



March 18, 2021

Mr. Steve von Raesfeld
Sonoma Academy
2500 Farmers Lane
Santa Rosa, CA 95404

Traffic Assessment Relative to a CEQA Exemption for the Sonoma Academy Project

Dear Mr. von Raesfeld;

In March of 2005 a Mitigated Negative Declaration was completed and subsequently approved for the Sonoma Academy project to be located at 2500 Farmers Lane in the City of Santa Rosa. The environmental clearance for the project tiered off the *Southeast Santa Rosa Area Plan Final EIR*, EIP Associates, October 1993, with project-specific analysis provided in the *Traffic Impact Study for Sonoma Academy High School*, TJKM Transportation Consultants, November 25, 2002 (TIS). It is noted that the enrollment level used in the TIS was 650 students, though the project as approved includes a maximum of 600 students.

The project was subsequently approved in 2016. While construction of the project is generally complete, the project has undergone a minor modification in that the proposed theater building (which has not been constructed) is to be replaced with a theater building having a different design that is 183 square feet larger and in a slightly different location.

Section 15162 Exemption

Staff has raised the issue of a potential need for a VMT analysis unless an exemption under Section 15162 is appropriate. CEQA Section 15162 (Subsequent EIRs and Negative Declarations) reads as follows.

15162 (a) 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 negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (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.

A review of the TIS prepared for this project indicates that the trip generation was based on students as the independent variable. The sizes of buildings as well as their locations and orientations were irrelevant to the traffic analysis; the slight change contemplated therefore has no effect on the findings and recommendations as presented in the traffic study and resulting Mitigated Negative Declaration. The proposed minor modification to the project would therefore not require a subsequent analysis under Section 15162 as the changes to the project are not major and would not require revision to the prior EIR.

We hope this information is adequate to address this issue. Thank you for giving us the opportunity to provide these services.

Sincerely,



Dalene J. Whitlock, PE, PTOE
Senior Principal

DJW/djw/SRO575.L1



Copy to: Jean Kapolchok, J. Kapolchok & Associates (via email to jkapolchok@sbcglobal.net)