Stonebridge Subdivision Project Amended Tentative Subdivision Map and Conditional Use Permit 2220 Fulton Road City of Santa Rosa, California

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Initial Study/Mitigated Negative Declaration Addendum

October 2022 Planning Application Number: PRJ22-002

Stonebridge Subdivision Project Amended Tentative Map and Conditional Use Permit

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Project Overview

The project is an amendment to an approved subdivision map and amended conditional use permit to subdivide three additional lots comprising Parcel "A," a 14,720 square foot portion of the larger previously approved Stonebridge Subdivision and to develop those resultant lots with three single-family homes (the "Amended Project") in lieu of the prior proposed storm water low-impact development water quality basin (the "LID Basin"). The Amended Project is located on the parcel identified as APN: 034-030-070 (the "Property"). The Amended Project will be located within the footprint of the approved Stonebridge Subdivision Project. The Amended Project development will be consistent with the standards and requirements of the approved Project. The Stonebridge Subdivision Project would be divided into a 14.6-acre residential subdivision on the western side and a 14-acre "Stonebridge Preserve" east of the residential development. The Amended Tentative Map and Amended Conditional Use Permit are consistent with the adopted General Plan land use designation and the existing Planned Development zoning for this Property.

The Property is located in the northwestern corner of the City of Santa Rosa ("City").

Prior CEQA Analysis

The City previously prepared an Initial Study/Mitigated Negative Declaration ("IS/MND") for the Stonebridge Subdivision, and circulated the draft IS/MND for a 30-day public review period, commencing on May 29, 2020. The Santa Rosa Planning Commission adopted a Final IS/MND on May 27, 2021, and the Planning Department filed and posted a Notice of Determination ("NOD") with the County of Sonoma. No legal challenges to the adequacy of the Final IS/MND were commenced during the 30-day statute of limitations under CEQA. (Pub. Res. Code, § 21167; CEQA Guidelines, § 15094.)

Stonebridge Subdivision Project IS/MND

On May 27, 2021, the City of Santa Rosa adopted the IS/MND, Mitigation Monitoring and Reporting Program ("MMRP"), a Conditional Use Permit, and tentative subdivision map for the Stonebridge Subdivision Project. The approved Stonebridge Subdivision would develop the Property with a total of 105 single-family residences.

The City prepared an Initial Study ("IS") to determine if the Stonebridge Subdivision would result in environmental impacts warranting an environmental impact report ("EIR"). The IS concluded that, although the Stonebridge Project could have a significant effect on the environment, revisions incorporated into the project would reduce those impacts below a significant level. The City prepared and adopted an MMRP to document how and when the mitigation measures adopted by the City, pursuant to the IS/MND, would be implemented. The MMRP further confirms that potential environmental impacts would be reduced to less than significant levels, as evaluated in the IS/MND.

In adopting the IS/MND and MMRP, the City concluded that the development of the Stonebridge Subdivision on the Property would not result in any significant environmental impacts with mitigation incorporated into the Stonebridge Project.

Proposed CEQA Analysis in this Document

The City prepared a new CEQA analysis for the Amended Project using the City's Initial Study Checklist, dated October 2022, incorporated herein by reference, to assess whether any further environmental review is required for the Amended Project. Pursuant to CEQA Guidelines section 15164, the City determined that no supplemental or subsequent EIR or subsequent Mitigated Negative Declaration is required for the Amended Project and an Addendum to the IS/MND is the appropriate CEQA review document for the following reasons:

No Subsequent Review is Required per CEOA Guidelines Section 15162

CEQA Guidelines section 15162 identifies the conditions requiring subsequent environmental review. After a review of these conditions, the City determined that no subsequent EIR or Negative Declaration is required for this Project. This is based on the following analysis:

a) Are there substantial changes to the project involving new or more severe significant impacts?

There are no substantial changes to the project as analyzed in the IS/MND. The proposed Amended Project would replace the original location of the LID Basin with three residential units. This change would result in 3 more units added to the previously approved 105-unit Stonebridge Subdivision for a total of 108 dwelling units. The Amended Project would be located within the same development footprint as the approved subdivision and will incorporate all of the same design standards and mitigation measures as the approved subdivision. As demonstrated in this Addendum, the Amended Project does not constitute a substantial change to the IS/MND analysis, will not result in additional significant impacts, or increase the severity of any impacts, and no additional or different mitigation measures are required.

b) Are there substantial changes in the conditions which the project is undertaken involving new or more severe significant impacts?

There are no substantial changes in the conditions evaluated in the IS/MND. The Property was vacant when the IS/MND was prepared and adopted and the Property is still vacant and undeveloped. The proposed Amended Project would merely replace the proposed LID Basin with three single-family homes in accordance with the conditions of approval for the previously approved Stonebridge Subdivision. Because all of the same impacts and mitigation measures applicable to the subdivision would likewise apply to the Amended

Project, no substantial changes would occur. This is documented in the attached analysis.

c) Is there new information of substantial importance, which was not known and could not have been known at the time of the previous IS/MND that shows the project will have a significant effect not addressed in the previous IS/MND; or previous effects are more severe; or, previously infeasible mitigation measures are now feasible but the applicant declined to adopt them; or mitigation measures considerably different from those in the previous IS/MND would substantially reduce significant effects but the applicant declines to adopt them?

As documented in the attached analysis, there is no new information showing a new or substantially more severe significant effects beyond those identified in the IS/MND. Similarly, the analysis indicates that no new or different mitigation measures are required for the Amended Project. All previously adopted mitigation measures continue to apply to the Amended Project. The IS/MND adequately describes the impacts and mitigations associated with the subdivision area, which necessarily includes the Property.

d) If no subsequent EIR-level review is required, should a subsequent negative declaration be prepared?

No subsequent EIR or Negative Declaration is required because there are no significant impacts or substantially greater impacts of the project beyond those identified in the IS/MND and no other standards for supplemental review under CEQA are met, as documented in the attached analysis.

Conclusion

This Addendum is prepared pursuant to CEQA Guidelines Section 15164 based on the attached analysis. Through the adoption of this Addendum and related analysis, the City determines that the proposed Amended Project does not require a subsequent Negative Declaration under Public Resources Code section 21166 or CEQA Guidelines sections 15162. The City further determines that the IS/MND adequately address the potential environmental impacts of the proposed three additional units to the Stonebridge Subdivision.

As provided in Section 15164 of the CEQA Guidelines, this Addendum need not be circulated for public review, but shall be considered with the prior environmental documents before making a decision on this Amended Project.

The Addendum and IS/MND are incorporated herein by reference and are available for public review at the City of Santa Rosa, Planning and Economic Development, 100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95407, or contact Susie Murray, Senior Planner, 707-543-4348, <u>SMurray@srcity.org</u>.

Aesthetics

EN\ Issu	/IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
1.	AESTHETICS. Would the project:			
a)	Have a substantial adverse effect on a scenic vista?			Х
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?			х
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?			Х
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			х

Previous IS/MND

The IS/MND determined that the Stonebridge Subdivision would not result in any significant impacts to aesthetics.

Project Impacts and Mitigation Measures

(a) Scenic vistas, views

The Property is vacant and surrounded by low- to medium-density residential neighborhoods. The existing visual character of the Property is mostly defined by grassland. The Property is relatively flat, aside from areas where depressional wetland habitat is present. The southwestern portion of the Property is developed with an existing single-family home and related outbuildings. Two scenic roadways, identified in the City General Plan, are located near the Property, but not closer than 0.49 mile. Previous CEQA findings found that the views from Fulton Road are primarily from moving vehicles and are, therefore, fleeting and short in duration. The nature of the single-family residential subdivision, as well as its development regulations capping heights at 35 feet, would be consistent with the surrounding residential development. Thus, impacts would be less than significant.

The replacement of the LID Basin with three additional homes within the footprint of the Stonebridge Subdivision, will not result in any additional impacts. The detention facilities will be incorporated into the proposed in-tract subdivision streets. The Amended Project homes will be consistent with the Stonebridge Subdivision's development standards. Thus, this project change will not result in significant or substantially greater impacts to scenic vistas or views.

(b) Scenic resources

The IS/MND found no impacts to scenic corridors because the Stonebridge Subdivision is not BN 48822542v3

visible from any Scenic State Highway. Since the Amended Project will occur within the footprint of the Stonebridge Subdivision, no impacts to scenic resources would occur.

(c) Substantially degrade the visual character of the site or surrounding area

The IS/MND found the Stonebridge Subdivision would result in a less than significant impact, due to its location in an urbanized area and surrounded by other single- and multi-family residential uses. While the Stonebridge Subdivision may obstruct views from Fulton Road, the Stonebridge Subdivision would preserve a view corridor of foothill views from Fulton Road along Street A.

The Amended Project's replacement of the LID Basin with three single-family homes consistent with the Stonebridge Subdivision and CUP will not result in any additional impacts to the visual character of the site or surrounding area because the same area will be developed as part of the Amended Project.

(d) Create a new source of substantial light or glare

Previous IS/MND findings found a less than significant impacts caused by interior, exterior, and street lighting at the Stonebridge Subdivision. Exterior lighting would comply with City Municipal Code requirements to ensure that lighting impacts would be reduced to the maximum extent possible. Project-related nighttime traffic lighting would be intermittent and limited to adjacent streets.

The changes proposed by the Amended Project would not result in additional significant impacts to light or glare.

Conclusion

The project does not propose changes that were not previously analyzed in the IS/MND that would require major revisions to the MND. Based on the information contained in the IS/MND and this environmental analysis, the project would not substantially increase the severity of the previously identified aesthetic/visual impacts, nor result in new significant impacts.

Agricultural and Forestry Resources



environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		x
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?		X
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?		X
d)	Result in the loss of forest land or conversion of forest land to non-forest use?		X
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 or conversion of forest land to non-forest use?		x

Previous IS/MND

The IS/MND determined that the Stonebridge Subdivision would not result in any significant impacts to agricultural and forestry resources.

Project Impacts and Mitigation Measures

(a) Convert farmland to a non-agricultural use

The IS/MND found there were less than significant impacts with respect to conversion of farmland to non-agricultural uses. Though the Stonebridge Subdivision project area is classified as "Farmland of Local Importance," there is no on-site cultivation and there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located within the Stonebridge Subdivision project area. A less than significant impact would occur. Because the Amended Project would replace an area planned for a LID Basin with three residences in a portion of the Stonebridge Subdivision, already slated for development, the Amended Project would not result in any additional impacts.

(c-d) Conflict with zoning or convert forest land

The IS/MND found there would be no impact caused by a zoning conflict or by converting property subject to a Williamson Act contract. The Stonebridge Subdivision project area is designated by the General Plan as *Low Density Residential*. Further, there are no properties under a Williamson Act contract located on the Stonebridge Subdivision site.

Further, the Stonebridge Subdivision is located in an area of Santa Rosa that does not meet the State's definitions of forest land and timberland. Therefore, the Amended Project would not

conflict with existing zoning for forest land, timberland, or timberland zoned for timberland production. No impact would occur.

Because the Amended Project would replace the LID Basin with three residences in a portion of the Stonebridge Subdivision, already slated for development, the Amended Project would not result in any additional impacts.

(e) Involve other changes that could result in the conversion of farmland or forest land

The IS/MND found less than significant impacts that could be caused by the Stonebridge Subdivision that could involve other changes resulting in a conversion of farmland or forest land to urban uses. The Stonebridge Subdivision Property is located in an urban area that the City has already designated for residential development. Because the Amended Project would replace a proposed LID Basin with three residences in a portion of the Stonebridge Subdivision, already slated for development, the Amended Project would not result in any additional impacts.

Conclusion

The Amended Project does not propose changes that were not previously analyzed in the IS/MND thatwould require major revisions to the MND. Based on the information in the IS/MND and this environmental analysis, the project would not substantially increase the severity of the previously identified agricultural or forestry resource impacts, nor result in new significant impacts. Therefore, no further environmental review is required.

EN\ Issu	/IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
a)	Conflict with or obstruct implementation of the applicable air quality plan?			х
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?			x
c)	Expose sensitive receptors to substantial pollutant concentrations?			x
e)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			x

Air Quality

Previous CEQA Documents

The IS/MND identified the following potentially significant impacts and mitigation measures for air quality:

- Impact: the Stonebridge Subdivision may result in a significant impact, without mitigation, by conflicting with or obstructing an applicable air quality plan. Mitigation Measure AIR-1 mitigates this impact to an insignificant level by requiring the Stonebridge Subdivision to comply with best management practices ("BMPs") during construction activities.
- Impact: the Stonebridge Subdivision's construction activities may result in a cumulatively considerable net increase in criteria pollutants, including fugitive dust PM₁₀ and PM_{2.5}, without the implementation of mitigation. Mitigation Measure AIR-1 mitigates this impact to an insignificant level by requiring the Stonebridge Subdivision to comply with BMPs during construction activities.
- Impact: the Stonebridge Subdivision's construction activities may result in the exposure of sensitive receptors to toxic air contaminants. Mitigation Measure AIR-2 requires all offroad construction equipment to meet certain federal and state emission standards.

The two mitigation measures identified in the MMRP would reduce these impacts to a less than significant level.

Project Impacts and Mitigation Measures

(a) Consistent with air quality plans

The Stonebridge Subdivision would not conflict with the Clean Air Plan adopted by BAAQMD since the project site has been included in Santa Rosa's planned growth as previously analyzed and is consistent withthe City's General Plan, which is the basis of the Clean Air Plan. However, construction activities could possibly conflict with BAAQMD's Clean Air Plan by creating particulate matter and fugitive dust. These impacts would be mitigated to a less than significant level through the implementation of Mitigation Measure AIR-1, which requires the implementation of specified BMPs during construction activities.

The only potentially significant impacts assessed here were related to construction of the Stonebridge Subdivision. Impacts caused by operation of the Stonebridge Subdivision were found to be less than significant. Because the Amended Project would replace the LID Basin with three residences in the subdivision already slated for development, there are no new or greater impacts than those previously evaluated in the IS/MND. The anticipated construction impacts and associated mitigation would occur with or without the Project. Mitigation Measure AIR-1 that would apply to the construction of the Stonebridge Subdivision would similarly apply to the Amended Project would not result in any additional impacts or increase the severity of previously identified impacts.

(b) Violate air quality standards or cause cumulatively considerable air pollutants

The Stonebridge Subdivision is expected to generate fugitive PM dust emissions during construction, which could cause a significant impact without mitigation. Construction emissions of ROG, NO_X, exhaust PM₁₀, and exhaust PM_{2.5} would cause a less than significant impact. Implementation of Mitigation Measure AIR-1, which requires the implementation of BMPs during construction activities, would reduce these impacts below a significant level. Operation of the Stonebridge Subdivision would result in less than significant impacts caused by ROG, NO_X, exhaust PM₁₀, and exhaust PM_{2.5} emissions.

The only potentially significant impacts assessed here were related to construction of the Stonebridge Subdivision. Impacts caused by operation of the Stonebridge Subdivision were assessed to be less than significant. Because the Amended Project would replace a LID Basin with three residences in the subdivision already slated for development, the anticipated construction impacts and associated mitigation would occur with or without Project implementation. Nevertheless, Mitigation Measure AIR-1 would be still applicable to the construction of the Stonebridge Subdivision, including for construction of the Amended Project. Accordingly, the Amended Project would not result in any additional impacts or increase the severity of previously identified impacts.

(c) Expose sensitive receptors to pollutant concentrations

The IS/MND concluded that construction activities could potentially subject nearby sensitive receptors to a significant level of toxic air contaminants, without mitigation implemented. Mitigation Measure AIR-2, therefore, requires all off-road diesel-powered construction equipment to meet certain federal and state emissions standards. The IS/MND determined that mitigation would reduce these impacts to a less than significant level. A cumulative health risk assessment at the maximum impacted receptor also determined that Stonebridge Subdivision would result in a less than significant impact of exposure to toxic air contaminants with implementation of mitigation. Cumulative health risks of toxic air contaminant exposure to future residents was also determined to be less than significant. Other operational toxic air pollutant and CO hotspot impacts were determined to be less than significant.

The only potentially significant air quality impacts assessed here were related to construction of the Stonebridge Subdivision. Impacts caused by operation of the Stonebridge Subdivision were assessed to be less than significant. Because the Amended Project would replace the LID Basin with three additional residences in the subdivision already slated for development, the anticipated construction impacts and associated mitigation would occur with or without Project implementation. Nevertheless, Mitigation Measures AIR-1 and AIR-2 would still apply to the construction of the Stonebridge Subdivision. Accordingly, the Amended Project would not result in any additional impacts or increase the severity of previously identified impacts.

(d) Result in other emissions, such as objectionable odors

The IS/MND explains that odors "are generally regarded as an annoyance rather than a health hazard" and the overall detection of them is subjective. The analysis explained that diesel exhaust and VOCs emitted during construction could be objectionable, but would disperse rapidly and would not affect a substantial number of people. Accordingly, construction odor impacts would be less than significant. Operation of a residential development is not "typically associated with objectionable odors." Thus, operational impacts are considered less than significant. Accordingly, the Amended Project's replacement of the LID Basin with three more single-family residences would not result in any additional impacts or increase the severity of previously identified impacts.

Conclusion

The Amended Project does not propose substantial changes to the land uses for the Stonebridge Subdivision. The Amended Project results in the replacement of the LID Basin with three singlefamily homes. The 3 homes are in addition to the 105 previously approved. Moreover, any BN 48822542v3 potential impacts would occur during construction and not during operation. Thus the impacts would occur with or without the addition of the Project. Nevertheless, the previously approved subdivision was determined to result in less than significant air quality impacts with mitigation implemented. Thus, based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified air quality impacts, nor result in new significant impacts.

Biological Resources

ENV Issu	'IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
4.	BIOLOGICAL RESOURCES. Would the project:			
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			Х
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			X
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			х
d)	Interfere substantially with the movement of any native 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?			x
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			x
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?			x

Previous CEQA Documents

The IS/MND identified the following potentially significant impacts to biological resources which could be reduced below a significant level with the applicable mitigation measures incorporated:

Impact: the Stonebridge Subdivision may have a significant adverse impact to special

status or endangered species. Mitigation Measures BIO-1a, 1b, and 1c reduce this impact to an insignificant level by requiring the developer to prepare a compliance report and to obtain permits from the necessary federal and state agencies. These mitigation measures would additionally require the preservation of habitat on the eastern "Preserve" portion of the subdivision property.

- Impact: the Stonebridge Subdivision may have a significant adverse impact on state or federally protected wetlands. Mitigation Measure BIO-1d would reduce this impact to an insignificant level by requiring the applicant to obtain federal and state permits and to enhance wetlands located on the preserve property on the eastern parcel.
- Impact: the subdivision project may conflict with an adopted conservation plan which protects several identified special status species. Mitigation Measures BIO-1a, 1b, and 1d, however, would reduce this impact to a level of insignificance.

The Project would be required to adhere to applicable mitigation measures as set forth in the IS/MND and the MMRP, which would reduce any potential impacts to a less than significant level.

Project Impacts and Mitigation Measures

(a) Substantial adverse effect on candidate, sensitive, or special status species The IS/MND included a comprehensive assessment of habitat and wildlife resources (i.e., riparian habitat, natural community, and wetlands). The IS/MND identified potential significant impacts related to Burke's goldfields found in isolated pools on the Property. The IS/MND also identified possible significant impacts to the California tiger salamander and nesting birds, should any be located on the Property during construction activities.

The MMRP identified three mitigation measures that, once implemented, would reduce these impacts to a less than significant level. Mitigation Measure BIO-1a would require the applicant to undertake specified actions prior to breaking ground, including submitting a compliance report to the City and detailing progress on the establishment of the vernal pool habitat in the Stonebridge Preserve. Mitigation Measure BIO-1a would additionally require the developer to submit to the California Department of Fish and Wildlife ("CDFW") the results of a plant survey. Finally, Mitigation Measure BIO-1a requires the applicant to apply to CDFW for a memorandum of understanding that allows for the harvest of Burke's goldfield seeds for the creation of the wetland in the Stonebridge Preserve.

Mitigation Measure BIO-1b would require an upland survey and two spring larval breeding pool surveys, prior to development, to identify whether any California tiger salamander are likely to occur on the development site. If the survey demonstrates that the subdivision site will be occupied by the California tiger salamander, then the applicant would be required to obtain an Incidental Take Permit from CDFW and a Biological Opinion from the U.S. Fish and Wildlife Service ("USFWS"), which would include conditions to ensure recovery of the species. The applicant would additionally be required to apply for a Section 404 permit from the U.S. Army Corps of Engineers ("USACE") to allow for the discharge of fill into waters of the U.S. The USFWS will additionally prepare a Biological Opinion providing for Federal Endangered Species Act Incidental Take authorized and the prior the will be service of the species.

Take authorization which will impose conditions of the USACE permit. Finally, the applicant would BN 48822542v3

be required to provide a 3:1 replacement ratio for impacts to California tiger salamander, of which the Stonebridge Preserve may constitute a pro rata acreage share. If the survey demonstrates that the subdivision site will not be occupied by the California tiger salamander, the applicant will be required to provide mitigation habitat at a 1:1 ratio.

Mitigation Measure BIO-1c imposes limitations on tree removal during the nesting season for active nesting birds. Prior to any tree removal, two surveys must be conducted to identify any active nests. If any active nests are found, the applicant must establish a protective nest buffer around the identified trees. Monitoring of active nests will be necessary during construction.

The implementation of the aforementioned mitigation measures will reduce any biological impacts to a less than significant level. The Amended Project only proposes to change a small 14,720 square feet portion of the larger 14.6-acre Stonebridge Subdivision. Any possible impacts would be the same as those previously identified for the larger subdivision with the replacement of the LID Basin with 3 homes. Moreover, these anticipated impacts will occur during construction activities, which would occur with or without the construction of the additional three homes. Thus, applying the identified mitigation measures to the Amended Project will also reduce any potential impacts below a level of significance. Accordingly, the Amended Project's addition of three more single-family residences would not result in any additional impacts or increase the severity of previously identified impacts.

(b) Substantial adverse effect on any riparian habitat or sensitive natural community

No riparian habitat or sensitive natural community has been identified on the Property. Thus, the IS/MND identified no impacts to riparian habitats. Since the Amended Project would result in development of the same area as the original Project, no impacts would likewise occur here.

(c) Substantial adverse effect on any state or federal protected wetlands

The Stonebridge Subdivision would permanently impact 2.52 acres of seasonal wetlands on the western parcel and approximately 0.13-acre of seasonal wetlands on the eastern parcel. These impacts are potentially significant. Mitigation Measure BIO-1d requires the applicant to obtain a Section 404 permit from the USACE for impacts to waters of the U.S. and a Section 401 Water Quality Certification for impacts to waters of the state and waters of the U.S. The applicant will compensate for the loss of wetlands by constructing and enhancing 5.52 acres of wetlands on the Eastern Parcel.

The implementation of Mitigation Measure BIO-1d will reduce any impacts to wetlands to a less than significant level. Since the Amended Project only proposes to develop a small portion of the larger 14.6-acre Stonebridge Subdivision, any possible impacts would be the same as those previously identified for the larger subdivision. Moreover, these anticipated impacts will occur during construction activities, which would occur with or without the construction of the additional three homes. Thus, applying the identified mitigation measure to the Amended Project will also reduce any potential impacts below a level of significance. Accordingly, the Amended Project's addition of three more single-family residences in lieu of the LID Basin would not result in any additional impacts or increase the severity of previously identified impacts.

(d) Interfere or impede the movement of migratory fish or wildlife

Given the location of the Property near developed properties, this development will not affect any wildlife movement corridor. The IS/MND determined that the impact would be less than significant. Since the Amended Project would replace the LID Basin on Parcel A with 3 homes, any impacts to the movement of migratory wildlife would similarly be less than significant because the development would not be within the Eastern Parcel. Accordingly, the Amended Project's addition of three more single-family residences would not result in any additional impacts or increase the severity of previously identified impacts.

(e) Conflict with local policies or ordinance include tree preservation or any adopted habitat conservation or natural community conservation plans.

The IS/MND concluded that no trees protected under the City Code are located on the Stonebridge Subdivision site. Thus, no impact to local tree preservation policies would occur here. This review inherently included the portion of the site slated for development of the three additional homes, subject to this review. Accordingly, the Amended Project's addition of three more single-family homes would similarly cause no additional impacts or increase the severity of previously identified impacts.

(f) Conflict with the provisions of an adopted conservation plan.

The IS/MND concluded that, though the City does not have any adopted conservation plans, the subdivision site is located within the boundaries of the Santa Rosa Plains Conservation Strategy, which seeks to protect the California tiger salamander and four endangered plant species. As identified above, the Stonebridge Subdivision may result in impacts to these protected species. Mitigation Measures BIO-1a, 1b, and 1d would reduce these impacts below a significant level. Thus, the larger subdivision project would not result in any conflict with the applicable Conservation Strategy.

Since the Amended Project would occur within the footprint of the larger subdivision, any impacts and mitigation measures applicable to the Stonebridge Subdivision would similarly apply to the Amended Project. Accordingly, the addition of three more single-family homes would cause no additional impacts or increase the severity of previously identified impacts.

Conclusion

The only impacts identified by the IS/MND would occur on the larger subdivision site, which necessarily includes the portion slated for development of the Amended Project. Accordingly, the mitigation measures identified would also apply to the Amended Project, reducing any potential impacts to a less than significant level. The proposed development of three additional single-family homes would not result in any additional impacts or increase the severity of those impacts that were previously analyzed in the IS/MND.

Cultural Resources

ENVIRONMENTAL IMPACTS Issues	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
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5.	CULTURAL RESOURCES. Would the project:	
a)	Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines section 15064.5?	Х
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5?	Х
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	х

The IS/MND identified the following potentially significant impacts to cultural resources and the mitigation measures that would render those impacts less than significant:

- Impact: earthmoving activities have the potential to uncover and disturb historical resources. Should any potentially significant resource be encountered, Mitigation Measure CUL-1 would require all construction activities to cease until the potential resource has been examined by a qualified archaeologist.
- Impact: earthmoving activities have the potential to uncover and disturb archaeological resources. Mitigation Measure CUL-1 would require all construction activities to cease until the potential resource has been examined by a qualified archaeologist, should any potentially significant resource be encountered.
- Impact: earthmoving activities have the potential to uncover and disturb human remains. Mitigation Measure CUL-2 would require the subdivision developer to halt construction within 100 feet of an accidental discovery and to take additional necessary actions to identify the remains through the County Coroner and potentially any local Native American tribe.

The Project would be required to adhere to applicable mitigation measures as set forth in the IS/MND and the MMRP, which would reduce any potential impacts to a less than significant level.

Project Impacts and Mitigation Measures

(a) Historic resources

The subdivision site was previously occupied with a poultry and egg ranch until at least the 1980s. The IS/MND determined that the residence and outbuildings on the site do not possess any of the criteria that would render it eligible for listing or preservation as a historic property. The IS/MND did note that, though unlikely, subsurface construction activities always have the potential to damage or destroy previously undiscovered historic resources, which could result in a significant impact to historic resources. Mitigation Measure CUL-1 would require all construction activities to cease until the potential resource has been examined by a qualified archaeologist, should any potentially significant resource be encountered. The implementation of this mitigation measure would reduce this possible impact to a less than significant level.

The mitigation measure applicable to the Project would similarly apply to the Amended Project. Since the Amended Project is located within the footprint of the larger subdivision, the replacement of the LID Basin with three additional residences will not cause any additional impacts or increase the severity of previously identified impacts.

(b) Archaeological resources

The IS/MND explained that, while no known archeological resources are located on-site, it is possible that earthmoving activities associated with project construction could encounter previously undiscovered archaeological resources. This could potentially result in a significant impact. Accordingly, the IS/MND determined that, once implemented, Mitigation Measure CUL-1 would reduce the potential impact to a less than significant level.

The mitigation measure applicable to the Project would similarly apply to the Amended Project. Since the Amended Project is located within the footprint of the larger subdivision, the development of three additional residences instead of the originally proposed LID Basin will not cause any additional impacts or increase the severity of previously identified impacts.

(c) Human remains

The IS/MND determined that no human remains or cemeteries are known to exist within or near the subdivision site. There is always the possibility that earthmoving activities associated with project construction could potentially damage or destroy previously undiscovered human remains, however. Mitigation Measure CUL-2 would require the subdivision developer to halt construction within 100 feet of an accidental discovery and to take additional necessary actions to identify the remains through the County Coroner and potentially any local Native American tribe. Implementation of this mitigation measure would reduce the potentially significant impact to a less than significant level.

The mitigation measure applicable to the subdivision project would similarly apply to the Project here. Since the Amended Project is located within the footprint of the larger subdivision, the development of three additional residences instead of the LID Basin will not cause any additional impacts or increase the severity of previously identified impacts.

Conclusion

The Amended Project does not propose substantial changes to the Project. Moreover, any potential impacts here would occur as a result of earthmoving activities that would occur across the entire subdivision, which included Parcel A where these three residences will be located. Accordingly, development of the Property was previously analyzed in the IS/MND. The mitigation measures applicable to the Project would likewise apply to the Amended Project and would reduce any impacts below a significant level. Based on the information in the IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of impacts to cultural resources impacts, nor result in new significant impacts.

Energy

IS/MND Addendum | Page 17

ENV Issu	/IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
6.	Energy. Would the project:			
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation??			х
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			x

Previous CEQA Documents

The IS/MND determined that the Stonebridge Subdivision would not result in any significant impacts to energy consumption.

Project Impacts and Mitigation Measures

(a) Consumption of energy

The IS/MND determined that the Project's energy consumption, both during construction and operation, would result in a less than significant impact to energy resources. The energy required for temporary buildings, lighting, and other sources during construction would occur with or without the Project. As with the Project, the Amended Project would be required to meet the City's net zero electricity standard and would comply with the state's CALGreen standards and requirements.

Since the Amended Project proposes a very minor addition of three single-family homes to the approved 105-unit subdivision, and the additional residences would meet the same efficiency standards as the remainder of the subdivision, the Project would not result in any additional impacts or increase the severity of previously identified impacts to energy consumption.

(b) State or local plan for renewable energy or energy efficiency

The IS/MND determined that construction and operation of the Project would not result in any significant impacts to a state or local plan for renewable energy or energy efficiency. Construction activities would not be subject to applicable renewable energy standards. Moreover, operation of the subdivision development would meet state efficiency standards and would be required to comply with the City's net zero electricity standards. Accordingly, subdivision operation would not result in any significant impact to a renewable energy plan.

Since the three additional homes would meet the same standards and criteria as the Stonebridge Subdivision, the Project would not result in any additional impacts or increase the severity of previously identified impacts to energy consumption.

Conclusion

The Amended Project will merely add three single-family homes to the approved 105-unit subdivision, which the IS/MND determined would not result in any significant impacts to energy consumption. The Amended Project would conform to and meet the same requirements as the Stonebridge Subdivision. Based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified energy impacts, nor result in new significant impacts.

Geology and Soils

EN\ Issu	/IRONMENTAL IMPACTS les	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
7.	GEOLOGY AND SOILS. Would the project:			
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			х
	 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? 			Х
	ii) Strong seismic ground shaking?			х
	iii) Seismic-related ground failure, including liquefaction?			х
	iv) Landslides?			Х
b)	Result in substantial soil erosion or the loss of topsoil?			Х
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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			x
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			х
e) I	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			x
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			х

The IS/MND identified the following potentially significant impacts to geology and soils and mitigation measures which would reduce those impacts below a significant level:

- Impact: the subdivision could potentially be subject to strong seismic shaking and seismicrelated ground failure, which could result in structural damage or failure. Mitigation Measure GEO-1 would require preparation of a geological technical report and conformity with the California Building Code's seismic standards.
- Impact: the subdivision could be located on unstable soil that could result in liquefaction. Implementation of Mitigation Measure GEO-1 would reduce any potential impacts to a less than significant level.
- Impact: the subdivision could be located on expansive soils that could threaten life or property. Mitigation Measure GEO-1 would similarly apply and would reduce any potential impacts to a less than significant level.
- Impact: the development could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Mitigation Measure GEO-2 would ensure a paleontologist has trained the construction crew on how to recognize fossils and procedures to follow in the event of a discovery.

The Project would be required to adhere to applicable mitigation measures as set forth in the IS/MND and the MMRP, which would reduce any potential impacts to a less than significant level.

Project Impacts and Mitigation Measures

(a) Seismic hazards

The IS/MND determined that, since a fault does not run through the subdivision site, the subdivision would not result in any impact to a rupture of a known earthquake fault.

Given the presence of nearby fault lines, the IS/MND did find that the subdivision could experience strong shaking during a seismic event that could result in structural failure. This could result in a potentially significant impact. Mitigation Measure GEO-1, which would require preparation of a design-level geotechnical report and incorporation of the report's recommendations, as well as the California Building Code's seismic standards, would reduce any potential impact to a less than significant level.

The IS/MND determined that the subdivision site is located in an area with moderate ground liquefaction potential. While this could result in a potentially significant impact, incorporation of Mitigation Measure GEO-1 identified above, would reduce any potential impact to a less than significant level.

Due to the Property being generally flat and the surrounding are characterized by level, urbanized land and vacant rangeland, the subdivision project would not pose any impact to landslides.

Since the Amended Project's proposed three additional single-family homes would sit within the footprint of the previously analyzed Stonebridge Subdivision, the impacts and mitigation identified

in the IS/MND would similarly apply to the Amended Project. Since the implementation of Mitigation Measure GEO-1 would reduce any seismic hazard impacts to a less than significant level, the Amended Project would not result in any additional impacts or increase the severity of previously identified impacts.

(b) Soil erosion

The IS/MND determined that subdivision construction would expose surface soils to wind and precipitation, which could cause soil erosion and loss of topsoil. However, implementation of the conditions of the Construction General Permit issued by the State Water Resources Control Board would reduce erosion impacts resulting from project construction to less than significant levels. Moreover, upon completion, the subdivision's stormwater system would accommodate runoff from impervious surfaces, minimizing erosion risk. Accordingly, the subdivision would result in a less than significant impact to soil erosion.

Since development of the Amended Project's three additional residences would meet the same criteria as the Project, and the Amended Project would implement the same requirements as the Project, soil erosion impacts would similarly be less than significant.

(c) Soil stability

The IS/MND concluded that the Project could experience structural failures and liquefaction due to seismic ground shaking. This could result in a potentially significant impact. However, implementation of Mitigation Measure GEO-1 would reduce any seismic hazard impacts to a less than significant level. Since the Amended Project lies within the same footprint as the Project, implementation of Mitigation Measure GEO-1 would similarly apply and would likewise reduce impacts to a less than significant level.

(d) Expansive soils

The IS/MND concluded that the Project is located on soils that have the potential to expand, compress, or deform because of the poor permeability and plastic qualities leading to building and roadway structural and foundational failures. This could result in a potentially significant impact. However, implementation of Mitigation Measure GEO-1 would reduce any impacts caused by expansive soils to a less than significant level. Since the Amended Project lies within the same footprint as the Project, implementation of Mitigation Measure GEO-1 would similarly apply and would likewise reduce impacts to a less than significant level.

(e) Soil capability to support wastewater disposal, including septic systems

The IS/MND determined that, since the Project will not utilize septic tanks on-site, the development would not result in any impact to soil ability to support wastewater disposal. Since the Amended Project's replacement of the LID Basin with three additional homes on Parcel A will be subject to the same planning standards as the rest of the subdivision, the Amended Project will similarly result in no impact.

(f) Unique paleontological resource or site or unique geologic feature

The IS/MND determined that paleontological resources are unlikely to be found in the subdivision site. Nevertheless, because it is possible that excavation could unearth a paleontological resource, the subdivision could result in a significant impact. Mitigation Measure GEO-2 would ensure a

paleontologist has trained the construction crew on how to recognize fossils and procedures to follow in the event of a discovery.

Since the Amended Project lies within the same development footprint as the Project, the potential impacts to paleontological resources would apply to the Amended Project. Accordingly, implementation of Mitigation Measure GEO-2 would similarly apply and would likewise reduce impacts to a less than significant level.

Conclusion

The Amended Project will only add three single-family homes on Parcel A originally planned as a LID Basin to the approved Stonebridge Subdivision. The IS/MND determined the Project would not result in any significant impacts to geology and soils with mitigation. The Amended Project would disturb the same footprint as the Project and would conform to and would meet the same requirements as the approved Project. Based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified geological impacts, nor result in new significant impacts.

Greenhouse Gas Emissions

EN\ Issu	/IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
8.	GREENHOUSE GAS EMISSIONS. Would the project:			
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			х
b)	Conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			х

Previous CEQA Documents

The IS/MND identified the following potentially significant impacts to greenhouse gas ("GHG") emissions and mitigation measures which would reduce those impacts below a significant level:

Impacts: the subdivision operation could result in long-term GHG emissions and could conflict with local GHG plans and regulations. Mitigation Measure GHG-1, however, would require the applicant to prepare and submit a Climate Action Plan New Development checklist to the City, demonstrating how the subdivision would comply with the City's GHG reduction strategy. Compliance with the City's plan ensures that the subdivision will not result in significant GHG emissions and would also ensure compliance with the local GHG plan.

The Project would be required to adhere to applicable mitigation measures as set forth in the IS/MND and the MMRP, which would reduce any potential impacts to a less than significant level.

Project Impacts and Mitigation Measures

(a) GHG emissions

The IS/MND determined that both construction and operation of the subdivision have the potential to generate GHG emissions. However, the IS/MND explained that construction emissions would be temporary and related to the movement of heavy vehicles. Operation of the subdivision would result in long-term emissions over the life of the project, relating to vehicles, natural gas use, electricity, water transport, and waste. Thus, the subdivision has the potential to result in a significant impact. Mitigation Measure GHG-1 would reduce these impacts to a less than significant level by requiring the applicant to prepare and submit a Climate Action Plan New Development checklist to the City, demonstrating how the subdivision would comply with the City's GHG reduction strategy. Compliance with this strategy would ensure that the City meet its GHG emission reduction targets.

The Amended Project would marginally contribute to any construction-related emissions, since three additional homes represents a minimal increase in the approved 105-unit Project. Moreover, implementation of Mitigation Measure GHG-1 would likewise ensure that the Amended Project will meet the City's emission reduction targets.

(b) Conflict with GHG plans or regulations

The IS/MND determined that, without mitigation, the Project could result in significant impacts caused by conflicts with the City's GHG plan. By implementing Mitigation Measure GHG-1, the subdivision would ensure compliance with the City's GHG plan and, thus, this impact would be reduced to a less than significant level.

Since development of the Amended Project's additional three residences on Parcel A would similarly be subject to Mitigation Measure GHG-1, no additional significant impacts, or increased severity of impacts will occur here.

Conclusion

The Amended Project will replace the planned LID Basin with three single-family homes. The IS/MND determined the Project would not result in any significant impacts to GHG emissions with mitigation. Based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified GHG impacts, nor result in new significant impacts.

Hazards and Hazardous Materials

ENVIRONMENTAL IMPACTS Issues	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project	t:		

a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	х
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?	x
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?	x
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?	x
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 result in a safety hazard for people residing or working in the project area?	x
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Х
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	X

The IS/MND identified the following potentially significant impacts to hazards and hazardous materials, and proposed mitigation measures which would reduce those impacts below a significant level:

- Impact: the removal of existing structures on the subdivision property could expose workers and nearby residents to hazardous materials contained in the structure. Mitigation Measure HAZ-1, however, would require the applicant to retain an abatement professional to conduct asbestos and lead paint surveys prior to issuance of demolition permits. Removal of all asbestos containing materials and lead-based paint shall be conducted in accordance with governmental regulations.
- Impact: the removal of existing structures could potentially affect an elementary school located 0.22 mile from the subdivision site. Mitigation Measure HAZ-1 would ensure that the structures are demolished responsibly and thus mitigating any impacts.

The Project would be required to adhere to applicable mitigation measures identified in the IS/MND and the MMRP, which would reduce potential impacts to a less than significant level. BN 48822542v3

Project Impacts and Mitigation Measures

(a) Transport, use or disposal of hazardous materials

The IS/MND determined that residential developments typically do not involve the regular use, storage, transport, or disposal of significant amounts of hazardous materials. Construction and operation may involve the minor routine transport and handling of minimal quantities of hazardous substances such as diesel fuels, lubricants, aerosols, solvents, asphalt, pesticides, and fertilizers. These, however, would not be used, stored, or transported in sufficient quantities to create a significant hazard to the public. Thus, impacts caused by the use of hazardous materials would be less than significant.

Because the Amended Project would replace the LID Basin with three additional single-family homes consistent with the policies and procedures that would be implemented in the approved subdivision, the Amended Project will not result in any significant increase in the use of hazardous materials. The Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(b) Potential release of hazardous materials into the environment

The IS/MND explained that spills of hazardous materials may occur during construction activities but would likely be minimal and any potential adverse effects would be localized. Removal of existing structures on the project site, and the potential for them to contain asbestos-containing materials and lead-based paint, could result in a significant impact to construction workers and nearby residents. Mitigation Measure HAZ-1 would require the applicant to retain an abatement professional to conduct asbestos and lead paint surveys prior to issuance of demolition permits. Removal of all asbestos containing materials and lead-based paint shall be conducted in accordance with governmental regulations. Implementation of this mitigation measure would reduce the potential impacts to a less than significant level.

Because the Amended Project would similarly comply with Mitigation Measure HAZ-1, the Amended Project will not result in a significant increase in the release of hazardous materials into the environment. The Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(c) Emit hazardous materials within one-quarter mile of an existing or proposed school

The IS/MND determined that, though the subdivision site is located 0.22 mile from a nearby elementary school, compliance with federal, State, and local laws pertaining to the safe handling and transport of hazardous materials would minimize spills. As noted previously, demolition of existing structures may result in a significant impact. However, implementation of Mitigation Measure HAZ-1, would reduce that impact to a less than significant level.

Because the Amended Project would similarly comply with Mitigation Measure HAZ-1, the Amended Project will not result in any emissions of hazardous materials into the environment. The Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(d) Listed as a hazardous materials site

The Property is not located on any hazardous materials site. Thus, the IS/MND determined that no impact would occur.

(e) Proximity to a public or private airport

The Property is not located on within any sphere of influence of the Sonoma County Airport or any other airport. Thus, the IS/MND determined that no impact would occur.

(f) Impair implementation of an emergency response plan or emergency evacuation plan

The IS/MND determined that the Project would not affect designated emergency evacuation routes, or propose any permanent road closures or lane narrowing that would impact an emergency response plan. Accordingly, the Project would result in a less than significant impact to an emergency response plan or emergency evacuation plan.

Because the Amended Project would merely add three additional homes to the subdivision in the same footprint, the Amended Project will not result in any additional changes to roadway configurations. The Amended Project will therefore not result in any new significant impacts or increased severity of assessed impacts.

(h) Expose people or structures to wildland fires

The IS/MND determined that the subdivision project site is not located within a CalFire designated High Fire Hazard Severity Zone. The subdivision would be consistent with the most recent version of the California Fire Code and Building Code and all roadways would be a minimum of 20 feet wide to allow for fire apparatus access. Accordingly, impacts would be less than significant.

Because the Amended Project would replace the LID Basin with three additional homes on Parcel A in the same subdivision footprint and consistent with the subdivision development plans, the Amended Project will not result in any additional exposure of people or structures to wildland fires. The Amended Project will therefore not result in any new significant impacts or increased severity of assessed impacts.

Conclusion

The Amended Project will only add three single-family homes to the approved Stonebridge Subdivision, which the IS/MND determined would not result in any significant impacts to hazards and hazardous materials, with implemented mitigation. The Amended Project would be located on the same footprint as the subdivision and would be developed consistent with the standards that are required of the Stonebridge Subdivision. Based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified hazards impacts, nor result in new significant impacts.

Hydrology and Water Quality

		Substantial	
		Increase in the	Equal or Less
	New	Severity of an	Severe Impact
ENVIRONMENTAL IMPACTS	Significant	Impact Identified	than Identified
Issues	Impact	in the IS/MND	in the IS/MND

10.	HYDROLOGY AND WATER QUALITY. Would the project:	
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	x
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin??	x
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would:	x
i)	Result in substantial erosion or siltation on- or off-site?	x
ii)	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	X
iii)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantialadditional sources of polluted runoff?	x
iv)	Impede or redirect flood flows?	X
d)	In flood hazard, tsunami, or seiche zones, risk release ofpollutants due to project inundation?	x
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	x

The IS/MND determined that the Project would not result in any significant impacts to hydrology and water quality.

Project Impacts and Mitigation Measures

(a) Violate water quality or waste discharge requirements

The IS/MND explained that runoff from the Project during construction and operation could enter storm drainage systems and enter nearby waterbodies, though implementation of construction and operational BMPs would ensure that these impacts remain less than significant.

The Amended Project would replace the LID Basin with three additional homes within the same subdivision footprint and consistent with the subdivision construction and development plans and practices. Therefore, the Amended Project will not cause any additional water quality or discharge impacts. The Amended Project will therefore not result in any new significant impacts or increased severity of assessed impacts.

(b) Substantially deplete or interfere with groundwater supplies

The IS/MND explained that the Project will obtain its water supplies from the City's water entitlements. The subdivision would not significantly increase population and water demand is accounted for in the Urban Water Management Plan (UWMP) projections. Thus, the subdivision is not anticipated to cause any significant impacts to groundwater supplies.

Since the Amended Project proposes only three additional homes in the same subdivision footprint and population estimates for the subdivision, the Amended Project will not result in a significant increase in population or water demand that would affect groundwater supplies. The Amended Project will therefore not result in any new significant impacts or increased severity of assessed impacts.

(c) Substantially alter existing drainage patterns

The IS/MND concluded that construction may temporarily alter stormwater flow patterns, though compliance with permit conditions and the City Code would lessen impacts due to erosion or siltation. During operation, the subdivision would include catch basins and underground pipes that convey stormwater to a treatment facility. The stormwater system to be installed will ensure that the subdivision will not significantly increase the rate, amount, or pollution of surface runoff. Finally, the subdivision site is not located in an area prone to flooding or within a flood hazard zone. Accordingly, all of these impacts would be less than significant.

The Amended Project proposes to replace the LID Basin with three additional homes on Parcel A in the same subdivision footprint and consistent with the subdivision construction and development plans and practices. Biotreatment swales will be installed as linear features along intract streets and landscaped areas to address stormwater treatment. The biotreatment swales will function to collect, treat, and convey stormwater away from the developed lots in the subdivision. As with the stormwater system analyzed in the IS/MND, these biotreatment swales will be installed to ensure that the rate or amount surface runoff will not significantly increase, while filtering out pollutants from the stormwater to provide treatment and maintain water quality. Therefore, replacing the LID Basin with biotreatment swales as part the Amended Project will provide equivalent or better water quality for stormwater in the subdivision and the addition of 3 homes will not cause any additional runoff, drainage or flooding impacts. The Amended Project will therefore not result in any new significant impacts or increased severity of the prior impacts evaluated in the IS/MND.

(g) Inundation by seiche, tsunami, or mudflow

The IS/MND explained that the subdivision site is not located in an area of high flood risk or near any body of water that presents a tsunami or seiche risks. Thus, the subdivision would not cause any impacts. Because the Property is within the subdivision footprint, development of Parcel A will not result in any new impacts.

(h) Conflict with water quality control or groundwater management plan

The IS/MND explains that the subdivision will be required to comply with the conditions imposed by its stormwater permit, including implementation of BMPs to ensure reduction of pollutants from construction activities potentially entering surface waters or groundwater basins.

Additionally, the subdivision will not utilize groundwater as a significant source of water supply. $_{\rm BN\,48822542v3}$

As a result, during operation, the proposed project would not conflict with or obstruct a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant.

The Amended Project will be located in the same subdivision footprint and will be developed consistent with the subdivision construction and development plans and practices. Therefore, the Amended Project will not cause any additional impacts to a water quality control plan or sustainable groundwater management plan. The Amended Project will therefore not result in any new significant impacts or increased severity of assessed impacts.

Conclusion

The Amended Project proposes to replace the LID Basin with three additional homes located on the same footprint as the subdivision and will be developed consistent with the subdivision's plans and practices. Based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified hydrology and water quality impacts, nor result in new significant impacts.

Land Use and Planning

ENV Issue	IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
11.	LAND USE AND PLANNING. Would the project:			
a)	Physically divide an established community?			X
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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			Х

Previous CEQA Documents

The IS/MND identified the following potentially significant impact to general plan compatibility, and a proposed mitigation measure which would reduce that impact below a significant level:

 Impact: noise levels caused by traffic on Fulton Road may exceed the City's noise guidelines. Mitigation Measure LAND-1 requires the construction of sound walls along Fulton Road and the addition of an alternative form of ventilation in all residences.

The Project would be required to adhere to applicable mitigation measure as set forth in the IS/MND and the MMRP, which would reduce any potential impacts to a less than significant level.

Project Impacts and Mitigation Measures

(a) Physically divide an established community BN 48822542v3 The IS/MND determined that the subdivision does not involve any such features that would separate an existing community and would not remove any means of access in the surrounding area. The Amended Project proposes to replace the LID Basin with three homes on Parcel A in a corner of the subdivision footprint. Accordingly, no impacts will occur.

(b) Conflict with general plan

The IS/MND explained that the subdivision project is consistent with the density allowed under the site's applicable *Low Density Residential* General Plan designation. The subdivision may cause a significant impact to General Plan compatibility by locating new land uses to an existing ambient noise environment that is in conflict with the City's established noise land use compatibility guidelines. Specifically, traffic noise levels associated along Fulton Road may conflict with the City's noise guidelines. Accordingly, Mitigation Measure LAND-1 requires the development to include a minimum 6-foot sound wall along all property lines adjacent to Fulton Road and requires all units to be supplied with an alternative form of ventilation that would allow residents to minimize noise by shutting windows. Implementation of this measure would reduce potential General Plan compatibility impacts below a significant level.

The Amended Project would replace the LID Basin with three residential units on Parcel A that would be added to the 105-unit subdivision project for a total of 108 units. This would marginally increase the overall density, but it would remain well below the maximum General Plan density of 8 dwelling units per acre. As part of the overall subdivision, the Amended Project will similarly comply with Mitigation Measure LAND-1, including by constructing a sound wall along Fulton Road as shown in the Revised Exhibit 12. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

Conclusion

The Amended Project proposes three additional homes located within the approved subdivision and will be developed consistent with the subdivision's plans and practices, including by implementing the necessary mitigation measure. Based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified land use compatibility impacts, nor result in new significant impacts.

Mineral Resources

ENV Issue	IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
12.	MINERAL RESOURCES. Would the project:			
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			Х

b)	Result in the loss of availability of a locally-important		х	
	mineral resource recovery site delineated on a local			
	general plan, specific plan, or other land use plan?			

The IS/MND determined that the subdivision would not result in any impacts to mineral resources.

Project Impacts and Mitigation Measures

(a-b) Loss of known or identified mineral resource

The Property does not have any mineral extraction areas and no known mineral resources exist there. There are no mineral resource recovery sites within or near the Property. In addition, the Property is not designated or zoned as a mineral recovery site by the General Plan or zoning code. Accordingly, the subdivision will not result in any impacts to the availability of a known mineral resource. Since the Amended Project is located within the subdivision footprint, the Amended Project will similarly not result in any impacts to the availability of any mineral resource.

Conclusion

Because the Amended Project site does not have any mineral extraction areas or known mineral resources, there would be no impact to the availability of mineral resources. Therefore, the Amended Project would not substantially increase the severity of the previously identified impacts to mineral resources, nor result in new significant impacts.

ENV Issu	IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
13.	NOISE. Would the project result in:			
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			x
b)	Generation of excessive groundborne vibration or groundborne noise levels?			х
c)	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 residing or working in the project area to excessive noise levels?			х

Noise

The IS/MND identified the following potentially significant impact to noise, and a proposed mitigation measure which would reduce that impact below a significant level:

Impact: short-term construction noise levels could temporarily exceed applicable noise thresholds. Mitigation Measure NOI-1 requires the utilization of specified construction equipment and implementation of construction performance standards to reduce the impacts below a significant level.

The subdivision project would be required to adhere to applicable mitigation measure as set forth in the IS/MND and the MMRP, which would reduce any potential impacts to a less than significant level.

Project Impacts and Mitigation Measures

(a) Exposure to or generate noise exceeding standards

The IS/MND identified short-term construction noise as a potentially-significant noise impact. Mitigation Measure NOI-1 requires construction equipment to be equipped with specified technology and to adhere to certain performance standards to minimize noise impacts. Upon implementation, construction noise impacts will be less than significant.

All operational noise levels, including noise from both stationary and mobile sources, would be within the conditionally acceptable thresholds and, therefore, cause less than a significant impact. Two of the three new lots (Lots 106 and 107) will be exposed to traffic noise levels due to their location adjacent to Fulton Road as shown in the revised Exhibit 12 and discussed in the Land Use Section above. A sound wall would be required along their westerly property lines consistent with Mitigation Measure LAND-1 designed to address potential noise impacts due to traffic noise on Fulton Road.

Construction noise impacts would occur with or without the development of the Amended Project. However, because the Amended Project would be developed within the same approved Project footprint, implementation of Mitigation Measure NOI-1 will apply to the entire development, reducing the construction noise impact to a less than significant level. The incorporation of the sound wall along the Fulton Road frontage as part of the Amended Project will avoid and minimize noise impacts due to traffic. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(b) Exposure to ground borne vibration or ground borne noise

The IS/MND determined that subdivision construction could result in some vibration impacts, but that they would be well below applicable construction vibration impact criteria. Subdivision operation would not result in vibration impacts. Therefore, the subdivision project will result in less than significant ground vibration impacts.

Construction vibration impacts would occur with or without the development of the Amended Project. However, because the Amended Project would occur in the same area as the Project, impacts assessed for the subdivision would likewise apply to Amended Project development. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(c) Excessive noise level near a public or private airport

The IS/MND concluded that the subdivision site is not located within the vicinity of an airport or airstrip. Thus, no impacts would occur as a result of subdivision development. Because the Amended Project is located within the subdivision footprint, no impacts would occur with the Amended Project.

Conclusion

The Amended Project proposes three additional homes located within the approved subdivision and will be developed as part of the overall subdivision and consistent with its plans and practices, including by implementing the necessary mitigation measure. Based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified noise or vibration impacts, nor result in new significant impacts.

Population and Housing

ENV Issue	IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
14.	POPULATION AND HOUSING. Would the project:			
a)	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			x
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			x

Previous CEQA Documents

The IS/MND determined that the subdivision would not result in any significant impacts to population growth and housing.

Project Impacts and Mitigation Measures

(a) Population growth

The IS/MND determined that development of the subdivision project is consistent with the City General Plan and state housing requirements. Moreover, the area around the subdivision site is well-served with necessary utility infrastructure. Accordingly, the subdivision project will not induce unplanned growth, and any population growth impacts would be less than significant.

Since the Amended Project would occur in the subdivision footprint of the Project, and would be consistent with the applicable City plans and zoning, the Amended Project will not result in a

significant impact to population growth. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(b) Housing and resident displacement

The IS/MND concluded that the Project will require demolition of one existing home on the site, and the 105-unit development will compensate for that loss in a single housing unit. Construction of replacement housing would not be required. Thus, the subdivision will result in a less than significant impact to displacement.

Since the only potential impact here would occur with subdivision development, whether or not the Amended Project is approved, the Amended Project will not create any new impacts to housing displacement. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

Conclusion

The Amended Project proposes to construct three additional homes on Parcel A within the approved subdivision and will be developed consistent with City planning standards, ordinances, and policies. The three additional units will not result in any unplanned growth, nor will the Amended Project cause any additional displacement. Based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified population and housing impacts, nor result in new significant impacts.

Public Services

ENV Issu	IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
15.	PUBLIC SERVICES. Would the project result in substantial a provision of new or physically altered governmental facilit governmental facilities, the construction of which could ca order to maintain acceptable service ratios, response time the public services:	ies or need fo ause significan	r new or physical t environmental i	altered mpacts, in
a)	Fire protection?			x
b)	Police protection?			х
c)	Schools?			x
d)	Parks?			х
e)	Other public facilities?			х

The IS/MND determined that the subdivision would not result in any significant impacts to public services.

Project Impacts and Mitigation Measures

(a) Fire

The IS/MND determined that, because development on the subdivision site is consistent with the City's long-term planning documents, and because the development would be required to comply with City tax provisions which would require a fair-share contribution for the replacement or expansion of public facilities. Therefore, the subdivision would have a less than significant impact to fire services.

Because the Amended Project will be developed as part of the subdivision and will be consistent with City planning policies, the Amended Project will not result in any new impacts to fire service. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(b) Police

The IS/MND determined that the subdivision is likely to "have a negligible effect on demand for police services." Because the subdivision is consistent with the City's long-term planning documents, and because the development would be required to pay City impact fees that would fund public services, the subdivision would have a less than significant impact to police services.

Because the Amended Project will be developed as part of the subdivision and will be consistent with City planning policies, the Amended Project will not result in any new impacts to police services. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(c) Schools

The IS/MND determined that the subdivision is likely to have some effect on the demand for schools. The subdivision is consistent with the City's long-term planning documents, and the development would be required to pay City impact fees that would fund the expansion of school facilities and acquisition of equipment. Therefore, the subdivision would have a less than significant impact on schools.

Because the Amended Project on Parcel A will be developed as part of the subdivision and will be consistent with City planning policies, and the applicant will pay the applicable impact fees, the Amended Project will not result in any new impacts to schools. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(d) Parks

The IS/MND determined that the City already exceeds its parkland to citizen ratio. Additionally, the subdivision would be required to provide fees for the development of parkland. Thus, the subdivision will result in less than significant impacts to park facilities.

Because the Amended Project will be developed as part of the subdivision and will be consistent with City planning policies, and will pay the applicable impact fees, the Amended Project will result in negligible impacts to park facilities. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

(e) Other public facilities

The IS/MND determined that the subdivision development will create a demand for library services, albeit a small one. The subdivision's payment of housing impact fees will account for increased demand in library services. Thus, the subdivision will result in less than significant impacts to library services.

Because the Amended Project will be developed as part of the subdivision and will be consistent with City planning policies, and will pay the applicable impact fees, the Amended Project will result in negligible impacts to library services. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

Conclusion

The Amended Project proposes three additional homes located within the approved subdivision and will be developed consistent with City planning standards, ordinances, and policies. The three additional units will not result in any unanticipated or unaccounted for impacts to public services. Based on the information in the IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified public services impacts, nor result in new significant impacts.

Recreation

ENV Issu	IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
16.	RECREATION. Would the project:			
a)	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?			x
b)	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			x

Previous CEQA Documents

The IS/MND determined that the subdivision would not result in any significant impacts to recreation.

Project Impacts and Mitigation Measures

(a, b) Increase the use of existing recreation facilities causing deterioration or require new recreation facilities

The IS/MND determined that, though the subdivision's impacts to neighboring park facilities would increase, the increase would not result in accelerated substantial physical deterioration. Additionally, the subdivision would not increase facility use due to population growth. Park impact fees payed by the subdivision developer would fund expansion and maintenance of park facilities. Accordingly, the subdivision development will result in a less than significant impact to recreation facilities.

Because the Amended Project will be developed as part of the subdivision, will increase the subdivision population by a negligible amount, and will pay the applicable impact fees, the Amended Project will result in almost no additional impacts to recreation. Thus, the Amended Project will not result in any new significant impacts or increased severity of assessed impacts.

Conclusion

The Amended Project will increase the population of the subdivision development by a negligible amount. The three additional units will not result in any unanticipated or unaccounted for impacts to recreation services. Based on the information in the IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified recreation impacts, nor result in new significant impacts.

ENV Issu	IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
17.	TRANSPORTATION. Would the project:			
a)	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			х
b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)??			х
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			х
d)	Result in inadequate emergency access?			х

Transportation

The IS/MND identified the following potentially significant impact to transportation, and one proposed mitigation measure which would reduce that impact below a significant level:

 Impact: traffic patterns at the planned intersection of Fulton Road and Street A of the subdivision may cause a hazard, resulting in a potentially significant impact. Mitigation Measure TRANS-1 requires the subdivision project to submit plans to the City depicting a dedicated left-turn lane in the southbound direction at this intersection.

The Project would be required to adhere to applicable mitigation measure as set forth in the IS/MND and the MMRP, which would reduce any potential impact to a less than significant level.

Project Impacts and Mitigation Measures

(a) Conflict with applicable transportation circulations plans/standards

The IS/MND concluded that the subdivision development would result in less than significant conflicts with the City's transportation circulation plans and standards. This included impacts to intersection levels of service, transit facilities, bicycle facilities, and pedestrian facilities. This conclusion was based on a traffic impact study ("TIS") that analyzed 120 single-family homes, as opposed to the planned 105 units.

Because the Amended Project, in addition to the approved subdivision, will be well within the 120 units analyzed, the Amended Project will not result in any new impacts or increased severity of impacts.

(b) Conflict with CEQA Guidelines Section 15064.3

The IS/MND determined that the Project need not comply with CEQA Guidelines section 15064.3 because that section only became effective on July 1, 2020. Section 15064.3 provides new criteria for analyzing transportation impacts. Specifically, that if vehicle miles traveled ("VMT") exceed an applicable threshold of significance may indicate a significant impact.

Under the City's VMT Guidelines, small infill projects—for residential development, this includes projects providing up to 11 single family residences—may be screened from further transportation impact analysis. Thus, the Project's three-unit addition to the subdivision is presumed to have a less than significant transportation impact under the City's VMT Guidelines.

(c) Substantially increase hazards due to a design feature

The IS/MND concluded that the subdivision development may cause a significant impact by creating a hazard at the Fulton Road/Street A intersection. Mitigation Measure TRANS-1 requires, prior to the issuance of building permits, the applicant to prepare and submit pans to the City depicting a dedicated left-turn lane in the southbound direction on Fulton Road at Street A. The mitigation measure would reduce this potential impact to a less than significant level.

Because the Amended Project, will be well within the 120 units analyzed under the Stonebridge Subdivision traffic impact study, the Amended Project will not result in any new impacts or increased severity of impacts.

(d) Result in inadequate emergency access

The IS/MND determined that, since the subdivision project would provide two full access points to the development and code-compliant street widths, consistent with California Fire Code and City standards, impacts to emergency access will be less than significant.

Because the Amended Project will be located within the approved Stonebridge Subdivision, which will meet all state and local emergency access codes, the Amended Project will not result in any new impacts to emergency access or increased severity of impacts.

Conclusion

The TIS prepared for the Stonebridge Subdivision was based on a conservative analysis that assessed the impacts of a 120-unit development. Since this analysis evaluated more than the 108 units included in the Amended Project, transportation impacts for the Amended Project were already analyzed and incorporated into the IS/MND. Accordingly, the Amended Project would not substantially increase the severity of the previously identified transportation impacts, nor result in new significant impacts.

Tribal Cultural Resources

ENV Issu	IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
18.	TRIBAL CULTURAL RESOURCES. Would the project cause a of a tribal cultural resource, defined in Public Resources C place, cultural landscape that is geographically defined in sacred place, or object with cultural value to a California N	ode section 21 terms of the s	074 as either a sit ize and scope of t	e, feature, he landscape,
a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			x
b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X

The IS/MND identified the following potentially significant impact to tribal cultural resources, and one proposed mitigation measure which would reduce that impact below a significant level:

Impact: despite the determination that no tribal resources are located on the subdivision site, the potential for encountering undiscovered resources is always present. Previously discussed Mitigation Measures CUL-1 and CUL-2 would require the subdivision project to implement specified procedures in the event of an accidental discovery of a cultural resource or human remains.

The subdivision project would be required to adhere to the applicable mitigation measure as set forth in the IS/MND and the MMRP, which would reduce any potential impact to a less than significant level.

Project Impacts and Mitigation Measures

(a) Listed or eligible for listing in the California Register of Historical Resources

The IS/MND determined that, after a review of historic records and consultation with local Native American tribes failed to identify any listed Tribal Cultural Resources ("TCRs") on the subdivision development site. Accordingly, no eligible or potentially eligible TCRs will be affected and any impacts would be less than significant.

(b) Significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1

The IS/MND explained that the City offered to consult with two tribal representatives that previously requested consultation. The City received no response and no additional requests for consultation. The possibility of encountering undiscovered TCRs could result in a potentially significant impact. The implementation of the previously discussed Mitigation Measures CUL-1 and CUL-2 would reduce any potential impacts to a less than significant level.

Because the Amended Project will be located within the approved subdivision footprint and will comply with the same construction practices and mitigation measures, the Amended Project will not result in any new impacts to tribal cultural resources or increased severity of impacts.

Conclusion

The Amended Project will be located on the same footprint as the Stonebridge Subdivision, for which the applicant and City already conducted a thorough analysis and attempted consultation with the applicable local Native American tribes. Any construction practices and mitigation measures applicable to the subdivision project would likewise apply to the Amended Project. Thus, based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified tribal cultural resource impacts, nor result in new significant impacts.

Utilities and Service Systems

ENV Issu	IRONMENTAL IMPACTS es	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
19.	UTILITIES AND SERVICE SYSTEMS. Would the project:			
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			Х
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			х
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project projected demand in addition to the provider's existing commitments?			x
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			x
e)	Comply with federal, state, and local statutes and regulations related to solid waste?			Х

Previous CEQA Documents

The IS/MND determined that the subdivision would not result in any significant impacts to utilities and service systems.

Project Impacts and Mitigation Measures

(a) Water and wastewater treatment, electricity, natural gas, telecommunications requirements and facilities

The IS/MND determined that the subdivision project will incorporate new water and wastewater lines connecting to the new residences. As previously discussed, the subdivision would be served by a sufficient water supply and will include biotreatment swales alongside in-tract streets. Other electric and natural gas facilities will be constructed in consultation with Pacific Gas & Electric. Since the subdivision would not require the relocation or construction of new utility facilities other than those proposed on-site, impacts would be less than significant.

The Amended Project will be located within the approved subdivision footprint and will be subject to the same design requirements, including the installation of utility facilities. Additionally, the Amended Project will result in 108 units. Thus, any increase in demand for utility service would be BN 48822542v3

negligible. Accordingly, the Amended Project will not result in any new impacts to utility facilities or increased severity of impacts.

(b) Sufficient water supplies

The IS/MND determined that the City's water capacity will be able to easily satisfy future water demand by the subdivision project. Thus, any impact would be less than significant. Because the Amended Project proposes only a three-unit addition to the subdivision, any increase in water demand would be negligible. Accordingly, the Amended Project will not result in any new impacts to water supplies or increased severity of impacts.

(c) Sufficient wastewater treatment capacity

The IS/MND determined that the City's wastewater treatment capacity will be able to easily satisfy future demand by the subdivision project. Thus any impact would be less than significant. Because the Amended Project proposes only a three-unit addition to the subdivision, any increase in demand for wastewater would be negligible. Accordingly, the Amended Project will not result in any new impacts to wastewater treatment capacity or increased severity of impacts.

(d, e) Solid waste disposal and regulatory compliance

The IS/MND determined that the generation of solid waste by the subdivision would not exceed state or local standards that would affect local infrastructure capacity. Additionally, the City's waste hauler would follow all federal, state, and local requirements for solid waste disposal. Thus impacts to regulatory compliance would be less than significant.

Because the Amended Project proposes a marginal three-unit addition to the subdivision, the Amended Project will not result in the generation of additional solid waste that would cause a new impact or increased severity of an impact to solid waste disposal. Moreover, the Amended Project would be subject to solid waste disposal through the City's waste hauler. Thus, regulatory compliance impacts would be less than significant.

Conclusion

The Amended Project will add only three additional units, which would result in a marginal increase to the demand for utility services. Thus, based on the information in IS/MND and this environmental analysis, the Amended Project would not substantially increase the severity of the previously identified utility service impacts, nor result in new significant impacts.

Wildfires

ENVIRONMENTAL IMPACTS Issues	New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
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20. Wildfires. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a)	Substantially impair an adopted emergency response plan or emergency evacuation plan??	х
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	x
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment	x
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	x

The IS/MND determined that the subdivision would not result in any significant impacts to wildfires.

Project Impacts and Mitigation Measures

(a) Impair emergency response plan

The IS/MND determined that, because the subdivision would comply with state and local access and roadway design requirements, impacts to emergency responses would be less than significant. Because the Amended Project is located within the subdivision footprint and would comply with those same state and local requirements, the Amended Project will not result in any new impacts to emergency responses or increased severity of impacts.

(b) Pollutants or uncontrolled spread

The IS/MND determined that the subdivision site would not be susceptible to significantly high wind speeds that could exacerbate the risk of spreading wildfires. Thus, impacts would be less than significant. Because the Amended Project is located in the same footprint as the subdivision, the IS/MND analysis would likewise apply to the Amended Project. The Amended Project will not result in any new impacts or increased severity of impacts caused by pollutants or uncontrolled spread of pollutants during a wildfire.

(c) Installation of infrastructure that would exacerbate fire risk

The IS/MND determined that the subdivision would comply with all state and local design and infrastructure improvement requirements. No overhead power lines will be required and water supplies would be sufficient. Therefore, impacts would be less than significant. Because the Amended Project will adhere to the same design standards as the approved Project, the Amended Project will not result in any new impacts or increased severity of impacts caused by the installation of infrastructure.

(d) Slope instability resulting in post-fire slope instability

The IS/MND explained that the subdivision site and surrounding area is flat and does not contain steep slopes. Moreover, the subdivision site does not contain post-fire slope instability nor is it directly downslope from affected areas. Accordingly, impacts would be less than significant. Because the Amended Project sits on the subdivision footprint, it would not result in any new impacts or increased severity of impacts caused by slope instability.

Conclusion

The Amended Project would be located on the same footprint and would be incorporated into the Stonebridge Subdivision. Because the Amended Project would adhere to the same design standards as the subdivision, it will not substantially increase the severity of the previously identified wildfire impacts, nor result in new significant impacts.

ENVIRONMENTAL IMPACTS Issues		New Significant Impact	Substantial Increase in the Severity of an Impact Identified in the IS/MND	Equal or Less Severe Impact than Identified in the IS/MND
21	MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:			
a)	Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			x
b)	Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)			x
c)	Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			х

Mandatory Findings of Significance

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animalcommunity, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

No New Impact. The IS/MND determined that, though the subdivision may result in impacts associated with air quality, biological resources, cultural resources, geology and soils, greenhouse BN 48822542v3

gas emissions, hazards and hazardous materials, land use and planning, noise, and transportation, implementation of the described mitigation measures would reduce such impacts to a less than significant level. As discussed and analyzed in this document, the Amended Project would add three units to the approved 105-unit subdivision development in lieu of the LID Basin. Because the Amended Project would be subject to the same planning, design, and mitigation measures as the approved Project, the Amended Project will not result in any new impacts that have the potential to degrade the quality of the environment.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

No New Impact. The IS/MND determined that the mitigation measures implemented by the subdivision will reduce all impacts to a less than significant level. Thus, any incremental effects are not considerable. This Amended Project would merely add an additional three homes to the Stonebridge Subdivision. The Amended Project will incorporate the same mitigation measures as those of the subdivision. Therefore, given the Amended Project's size and the mitigation measures, it will not result in any cumulative considerable impacts.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

No New Impact. The IS/MND determined that the subdivision would not have any significant impacts to human beings with mitigation incorporated. The Amended Project would be part of the subdivision development and would be required to comply with all the regulations, standards, and mitigation measures required of that development. Thus, the Amended Project would not result in any new substantial adverse effects on human beings.