

3150 DUTTON AVENUE DEVELOPMENT PROJECT

Addendum to an Adopted Mitigated Negative Declaration

Prepared for
City of Santa Rosa

March 2025



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3150 DUTTON AVENUE INDUSTRIAL PROJECT

Addendum to an Initial Study/Mitigated Negative Declaration

Introduction and Background

The proposed action is the approval of a General Plan Amendment and rezone to allow for the development of industrial uses on a 6-acre site located at 3150 Dutton Avenue in the City of Santa Rosa. The site is identified by Assessor's Parcel Number (APN) 043-133-013. The project involves a General Plan Amendment (GPAM) to change the land use designation from Medium Density Residential (8-18 units/acre) to General Industry, facilitating the development of industrial facilities.

As part of the City's long-term land use planning efforts, a separate land use change is included in the General Plan 2050 Update to ensure compliance with No Net Loss requirements (Government Code Section 65863). This change will accommodate the required residential density elsewhere in the city, maintaining adequate housing sites consistent with the 2023-2031 Housing Element. This land use change is independent of the proposed project and is being addressed through the City's broader General Plan Update process.

Location and Site Characteristics

The project site is located in the City of Santa Rosa within Sonoma County and spans approximately 6 acres. The property is currently vacant but has an approved plan for an 86-unit affordable housing project. The approved residential project included a mix of one, two, and three-bedroom units, along with associated on-site amenities. Surrounding land uses include commercial, warehouse, and industrial uses to the north, south, and west, while residential uses are located to the east, separated from the site by the Sonoma-Marín Area Rail Transit (SMART) tracks. The site is currently zoned as Medium Density Residential, and the existing General Plan designation is also Medium Density Residential.

Proposed Entitlements

General Plan Amendment and Zoning Change

The proposed application includes the development and operation of warehouse industrial facility at the project site that would be within the range of allowable uses, facility size, and operational density for the General Industry general plan land use designation for the project site, in

conformance with the proposed General Plan Amendment. The proposed zoning change would be to IG (General Industrial). For this analysis, an illustrative development (“proposed project”) is provided to assist in conceptualizing development of a facility consistent with the general plan land use and zoning designations intended for the site. The proposed project would be a high box warehouse industrial facility that would have a maximum height of 55 feet. To provide for the required setbacks for the project site, the proposed project would have a maximum square footage of approximately 99,800 square feet.

The proposed project would provide at least 143 vehicle parking spaces in compliance with the City’s Parking and Loading Standards (§20-36.040) for Industrial land uses, which requires 1 vehicle space for each 700 square feet, or as determined by a conditional use permit). At least five of the proposed vehicle spaces would be disabled spaces, in compliance with City Code §20-36.060. Additionally, at least 15 bicycle parking spaces would be included.

Potential uses of the proposed project could include various industrial activities allowed within the General Industrial zone, such as manufacturing, processing, and wholesale distribution. Specific uses may range from artisan manufacturing to community care facilities or broadcasting studios, depending on market demand and future ownership decisions. The uses would be those that do not require a conditional use permit (CUP) or minor conditional use permit (MUP), and that are not subject to specific use regulations or requirements. Potential uses of the proposed project could include the following:

INDUSTRY, MANUFACTURING & PROCESSING, WHOLESALING

- Artisan/craft product manufacturing
- Brewery – Production
- Cannabis – Testing Laboratory
- Community Care Facilities – 6 or fewer clients
- Laundry, dry cleaning plant
- Printing and publishing
- Winery – Boutique
- Winery – Production

RECREATION, EDUCATION, & PUBLIC ASSEMBLY USES

- Commercial recreation facility - Indoor

RETAIL TRADE

- Accessory retail uses

SERVICES – General

- Catering service
- Maintenance – Client site services

TRANSPORTATION, COMMUNICATIONS & INFRASTRUCTURE

- Broadcasting studio

Project Construction

For the purpose of this analysis development of the Project would be anticipated to take approximately 320 construction workdays and would be completed in a single construction phase. Construction is expected to occur over an 18-month period, with the exact start date to be determined by the future property owner.

Regulatory Context

City of Santa Rosa General Plan 2035

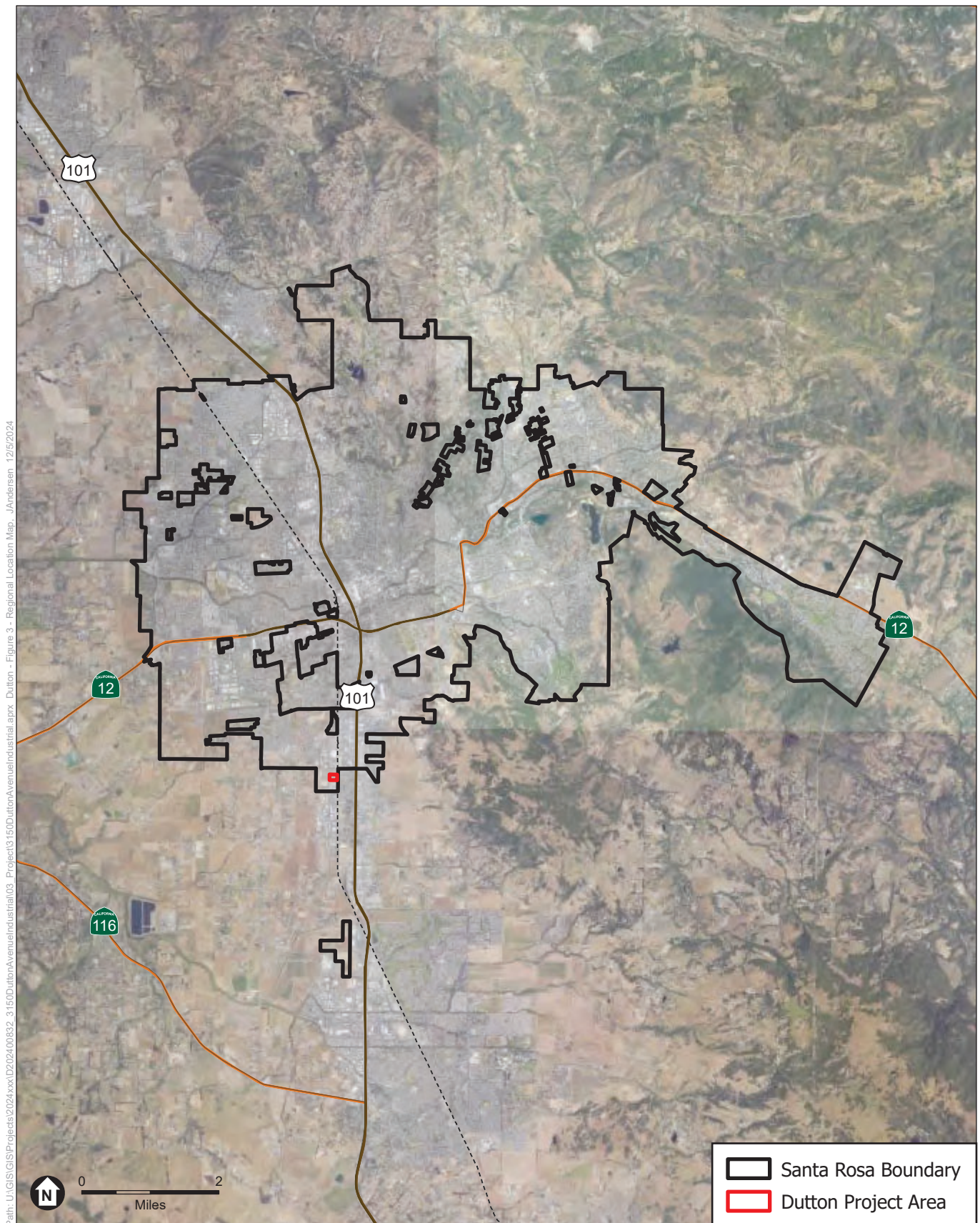
The project site is governed by the City of Santa Rosa General Plan 2035, which was adopted by the City on November 3, 2009, and updated in October of 2020. The primary purpose of the General Plan is to address issues related to physical development, growth management, transportation services, public facilities, community design, energy efficiency, greenhouse gas reduction strategies, and conservation of resources in the Planning Area.¹ The City of Santa Rosa prepared an Environmental Impact Report for the Santa Rosa General Plan 2035. The Santa Rosa General Plan 2035 EIR (2035 GP EIR) evaluated the physical environmental effects of development pursuant to implementation or buildout of the Santa Rosa General Plan 2035. The 2035 GP EIR identified five impacts from implementation of the General Plan as being significant and unavoidable, including increased traffic volumes and delay (Impact C-1), increased motor vehicle traffic on Highway 101 (Impact C-6), conflict with implementation of the Bay Area Ozone Strategy resulting from increased population and VMT (Impact D-1), conflict with goals for reducing greenhouse gas emissions or the generation of greenhouse gas emissions (Impact D-5), and cumulatively significant inconsistency with the 2005 Bay Area Ozone Strategy (Impact D-6). All other potential impacts were determined to result in no impact, less than significant impacts, or less than significant impacts with implementation of mitigation.

2018 Dutton Avenue Development Project IS/MND

The Dutton Avenue Development Project Initial Study/Mitigated Negative Declaration, approved in 2018 by the City of Santa Rosa, includes an analysis of the potential environmental impacts which could result from implementation of the Dutton Avenue Development Project. The approved 3150 Dutton Avenue development includes a multi-family residential community consisting of 107 apartment units. The apartments include 33 one-bedroom, 64 two-bedroom, and 10 three-bedroom units within five buildings. Ancillary on-site uses consist of a leasing office/internet café, club house, community kitchen, wine storage, fitness center, outdoor recreation area including a swimming pool, BBQ area, fireplace, as well as bocce ball court and community garden.

The IS/MND determined that the project would not result in potentially significant impacts that cannot be mitigated to a level of non-significance. Mitigation was included to reduce potential impacts related to Noise and Transportation.

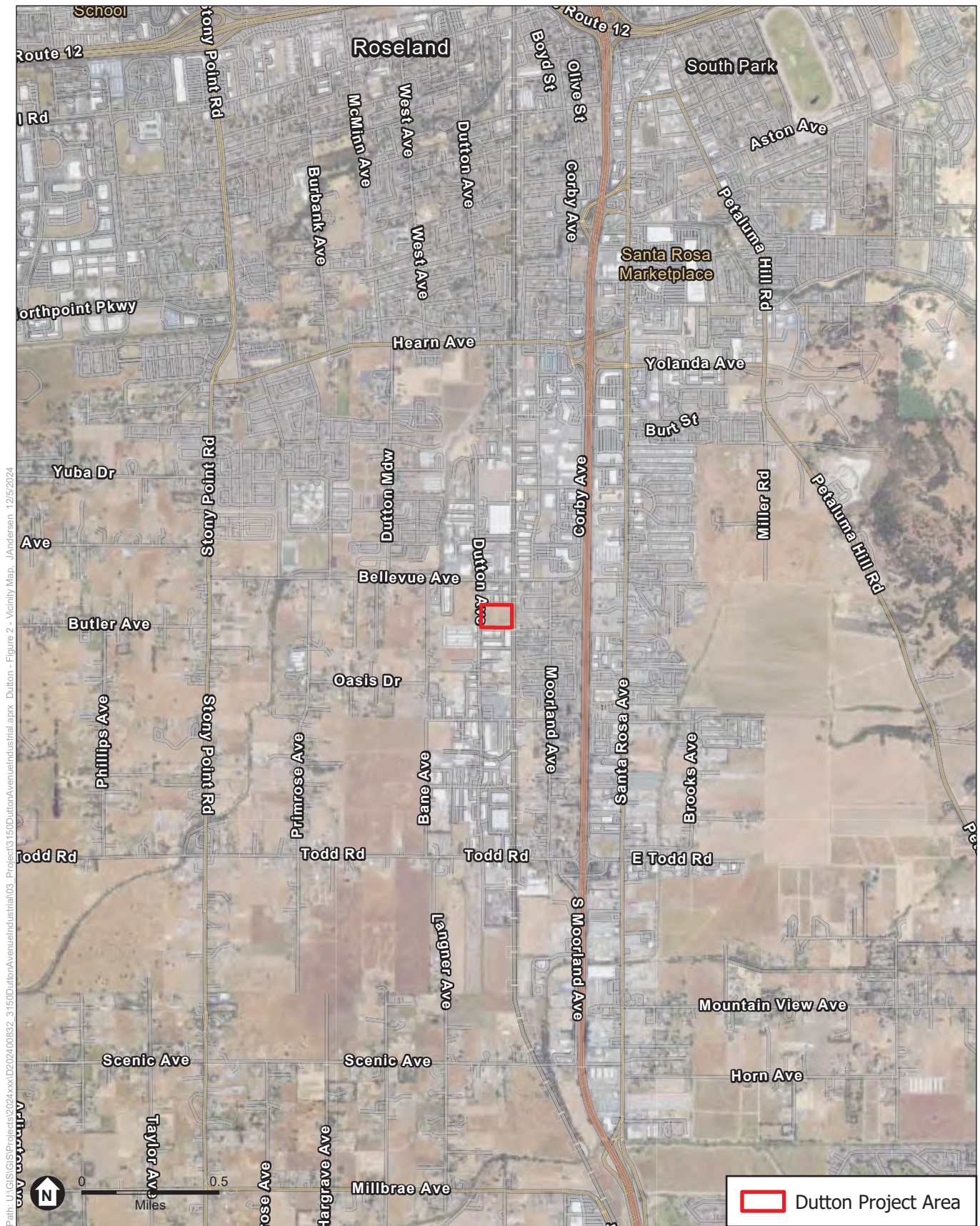
¹ City of Santa Rosa, 2020, *Santa Rosa General Plan*; 1 Introduction. Page 1-3.



SOURCE: USDA 2023; City of Santa Rosa 2024; ESA, 2024

3150 Dutton Avenue

Figure 1
Regional Location Map



SOURCE: USDA 2023; City of Santa Rosa 2024; ESA, 2024

3150 Dutton Avenue

Figure 2
Vicinity Map



Path: U:\GIS\GISProjects\2024\001\202400832_3150DuttonAvenueIndustrial\03_Project\3150DuttonAvenueIndustrial.aprx Dutton - Figure 1 - Project Area Map_JAndersen 12/5/2024

SOURCE: USDA 2023; City of Santa Rosa 2024; ESA, 2024

3150 Dutton Avenue

Figure 3
Project Area Map

Environmental Review and Scope of Analysis

In the case of a discretionary approval by the City concerning changes to a project for which the City has previously adopted a negative declaration, as here, the City must determine whether, in light of the proposed changes to the project, the environmental analysis in the original 2018 Dutton Avenue Development IS/MND remains relevant because it retains some informational value, and, if so, whether further environmental review is required under the California Environmental Quality Act (CEQA). (Pub. Resources Code, section 21166.) The proposed project would introduce minor modifications to the previously approved development. The Dutton Avenue Development IS/MND is relevant, and the discussion below examines the issue of whether new impacts are present.

As described in CEQA Guidelines section 15164, a lead agency shall prepare an addendum to an adopted negative declaration if some changes or additions are necessary but none of the conditions identified in CEQA Guidelines section 15162 calling for the preparation of further environmental review have occurred. The standards for subsequent or supplemental environmental review are set forth in CEQA Guidelines section 15162, which provides that when an EIR has been certified or a negative declaration 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 MND 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 MND 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 MND was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or MND;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR or MND;
 - 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 or MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based on the analysis in this Addendum, the City has determined that the proposed project changes would not result in any new significant adverse impacts, nor an increase in the severity of significant adverse impacts previously identified in the 2018 IS/MND prepared for the Dutton Avenue Development. The proposed project would not require the adoption of any considerably different mitigation measures or alternatives. The analysis in this Addendum demonstrates that there would be no new or more severe impacts than previously evaluated and disclosed in the 2018 IS/MND. Therefore, this Addendum is the appropriate form of environmental review required under CEQA. This Addendum has been prepared to satisfy the requirements of CEQA Guidelines sections 15164 and 15162.

Differences in the potential impacts associated with the proposed project relative to those previously described in the 2018 IS/MND are discussed below. Each Environmental issue area is presented in the order in which it is presented in the 2018 IS/MND.

Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
1. AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:		
a) Have a substantial adverse effect on a scenic vista?	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No	No
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	No	No
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	No	No

Discussion

The Aesthetics section of the 2018 Dutton Avenue Development IS/MND described existing visual and aesthetic resources in the project site and evaluated potential impacts of project buildout.

The 2018 IS/MND analyzed the aesthetic impacts from development of the previously approved project. The City determined that implementation of the Dutton Avenue Development Project would not result in a substantial negative change to the visual character of the project area, degrade or displace a scenic vista or have an adverse effect on scenic resources, or create a new source of substantial light or glare. The previously approved project would adhere to uniformly applied development policies and standards set forth in the General Plan and the City of Santa Rosa Design Guidelines that are designed to protect views of important scenic resources, protect the existing visual character and quality of the City, and limit new sources of light and glare. Consequently, the effects of the 2018 project, as analyzed in the 2018 IS/MND, on scenic resources would be a less-than-significant impact.

Scenic Vistas and Scenic Resources

The proposed land use changes could involve the development of an industrial facility, which could include potential uses such as warehouses, manufacturing units, and distribution centers, aligning with the proposed General Plan amendment and zoning change from Medium Density Residential to General Industrial. The proposed project would not exceed height, massing, or floor-area-ratio limitations imposed by such designations. As described in the 2018 IS/MND, the project site is not located within a designated scenic corridor or scenic vista area and is not neighboring any scenic resources, including rock outcropping or historic buildings. The project site is also not located along a scenic highway. Therefore, the proposed project would have a less-than-significant impact on scenic vistas and resources.

Visual Character

As described above, development pursuant to the proposed land use changes would not exceed height, massing, or floor-area-ratio limitations imposed on the project site, nor would it conflict with applicable regulations governing scenic quality. Project development would adhere to the maximum height of 50 feet, with a floor-area ratio of 0.5, ensuring that the development remains consistent with the surrounding industrial context and complies with all relevant design guidelines. Further, as described in the 2018 IS/MND, the project site is located between the Oak Manor Industrial Park and another similar-sized industrial park, with vacant land and Storage Master Self Storage across Dutton Avenue to the west, and multi-family housing to the east. The project would be a similar development to the industrial uses to the north, south, and west of the project site and would not be inconsistent with the building design and aesthetic of other surrounding industrial uses. The proposed project would align with other industrial uses in the area and would be consistent with the proposed General Plan land use designation and zoning for the site. Given that the proposed project is subject to design review and must therefore demonstrate superior design, the proposed project would have a similarly less-than-significant impact on the existing visual character and quality of the site and its surroundings.

Light and Glare

The 2018 IS/MND assessed whether the approved project would result in a significant new source of light and glare within the project area, and did not identify any significant impacts related to adversely affecting day or nighttime views of the area. The proposed project would develop industrial uses onsite that would replace the existing vacant lot. The project would include new sources of light and glare, intended to provide visibility along walkways and driveways for safety purposes. Project elements would be designed to minimize release of fugitive light and effects on nighttime views in the project area, consistent with City design standards and General Plan Policy UD-A-5. The project would not create a new source of substantial light in the project area. Thus, project impacts related to nighttime light would be similarly less than significant.

The proposed project would not include reflective exterior surfaces which could be a source of glare. Building materials are anticipated to be non-reflective and designed to minimize potential glare. The selection of materials will prioritize durability and functionality typical of industrial developments, such as metal panels, concrete, or other non-glossy finishes. These materials will help ensure that the project does not introduce significant glare into the surrounding area. Thus, the proposed project would not be a new source of glare effects that would have a substantial impact on the project area. As was concluded for glare effects in the 2018 IS/MND, the proposed project would also have a less-than-significant impact related to glare effects.

Conclusion

Consequently, the proposed project would not have any new significant effects that were not discussed in the 2018 IS/MND or increase the severity of impacts discussed therein. The proposed project would not make feasible mitigation measures that were found to be infeasible in the 2018 IS/MND. Further, there are no mitigation measures that were not considered in the 2018 IS/MND, that would more substantially reduce the potential effects of the proposed project on

aesthetics, light, and glare. For these reasons, impacts related to aesthetics, light, and glare from the proposed project would not require further environmental review.

Agriculture and Forestry Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
2. AGRICULTURE AND FORESTRY RESOURCES— 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?	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No	No
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))?	No	No
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No	No
e) Involve other changes in the existing environment which, due to their location and nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No	No

Discussion

As was identified in the 2018 Dutton Avenue Development IS/MND, the project site does not contain soil designated as Important Farmland (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance). The site is not zoned for agricultural uses, and there are no Williamson Act contracts that affect the project site or would be affected by development and operation of the proposed project. No existing agricultural or timber-harvest uses are located on or in the vicinity of the project site. The 2035 General Plan does not identify any Agricultural land within the city limits or the Urban Growth Boundary (UGB). The project site is within the city limits, as is the surrounding lands.

The 2018 Dutton Avenue Development IS/MND concluded that impacts to agricultural and forestry resources resulting from the approved project would be less than significant, as they relate to the loss of important farmland or conflicts with any agricultural uses in the area. The proposed project would be consistent with these conclusions and would not introduce any new significant impacts related to the development or elimination of agricultural or forestry resources. The proposed project would have no impact on farmland or forestry resources.

Conclusion

Consequently, the proposed project would not have any significant effects that were not discussed in the 2018 IS/MND or increase the severity of impacts discussed therein. The proposed project would not make feasible mitigation measures that were found to be infeasible in the 2018 IS/MND. Further, there are no mitigation measures that were not considered in the 2018 IS/MND, that would more substantially reduce the potential effects of the proposed project on agriculture and forestry resources. For these reasons, impacts related to agriculture and forestry resources from the proposed project would not require further environmental review.

Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
3. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	No	No
a) Conflict with or obstruct implementation of the applicable air quality plan?	No	No
b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	No	No
c) Expose sensitive receptors to substantial pollutant concentrations?	No	No
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No	No

Discussion

The 2018 Dutton Avenue Development IS/MND concluded that development of the project site with residential uses would result in less-than-significant impacts related to air quality. Specifically, the project site is located within the San Francisco Bay Area Air Basin and is governed by the Bay Area Air Quality Management District (BAAQMD). The approved project would be consistent with the BAAQMD Clean Air Plan, as it is within the operational criteria pollutant screening size for residential development. The previously approved project would not expose the community to greater health risks stemming from exposure to air pollutants and would assist in reducing greenhouse gas emissions through its inclusion of green building design measures and the incorporation of all applicable Santa Rosa Climate Action Plan policies.

The 2018 IS/MND also determined that the project would not exceed construction-related impacts, nor would it expose sensitive receptors to substantial pollutant concentrations. It was concluded the previously approved project is unlikely to generate any sources of significant odors that would cause complaints from surrounding users. Furthermore, any potential use would be required to comply with all applicable City, state, and Federal regulations as part of standard permitting procedures.

Standard Conditions of Approval

Although the approved project would fall below the significance thresholds established by the BAAQMD, the IS/MND incorporated the following Standard Conditions of Approval (COA) to the project conditions to ensure compliance with Best Management Practices:

- **COA AQ-1:** All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day and/or toxic soil stabilizers shall be applied.

- **COA AQ-2:** All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- **COA AQ-3:** All visible mud or dirt tracked –out onto adjacent public roads shall be swept daily.
- **COA AQ-4:** All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- **COA AQ-5:** Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- **COA AQ-6:** Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- **COA AQ-7:** All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- **COA AQ-8:** A publicly visible sign shall be posted with the telephone number and contact information for the designated on-site construction manager available to receive and respond to dust complaints. This person shall report all complaints to the City of Santa Rosa and take immediate corrective action as soon as practical but not more than 48 hours after the complaint is received. The BAAQMD’s phone number shall also be visible to ensure compliance with applicable regulations.

No additional Standard Conditions of Approval or mitigation measures were required, and impacts to air quality were concluded to be less than significant. Impacts resulting from the proposed project are discussed below.

Short-Term Emissions

As was concluded for the previously approved project, the proposed project would not result in significant construction-related impacts nor expose sensitive receptors to substantial pollutant concentrations. The volume of construction trips and materials would be similar to what was originally proposed under the approved project. Additionally, the proposed project would comply with the construction Best Management Practices listed above to reduce potential air quality impacts from construction activities. No further mitigation measures or Standard Conditions of Approval would be required to reduce impacts, which would remain less than significant.

Long-Term Emissions

The proposed industrial project would not increase operational air quality impacts beyond those identified in the previously approved project. The residential project was determined to be consistent with the BAAQMD Clean Air Plan and would assist in the reduction of greenhouse gas emissions through the incorporation of green building design measures and Santa Rosa Climate Action Plan policies. The majority of project emissions from the approved project would be the result of mobile emissions from vehicle trips by residents of the approved project.

Similarly for the proposed industrial project, operational air emissions would be generated primarily through mobile emissions from automobile trips to and from the site. As determined by the ITE 11th Edition Trip Generation Manual, the proposed project would generate approximately 337 daily trips under industrial uses, significantly fewer than the 712 daily trips projected for the

previously approved residential use (2018 Project), as described in the 2018 IS/MND. As compared to the previously approved residential use, the proposed project would have a reduced operational impact due to the lower volume of vehicle trips. Therefore, the impact would remain less than significant.

Conclusion

The proposed project would not alter the impact conclusions for air quality relative to those discussed in the 2018 IS/MND. The changes introduced by the proposed project, along with any new circumstances relevant to it, would not result in new significant impacts compared to those discussed in the 2018 IS/MND. Furthermore, there is no new information of substantial importance showing that the proposed project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the 2018 IS/MND. Additionally, there is no new information of substantial importance showing (i) that 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 declined to adopt the mitigation measure or alternative or (ii) that mitigation measures or alternatives considerably different from those analyzed in the 2018 IS/MND would substantially reduce one or more significant effects, but the proponents decline to adopt the mitigation measure or alternative. For these reasons, impacts to air quality from the proposed project would not require further environmental review.

Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
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?	No	No
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?	No	No
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No	No
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?	No	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No	No
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?	No	No

Discussion

Sensitive Natural Communities

Biological baseline summaries, impact evaluations, a letter, and a Biological Resource Assessment were prepared for the previously approved project and utilized in the 2018 IS/MND analysis. According to these reports, the vegetation throughout the project site is almost exclusively non-native upland weeds and grasses with no other trees or any other significant woody vegetation onsite. No rare, endangered, or otherwise sensitive plant species were found onsite during any of the field surveys performed for the previously approved project. The site is heavily dominated by an assortment of common non-native annual grasses and weeds, with almost no remaining native vegetation. The analysis determined that no natural habitats or plant communities remain onsite, as the area supports a dense carpet of non-native grasses and weeds.

Project site conditions have not changed since the 2018 IS/MND analysis. The proposed project development footprint would be the same as the previously approved project resulting in the site being fully developed. As a result, there would be no new findings related to sensitive natural communities. The impact would remain less than significant under the proposed project.

Wetlands

The project site was surveyed for possible wetland conditions as part of the 2018 IS/MND analysis. The survey identified small wetland feature consisting of 0.037 acres of seasonally wet swale habitat, as determined by the Army Corps of Engineers to be “jurisdictional.” This wetland

feature was determined to provide almost no measurable wetland resource value and provide no suitable habitat for any regionally known listed species, plant, or wildlife. Given the absence of any significant biological resources present onsite, no related mitigation measures or formal wetland or sensitive species permitting were deemed necessary.

The existing wetland feature has not changed since the analysis for the previously approved project. As a result, the impact from the proposed project would be consistent with the conclusion of the 2018 IS/MND.

Special Status Species

The project site was previously surveyed for rare plant occurrences. As a result, no rare, endangered, or otherwise sensitive plant species were found onsite, and no such species have been historically reported at the project site by the California Native Plant Society (CNPS) or the California Natural Diversity Data Base (CNDDB). Further, the 2018 IS/MND concluded that the approved project would not result in “take” of the threatened California Tiger Salamander (CTS), as the site lacks potential breeding habitat and is isolated from areas known or suspected to support CTS. No other sensitive species were identified as having the potential to occur.

The proposed project would not result in any impacts to special status plant or animal species beyond what was previously determined for the approved project.

Native resident or migratory species

As described in the 2018 IS/MND, the project site and surrounding properties are without significant vegetative cover that would provide a natural habitat for native resident or migratory wildlife species. Additionally, the site is not located within an established wildlife corridor. However, the existing grasses on the site may provide minimal habitat value for ground-nesting bird species. Although this potential impact is not considered significant, the application of a Standard Condition of Approval (COA) requiring preconstruction surveys was concluded to address any potential impact on ground-nesting birds. The proposed project would be assumed to be subject to and comply with this COA, listed below, to reduce potential impacts to any native resident or migratory species consistent with General Plan Policy OSC-D-3.

Standard Conditions of Approval

Pre-construction surveys will be conducted no more than 14 days prior to the start of construction or ground disturbing activities if the activities occur during the nesting season (February 1 to August 15). These surveys will be repeated at 30-day intervals until construction has started. Active nests will be identified, located, and described and protective measures will be implemented. These protective measures will include the establishment of clearly delineated (i.e., Visi-barrier, orange construction fencing) exclusion zones around each nest site. The active nest sites within exclusion zones will be monitored on a weekly basis throughout the nesting season to identify any signs of disturbance or nest abandonment. The barriers will remain in place until the young have fledged and are foraging independently or until the nest is no longer active.

Conflict with Policies, Ordinances, or Adopted Plans

As was identified in the 2018 IS/MND, there are no trees on the project site. Similar to the previously approved project, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance or adopted conservation plans.

Conclusion

The proposed project would not alter the impacts to biological resources, relative to those discussed in the 2018 IS/MND. The changes introduced by the proposed project and/or new circumstances relevant to the project would not, when compared to the 2018 IS/MND, result in a new significant impact or substantially more severe impacts than those previously disclosed. In addition, there is no new information of substantial importance showing that the proposed project would have one or more significant effects not previously discussed, or that any previously examined significant effects would be substantially more severe than indicated in the 2018 IS/MND. Furthermore, there are no new mitigation measures beyond those identified in the 2018 IS/MND that would more substantially reduce the potential effects of the proposed project on biological resources, nor are there previously identified mitigation measures that were found to be infeasible in the 2018 IS/MND but are now feasible. For these reasons, impacts to biological resources from the proposed project would not require further environmental review.

Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
5. CULTURAL RESOURCES — Would the project:		
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	No	No
c) Disturb any human remains, including those interred outside of formal cemeteries?	No	No

Discussion

The 2018 Dutton Avenue Development IS/MND concluded that the previously approved residential project would have a less-than-significant impact related to cultural resources. To support this analysis, a Historical Resources Study by Origer & Associates was completed on March 6, 2017 to aid the IS/MND analysis. This study found no cultural resources identified onsite. Furthermore, any potential for the approved project to impact archaeological and cultural resources would be reduced through the application of Standard Conditions of Approval (COA) and Uniformly Applied Development Policies including CUL-1 addressing Archaeological Resources and CUL-1 addressing Human Remains. Impacts on cultural resources of the proposed industrial project are discussed below.

Historical Resources

As described above, a Historical Resources Study prepared for the previously approved project revealed that no historical resources exist on the project site. The study indicated that lands within the vicinity of the project site had been previously surveyed and that no identified historical resources were likely to extend into the project area. There were no reported ethnographic sites within a quarter mile of the study area, and none of the isolated artifacts discovered would constitute historical resources. As the proposed project has not been modified since the Historical Resources Study was performed, the impacts related to historical resources would be consistent with what was previously analyzed. The proposed project would not affect any existing historical resources, and the impact would be less than significant.

Archaeological Resources and Human Remains

The 2018 IS/MND determined that there would be a possibility for the presence of buried archaeological deposits at the project site, and accidental discovery could occur as a result of construction activities. However, to mitigate this risk, as well as the possibility of discovering human remains, the IS/MND included the application of uniformly applied development policies through Standard Conditions of Approval. These conditions were designed to address the potential for encountering archaeological resources or human remains during construction, ensuring that any such discoveries would be managed in compliance with applicable regulations and cultural resource protection protocols.

The proposed project would encounter the same potential for accidental discovery as the approved residential project, and would therefore adhere to the actions pursuant to implementation of General Plan policies HP-A-2, HP-A-3, and HP-A-5, as listed below:

CUL-1 Archaeological Resources

If archaeological remains are uncovered, work at the place of discovery should be halted immediately until a qualified archaeologist can evaluate the finds. Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).

CUL-2 Human Remains

If human remains are encountered, all activities in the immediate vicinity of the find and with an adequate buffer zone will be halted and, in accordance with California Health and Safety Code Section 7050.5, the County Coroner will be notified and permitted to assess the remains. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a reasonable timeframe. Subsequently, the Native American Heritage Commission shall identify the “most likely descendant.” The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Compliance with these development policies would ensure that any encountered materials or remains are handled appropriately, resulting in a less-than-significant impact to these resources.

Conclusion

The proposed project would not alter the impacts to cultural resources relative to those discussed in the 2018 IS/MND. Changes introduced by the proposed project and/or new circumstances relevant to the project would not, as compared to the 2018 IS/MND result in a new significant impact or significant impacts that are substantially more severe than significant impacts previously disclosed. In addition, there is no new information of substantial importance showing that the proposed project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the 2018 IS/MND. Further, there are no new mitigation measures beyond those identified in the 2018 IS/MND that would more substantially reduce the potential effects of the proposed project on cultural resources or mitigation measures that were previously found to be infeasible in the 2018 IS/MND but are now feasible. For these reasons, impacts to cultural resources from the proposed project would not require further environmental review.

Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
6. ENERGY— Would the project:		
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	No	No
i) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No	No

Discussion

Since the adoption of the 2018 IS/MND, the CEQA Guidelines have been updated to include Energy as a separate impact category. This section evaluates the proposed project's potential impacts related to energy consumption, including compliance with applicable energy efficiency standards and policies. While energy use was not previously analyzed as a standalone topic, the proposed project is assessed here in the context of its overall energy demand compared to the originally approved residential development.

The proposed project would result in lower overall energy consumption compared to the previously approved 107-unit residential development. Industrial uses, while requiring energy for equipment, lighting, and operational needs, generally consume less energy per square foot than residential developments, which have continuous HVAC demand, water heating, refrigeration, and numerous household appliances operating across multiple units. The previously approved residential project would have generated substantial energy use from 24/7 lighting in residential common areas, individual unit energy consumption (appliances, HVAC, electronic devices), and domestic hot water demand for 107 units. In contrast, the proposed industrial facility would have predictable and controlled operational hours, limiting energy use primarily to business hours and reducing overall electricity demand. Additionally, industrial buildings are typically designed for efficient energy use, with higher insulation standards, energy-efficient LED lighting, and lower residential-grade HVAC needs compared to multi-unit residential buildings.

The proposed project would comply with all State energy efficiency regulations under Title 24 of the California Building Standards Code, which sets energy efficiency requirements for non-residential buildings. Additionally, the project would adhere to the City of Santa Rosa Climate Action Plan (CAP), which outlines energy reduction goals and requires compliance with CALGreen standards, rooftop solar-readiness, and EV charging station infrastructure where applicable.

Santa Rosa's Climate Action Plan (CAP) includes policies aimed at reducing community-wide energy consumption and greenhouse gas emissions. The project would align with the CAP's objectives, particularly:

- Measure 1.1: Reduce building energy use through efficiency and renewable energy.
- Measure 1.3: Expand access to EV infrastructure and clean energy in industrial development.

- Measure 2.2: Promote energy-efficient building operations (City of Santa Rosa, 2020).

By adhering to CALGreen, Title 24, and Santa Rosa CAP requirements, the project would ensure efficient energy use, incorporate best management practices for industrial operations, and reduce energy demand compared to the previous residential project. As a result, impacts related to energy use would remain less than significant.

Conclusion

By adhering to CALGreen, Title 24, and Santa Rosa CAP requirements, the project would ensure efficient energy use, incorporate best management practices for industrial operations, and reduce energy demand compared to the previous residential project. As a result, the proposed project would result in a less-than-significant impact related to energy use. While not specifically addressed in the 2018 IS/MND, conditions under which the preparation of a subsequent EIR or Negative Declaration pursuant to Section 15162(a) of the CEQA Guidelines have not occurred with respect to energy use. For these reasons, impacts related to energy from the proposed project would not require further environmental review.

Geology and Soils

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
7. GEOLOGY AND SOILS— Would the project:		
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	No	No
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	No	No
ii) Strong seismic ground shaking?	No	No
iii) Seismic-related ground failure, including liquefaction?	No	No
iv) Landslides?	No	No
b) Result in substantial soil erosion or the loss of topsoil?	No	No
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?	No	No
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	No	No
e) 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?	No	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No	No

Discussion

Seismic Hazards and Erosion

As described in the Geology and Soils section of the 2018 IS/MND, the City of Santa Rosa is subject to geological hazards related primarily to seismic events due to the presence of active faults. However, according to published geologic maps, there are no active faults in the vicinity of the project site, which significantly reduces the risk of fault rupture at the site.² Furthermore, any risk of soil expansion or other seismic hazards onsite would be addressed through the application of the Uniform Building Code, City Standards, and Title 24/California Code of Regulations in effect at the time of a building permit application.

Standard Conditions of Approval

The 2018 IS/MND concluded that Standard Conditions of Approval (COA) would be applied to the approved project at the time of Building permit issuance. The Standard Conditions of Approval are as follows:

² California Geological Survey, 2015. Fault Activity Map of California. Available online: <https://maps.conservation.ca.gov/cgs/fam/>. Accessed September 2024.

- **COA GEO-1:** All structures shall be designed in accordance with California Building Code (CBC) and any local amendments thereto in place at the time of building permit submittal.
- **COA GEO-2:** All recommendations of the preliminary geologic investigation prepared for the project prior to the issuance of building and grading permits shall be incorporated into the project design.
- **COA GEO-3:** The Project Civil Engineer shall design the site drainage to collect surface water into storm drain systems and discharge water at appropriate locations. Erosion control measures during and after construction shall conform to the most recent version of Erosion and Sediment Control Field Manual prepared by the North Coast Regional Water Quality Control Board.

The current geologic context of the project site remains consistent with those assessed in the 2018 IS/MND. The proposed project would have a similar development footprint and level of ground disturbance to those previously analyzed, which would be subject to the same or more advanced regulatory framework that addresses earthquake safety issues. The proposed project site is not located within an Alquist-Priolo Earthquake Fault Zone, nor is it in the immediate vicinity of an active fault. Additionally, the project site is not located within a State Designated Seismic Hazard Zone for liquefaction.³ Therefore, implementation of the proposed project would similarly result in less-than-significant impacts related to geologic and seismic hazards. As a result, no new or substantially more severe significant impacts would occur, and no additional mitigation measures beyond those already identified are necessary.

Conclusion

The proposed project would not introduce new significant impacts related to fault rupture, seismic ground shaking, or liquefaction, nor would it exacerbate any previously identified impacts disclosed in the 2018 IS/MND. There are no new mitigation measures beyond those identified in the 2018 IS/MND that would more substantially reduce the potential effects of the proposed project on geology and soils or mitigation measures that were previously found to be infeasible in the 2018 IS/MND but are now feasible. For these reasons, impacts related to geology and soils from the proposed project would not require further environmental review.

³ California Geological Survey. Earthquake Zones of Required Investigation. Available online: <https://maps.conservation.ca.gov/EQZApp/app/>.

Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
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?	No	No
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No	No

Discussion

The 2018 Dutton Avenue Development IS/MND concluded that the development of the project site with residential uses would result in less-than-significant impacts related to greenhouse gas emissions (GHG). Specifically, the approved project would incorporate all mandatory Santa Rosa Climate Action Plan (SRCAP) measures that are applicable to residential projects. A total of 22 measures intended to reduce community-wide GHGs would be complied with as a result of approved project implementation. Additionally, the project was determined to be consistent with all applicable local plans, policies, and regulations and would not conflict with the provisions of AB 32, the SRCAP, the applicable air quality plan, or any other State or regional plan, policy, or regulation of an agency adopted for the purpose of reducing greenhouse gas emissions.

No mitigation was required for the approved residential project, as impacts were less than significant. Impacts resulting from the proposed project are discussed below.

Generation of Emissions and Conflict with Applicable Regulations

The proposed project would occur on the same project site as the approved project. Therefore, the project would be subject to the same regional and local regulations as was previously analyzed in the 2018 IS/MND. Specifically, the proposed project would adhere to SRCAP mandatory measures to reduce greenhouse gas emissions. As the project would introduce industrial uses in place of the previously analyzed residential use, the following mandatory measures would be applied:

Policy 1.1.1: Comply with CALGreen Tier 1 Standards

Policy 1.1.3: After 2020, all new development will utilize zero net electricity

Policy 1.4.2: Comply with the City's tree preservation ordinance

Policy 1.4.3: Provide public and private trees in compliance with the Zoning Code

Policy 1.5: Install new sidewalks and paving with high solar reflectivity materials

Policy 3.2.2: Improve non-vehicular network to promote walking, biking

Policy 3.6.1: Install calming features to improve pedestrian and bike experience

Policy 4.1.1: Implement the Bicycle and Pedestrian Master Plan

Policy 4.1.2: Install bicycle parking consistent with regulations

Policy 6.1.3: Increase diversion of construction waste

Policy 9.2.1: Minimize construction equipment idling time to 5 minutes or less

Policy 9.2.2: Maintain construction equipment per manufacturer's specifications

Policy 9.2.3: Limit greenhouse gas construction equipment emissions by using electrified equipment or alternative fuels

Like the approved project, the proposed project would be consistent with local plans, policies, and regulations and would not conflict with the provisions of AB 32, the City of Santa Rosa CAP, the applicable air quality plan, or any other State or regional plan, policy, or regulation of an agency adopted for the purpose of reducing greenhouse gas emissions.

The proposed project would result in decreased energy consumption during operation compared to the approved project. Potential uses of the proposed project could include industrial manufacturing, processing, and wholesaling uses such as a brewery or winery, recreation or education uses such as a commercial recreation facility, accessory retail uses, general services, or transportation, communications, and infrastructure uses such as a broadcasting studio. Each of these uses would involve a mix of truck and vehicle trips which would be substantially fewer than the number of daily vehicle trips that could be anticipated to occur from operation of the approved residential use, as described in Chapter 3, *Air Quality*. Additionally, there would be fewer emissions from electricity use during operations than would occur under the approved project. As the resulting mobile emissions for both the approved project and proposed project would constitute the majority of operational greenhouse gas emissions, impacts to greenhouse gas emissions from the proposed project would remain less than significant.

Conclusion

The proposed project would not alter the impact conclusions for greenhouse gas emissions relative to those discussed in the 2018 IS/MND. Changes introduced by the proposed project and/or new circumstances relevant to the proposed project would not, compared to the 2018 IS/MND, result in a new significant impact. In addition, there is no new information of substantial importance showing that the proposed project would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the 2018 IS/MND. There is no new information of substantial importance showing (i) that 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 declined to adopt the mitigation measure or alternative or (ii) that mitigation measures or alternatives considerably different from those analyzed in the 2018 IS/MND would substantially reduce one or more significant effects, but the proponents decline to adopt the mitigation measure or alternative. For

these reasons, impacts to greenhouse gas emissions from the proposed project would not require further environmental review.

Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
9. HAZARDS AND HAZARDOUS MATERIALS— Would the project:		
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No	No
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?	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No	No
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?	No	No
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 or excessive noise for people residing or working in the project area?	No	No
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No	No
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	No	No

Discussion

The 2018 IS/MND evaluated the potential for the previously approved project to result in adverse impacts associated with exposure of humans to hazards and hazardous materials from exposure to contaminated soil, contaminated groundwater, hazardous building materials, wildfire, or accidental release of hazardous substances.

Exposure to Hazardous Materials

As analyzed in the 2018 IS/MND for the previously approved Dutton Avenue Development Project, the project would be required to comply with relevant Fire and Building Codes, which would mitigate the risk of accidental release or upset involving the use or transport of hazardous materials. Additionally, according to the EnviroStor Database, the project site is not located on or near any Federal or State cleanup sites. The proposed industrial use would likely involve routine use and handling of hazardous materials typical of industrial activities. However, the types of hazardous materials that could be used in the array of potential industrial uses permitted without a Conditional Use Permit (CUP) would not be substantial and are regulated under stringent federal, state, and local regulations. Any uses that would involve a significant quantity of hazardous materials or pose a higher risk would require a CUP, which provides additional oversight and mitigation measures. Therefore, the impact would be less than significant.

Proximity to an Airport or School

Consistent with the previously approved project, the proposed industrial project would not result in hazardous emissions or handle acutely hazardous materials, substances, or waste within ¼ mile

of an existing or proposed school. The nearest school is Taylor Mountain Elementary School, located approximately 0.7 miles east of the project site. Additionally, the project site is located approximately 10.9 miles from the Charles M. Schultz Sonoma County Airport and is outside of the Airport Land Use planning area. The project site is not within the vicinity of a private airstrip.

Interference with Emergency Access

The 2018 IS/MND described that the City of Santa Rosa is under the County of Sonoma's jurisdiction for the Department of Emergency Services. The project site would be covered within the Division of Emergency Management in the Department of Emergency Services as the lead agency for the Sonoma Operational Area. While construction of the proposed project would not interfere with an adopted emergency response or evacuation plan, there may be brief and intermittent disruptions to traffic during construction at the site.

Standard Conditions of Approval

The proposed project would be assumed to be subject to and comply with the same Standard Conditions of Approval (COA) regarding Emergency Response and Traffic Control that were applied to the approved project. The applicable Standard Conditions of Approval are as follows:

The applicant shall adopt standard traffic control procedures to minimize traffic congestion and traffic hazards. As required, construction flagging and signage, use of plates, and other safety measures shall be in conformance with Caltrans 2014 Manual of Uniform Traffic Control Devices. Other measures shall include:

- **COA HAZ-1:** If temporary lane or street closures are required, the applicant shall contact emergency response providers (i.e., hospitals, police, fire, and ambulance) to determine if the streets impacted are considered primary routes.
- **COA HAZ-2:** Where construction necessitates lane or street closures along emergency response routes, the applicant shall recommend and obtain approval of alternate routes or other means from the affected service providers, at a minimum of one week prior to construction.
- **COA HAZ-3:** During construction, the applicant shall notify the service providers on a weekly basis of the timing, location, and duration of construction.
- **COA HAZ-4:** The applicant shall maintain pedestrian and vehicular access to public facilities, businesses, and residences along the street during commute hours and shall minimize the closure of pedestrian and vehicular access at other times. Peak commute hours are between 7:00 AM - 9:00 AM and 4:00 PM - 6:00 PM.

Exposure to Wildfire

The proposed project site is located within an urbanized industrial and residential area and is not within a designated urban wildland fire zone. As a result, the project would not expose people or structures to significant risks of loss, injury, or death due to wildland fires.

Conclusion

The proposed project would not introduce any significant effects beyond those discussed in the 2018 IS/MND, nor would it increase the severity of the impacts previously identified. Additionally, there are no new mitigation measures beyond those identified in the 2018 IS/MND

that would more substantially reduce the potential impacts related to hazards and hazardous materials. Similarly, there are no previously identified mitigation measures found to be infeasible in the 2018 IS/MND that have since become feasible. For these reasons, impacts related to hazards and hazardous materials from the proposed project would not require further environmental review.

Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
10. HYDROLOGY AND WATER QUALITY — Would the project:		
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	No	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:		
i) result in substantial erosion or siltation on- or off-site;		
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	No	No
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or		
iv) impede or redirect flood flows?		
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No	No

Discussion

Drainage

The 2018 IS/MND concluded that the previously approved residential project would alter onsite drainage by increasing the area of impervious surfaces. The resulting increase in runoff would be offset by incorporating Best Management Practices (BMPs) designed in accordance with the City of Santa Rosa and County of Sonoma Low Impact Development (LID) Technical Design Manual to achieve volume capture and treatment requirements which will control and minimize the potential for erosion, siltation, and flooding. Furthermore, the approved project was required to comply with all requirements of the latest edition of the City Standard Urban Storm Water Mitigation Plan Guidelines.

Standard Conditions of Approval

For the proposed industrial project, similar drainage concerns would arise, but the same BMPs and compliance with city standards would be employed. These measures would ensure that drainage impacts from the proposed project remain less than significant, just as they were for the previously approved residential project. The proposed project would be assumed to be subject to and comply with the same Standard Conditions of Approval (COA) as the 2018 IS/MND listed below:

- **COA HYD-1:** Developer's engineer shall comply with all requirements of the City Standard Storm Water Mitigation Plan Guidelines using Low Impact Development (LID) Best Management Practices (BMPs).
- **COA HYD-2:** Final Plans shall address the storm water quality and quantity along with a

maintenance agreement or comparable document to assure continuous maintenance of the source and treatment. The North Coast Regional Water Quality Control Board may approve alternative mitigation.

- **COA HYD-3:** Submit landscape and irrigation plans in conformance with the Water Efficient Landscape Ordinance adopted by the Santa Rosa City Council, Resolution No. 27518, on November 17, 2009. Plans shall be submitted with the Building Permit application. Submit the following with the above-mentioned plans: Maximum Applied Water Allowance and Hydrozone Table
- **COA HYD-4:** A Final Standard Urban Storm Water Mitigation Plan (SUSMP) using LID BMPs is to be included with the Building Permit application.
- **COA HYD-5:** Alternative approaches to mitigating storm water impacts may be approved by the North Coast Regional Water Quality Control Board.

The proposed project would be assumed to be subject to and comply with the same Standard Conditions of Approval listed above and would have adequate drainage facilities to serve the project site. Storm drainage from the site will be routed through LID features and conveyed to service connections to the City's stormwater drainage infrastructure, as was assumed for the approved project. Project design will include permeable surfaces, detention basins, and bioswales designed to capture, filter, and manage stormwater runoff. The proposed project would not result in more significant impacts to drainage than what was previously analyzed in the 2018 IS/MND.

Operational Water Quality

The 2018 Dutton Avenue Development IS/MND concluded that the approved project would result in a less-than-significant impact related to hydrology and water quality. The project was determined to be within the permit boundary of the National Pollution Discharge Elimination System (NPDES) MS4 Storm Water Permit, which regulates discharges into the watershed with the intent of reducing storm water pollution and protecting water quality. A Preliminary Storm Water Mitigation Plan (PSWMP) was developed for the project in compliance with the City's LID Manual. Implementation of the SWMP was determined to assure compliance with NPDES regulations. Although the approved project was concluded to have the potential to impact water quality, the application of uniformly applied development policies and standards set forth in the General Plan 2035, Standard Conditions of Approval, and measures found in the Standard Urban Stormwater Management Plan would reduce potential impacts to less than significant.

The proposed industrial project would develop the project site with impermeable surfaces in a manner similar to that anticipated for the residential development analyzed in the 2018 IS/MND. The proposed project would be subject to and implement all the regulatory requirements described in the 2018 IS/MND, which would minimize potentially adverse impacts from urban runoff. With conformance to City, regional, and statewide stormwater runoff requirements, such as the NPDES Program and the SUSMP, impacts to surface water from urban runoff resulting from the proposed project would be less than significant and would not require mitigation, consistent with the conclusion for the previously approved project.

Risk of Flooding

Based on the 2018 IS/MND, project site is not located within a designated flood zone and the previously approved project is not anticipated to expose people or structures to a significant risk

or loss, injury, or death involving flooding. The site is not subject to flooding from the failure of a levee or dam, nor is it expected to be impacted by inundation by seiche, tsunami, or mudflow. The previously approved project was determined to have no impact related to flooding.

The proposed project would similarly not affect existing or planned flood management facilities or operations and would not be constructed within a flood hazard zone. Therefore, the potential for the proposed project to exacerbate flood elevations or to be affected by flood conditions would be minimal, and the project would have no impact, consistent with the findings of the 2018 IS/MND.

Conclusion

The proposed project would not alter the impacts related to hydrology and water quality, relative to those discussed in the 2018 IS/MND. Changes introduced by the proposed project and/or new circumstances relevant to the project would not result in a new significant impact or substantially more severe impacts than significant impacts previously disclosed. In addition, there is no new information of substantial importance showing that the proposed project would have one or more significant effects not previously discussed, or that any previously examined significant effects would be substantially more severe than those identified in the 2018 IS/MND. Furthermore, no new mitigation measures beyond those identified in the 2018 IS/MND that would more effectively reduce the potential effects of the proposed project related to hydrology and water quality, nor are there mitigation measures previously found to be infeasible that are now feasible. For these reasons, impacts to hydrology and water quality from the proposed project would not require further environmental review.

Land Use and Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
11. LAND USE AND PLANNING — Would the project:		
a) Physically divide an established community?	No	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No	No

Discussion

Project Site

The six-acre project site is located within the Santa Rosa General Plan 2035 area. The site has remained vacant, and the physical conditions of both the project site and surrounding areas have remained substantially similar to those existing in the 2018 residential IS/MND. Land uses immediately surrounding the project site include residential and industrial uses.

The Santa Rosa General Plan 2035 land use designations for surrounding properties include Low Density Residential and Medium Low Density Residential to the east and Light Industry and General Industry to the north, south, and west.⁴

Land Use and Zoning Designations

The project site is currently designated as Medium Density Residential (8-18 units/acre) under the Santa Rosa General Plan 2035 and zoned as the Multi-Family Residential/18 units per acre (R-3-18).

As part of the proposed project, the General Plan land use designation would be amended to General Industry. Concurrently, a rezoning application would be submitted to reclassify the site's zoning to align with the new General Plan designation. The General Industry designation supports manufacturing and distribution activities, which may generate truck traffic that could operate 24 hours a day. However, the traffic generated from the proposed industrial project would be lower than that of the previously approved residential project. While accessory offices and retailing are allowed, unrelated retail and service commercial uses that could be located elsewhere in the city are not permitted.

Land Use Evaluation

This section evaluates the proposed project for compatibility with existing and planned adjacent land uses and for consistency with adopted plans, policies, and zoning designations. Physical

⁴ City of Santa Rosa, 2021. General Plan Land Use Diagram. December 14, 2021. Available online: <https://www.srcity.org/DocumentCenter/View/3094/General-Plan-Land-Use-Diagram-PDF-December-2021>. Accessed September 2024.

environmental impacts resulting from implementation of the proposed project are discussed in the applicable environmental resource sections in this Addendum.

Key considerations in the land use analysis include consistency with applicable plans adopted by the City or other agencies, as inconsistency could lead to unplanned growth or development, and compatibility with existing and planned development, as conflicts could result in environmental effects that warrant analysis.

As described above, the proposed project would include a General Plan land use designation and zoning amendment to General Industry. While this designation differs from the current General Plan 2035 designation, the site was originally designated for industrial uses in 2010. The presence of existing industrial facilities immediately north and south of the project site further supports the compatibility with the surrounding area. The proposed project would not physically divide an established community and would introduce a use consistent with existing development in the project area. Land use impacts would remain less than significant.

Conclusion

The proposed project is consistent with the allowable land uses and development intensities identified in the General Plan 2035 and zoning code for the project site. The proposed project does not conflict with surrounding industrial land uses and would not disrupt the existing or planned use of adjacent properties. The proposed project would not have significant land use effects that were not discussed in the 2018 IS/MND, nor would it increase the severity of land use impacts previously discussed. The proposed project would not introduce any feasible mitigation measures that were previously found to be infeasible in the 2018 IS/MND. No new mitigation measures have been identified that would more substantially reduce the potential effects of the proposed project on land use. As such, impacts related to land use from the proposed project would not require further environmental review.

Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>		<i>Any New Information of Substantial Importance?</i>	
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?		No		No
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?		No		No

Discussion

Loss of Mineral Resources

The 2018 IS/MND for the previously approved Dutton Avenue Development Project described that the project site does not contain any locally or regionally significant mineral resources. The approved project was determined not to create an adverse impact upon locally or regionally significant mineral resources since no such resources have been identified on the project site.

As the proposed project would occur on the previously analyzed project site, and no site conditions have changed since analysis of the approved project, there would be no new significant impacts related to regionally or locally important mineral resources.

The proposed project would not conflict with the availability of any locally important mineral resource recovery site, and the project would have no impact related to the loss of availability of any local mineral resource.

Conclusion

The proposed project would not have any significant effects that were not disclosed in the 2018 IS/MND, nor would it increase the severity of impacts discussed therein. There are no new mitigation measures beyond those identified in the 2018 IS/MND that would more substantially reduce the potential impacts. Furthermore, no mitigation measures previously found infeasible in the 2018 IS/MND are now feasible. For these reasons, impacts related to mineral resources from the proposed project would not require further environmental review.

Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
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?	No	No
b) Generation of excessive ground borne vibration or groundborne noise levels?	No	No
c) For a project located within the vicinity of a private airstrip or 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?	No	No

Discussion

The 2018 IS/MND identified less-than-significant impacts related to construction noise, noise from increased vehicle traffic, generation of excessive groundborne vibration or noise levels, and exposure to excessive noise levels from proximity to nearby industrial uses.

Construction Noise

The 2018 IS/MND concluded that there would be a less-than-significant impact related to excessive noise generated by construction equipment. The previously approved project also identified several policies from the Santa Rosa General Plan 2035, which would reduce the potential for excessive noise from construction activities to a less-than-significant impact. These policies include Policies NS-B-1 through NS-B-7, NS-B-9, -10, and -12 through -14, which focus on locating sensitive receptors away from substantial noise sources, considering land use compatibility, supporting essential land uses that may be substantial sources of noise, requiring acoustical studies for specific projects, and implementing noise reduction measures in site planning.

The proposed project would involve standard construction activities, with noise impacts similar to those assumed in the 2018 IS/MND. The project would use a combination of the construction equipment previously identified, including demolition of existing structures, grading, and site preparation. However, no extended grading, pile driving, or infrequently utilized construction methods are anticipated that would exceed the typical scope of construction phases analyzed in the 2018 IS/MND. Construction activities would be scheduled during normal construction hours (between 7:00 am and 7:00 pm) in compliance with the City's noise ordinance, ensuring that construction noise remains within acceptable limits. For these reasons, the proposed project would not result in substantial changes with respect to the circumstances under which the General Plan 2035 was undertaken. Therefore, the proposed project would not result in new or more severe significant construction noise impacts.

Operational Noise

The 2018 IS/MND concluded that there would be a less-than-significant noise impact related to the operation of development pursuant to the General Plan 2035, including noise from increased vehicle traffic and proximity to nearby industrial uses. Adherence to existing city codes and the General Plan 2035 policies listed above would minimize any negative operational noise effects.

The proposed project would involve industrial operations that generate noise primarily from vehicular traffic, equipment operation, and other typical industrial activities. Based on the characteristics of industrial land use and the surrounding environment, the operational noise impacts are expected to be less intrusive than those of a residential development. Industrial facilities typically generate more predictable and concentrated vehicle trips during regular business hours, minimizing the occurrence of late-night or early-morning traffic noise, which is common in residential areas. In contrast, residential developments often produce more varied and frequent vehicle movements at all hours, contributing to a continuous noise level that is more disruptive to surrounding areas.

Additionally, the proposed industrial use is more compatible with the existing noise environment, as the project site is surrounded by other industrial properties. The noise generated by the project would align with the surrounding uses, making it less likely to introduce disruptive new noise sources. Industrial facilities also typically employ noise mitigation measures, such as soundproofing, equipment enclosures, and strategic site layouts that contain noise within the facility. In contrast, residential developments tend to generate more continuous noise from outdoor activities, frequent vehicle movements, and HVAC systems. Overall, the industrial project is expected to integrate better into the existing noise environment, resulting in reduced overall noise impacts compared to residential development.

Considering these factors, the operational noise impacts from the proposed Dutton Avenue Industrial Project are anticipated to be less significant than those from a residential development. The controlled operational hours, targeted noise mitigation strategies, and compatibility with surrounding uses contribute to a noise environment that would be less intrusive and more manageable than the previously proposed residential development. Consequently, the change from residential to industrial use would result in a less-than-significant impact on operational noise, consistent with the findings of the 2018 IS/MND.

Groundborne Vibration

The 2018 IS/MND concluded that increased exposure to sources of groundborne vibration could occur through proximity to noise-generating activities. Implementation of the General Plan 2035 policies listed above would reduce the potential for substantial vibration at sensitive receptors to less than significant.

The proposed project would require standard construction activities that would not result in abnormal amounts of groundborne vibration. The vibration impacts from the proposed construction activities are not anticipated to differ significantly from those analyzed in the 2018 IS/MND. Therefore, the proposed project would not result in new or substantially more severe vibration impacts.

Conclusion

The introduction of the proposed project would not, as compared to the analysis of anticipated development within the 2018 IS/MND result in new significant impacts relating to noise and vibration or new significant impacts that are substantially more severe than those previously disclosed. Further, there are no mitigation measures beyond those identified in the 2018 IS/MND that would more substantially reduce the potential effects of the proposed project on noise or mitigation measures that were previously found to be infeasible in the 2018 IS/MND but are now feasible. For these reasons, impacts related to noise from the proposed project would not require further environmental review.

Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
14. POPULATION AND HOUSING — Would the project:		
a) Induce substantial unplanned 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)?	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No	No

Discussion

As analyzed in the Population and Housing section of the 2018 IS/MND, the previously approved residential project would have provided 107 new apartment units and upgraded existing infrastructure to comply with City regulations. Given the consistency of the approved project with the City's long-range planning documents, it was not considered growth-inducing. Additionally, because the site is currently vacant, the approved project was determined not to displace existing housing or require replacement housing elsewhere.

The proposed industrial project would have a reduced impact on population and housing compared to the previously analyzed residential use. No residents would be introduced to the project site as part of the proposed project. Instead, the industrial facility is expected to employ approximately 100 to 200 employees, depending on the final industrial use. No existing residents would be displaced, as the site is currently vacant. Additionally, the industrial uses onsite would not introduce unplanned population growth or result in significant population and housing impacts.

The project site at 3150 Dutton Avenue is designated in the 2023-2031 Housing Element as an 86-unit moderate-income RHNA site. Pursuant to Government Code Section 65863 (No Net Loss Law), jurisdictions must maintain adequate sites to accommodate their remaining unmet RHNA across all income categories throughout the planning period. While the 2023-2031 Housing Element demonstrates a 49% overall RHNA surplus, including a 25% surplus in the moderate-income category, a proposed land use change in the General Plan 2050 Update will increase residential density elsewhere in the City, adding more than 140 residential units to maintain compliance with No Net Loss requirements. The General Plan Amendment is scheduled for consideration by the Planning Commission and City Council in Spring 2025 and will ensure that additional housing units are made available within 180 days, as required by Government Code 65863.b(2).

Conclusion

The proposed project would not have any significant effects related to population and housing that were not discussed in the 2018 IS/MND, nor would it increase the severity of significant impacts discussed. For these reasons, impacts to population and housing from the proposed project would not require further environmental review.

Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
15. PUBLIC SERVICES —		
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:		
i) Fire protection?	No	No
ii) Police protection?	No	No
iii) Schools?	No	No
iv) Parks?	No	No
v) Other public facilities?	No	No

Discussion

The Public Services section of the 2018 Dutton Avenue Development IS/MND described existing public services for the project site. As the project site is located within the City of Santa Rosa, it was determined that the necessary public services would be provided. The IS/MND concluded that potential adverse impacts to public services from the previously approved project would be less than significant. Impacts of the proposed project are discussed below.

All Public Services

As described in the previously approved IS/MND, the project site is within the City of Santa Rosa Urban Growth Boundary and is thus eligible to receive all essential public services. Fire protection services would be provided by the City of Santa Rosa, and police protection services would be handled by the City's Police Department. Additionally, the site is located within the Bellevue School District. The IS/MND also identified several development impact fees required for any project development within Santa Rosa, including Capital Facilities, Water, Wastewater, Park and Recreation, Affordable Housing, and School impact fees. These fees are payable at the time of building permit issuance as a Standard Condition of Approval.

The proposed project would be consistent with the analysis of the previously approved project, as the site remains within the City's service boundary. However, the land use and zoning amendments would result in the presence of employees rather than residents onsite. This shift would reduce demand for public services, particularly for police and fire protection, as fewer employees would occupy the site compared to the residential population initially projected under the approved project. Additionally, the elimination of residents would remove the demand for school services, further reducing the impact on public infrastructure. The proposed project would be assumed to be subject to and comply with the same Standard Conditions of Approval requiring the payment of park development fees. As a result, the impact to public services would continue to be less than significant.

Conclusion

The proposed project would not introduce new or more severe impacts on public services compared to those discussed in the 2018 IS/MND. The proposed development would not necessitate the construction of new or unplanned facilities for fire, emergency medical response, schools, or police protection, which could lead to potentially significant environmental impacts. Additionally, no new significant impacts or substantially more severe impacts would arise due to changes introduced by the proposed project or new circumstances. Finally, no mitigation measures beyond those identified in the 2018 IS/MND are needed, as they remain sufficient to address the potential effects on public services. Therefore, impacts related to public services from the proposed project would not require further environmental review.

Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
16. RECREATION		
a) Would the project 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?	No	No
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No	No

Discussion

The Recreation section of the 2018 Dutton Avenue Development IS/MND concluded that the approved project would contribute to an overall increase in park and recreational demand. As a result, the project would be required to pay park development fees prior to City issuance of any building permits. Since development of the project site has been anticipated since 2008, and parks infrastructure to serve the proposed development was included in the General Plan 2035, the IS/MND determined that there would be sufficient park facilities to meet the project's demand. The payment of in-lieu park fees by the approved project was deemed adequate to offset the need for increased recreational facilities.

The proposed project, which involves industrial uses rather than residential development, would be consistent with the previous analysis regarding parks and recreational demand. As the project would propose industrial uses onsite rather than the previously analyzed residential use, there would be less demand for parks and recreational facilities resulting from project implementation. Therefore, the proposed project would not result in substantial adverse physical impacts related to the need for new or altered parks or recreational facilities.

Standard Conditions of Approval

As part of the project's compliance with City regulations, it will still be required to adhere to the Standard Conditions of Approval, ensuring that any minimal demand for recreational facilities is properly addressed. This condition, listed below, mandates the payment of park development fees to mitigate any potential impact, and as such, the impact would remain less than significant.

- **COA REC-1:** Evidence showing payment of any applicable park development fees will be provided prior to City issuance of any building permits.

Conclusion

As detailed above, the proposed project would not result in significant recreational impacts. Therefore, no new mitigation measures are required. Additionally, there is no new information of substantial importance indicating that the project would create new significant effects not previously discussed, or that any previously analyzed significant effects would be substantially more severe than those discussed in the 2018 IS/MND. Furthermore, no additional mitigation measures beyond those identified in the 2018 IS/MND are necessary to further reduce the

potential effects of the proposed project related to recreation. As a result, the impacts related to recreation from the proposed project would not require further environmental review.

Transportation and Circulation

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
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?	No	No
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No	No
d) Result in inadequate emergency access?	No	No

Discussion

Conflicts with Programs, Ordinances or Policies Addressing the Circulation System

Project Construction

The proposed project is anticipated to be completed over a period of approximately 18 months and would be anticipated to result in temporary construction traffic related to the transportation of workers, equipment, and materials to and from the project site. The project site is generally flat and would not require the import or export of substantial amounts of fill or excavated materials. Thus, project construction would not include any activities or features that would be substantially different from other similar types of projects. Construction traffic would consist primarily of delivery trucks, construction vehicles, and worker vehicles, with traffic peaks expected during the start and end of the workday. Project construction would be subject to City regulations regarding construction traffic management and would be required to implement a construction traffic management plan if temporary closure of City transportation facilities is required for construction. The proposed project would have a similar development footprint and level of construction as was anticipated to occur on the project site in the 2018 IS/MND pursuant to the approved project.

Project Operation

The proposed project would occur within the same project footprint as the approved project. The project would not interfere with bicycle, pedestrian, or transit use in the vicinity. As the site was originally designated for industrial use prior to the approved project, the transition to industrial use as part of the proposed project would not be inconsistent with plans or policies governing the project area. The proposed project would result in fewer daily vehicle trips, as previously described in Section 3, Air Quality, than the approved project. For these reasons, the proposed project would not conflict with City policies intended to maintain and benefit the provision of multimodal transportation.

In terms of traffic generation, the proposed industrial use would result in fewer daily vehicle trips compared to the previously approved residential project. As noted earlier, the industrial project is

expected to generate 337 daily trips, while the previously approved residential project would have generated 712 daily trips. This reduction in trips would lessen the strain on the local transportation network, particularly during peak hours. Therefore, the proposed project would align with City policies designed to promote efficient and sustainable transportation systems, including the provision of multimodal transportation options (bicycles, pedestrians, and transit users).

By complying with all relevant transportation and circulation policies, the proposed project would not result in any conflicts with programs, ordinances, or policies aimed at maintaining an efficient circulation system.

Trip Generation and Vehicle Miles Traveled (VMT)

The anticipated trip generation for the proposed project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 11th Edition for “Industrial Park” (ITE LU 130). Based on these rates, the proposed project is expected to generate an average of 337 trips per day. In comparison, the 2018 IS/MND for the approved residential project estimated that it would generate 712 trips per day, meaning the proposed industrial use would result in significantly fewer trips than the previously approved residential use.

Since the completion of the 2018 IS/MND, Senate Bill 743 (SB-743) was enacted, codified in Public Resources Code section 21099. SB-743 revised the guidelines implementing CEQA Guidelines to require that transportation impacts be analyzed using a vehicle-miles-traveled (VMT) metric rather than the traditional level-of-service (LOS) standard. LOS impacts are no longer considered environmental impacts under CEQA. Thus, VMT is now the current standard for the evaluation of traffic impacts, and LOS impacts are no longer considered environmental impacts under CEQA. The 2018 IS/MND included the LOS standard for evaluation of project-specific impacts from implementation of the approved project. No VMT analysis was included in the 2018 IS/MND, and none is required here.⁵ Nevertheless, the proposed project impacts relative to VMT would result in less than significant as discussed below.

The City of Santa Rosa provides VMT screening maps for work and residential VMT. The proposed project would generate work trips. The work VMT screening map identifies areas within the City’s sphere of influence which have been identified as being within transit priority areas (areas within 1/2 mile of rail station), along high-quality transit corridors (areas within 1/2 mile of transit routes with 15-minute peak headways), or areas with work-based VMT per employment lower than 15% below the countywide average as estimated by the 2019 Sonoma

⁵ Lead agencies are not required to conduct additional traffic analysis using VMT for subsequent CEQA review of documents prepared prior to 2018 when the CEQA Guidelines were updated (see CEQA Guidelines §§ 15064.3(c), 15007(b), 15008(b); see also Governor’s Office of Planning and Research SB 743 Frequent Asked Questions, “What about draft documents that still use LOS? Do they need to be redone with VMT analysis?,” available at <https://opr.ca.gov/ceqa/sb-743/faq.html#draft-docs> (last visited August 21, 2024).

County Travel Model.⁶ The project site is located in the area the meets the screening criteria to be considered to have a less-than-significant VMT impact for employment related trips.

Substantially increased hazards due to a geometric design feature

The proposed project, as with anticipated development of the project site in the 2018 IS/MND, would not include the development of transportation facilities improvements or project features that would substantially increase hazards to circulation. All project design features would be in accordance with City safety standards and subject to design review and approval by the City's transportation engineers. As a result, design features implemented by the proposed project would not substantially increase hazards to circulation.

In addition, the recommended mitigation measures related to transportation improvements, which were included in the 2018 IS/MND for the approved residential project, would continue to be relevant for the proposed project. These measures are designed to ensure that any potential hazards or circulation challenges are mitigated. The applicable mitigation is as follows:

Recommended Mitigation Measures:

The mitigation measures from the 2018 IS/MND provided as a list bullets with no numbering. For the purpose of this analysis, mitigation measures from the 2018 IS/MND have been numbered to provide for organization and future tracking of compliance.

Mitigation Measure MM-TRANSPORTATION-1

Parking shall be prohibited for a distance of 50 ft. on either side of the project entrance. This shall be shown on the improvement plans.

Mitigation Measure MM-TRANSPORTATION-2

A proportional share contribution of 2.2 percent of the costs funded by private development shall be paid towards the future improvements at Todd Road/Standish Avenue-Ghilotti Avenue to install a traffic signal unless such costs are included in a traffic impact fee.

Mitigation Measure MM-TRANSPORTATION-3

A proportional share contribution of 4.5 percent of the costs funded by private development shall be paid towards the future improvements at Dutton Avenue/Bellevue Avenue to install a traffic signal unless such costs are included in a traffic impact fee.

The impact from the proposed project related to increased hazards would be less than significant.

⁶ City of Santa Rosa, 2020. Vehicle Miles Traveled Maps – Home and Work. Available at: https://www.srcity.org/DocumentCenter/View/28509/Vehicle-Miles-Traveled-Maps_Home-and-Work?bidId=. Accessed August 21, 2024.

Emergency Access

The previously approved project was anticipated to increase vehicle traffic; therefore, the following mitigation measure was implemented to minimize traffic congestion and hazards that could interfere with emergency access:

Recommended Mitigation Measures:

The mitigation measures from the 2018 IS/MND provided as a list bullets with no numbering. For the purpose of this analysis, mitigation measures from the 2018 IS/MND have been numbered to provide for organization and future tracking of compliance.

Mitigation Measure MM-TRANSPORTATION-4:

The applicant shall adopt the following traffic control procedures to minimize traffic congestion and traffic hazards. As required, construction flagging and signage, use of plates, and other safety measures shall be in conformance with Caltrans 2006 Manual of Uniform Traffic Control Devices. Other measures shall include:

- If temporary lane or street closures are required, the applicant shall contact emergency response providers (i.e., hospitals, police, fire, and ambulance) to determine if the streets impacted are considered primary routes.
- Where construction necessitates lane or street closures along emergency response routes, the applicant shall recommend and obtain approval of alternate routes or other means from the affected service providers, at a minimum of one week prior to construction.
- During construction, the applicant shall notify the service providers on a weekly basis of the timing, location, and duration of construction.
- The applicant shall maintain pedestrian and vehicular access to public facilities, businesses, and residences along the street during commute hours and shall minimize the closure of pedestrian and vehicular access at other times. Peak commute hours are between 7:00 AM - 9:00 AM and 4:00 PM - 6:00 PM.

The proposed project would continue to implement the applicable mitigation which would reduce potential impacts to emergency access. During project operation, the site would have two driveways on Dutton Avenue which would provide direct access for emergency vehicles. Therefore, access for emergency services to the proposed site would be adequate, and the impact of the proposed project on emergency access would be less than significant.

Conclusion

The proposed project would not alter the transportation impacts discussed in the 2018 IS/MND. Changes introduced by the project and/or new circumstances would not result in new significant impacts or substantially more severe impacts than those previously disclosed. Development of the proposed project would not result in substantial changes with respect to the circumstances under which the approved project is undertaken which would require major revisions of the 2018 IS/MND due to the involvement of new significant environmental effects or a substantial increase

in the severity of previously identified significant effects related to the potential occurrence of substantial adverse physical impacts associated with project VMT. In addition, there are no new mitigation measures beyond those identified in the 2018 IS/MND that would be necessary to reduce transportation-related impacts. For these reasons, impacts related to transportation from the proposed project would not require further environmental review.

Tribal Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
18. TRIBAL CULTURAL RESOURCES — Would the project:		
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:		
i) 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	No	No
ii) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	No	No

Discussion

The 2018 IS/MND did not specifically address tribal cultural resources; a cultural resources study including tribal outreach was completed to support the cultural resources analysis in the 2018 IS/MND (Origer & Associates, 2017). This study did not identify any cultural resources onsite. Furthermore, it was determined that any potential for the approved project to impact archaeological and cultural resources would be reduced through the application of Standard Conditions of Approval (COA) and Uniformly Applied Development Policies including CUL-1 addressing Archaeological Resources and CUL-2 addressing Human Remains, as described in the Cultural Resources discussion above. Impacts on tribal cultural resources of the proposed industrial project are discussed below.

Tribal Cultural Resources

Origer & Associates (2017) completed tribal outreach as part of their cultural resources analysis for the 2018 IS/MND. A request was sent to the State of California's Native American Heritage Commission for information from the sacred lands files and the names of Native American individuals and groups that would be interested in the project location. Letters were sent to the Federated Indians of Graton Rancheria, the Kashia Band of Pomo Indians of Stewarts Point, and the Lytton Rancheria. The Federated Indians of Graton Rancheria responded that they would review the project within ten business days. No additional communication was received.

As was anticipated to occur in the 2018 IS/MND, the proposed project would disturb the whole project site, which would have a similar impact to subsurface tribal cultural resources as would have occurred with the original project. Based on the results of the Historical Resources Study, no known tribal cultural resources listed or determined eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined by the lead agency to be significant would be impacted by the proposed project. The 2018 IS/MND determined that there would be a possibility for the presence of buried archaeological deposits at

the project site, and accidental discovery could occur as a result of construction activities. However, to mitigate this risk, as well as the possibility of discovering human remains, the 2018 IS/MND included the application of uniformly applied development policies through Standard COAs. These conditions were designed to address the potential for encountering archaeological resources or human remains during construction, ensuring that any such discoveries would be managed in compliance with applicable regulations and cultural resource protection protocols.

The proposed project would encounter the same potential for accidental discovery as the approved residential project, and would therefore adhere to the actions pursuant to implementation of General Plan policies HP-A-2, HP-A-3, and HP-A-5, as well as CUL-1 addressing Archaeological Resources and CUL-2 addressing Human Remains, as described in the Cultural Resources discussion above.

Compliance with these development policies and measures would ensure that any encountered cultural materials or human remains are handled appropriately, resulting in a less-than-significant impact to these resources.

Conclusion

The project would have a similar level of ground disturbance to the level of disturbance anticipated and analyzed in the 2018 IS/MND. With implementation of actions pursuant to compliance with development policies and measures the project would be anticipated result in a less than significant impact to tribal cultural resources, and no mitigation is required. While not specifically addressed in the 2018 IS/MND, conditions under which the preparation of a subsequent EIR or Negative Declaration pursuant to Section 15162(a) of the CEQA Guidelines have not occurred with respect to tribal cultural resources. For these reasons, impacts to tribal cultural resources from the proposed project would not require further environmental review.

Utilities and Service Systems

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
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?	No	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	No	No
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's projected demand in addition to the provider's existing commitments?	No	No
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?	No	No
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No	No

Discussion

All Utilities

The Utilities and Service Systems section of the 2018 Dutton Avenue Development IS/MND analyzed impacts to utilities from the approved residential project. The IS/MND concluded that the approved project would be adequately served by the City of Santa Rosa's water and wastewater treatment facilities, as well as storm water drainage facilities. The IS/MND confirmed that all necessary utility improvements would be conducted in compliance with the latest adopted City standards. Standard City conditions would require compliance with the Storm Water Mitigation Plan Guidelines, including implementation of measures requiring use of best management practices (BMPs). Furthermore, the IS/MND concluded that sufficient landfill capacity would be available at County or County-contracted facilities to support the waste generated by future development, including the approved project.

The proposed project would have a reduced demand for water, wastewater, stormwater treatment, solid waste generation, and electricity compared to the previously approved residential project. However, the proposed industrial use may result in an increase in impervious surfaces, as industrial projects typically involve less green and open space than residential developments. This could lead to higher volumes of stormwater runoff. To address this, the project would implement stormwater management practices in line with the City's Low Impact Development (LID) standards and BMPs to ensure proper stormwater treatment and mitigation of potential runoff impacts. Through the application of Standard Conditions of Approval, including adherence to water use, water quality, and stormwater management BMPs, the project would minimize impacts on utilities and service systems. As a result, the impacts to utilities and service systems would remain less than significant.

Conclusion

The proposed project would not result in any significant effects related to utilities and service systems that were not discussed in the 2018 IS/MND, nor would it increase the severity of the impacts previously identified. The proposed project would not introduce feasible mitigation measures that were previously deemed infeasible in the 2018 IS/MND. Additionally, there are no new mitigation measures that would more effectively reduce potential impacts on utilities and service systems than those identified in the 2018 IS/MND. For these reasons, the proposed project would not require further environmental review regarding utilities and service systems.

Wildfire

<i>Issues (and Supporting Information Sources):</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information of Substantial Importance?</i>
20. WILDFIRE— Would the project:		
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No	No
i) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and expose occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire?	No	No
ii) Require installation or maintenance of infrastructure (such as roads, fuel breaks, emergency water sources, or power lines) that may exacerbate fire risk or result in temporary or ongoing impacts to the environment?	No	No
iii) Expose people or structures to significant risks, including downslope or downstream flooding or landslides following a wildfire?	No	No

Discussion

The project site is not located within a State Responsibility Area (SRA) or a Very High Fire Hazard Severity Zone (VHFHSZ), as designated by CAL FIRE's Fire Hazard Severity Zones Map (California Department of Forestry and Fire Protection, 2023). The site is in a developed industrial area, surrounded by paved infrastructure and existing industrial buildings, with no significant vegetation or trees onsite that could contribute to wildfire risk.

According to the CAL FIRE Fire Hazard Severity Zone Map for Santa Rosa, the project site is classified as a Non-VHFHSZ urban area, meaning the site is not subject to extreme wildfire risk (California Department of Forestry and Fire Protection, 2023). The site's industrial surroundings and lack of vegetative fuels further minimize the likelihood of wildfire exposure. Additionally, the site is served by existing municipal water infrastructure, ensuring adequate fire suppression availability.

While wildfire is not a significant hazard at the project site, the project would comply with all Santa Rosa Fire Code regulations for industrial development, including defensible space requirements and construction standards that reduce fire risk.

As a result, the project would not expose people or structures to wildfire risk beyond those typically associated with an urban industrial setting. Wildfire-related impacts would remain less than significant.

Conclusion

As a result, the project would not expose people or structures to wildfire risk beyond those typically associated with an urban industrial setting. No new significant wildfire-related impacts would occur, nor would the project exacerbate any previously identified hazards. The proposed project would comply with all applicable fire safety regulations, including those outlined in the Santa Rosa Fire Code, ensuring that fire protection measures remain sufficient. Given the absence of wildfire-prone vegetation onsite, existing fire suppression infrastructure, and the project's location outside of a Very High Fire Hazard Severity Zone, no additional mitigation measures are necessary. While not specifically addressed in the 2018 IS/MND, conditions under which the preparation of a subsequent EIR or Negative Declaration pursuant to Section 15162(a) of the CEQA Guidelines have not occurred with respect to wildfire. Therefore, impacts related to wildfire from the proposed project would not require further environmental review.

Environmental Determination

Section 15182(c)(2). As established in the discussions above regarding the potential project-specific impacts of the 3150 Dutton Avenue Industrial project, none of the criteria described in Section 15162(a) of the CEQA Guidelines has occurred, for which the City would be required to prepare a subsequent EIR (or negative declaration) under CEQA.

- Section 15162(a)(1). The proposed 3150 Dutton Avenue Industrial project is consistent with anticipated development pursuant to implementation of the Santa Rosa General Plan 2035. Therefore, no major revisions to the 2018 IS/MND are required as a result of the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- Section 15162(a)(2). No substantial changes have occurred with respect to the circumstances under which the 3150 Dutton Avenue Industrial project would be undertaken which will require major revisions of the 2018 IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- Section 15162(a)(3). There is no new information of substantial importance showing that 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.

This document satisfies the criteria described in the Section 15164(a) of the CEQA Guidelines. An addendum is the appropriate CEQA document for the current circumstances relevant to the Santa Rosa General Plan 2035, as some changes or additions would have been necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

Having considered the analysis set forth in this document, the City of Santa Rosa would have grounds to conclude that the analyses conducted, and the conclusions reached in the 2018 IS/MND remain relevant and valid. Based on the record, there is no substantial evidence to support a fair argument that the Santa Rosa General Plan 2035 may result in significant environmental impacts not previously studied in the EIR and, accordingly, the project changes would not result in any conditions identified in CEQA Guidelines Section 15162. Thus, a subsequent EIR is not required for the changes to the project.