# CEQA 15162 Addendum Recess Storage Project Santa Rosa, California

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# **APPENDICES**

Appendix A 2019 Initial Study/Mitigated Negative Declaration

# **ACRONYMS AND ABBREVIATIONS**

BAAQMD Bay Area Air Quality Management District

BMP best management practice

CEQA California Environmental Quality Act

db Decibels

dBA A-weighted decibel

EIR Environmental Impact Report

GHG greenhouse gas

gpm gallons per minute

IS Initial Study

IS/MND 2019 Initial Study Mitigated Negative Declaration for the Recess Storage Project

Ldn Day-Night average sound level

LOS Level of Service

MRZ mineral resource zone

NAHC Native American Heritage Commission

ND Negative Declaration

NO<sub>x</sub> oxides of nitrogen

PM<sub>10</sub> particulate matter with an aerodynamic diameter less than 10 microns

PM<sub>2.5</sub> particulate matter with an aerodynamic diameter less than 2.5 microns

PRC Public Resources Code

SCH State Clearninghouse

SO<sub>x</sub> oxides of sulfur

SWPPP Stormwater Pollution Prevention Plan

# 1 INTRODUCTION AND PURPOSE

The City of Santa Rosa (City) has prepared this Addendum for the Recess Storage Project to analyze project changes that occurred since the City adopted the Mitigated Negative Declaration and approved the Project on August 8, 2019 (State Clearinghouse Number 2019079002). This Addendum analyzes project changes requested by the project proponent to change from a residential development originally to the development of additional self-storage facilities (Revised Project).

# 1.1 Basis for Decision to Prepare Addendum

CEQA requires that the proposed project be reviewed to determine the environmental effects that would result if the project is approved and implemented. California Public Resources Code (PRC) Section 21166 and CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining whether a subsequent Environmental Impact Report (EIR), subsequent ND, addendum, or no further documentation be prepared in support of further agency action on the project. Pursuant to CEQA Guidelines Section 15162, a subsequent EIR or ND will be prepared if any of the following criteria are met:

- (a) When an EIR has been certified or ND adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
  - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
  - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the ND was adopted, shows any of the following:
    - (A) The project will have one or more significant effects not discussed in the previous EIR or ND;
    - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a ND, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise, the lead agency shall determine whether to prepare a subsequent ND, and addendum, or no further documentation.

In determining whether an Addendum is the appropriate document to analyze the proposed modifications to the project and its approval, CEQA Guidelines Section 15164 (Addendum to an EIR or ND) states:

- (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted ND may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or ND have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted ND.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted ND prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

As demonstrated in the environmental analysis provided in Section 3.0 (Environmental Analysis), the Revised Project does not meet the criteria for preparing a subsequent EIR or ND as established under CEQA Guidelines Section 15162.

# 1.2 Changes Since Project Approval

Since the City approved the Project in August 2019, the following changes have occurred:

- The Revised Project will include construction of additional self-storage facilities instead of the 14 residential units described in the Approved Project. The Revised Project is described in detail in Section 2.
- During grading of the site under Phase I, trees 24 and 25, which had originally been required to be retained, were removed because it was determined that the trees encroached into the pavement area. The City approved removal of these trees in a letter dates September 23, 2021.

# 2 REVISED PROJECT DESCRIPTION

The Approved Project was analyzed in the 2019 IS/MND included construction of a four-story,124,000-square foot self-storage facility and two multi-family residential structures; one structure will have six dwelling units and one structure will have eight dwelling units. Phase I of construction included construction of the four-story self-storage facility and grading of the entire project site. The Revised Project no longer includes construction of the residential structures but instead includes construction of additional self-storage facilities.

The Recess Storage Project Phase II (Revised Project) will construct 3-story self-storage building and two single-story self-storage buildings in the same location as the residential units described in the Approved Project. The buildings will be located on lots located at 4465 and 4480 Streamside Drive (Figure 1). Streamside Drive and Lots 2 and 3 were established during Phase I of the Project. The Revised Project will be set back from Santa Rosa Creek as shown on Figure 2. The Approved Project and Revised Project buildings are intended to serve as a campus where all three storage facilities will share access driveways, parking spaces, office space, restrooms, and parking facilities (Figure 3). The entire site was graded, and construction pads were created during Phase I. Apart from the sidewalk along Streamside Drive, all off-site improvements were constructed during Phase I.

The Revised Project includes construction of a three-story self-storage facility that will be approximately 21,780 square feet in area and located on the northeastern portion of the Project site on Lot 2. Each of the three floors will be approximately 8,440 square feet with the ground floor including restrooms. An elevator will be installed that will access the lower and third floors. Emergency exits and stairs are located at the northern and southern ends of the building. Total height of the building will be a maximum of 25 feet high from the north elevation and 34 feet high from the southern elevation.

The two, one-story storage units would be approximately 3,788 square feet in total area and would be located on the southern portion of the Project site on Lot 3. Maximum height of the one-story units would be 13 feet, six inches.

The Revised Project self-storage facilities would be constructed with the same or similar materials used for self-storage facilities described in the Approved Project, including a combination of, concrete masonry units, and metal siding. The color-scheme would be the same as the self-storage facilities described in the Approved Project.

Per City of Santa Rosa Zoning Code 20-36, Revised Project would include 11 customer parking spaces and four loading spaces. Two loading spaces would be located between the two single-story storage facilities. Two loading facilities would be located at the eastern side of the three-story facility.

Two planted stormwater retention areas would be constructed. As shown on the site plan, one retention facility would be located north of Streamside Drive and the other to the northeast of the three-story storage facility.

Additional site improvements under the Revised Project include landscaping including planting of trees, shrubs, and herbaceous vegetation that would be located around the property, at the frontage of Sonoma Highway and between the Revised Project self-storage facilities and Santa Rosa Creek Multi-Use Path. Landscaping would include drought tolerant plants and replacement trees in compliance with the City

Water Efficient Landscaping Ordinance (WELO) and would include tree replacement in compliance with the City's Tree Ordinance, City Code Chapter 17-24.

**Construction Schedule:** Construction would occur for approximately 8 months beginning in Summer 2022. Construction would be restricted to the hours of 7:00 AM to 7:00 PM Monday through Friday and 9:00 AM to 5:00 PM on Saturdays or as allowed under Municipal Code Section 17-16.030. No construction activities are permitted on Sundays and holidays. Equipment anticipated to be used includes bulldozers, backhoes, excavators, dump trucks, cranes, as well as smaller hand-held equipment. All materials would be stored on-site during construction.

# 3 ENVIRONMENTAL ANALYSIS

This section of the Addendum provides analysis and cites substantial evidence that supports the conclusion that the project revisions do not meet the criteria requiring preparation of a subsequent ND. As required under CEQA Guidelines Section 15164(d), "... the decision-making body shall consider the addendum with the final EIR or adopted ND prior to making a decision on the project." A brief explanation of the decision to not prepare a subsequent document will be supported by substantial evidence.

The Revised Project occupies the same location as the Approved Project adopted in August 2019. Because the project site occupies the same location, all impacts related to the physical conditions of the site (e.g., biological and cultural resources, geology, hydrology, land use, and mineral resources) would be similar to that previously identified in the adopted IS/ND.

# 3.1 Aesthetics

#### **Description and Impact Summary**

The 2019 IS/MND determined that the Project construction and operation of the Approved Project would temporarily reduce the visual character of the site from the Santa Rosa Creek Multi-Use Path. During and immediately after construction, because of the removal of trees and other vegetation, views from the multi-use path of the structure on Lot 2 will be obvious and result in a temporary change in the character of the view from the multi-use path. Similarly, the construction and operation of the Revised Project would temporarily reduce the visual character of the site from the multi-use path. The Revised Project buildings would be temporarily visible from the multi-use path during and immediately following construction. Trees and vegetation that would be planted between the path and the Revised Project facilities to restore the views from the path to pre-project conditions to the extent feasible. Once the trees and other vegetation has been able to mature, views of the structures would be screened, and views of the Revised Project would become less obvious and the visual character of the site from the path would be consistent with the surrounding area. Figures 5 through 8 illustrate the conceptual views of the multi-use path before and after restoration.

As described in the 2019 IS/MND, construction of the Revised Project would include equipment and some minor lighting that would result in a minor temporary increase in light and glare at the site during construction. Nighttime construction work is not anticipated, but some lighting may be used during the fall and winter months in the afternoon to provide for a safe work area. Lighting will be directed down and away from adjacent residences, businesses, and the creek area and light will be contained on site.

The storage facilities described in the Revised Project will include lighting. The City of Santa Rosa Zoning Code (Zoning Code) Section 20-30.080 requires that lighting fixtures be shielded or recessed to reduce light bleed to adjoining properties, and that each light fixture be directed downward and away from adjoining properties and public rights-of-way, so that no on-site light fixture directly illuminates an area off the site. Exterior lighting fixtures associated with the storage facility have been selected and will be installed in compliance with Code Section 20-30-080. Fixtures will be downcast and installed to direct light toward the site and prevent intrusion into adjacent properties, including creek habitat to the east of the site. Compliance with these requirements will not create a new source of substantial light or glare associated with the Project that will adversely affect day or nighttime views in the area. Additionally, the replacement of trees along the southside of Lot 2 will further prevent light intrusion into adjacent riparian habitat in the creek area.

**Conclusion**: Aesthetics and visual resources impacts associated with the Revised Project would be the same or similar to those analyzed in the 2019 IS/MND which were determined to be less than significant. The temporary change in visual character of the views from the Santa Rosa Creek Multi-Use Path would be temporary during and immediately following construction similar the impacts described for the Approved Project. The site will be restored with trees and other vegetation that will provide views similar to existing views once vegetation has matured. Therefore, there are no new impacts or an increase in severity of impacts on aesthetics or visual resources associated with the Revised Project.

As a standard condition of approval, the Project lighting plan will be approved by the City prior to the issuance of grading and building permits. Installation of the lighting according to City requirements and in compliance with Zoning Code Section 20-30-080. Lighting requirements for Revised Project would be the same or similar as analyzed under the 2019 IS/MND determined to be less than significant.

#### **Sources**

2019 Initial Study/Mitigated Negative Declaration

# 3.2 Agricultural and Timber Harvest Resources

As described in 2019 IS/MND, no agricultural or timber harvest resource occur on the project site, nor is the project site located on Prime, Unique, or Statewide Important farmland or within a Williamson Act contract area. As detailed in Section 3.2 of the IS/MND no impact to agricultural or forestry resources would result from development of the project site. The Revised Project occupies the same location as the analyzed in the 2019 IS/MND; therefore, no agricultural or forestry resources are present within the Revised Project area.

**Conclusion:** The implementation of the Revised Project would not alter the analysis or findings for agricultural/forest resources detailed in the adopted 2019 IS/MND. The adopted IS/MND identified no agricultural/forest resources and concluded that, because there are no agricultural or forestry resources on the project site, there would be no impacts on agricultural or forested resources. The Revised Project occupies the same area identified in the adopted ND and does not include features or uses that would impact any identified agricultural or forestry resource; therefore, implementation of the Revised Project would not alter the findings detailed in the adopted IS/ND.

#### Sources:

• 2019 Initial Study/Negative Declaration

# 3.3 Air Quality

As detailed in Section III of the 2019 IS/ND, the project-specific short-term construction and long-term pollutant emissions would be less than the emissions thresholds established in the Bay Area Air Quality Management District (BAAQMD). In the absence of an exceedance of any established air quality thresholds, impacts were determined to be less than significant, and no mitigation was warranted.

The Revised Project includes construction of storage facilities on Lots 2 and 3 and construction would be the same or similar to the construction analyzed in the 2019 IS/MND for the residential units on Lots 2 and 3; therefore, no change in the amount or character of short-term air emissions would result from construction of Revised Project. Mitigation Measure AQ-01 would continue to be implemented during construction of the Revised Project.

The Revised Project does not include any land use change and remains consistent with local plans, which were analyzed in the 2019 IS/MND; therefore, no inconsistency with local air quality management plans would result from construction and operation of the Revised Project.

Air emissions analyzed for construction and operation of Project were analyzed in the 2019 IS/MND. Table III-3 In Section III of the 2019 IS/MND determined construction emissions would not exceed significance thresholds for criteria pollutants. Construction of the Revised Project would include the same or similar equipment analyzed in the 2019 IS/MND, construction of the Revised Project would result in the same construction emissions and would remain below significance thresholds.

Table III-4 in Section III of the 2019 IS/MND determined that operation of the Project would not exceed significance thresholds. Operation of the Revised Project would include the same or similar vehicle trips identified in the 2019 IS/MND for operation of the Approved Project.

**Conclusion:** Because the Revised Project consists of construction activities that would be the same or similar to those analyzed in the 2019 IS/MND, air quality impacts during construction would not change. Mitigation Measure AQ-01 would be implemented during construction of the Revised Project and no new impact or significant increase in the severity of a previously identified impact would result from the Revised Project.

Because the Revised Project would result in the same or similar operational daily vehicle trips, no new impacts or an increase in severity of impacts previously identified in the 2019 IS/MND would result.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.4 Biological Resources

As described in Section IV of the 2019 IS/MND, there is limited habitat for plants and wildlife on the Project Site. Trees and shrubs that were present prior to construction of Phase I provided habitat for nesting birds and raptors. As described in Section 2 above, clearing and grubbing occurring during Phase

I and Mitigation Measures BIO-01 and BIO-2 were implemented, as applicable during construction of Phase I.

Construction of the Revised Project would occur on Lots 2 and 3 and would be the same or similar to construction activities described in the 2019 IS/MND for the residential units on Lots 2 and 3.

As described in Section IV in the 2019 IS/MND, there are no aquatic features such as wetlands or vernal pools on site. Santa Rosa Creek is located approximately 150 feet to the southeast and outside of the work area and no impacts on the creek would occur during Phase II construction and operation of the Project.

The Project would include the planting of 55 trees onsite to offset the loss of trees in compliance with the City of Santa Rosa Tree Ordinance. The Approved Project included the implementation of Mitigation Measure Bio-3 which required the protection of Trees 24 and 25. However, during construction of Phase I it was determined that these trees encroached into the paved areas of the site and needed to be removed. The City of Santa Rosa approved the removal of Trees 24 and 25 in an email from Susie Murray, Senior Planner dated September 23, 2021 (City of Santa Rosa, 2021). Pursuant to City Code Chapter 17-24, the applicant shall plant two 36-inch box Coastal Live Oak trees adjacent to the residential properties for 4061, 4065, 4069 and 4073 Calloway Drive and 4424 Streamside Drive. These replacement trees are in addition to the required tree mitigation approved by Planning Commission Resolution Nos. 11972-11976.

**Conclusion:** The construction activities associated with the Revised Project would be the same or similar to those described in the 2019 IS/MND and mitigation measures to protect biological resources would be implemented during construction of Revised Project with the exception of Mitigation Measure BIO-3 as described above. Implementation of the Revised Project will not result in new impacts or an increase in severity of impacts associated with biological resources.

#### **Sources**

- 2019 Initial Study/Mitigated Negative Declaration
- 2019 City of Santa Rosa, Email from Susie Murray, Senior Planner

# 3.5 Cultural Resources

As described in Section V of the 2019 IS/MND, there are no historical, archaeological, or paleontological resources or unique geological features known to exist on the Project site. Previous investigations conducted on the property did not encounter any historical, archaeological, or paleontological items. According to the Sacred Lands files search with the Native American Heritage Commission (NAHC) during preparation of 2019 IS/MND, the site is not located within or near a location where human remains are expected, and no formal cemeteries are located on or very near the site. Mitigation Measure CUL-01 which required procedures in the event of unintended discovery of human remains was implemented during Phase I and would continue to apply to the Revised Project.

The activities associated with construction and operation of the Revised Project would be the same or similar to the construction activities associated with construction of the residential units on Lots 2 and 3 analyzed in the 2019 IS/MND. Because the Revised Project is located within the same location analyzed in the 2019 IS/MND, the potential for historical, archeological, or paleontological remains is the same

under the Revised Project. Mitigation Measure CUL-01 would be implemented in the event of an unintended discovery during construction of the Revised Project.

**Conclusion:** The activities associated with the Revised Project would not alter the analysis or findings for cultural resources detailed in the 2019 IS/MND. The Revised Project occupies the same area identified, and construction activities required for the Revised Project would be the same or similar to those described in the 2019 IS/MND. The Revised Project would be subject to the same cultural resource procedures in the event of an unintended discovery. The Revised Project would not generate a new impact or an increase the severity of any previously identified cultural resource impact.

#### **Sources**

2019 Initial Study/Mitigated Negative Declaration

# 3.6 Energy

As described in Section VI of the 2019 IS/MND Project construction would consume energy over the course of 8 months. Electricity would be used to power tools, lighting, and electric machinery during construction. Operation of the self-storage facility, including the Revised Project, would consume electricity, and water. Electricity would be used for lighting, heating, and climate control of the storage units, and for operation of elevators. All lighting would be high-efficiency LED and set to occupancy sensors.

The Project, including the Revised Project, would be required to comply with the applicable measures identified in the CAP *New Construction Checklist* including policies related to energy efficiency as a standard condition of approval.

The Project, including the Revised Project, must comply with California requirements under Title 20 and Title 24 would require the Project to comply with state building energy requirements. These requirements are enforced during the City's permit approval and would reduce impacts on wasteful, inefficient, or unnecessary consumption of energy during operation of the Project.

Conclusion: The activities associated with the Revised Project would not alter the analysis or findings for energy detailed in the 2019 IS/MND. Construction activities of the Revised Project would be the same or similar to those described in the 2019 IS/MND. Operation of the Revised Project would be expected to be the same or similar to the energy requirements analyzed for the residential units evaluated in the 2019 IS/MND. Design of the Revised Project would be to comply with the same energy efficient building requirements identified in the 2019 IS/MND, including compliance with required the City's CAP. The Revised Project would not result in new impacts or an increase the severity of any previously identified energy resource impact.

#### Sources

- 2019 Initial Study/Mitigated Negative Declaration
- City of Santa Rosa, Climate Action Plan (CAP) Checklist for New Construction

# 3.7 Geology and Soils

As described in Section VII of the 2019 IS/MND, there are no known faults within the vicinity of the project site according to the Alquist-Priolo Earthquake Fault Zoning Maps. The nearest The nearest active fault is the Rodgers Fault located approximately 1.4 miles to the east of the Project site. he Project area is subject to seismic ground shaking in the event of an earthquake. The Project facilities, including the Revised Project would be designed and constructed in accordance with the seismic requirements of the California Building Code (Title 24) in effect at time of building permit issuance. The severity of ground shaking would not be expected to result in significant structural damage, and thus impacts to the Revised Project in the event of strong seismic ground shaking would be less than significant.

The Revised Project would be located at the same location as the residential units evaluated in the 2019 IS/MND and not located in an area known for liquefaction, subsidence, or lateral spreading. The risk of the Project resulting in substantial adverse effects related to ground failure is low.

**Conclusion:** Because the Revised Project would occur at the same location as the project analyzed in the 2019 IS/MND, no new impacts or increase in severity of impacts related to geology and soils would result from implementation of the Revised Project.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.8 Greenhouse Gases

As analyzed in Section VIII, the 2019 IS/MND, the Project, including the Revised Project, would not conflict with any plan adopted for the purposes of reducing emissions of greenhouse gases. The Revised Project would comply with the State of California Tier 1 CALGreen requirements and the City's CAP as demonstrated by the CAP New Development Checklist, included as Appendix E in the 2019 IS/MND. All mandatory requirements of the Santa Rosa's CAP New Development Checklist would be implemented during construction and operation of the Revised Project, except where the item is not applicable or where a suitable substitution is provided.

**Conclusion:** Because the Revised Project would be required to comply with the City's CAP and California's Tier 1 CALGreen requirements as described in the 2019 IS/MND, the Revised Project would not result in additional impacts associated with Greenhouse Gases. Therefore, no new impacts or significant increase in the severity of a previously identified greenhouse gas impacts would result from Revised Project. Similar to the Approved Project addressed in the 2019 IS/MND, impacts associated with greenhouse gases remain less than significant.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.9 Hazards and Hazardous Materials

Section IX of the 2019 IS/MND determined that a search of the Project site and vicinity using the DTSC EnviroStor database and the SWRCB GeoTracker database did not identify any hazardous materials

spills, cleanup or permitted users within one mile of the site. The Revised Project is located within the same boundaries of the Project analyzed in the 2019 IS/MND which concluded that there are no schools within ¼ miles of the Project area and the Project is not located within two miles of an airport or airstrip.

Because the Revised Project is located within an area identified as a wildfire risk in the 2019 IS/MND, Mitigation Measures HAZ-03 would be required to be implemented as described in the 2019 IS/MND.

The location of the Revised Project on Lots 2 and 3 would be the same as the residential units analyzed in the 2019 IS/MND and will not interfere with any adopted emergency plan or evacuation plan. The site development plan includes emergency access to the site including onsite access to accommodate emergency vehicles with adequate roadway width and turning radii.

Construction of the Revised Project will include the use of use of certain materials such as fuels, oils, solvents, and glues that in large quantities could pose a potential hazard to the public or environment if improperly used or inadvertently released. Inadvertent release or foreseeable upset of large quantities of these materials into the environment could adversely impact soil, surface waters, or groundwater quality. The contractor will be required to follow manufacturer's recommendations on transportation of, use, storage, and disposal of chemical products used in construction. This direction will be included under the heading of General Notes on plan sets submitted for building or grading permits. If construction requires the storage of potentially hazardous materials, a declaration form will be filed with the Fire Marshall's office and a hazardous materials storage materials permit will be obtained. If the storage of hazardous materials occurs at the site, a Hazardous Materials Inventory Statement will be submitted to the City of Santa Rosa Fire Department for review.

**Conclusion:** Construction of the Revised Project will require the use of heavy equipment and use of fuels, oils, solvents, and lubricants as analyzed in the 2019 IS/MND. The materials used will be the same as those analyzed in the 2019 IS/MND and will be handled according to manufacturers' specifications and local, state, and federal regulations where applicable. The use of these materials during construction of the Revised Project will not result in new impacts or an increase in severity of impacts and the conclusions of the 2019 IS/MND will remain less than significant.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.10 Hydrology and Water Quality

The City of Santa Rosa is located within the Santa Rosa Creek watershed. The headwaters of Santa Rosa Creek is in the Mayacamas Mountains and ultimately drains to the Laguna de Santa Rosa and then to the Russian River. There are no ponds, streams, or other water features within the Project site.

Because the site will include disturbance to greater than one acre, the Project is subject to the Construction General Permit for Stormwater during Construction (2009-0009-DWQ). The Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of site-specific best management practices (BMPs) to capture construction-related sediment from leaving the site. Phase I of the Project has prepared a SWPPP that includes BMPs that will be installed during construction of the Revised Project on Lots 2 and 3.

Construction and operation of the Project has the potential to result in increased stormwater runoff that could degrade water quality. Stormwater runoff could contain sediment as well as oils, grease, and concrete that if not managed, could be discharged into surface waters. Construction of the Revised Project will result in the same or similar areas of impervious surface as analyzed in the 2019 IS/MND. The location of the self-storage facilities described in the Revised Project on Lots 2 and 3 are generally the same as the residential development analyzed in the 2019 IS/MND. Retention basins will be installed as described in Section X in the 2019 IS/MND. Because the area of impervious surface will be the same or similar to area analyzed in the 2019 IS/MND, the retention basins will provide adequate stormwater retention for the Revised Project.

Conclusion: Construction of the Revised Project will result in the same or similar disturbance related to grading and construction and will have the same or similar potential for discharge of stormwater. Because the Revised Project will be generally located where the residential units were proposed, construction of the Revised Project will result in the same or similar alterations to onsite drainage patterns. Construction of the Revised Project includes implementation of the City's LID Technical Manual as a standard condition of approval. The SWPPP developed for Phase I of the Project includes site specific BMPs applicable to the Revised Project. Retention basins that will be installed will provide adequate post-construction stormwater capture and infiltration. Because the Revised Project will be generally located in the same location as the residential units proposed under the Project, proposed changes as described under the Revised Project will not change the conclusions made in the 2019 IS/MND. Mitigation Measure HYDRO-01 will be implemented during construction of the Revised Project. Construction of the Revised Project will not result in new impacts or an increase in severity of impacts related to hydrology and water quality.

#### Sources:

• 2019 Initial Study/Mitigated Negative Declaration

# 3.11 Land Use and Planning

As described in Section XI of the 2019 IS/MND, the Project is located in the City of Santa Rosa along Sonoma Highway. The City of Santa Rosa General Plan identifies the site as Retail and Commercial Services. Properties to the north are designated as Retail and Commercial Services. Property to the east is designated as Low Density Residential (2-8 units per acre). The Revised Project involves construction of self-storage facilities generally in the same location as the residential units proposed and analyzed in the 2019 IS/MND. Construction and operation of the Revised Project is consistent with the City's General Plan designation.

As described in the 2019 IS/MND, Project location is not located in the Coastal Zone and there are no specific plans that apply to the Project area. The Project site is not located within a habitat conservation plan or priority conservation area, and all tree removal will be incompliance with the City's Tree Ordinance, City Code Chapter 17-24.

The project supports General Plan Policy OSC-B-2, which requires that alteration to slopes greater than 10 percent be minimized to the extent practicable and OSC-B-5, which requires a Hillside Development Permit for all new development and land subdivision on slopes greater than 10 percent. A Hillside

Development Permit was acquired prior to the construction of Phase I, and the includes the Revised Project.

**Conclusion:** Because the Revised Project occurs within the same location analyzed in the 2019 IS/MND, the Revised Project will not result in new impacts or increase in a severity of impacts on land use and planning.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.12 Mineral Resources

As described in Section XII in the 2019 IS/MND, the City of Santa Rosa General Plan and the California Department of Conservation, there are no mineral resources within the vicinity of the Project. There are no active mines within the vicinity of the Project (California Department of Conservation 2019).

**Conclusion:** The Revised Project is located in the same location involves the same or similar to the construction activities discussed in the 2019 IS/ND, and because the excavation work will be limited to the project site, no new impact or an increase in severity of impacts related to mineral resources will result from implementation of the Revised Project.

#### Sources:

• 2019 Initial Study/Mitigated Negative Declaration

# 3.13 Noise and Vibration

As described Section XIII in the 2019 IS/MND, the Project is located within a commercial and residential neighborhood in Santa Rosa, California. The Project, including the Revised Project is located adjacent to a single-family residential community, a hardware and lumber store, and Sonoma Highway. The current ambient noise environment is predominately associated with noise from Sonoma Highway and the adjacent hardware and lumber store. The Santa Rosa General Plan shows an acceptable noise exposure level of 60-65 day-night average sound level (Ldn) A-weighted decibel (dBA) for residential communities, and 70-75 Ldn dBA for commercial and industrial use.

Construction of the Revise Project will include the same or similar equipment as described in the 2019 IS/MND. As analyzed in the 2019 IS/MND, operation of the Project is not expected to increase noise levels above ambient levels. Pursuant to Figure 12-2 of the General Plan, the Project will be located within the 65-70 dBA noise contour, which is within acceptable levels established by the General Plan for the proposed self-storage facility and multi-family residential use. The City's Noise Ordinance identifies a conditionally acceptable exposure level up to 70 decibels (dB). Therefore, the proposed project will be sited in a noise environment that is consistent with the acceptable noise levels for commercial businesses and multi-family residential use under both the General Plan and the Noise Ordinance. The Revised Project includes operation of self-storage facilities similar to the facility analyzed in the 2019 IS/MND and determined not to have a significant impact on noise and vibration.

**Conclusion:** Because the Revised Project consists of construction activities similar to those discussed in the 2019 IS/ND, and because work will be limited to the project site and restricted to certain hours, no

new impacts or an increase in severity of impacts will result from implementation of the Revised Project. Operation of the Revised Project will be expected to produce the same noise as the residential units analyzed in the 2019 IS/MND. The Revised Project will not result in new impacts or an increase in severity of impacts on noise and vibration.

#### Sources:

• 2019 Initial Study/Mitigated Negative Declaration

# 3.14 Population and Housing

The workforce necessary to construct the Revised Project will be the same as the workforce necessary to construct the residential units under the Project analyzed in the 2019 IS/MND. Minimal new personnel will be hired to operate the new storage facility described under the Revised Project. Therefore, neither construction nor operation of the Project will result in any population growth in the area requiring the construction of housing. The Revised Project will be located within the same location as the residential units proposed under the Project, and therefore will not displace existing housing or people as analyzed in the 2019 IS/MND

**Conclusion:** Construction and operation of the Revised Project will not displace existing housing or require additional housing to be constructed. The Revised Project will not result in a new impacts or an increase in severity of a previously identified impact related to population and housing.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.15 Public Services

As described in the 2019 IS/MND, Project activities will not require new or altered facilities to maintain service ratios, response times, or performance objectives for fire protection. Because the Revised Project will be located in the same location as analyzed in the 2019 IS/MND, the Revised Project will be consistent with General Plan policy PSF-E-1 sets a 5-minute travel time for emergency response within the City. The Revised Project will not result in the introduction of residents, as analyzed in the 2019 IS/MND and will therefore not generate an increase in demand for schools, parks or other public services.

**Conclusion:** The Revised Project's demand on public services will be same or similar to the demands identified in the 2019 IS/MD. No new impact or increased severity in a previously identified impact on public services will occur. Similar to the Approved Project, the public service impacts associated with the Revised Project will be less than significant.

#### Sources:

• 2019 Initial Study/Mitigated Negative Declaration

# 3.16 Recreation

As analyzed in Section XVI of the 2019 IS/MND the Project will not result in an increase the use of parks or recreational facilities and will therefore not result in the physical deterioration of facilities or in

accelerated deterioration of recreation facilities in the vicinity of the proposed Project. Activities associated with the Revised Project will not change the location or crew size such that construction or expansion of parks or recreation facilities. Because the Revised Project no longer includes construction of residential units, the Revised Project will not introduce new residents to the area.

**Conclusion:** Because the Revised Project will not result in an increase in population, no increase in the demand for park and recreation services will result from implementation of the Revised Project. No new impact or increased severity of a previously identified impact will occur. Similar to the Approved Project, there will be no impacts on recreation with implementation of the Revised Project.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.17 Traffic and Transportation

As described in Section XVII of the 2019 IS/MND, because the volume of traffic generated during construction will be nominal during peak periods due to the off-peak scheduling of construction work, the project is similarly expected to have a less-than-significant impact on traffic during the construction phase. The off-peak scheduling of construction work and materials deliveries will continue through the Revised Project, construction impacts related to construction of the Revised Project will remain less than significant.

The 2019 IS/MND analyzed traffic and vehicle trips related to the residential development proposed as part of the Project. At the time of the 2019 IS/MND, the City had not yet adopted a policy regarding vehicle miles traveled (VMT) so the project's contribution was estimated for informational purposes. As shown in Table XVI-2 in Section XVI of the 2019 IS/MND, the calculated VMT for the residential units was estimated to be approximately 478.4 miles. The self-storage facility was calculated at 22.7 miles daily VMT. The Revised Project includes construction of new self-storage facilities with similar capacity as the self-storage facility analyzed in the 2019 IS/MND. It can be concluded that the estimated VMT will be the same or similar to the VMT calculated for the self-storage facility and significantly less than the VMT calculated for the residential units.

**Conclusion:** The Revised Project's construction traffic volumes will be short-term will be the same as calculated for construction in the 2019 IS/MND. VMT for the Revised Project will be the same or similar to the estimations provided in the 2019 IS/MND. No new impact or increased severity in a previously identified impact on traffic and transportation will occur. Similar to the Approved Project, the traffic and transportation impacts associated with the Revised Project are less than significant.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.18 Tribal Cultural Resources

As described in Section XVII in the 2019 IS/MND, Northwest Information Center and Sacred Lands file search did not reveal any known historical resources eligible for listing on the California Register of Historical Resources or in any local register. The Revised Project is generally located in the same location

on Lots 2 and 3 that were evaluated for tribal cultural resources. Mitigation Measure TRI-01 will be implemented during construction of the Revised Project.

**Conclusion:** The Revised Project will occur at the same location and will have no greater potential to cause impacts to known or unknown tribal cultural resources. With the implementation of Mitigation Measure TRI-01, the Revised Project will not result in new or in an increase in severity of impacts on tribal cultural resources. The Revised Project activities are similar to those for the Project previously analyzed in the adopted IS/ND and impacts on Tribal Cultural Resources will be less than significant.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.19 Utilities and Service Systems

As described in Section XIX in the 2019 IS/MND, new storm water infrastructure will be installed as part of the approved Project will include measures to capture increased storm water resulting from development and increased impervious surfaces. The Revised Project will result in the same area of new impervious surface as described and analyzed in the 2019 IS/MND. The Revised Project will be required to comply with the City's Stormwater Ordinance set forth in Municipal Code Chapter 17-12 which established standard requirements and controls over the City's stormwater drainage system. All new development is required to adhere to the Ordinance.

Because the Revised Project does not include residential units, it will not require more potable water or generate more solid waste than what was analyzed in the 2019 IS/MND and determined to be less than significant.

**Conclusion:** Because the Revised Project includes the same area of impervious surface and will not require additional potable water or solid waste disposal services, the Revised Project will not result in new or in an increase in severity of impacts related to utilities and service systems. Similar to the Approved Project, the utility and service system impacts associated with the Revised Project will be less than significant.

#### Sources:

2019 Initial Study/Mitigated Negative Declaration

# 3.20 Wildfire

As analyzed in the 2019 IS/MND the Approved Project is located within an area susceptible to wildland fires with expansive areas of chaparral, woodland, grassland, and scrub vegetation communities as well as steep slopes, and climatic conditions. The 2019 IS/MND determined that, in the event of a wildfire, the Approved Project will not be expected to substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts will be less than significant. The Approved Project will not require the installation of infrastructure that may exacerbate fire risk and that impacts associated with exposing people or structures to significant risks of down slope or downstream flooding was less-than significant.

**Conclusion**: Because the Revised Project will be located in the same location as the Approved Project and will include the same or similar activities analyzed in the 2019 IS/MND, implementation of the Revised Project will not result in new impacts or an increase in severity of impacts associated with wildfires. Similar to the Approved Project, wildfire related impacts associated with the Revised Project will be less than significant.

#### Sources:

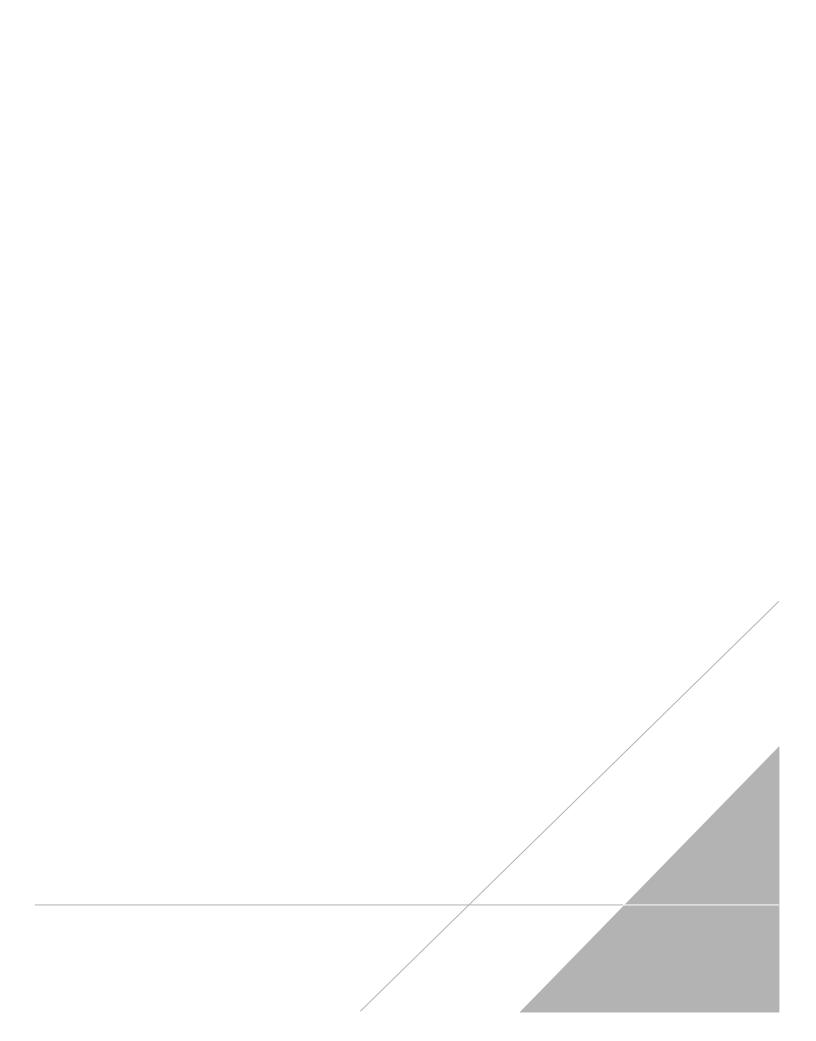
• 2019 Initial Study/Mitigated Negative Declaration

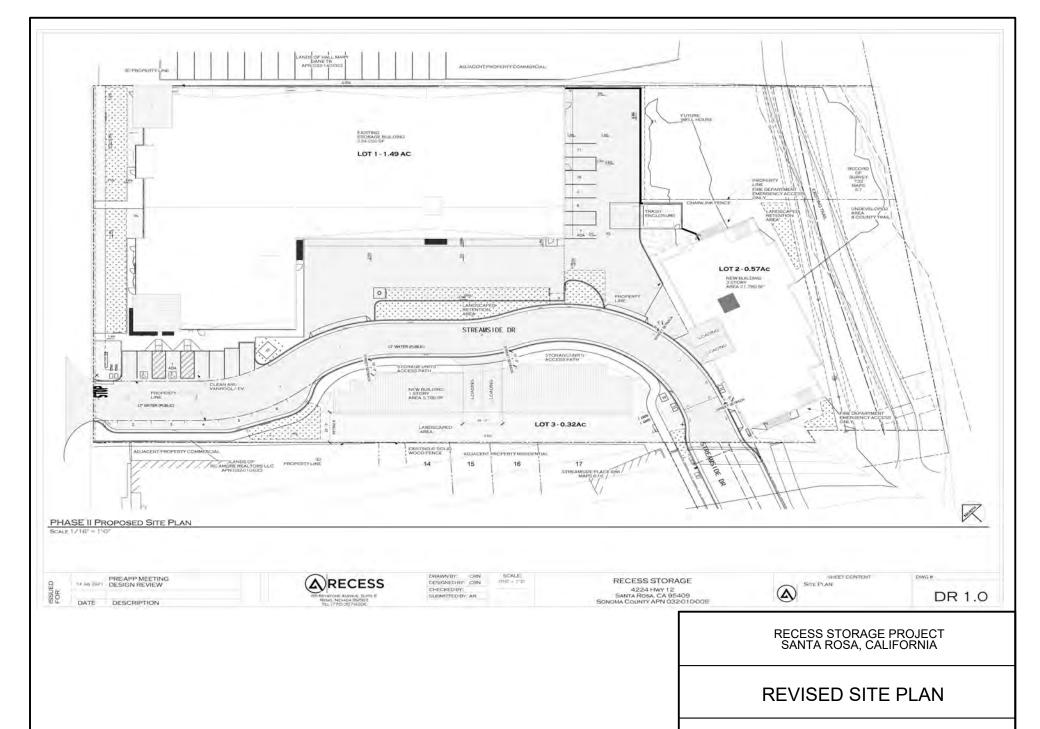
# 4 ENVIRONMENTAL FINDINGS

The 2019 IS/ND adopted for the Approved Project was supported by detailed air quality, biological resources, cultural resources, GHG, hydrology and water quality, hazardous materials, and traffic analyses. The IS/ND underwent required public review and comment on July 2, 2019, for a 30-day comment period ending on August 2, 2019. Compliance with the City's conditions of approval will apply to Revised Project and will reasonably ensure that the Revised Project is constructed and operated in a safe and effective manner.

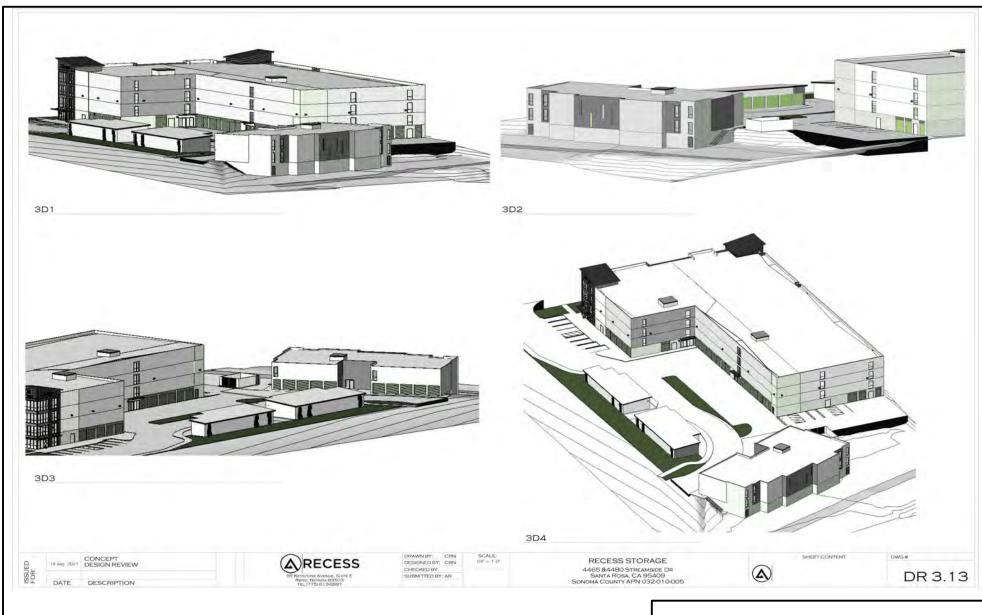
As described in Section 2 of this Addendum, the Revised Project includes construction of new self-storage facilities instead of 14 residential units that were included in the Approved Project. No new plans, policies, or regulations that will result in new significant environmental impacts or an increase in the severity of environmental impacts were identified. Because the Revised Project will occur at the same location as the Approved Project analyzed in the adopted 2019 IS/ND, there have been no significant changes in circumstances that would involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects. None of the "new information" conditions listed in CEQA Guidelines Section 15162[a][3] are presented here to trigger the need for a subsequent MND.

CEQA Guidelines Section 15164 states that "An addendum to an adopted ND may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or ND have occurred." An addendum is appropriate for the Revised Project because, as explained above, construction of the Revised Project is substantially similar to the construction and operation of the Approved Project analyzed in the adopted 2019 IS/MND., is of limited scale and duration, and would not result in a new significant impact or increase the severity of a previously identified impact. As such, the Revised Project does not entail project changes warranting the preparation of a subsequent EIR or ND.









Conceptual Campus View



FIGURE

3



Revised Project Landscaping Plan



**FIGURE** 

1



Conceptual View from Multi-use Path Before Restoration-Looking West



**FIGURE** 

5



Conceptual View from Multi-use Path After Restoration-Looking West





Conceptual View from Multi-use Path Before Restoration-*Looking East* 





Conceptual View from Multi-use Path After Restoration- *Looking East* 



# **APPENDIX A** 2019 Initial Study/Mitigated Negative Declaration

