoma County, City of Healdsburg

**Project Description:**

This Addendum considers minor project refinements to extend passenger rail along approximately 9 miles of the SMART corridor from the intersection of Lytton Springs Road and Healdsburg Avenue, south to the intersection of the tracks and Windsor River Road, north of the Town of Windsor. Construction would occur over approximately 3 years and include trackwork, bike/ped infrastructure, bridge replacement and staging area refinements.

This is to advise that the SMART Board of Directors has approved the above  
( Lead Agency or  Responsible Agency)

described project on 12/17/2025 and has made the following determinations regarding the above  
(date)  
described project.

- 1. The project [ will  will not] have a significant effect on the environment.
- 2.  An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.  
 A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
- 3. Mitigation measures [ were  were not] made a condition of the approval of the project.
- 4. A mitigation reporting or monitoring plan [ was  was not] adopted for this project.
- 5. A statement of Overriding Considerations [ was  was not] adopted for this project.
- 6. Findings [ were  were not] made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the negative Declaration, is available to the General Public at:

SMART District office: 5401 Old Redwood Highway, Suite 200, Petaluma, CA 94954

Signature (Public Agency): \_\_\_\_\_ Title: \_\_\_\_\_

Date: \_\_\_\_\_ Date Received for filing at OPR: \_\_\_\_\_

Original  
Filed

270874

<b>TO:</b> County Clerk, County of Sonoma 2300 County Center Drive, Suite B177 Santa Rosa, CA 95403	<b>FROM:</b> Sonoma-Marine Area Rail Transit District (SMART) 4040 Civic Center Drive San Rafael, CA 94903
County Clerk, County of Marin Hall of Justice, Marin County Civic Center, Rm. 247 San Rafael, CA 94913	

**Subject:** Filing of Notice of Determination in compliance with Section 21152 of the Public Resources Code

**FILED**

**Project Title:** Sonoma-Marine Area Rail Transit Project

JUL 21 2006

**State Clearinghouse Number:** SCH #2002112033

MICHAEL J. SMITH  
MARIN COUNTY CLERK  
By: J. Whitney, Deputy

**Project Location:** District-wide, within Counties of Marin and Sonoma

**Project Description:** Adoption of Retail Transactions and Use Tax Ordinance, subject to voter approval, to implement passenger rail service and a parallel bicycle/pedestrian pathway on the Northwestern Pacific (NWP) right-of-way within the Counties of Marin and Sonoma, and imposing ¼-cent retail transactions and use tax (sales tax) to provide funding for the project.

This is to advise that on July 19, 2006, the Board of Directors of the Sonoma-Marine Area Rail Transit District, as the lead agency under CEQA, approved the above-described project and has made the following determinations regarding the above-described project:

1. The project will have a significant effect on the environment.
2. An Environmental Impact Report was prepared and certified for this project pursuant to the provisions of CEQA.
3. Mitigation measures were made a condition of the approval of this project.
4. A Mitigation Monitoring Plan was adopted for this project.
5. A Statement of Overriding Considerations was adopted for this project.
6. Findings were made pursuant to the provisions of CEQA.

This to certify that the Final Environmental Impact Report with comments and responses and record of project approval may be examined at the Sonoma-Marine Area Rail Transit District offices at 4040 Civic Center Drive, Suite 200, San Rafael, CA 94903.

  
 Lillian Hames, General Manager  
 Sonoma-Marine Area Rail Transit District (SMART)

7/21/06  
 Date