

# Advanced Metering Infrastructure Project Addendum to Mitigated Negative Declaration

Prepared for:



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# 1. Introduction

The City of Santa Rosa approved the Advanced Metering Infrastructure (AMI) Project, which includes replacement or retrofitting of water meters throughout the city and installation of four antennas, in June 2016. A Mitigated Negative Declaration (MND) for the AMI Project was adopted by the City of Santa Rosa in June 2016. The City has experienced delays in installing the antenna at the Newgate Court site, and now proposes an alternate location for the Newgate Court antenna that can be utilized more quickly and easily. This Addendum to the MND evaluates the environmental impacts of the alternate antenna site.

This Addendum concludes that the minor revisions being proposed to the AMI Project do not result in new significant impacts and do not cause substantially more severe significant impacts relative to the impacts previously disclosed in the AMI MND. Thus, no additional CEQA documentation is necessary for approval of the alternate antenna site, and an Addendum to the AMI MND is the appropriate CEQA document, pursuant to Sections 15162 and 15164 of the Guidelines implementing the California Environmental Quality Act (CEQA).

## Public Comments

This Addendum and the 2016 AMI MND are available for review at Municipal Services Center – South, located at 69 Stony Circle, Santa Rosa. The Addendum is tentatively scheduled for consideration at the Santa Rosa Board of Public Utilities meeting to be held on Thursday, July 20, 2017 at 1:30 p.m.

Written comments should be mailed or emailed to:

City of Santa Rosa Finance Department  
Kimberly Zunino, Revenue Manager  
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Santa Rosa, CA 95401  
kzunino@srcity.org

## Organization of the Addendum

The Addendum is organized in a similar fashion to the 2016 MND.

Chapter 1 provides an introduction and background on the change to the Project.

Chapter 2 contains a detailed description of the proposed modifications to the Project.

Chapter 3 presents the environmental analysis of the proposed revisions.

Chapter 4 presents the references used.

Chapter 5 presents the preparers of this Addendum.

## Applicability and Use of an Addendum

As directed by CEQA, California Public Resources Code Section 21166, and CEQA Guidelines Section 15162, when an MND has been adopted for a project, no subsequent MND or EIR shall be prepared, unless one or more of the following circumstances occur:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

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

The change in environmental impacts due to proposed changes in the project or changed conditions has been evaluated and measured against the standards set forth in paragraphs 1, 2, and 3 above to determine whether an Addendum is appropriate or a subsequent MND or EIR is needed. The environmental analysis in Chapter 3 provides the detailed examination of each of these issues.

Section 15164 of the Guidelines implementing the California Environmental Quality Act ("CEQA") provides that an Addendum is the appropriate level of CEQA analysis when the circumstances defined in Section 15162 calling for preparation of a subsequent MND or EIR do not occur. None of the circumstances that require a subsequent MND or EIR, such as new significant impacts or significant impacts of a substantially more severe nature is present. Thus, an Addendum is the appropriate CEQA document.

This Addendum should be read together with the full text of the 2016 AMI MND. Even though modifications to the adopted project are minor, the modifications have been subjected to a detailed analytical process consistent with the methodology applied in the MND.

## 2. Detailed Description of Proposed Change

Due to the need for a faster installation of the Newgate Court Antenna, the City has identified an alternate site for the antenna. The alternate site would be located approximately 400 feet west of the Newgate Court Antenna site, across Fountaingrove Parkway, on City-owned land at the site of the existing R3 water storage tank (see Figure 1). The storage tank site already has a wooden pole installed that was previously used for an antenna, but that antenna has been removed. The wooden pole is 42 feet tall. The new AMI antenna would be affixed to the top of the pole and would extend an additional 8 feet above the height of the existing pole, for a total height of 50 feet.

This alternate antenna site may be used temporarily or permanently. If it is used temporarily, the antenna on the alternate site would be removed after an antenna is successfully installed at the Newgate Court site as described in the 2016 AMI MND. If the Newgate Court antenna is never installed, the alternate site would be used permanently.

Installation of the antenna at the alternate site would require only 2-3 days or less, as the pole is already in place. Installation would not require use of a staging area, because no large construction equipment or materials would be required. Similar to the other AMI antennas, coaxial cable would be strung from the receiver down the pole to a control panel box mounted on an existing retaining wall near the water storage tank. The cable would require a short underground conduit, about 20-25 feet long, from the pole to the control panel box. Electric power would be supplied from existing utilities at the water storage tank to the control panel box.

No changes to the project's implementation, construction, maintenance, or operation, as described in the 2016 MND, are proposed.

No changes to mitigation measures or the Mitigation Monitoring Program for the AMI Project are proposed.

### *Required Permits and Approvals*

The only approval required for the modification to the project is approval by the Santa Rosa Board of Public Utilities.





0 100 200  
Feet

Approximate Scale



#### LEGEND

- Property Boundary
- Existing pole where antenna would be placed
- ..... Trench



City of Santa Rosa  
Advanced Metering Infrastructure Project

|            |          |
|------------|----------|
| Job Number | 11110656 |
| Revision   |          |
| Date       | Jun 2017 |

Alternate Antenna Site

Figure 1



### **3. Environmental Analysis**

The following analysis evaluates whether the alternate site for the Newgate Court antenna would cause any of the circumstances listed in CEQA Guidelines 15162, i.e., new significant impacts or significant impacts of substantially greater severity due to the change proposed to the Project. No changes in circumstances have been identified that would cause new significant impacts or significant impacts of substantially greater severity.

#### **3.1 Aesthetics**

The alternate site for the Newgate Court antenna is situated on a ridge in the Fountaingrove area of the City. The alternate location would be approximately 400 feet west of the Newgate Court antenna site evaluated in the 2016 MND. The visual setting for the alternate site is the same as the original Newgate Court site, in that the surrounding area is visually characterized by single-family residences, trees, and landscaped areas in the neighborhoods along Fountaingrove Parkway, a City-designed scenic roadway. Views of the R3 water tank on the alternate site are much more limited than views of the R17 water tank located on the Newgate Court Antenna Site. The antenna receiver (or whip) would be attached to the top of the existing 42-foot pole on the property and would extend an additional 8 feet. Figure 2, Photo A shows the existing pole as seen from across Fountaingrove Parkway in front of the Fountaingrove II sign. It shows the pole against a backdrop of several trees which are taller than the pole. The water storage tank is not visible. Figure 2, Photo B shows the existing pole as seen from across Fountaingrove parkway approximately 0.2 mile west of Newgate Court. Some of the infrastructure boxes which are a part of the water tank site are visible in the foreground; the water tank itself is not visible. Again, the pole is not as tall as the nearby trees.

Construction activities for the alternate antenna site would not be visible for the most part; construction may be visible to traffic from Fountaingrove Parkway briefly over a period of 2-3 days. The impact of construction activities on scenic vistas and the visual character of the site and its surroundings would be less than significant.

There are no notable views which would be blocked by the antenna at the alternate site, and no specific scenic resources on the site would be lost. Use of the alternate antenna site would not degrade the visual experience of travelers on Fountaingrove Parkway, a City-designated scenic roadway. Overall, the project would not significantly degrade the visual quality or character of the site or its surroundings.

In addition, like the Newgate Court Antenna Site, the use of the alternate antenna site would be consistent with the existing use of the site for public services (i.e., City water tank). The use of the alternate site for the antenna would not conflict with the General Plan goals and policies discussed in the 2016 MND regarding the protection of the City's visual resources, because it would have little impact on view corridors, skyline views, notable landforms, the area's community character, and general visual backdrop.

The alternate antenna site would not be located adjacent to a state scenic highway. Light or glare impacts at the alternate antenna site would be the same as at the Newgate Court Antenna Site.

Therefore, installation of an antenna on the alternate site would not have new significant aesthetic impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.



Photo A from Fountaingrove Parkway west of the site.



Photo B from Fountaingrove Parkway east of the site.



### **3.2 Agriculture and Forest Resources**

According to the Farmland Mapping and Monitoring Program map for Sonoma County, the alternate antenna site is designated as “Other Land”. Similar to the other antenna sites, no impact to status farmland would occur. The alternate site is not subject to a Williamson Act contract (Sonoma County 2015) and is not zoned or used for agricultural or forest purposes.

Therefore, installation of an antenna on the alternate site would not have new significant farmland or forest impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.3 Air Quality**

Use of the alternate site for the antenna would have fewer construction emissions than at the Newgate Court site, because construction of a foundation would not be required. Operational emissions would be similar to those identified in the 2016 MND.

Therefore, installation of an antenna on the alternate site would not have new significant air quality impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.4 Biological Resources**

Because the pole is already in place at the alternate site, no ground disturbance would be required to install the antenna. However, approximately 100 square feet of ground disturbance would occur temporarily for placement of the coaxial cable in an underground conduit for a distance of 20 to 25 feet. Similar to the other antenna sites, the construction area has been disturbed as a result of prior construction and operation of the water tank, and only ruderal habitat or ornamental landscaping is present. Therefore, antenna construction would not have a substantial adverse effect on special-status plant or wildlife species.

Trees and some landscaping are located near the pole, and some vegetation trimming may be required. The City’s tree protection ordinance does not apply to the trimming of tree branches to prevent interference with public utilities. Noise from construction would be minor and consistent with the level of noise caused by the maintenance activities that currently occur at the water tank site.

Therefore, installation of an antenna on the alternate site would not have new significant biological impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.5 Cultural Resources**

The alternate antenna site is not included within a City of Santa Rosa Historic District or designated by the City as a historic site. The alternate antenna site would not be expected to be eligible for listing on the California or National Register. Additionally, use of the alternate antenna site would not require demolition of any existing buildings or structures and would not result in a substantial change in character or use.

No known archaeological sites have been documented within or immediately adjacent to the alternate antenna site (ASC 2016). However, previously recorded prehistoric resources have been identified nearby. Similar to the rest of the antenna sites, the potential exists to encounter as-of-yet unknown

archaeological materials at the alternate antenna site during construction activities (e.g., trenching and grading). A significant impact was identified in the 2016 MND relative to potential damage to unknown archaeological sites. Use of the alternate site would not substantially increase the severity of the significant impact. Mitigation Measure CR-1, Protect Archaeological Resources during Construction Activities, would be applicable to the alternate antenna site.

It is unlikely that undiscovered human remains are present within the construction area given that the alternate antenna site has been disturbed by previous development. However, the possibility of encountering human remains during construction cannot be completely discounted. A significant impact was previously identified in the 2016 MND relative to potential discovery of human remains. Use of the alternate site would not substantially increase the severity of the significant impact. Mitigation Measure CR-3, Protect Human Remains if Encountered during Construction, would be applicable to the alternate antenna site.

Therefore, installation of an antenna on the alternate site would not have new significant cultural resources impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.6 Geology and Soils**

Use of the alternate site would not require a foundation for a new antenna because a pole has already been placed at the site. Burial of the coaxial cable from the pole to the control panel box would require only 20-25 feet of conduit to be buried at a shallow depth. No geological hazards would affect the alternate antenna site.

Therefore, installation of an antenna on the alternate site would not have new significant geology and soils impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.7 Greenhouse Gas Emissions**

Use of the alternate site for the antenna would have fewer construction emissions than at the Newgate Court site, because a foundation does not need to be constructed.

Therefore, installation of an antenna on the alternate site would not have new significant greenhouse gas emission impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.8 Hazards and Hazardous Materials**

The alternate antenna site would require less construction than the Newgate Court Antenna Site, because the antenna would be attached to an existing pole. The alternate antenna site would not be located within 0.25 mile of a school, would not be located on the Cortese List of hazardous materials sites, and would not be in the vicinity of a public airport or private airstrip. The alternate site would be located within the Wildland-urban Interface Fire Area designated by the City (Santa Rosa 2009), similar to the Newgate Court Antenna Site, but addition of an antenna on top of the existing pole would not present a significant risk of wildfire.

Therefore, installation of an antenna on the alternate site would not have new significant hazards or hazardous materials impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.9 Hydrology and Water Quality**

Construction at the alternate antenna site would not require dewatering because the antenna would be placed on an existing pole; therefore fewer impacts would occur than at the Newgate Court Antenna Site. The alternate site would not affect groundwater or drainage because it would be attached to an existing pole, and the shallow trench for the coaxial cable would not intersect either groundwater or surface water drainages. The alternate antenna site would not be located within a 100-year flood zone (Santa Rosa 2009) and would not be subject to seiches, tsunamis, or mudflows, as it is located at the top of the Fountaingrove ridge.

Therefore, installation of an antenna on the alternate site would not have new significant hydrology or water quality impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.10 Land Use and Planning**

The alternate antenna site would not divide an established community, because it is only an 8-foot long antenna that would be placed on top of an existing pole. The antenna at this site would not conflict with applicable plans or policies because the alternate site is already dedicated for public infrastructure. No adopted habitat conservation plans or natural community conservation plans are applicable to the alternate site.

Therefore, installation of an antenna on the alternate site would not have new significant land use and planning impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.11 Mineral Resources**

The alternate antenna site is not designated as Mineral Resource Zone (MRZ)-2 by the state's Surface Mining Act and is not identified in the Santa Rosa General Plan as a locally important mineral resource recovery site (Santa Rosa 2009).

Therefore, installation of an antenna on the alternate site would not have new significant mineral resources impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.12 Noise**

Similar to the Newgate Court Antenna Site, the alternate antenna site would be located approximately 50 feet from the closest sensitive receptor, a residence just east of the site on Fountaingrove Parkway. However, construction at the alternate site would be much simpler and shorter than at the Newgate Court site, because no foundation work or mono-tree installation would be required. Construction would occur over 2-3 days rather than for 2 weeks, and would be subject to Environmental Protection Measure 4, BMPs for Reduction of Construction Noise. No noise would be generated during operation. Construction at the alternate site would not cause significant groundborne vibration, or significant noise from traffic. The alternate antenna site would not be located near a public or private airport.

Therefore, installation of an antenna on the alternate site would not have new significant noise impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.13 Population and Housing**

The alternate antenna site would not cause the project to induce growth, displace housing, or displace people.

Therefore, installation of an antenna on the alternate site would not have new significant population and housing impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.14 Public Services**

The alternate antenna site would not cause the project to induce growth or require expansion of public services.

Therefore, installation of an antenna on the alternate site would not have new significant public services impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.15 Recreation**

Use of the alternate antenna site would not cause the project to increase the use of existing recreational facilities. The alternate site does not include recreational facilities that would be directly affected.

Therefore, installation of an antenna on the alternate site would not have new significant recreation impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.16 Transportation/Traffic**

Construction at the alternate antenna site would be much simpler and shorter than at the Newgate Court site, because no foundation work or mono-tree installation would be required. Construction would occur over 2-3 days rather than for 2 weeks. The alternate antenna site would require fewer construction truck and employee trips. The alternate antenna site would not cause a conflict with an applicable plan regarding the effectiveness of the transportation system, nor would it increase hazards or result in inadequate emergency access. Installation of the antenna at the alternate site would not conflict with public transit, bicycle, or pedestrian facilities or plans.

Therefore, installation of an antenna on the alternate site would not have new significant transportation impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.

### **3.17 Utilities and Service Systems**

Because the alternate antenna site would affix the antenna to an existing pole, no new impervious surfaces would result, and no new stormwater facilities would be required. Use of the alternate antenna site would not require water or generate wastewater. Solid waste generated during construction would be less than that estimated for construction at the Newgate Court Antenna Site.

Therefore, installation of an antenna on the alternate site would not have new significant utilities and service systems impacts or significant impacts of substantially greater severity than the impacts identified in the 2016 MND.



### **3.18 Mandatory Findings of Significance**

Use of the alternate antenna site would not change the Project's mandatory findings of significance as identified in the 2016 AMI MND.

## 4. References

Anthropological Studies Center (ASC). 2016. *Archaeological Resources Study of Four Advanced Metering Infrastructure/Automated Meter Reading Device Locations*. March 25.

Santa Rosa, City of. 2009. *Santa Rosa General Plan 2035*. November 3.

Sonoma, County of. 2015. *Williamson Act 2015 Calendar Year*. March.

## **5. Preparers**

### **5.1 City of Santa Rosa**

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### **5.2 GHD**

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