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+ Associates

Land Use Planning
Urban Design

**CEQA REVIEW FOR THE MODIFICATION TO THE
2016 SONOMA ACADEMY PROJECT
2500 FARMERS LANE
SANTA ROSA, CA**

Prepared for:
Department of Planning and Economic
Development
City of Santa Rosa
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A. OVERVIEW

J. Kapolchok & Associates has prepared this technical memorandum for the purpose of determining the level of CEQA analysis necessary for the proposed modification to the 2016 Sonoma Academy project. This Memorandum analyzes the potential impacts of replacing an approved 17,984 sq. ft. Visual and Performing Arts Center building with a 18,187 sq. ft. Visual and Performing Arts Center building at a slightly different location on the existing, built campus of Sonoma Academy. The Project's address is 2500 Farmers Lane Santa Rosa, CA. A Design Review application for this replacement theater building was filed with the Department of Planning and Economic Development by Quattrocchi Kwok Architects in March 2020.

B. BACKGROUND

On February 25, 2005 the Planning Commission of the City of Santa Rosa approved a Conditional Use Permit for a private high school to be constructed in two phases, on a ±33.8-acre property with an occupancy of 600 students and 170,000 sq. ft. of building area (Resolution No. 10684). The Planning Commission also recommended that the City Council adopt a mitigated Negative Declaration (Resolution No. 10682) and Rezone the property from the existing PD district to a revised PD district, which revised the Policy Statement for the Southeast Specific Plan (Resolution No.10683). On March 22, 2005 the Santa Rosa City Council introduced an ordinance to amend the policy statement for the Southeast Area Plan to allow schools in Site #8 (Sonoma Academy). On April 5, 2005 by Ordinance No. 3716, the City Council modified the policy statement (PD district) and adopted the mitigated Negative Declaration for Sonoma Academy. On July 21, 2005, Preliminary Design Review was granted for Phase 1 by the Design Review Board. Final Design Review approval was granted by staff.

On April 21, 2016 the Design Review Board approved Preliminary Design review for the Studios and Grange project, which included construction of a 400-seat theater, studios, teaching kitchen/dining area, offices and maintenance facility. Said project increased the total approved building square footage to 142,000 sq. ft. On August, 2016 the Planning Commission approved a Hillside Development Permit for the Studios and Grange project. On October 13, 2016, continued to November 17, 2016, the Planning Commission heard a request to modify hours of construction to include the ability to construct on Saturdays between 9am to 5pm and to allow rental of the school's athletic fields to outside organizations without the necessity of a minor conditional use permit. The Planning Commission approved request to allow outside rentals (Resolution No. 11797). The request for expanded construction hours was denied (Resolution No. 11796).

As the lead agency, the City of Santa Rosa prepared an MND analyzing a request for a Use Permit and amendment to the policy statement (rezoning) to allow construction of a private high school having a maximum enrollment of 600 students and 170,000 sq. ft. of building under the California Environmental Quality Act (CEQA) (Public Resources Code §21000 et seq.). The MND disclosed and analyzed the environmental impacts that would result from the full build out and operation of the school facility, mitigating them to the maximum extent feasible. The Planning Commission recommended adoption of the MND to the City Council on February 25, 2005. On April 5, 2005 the City Council adopted the MND.

On November 17, 2016 under Resolution No. 11797, the Planning Commission found the proposed use to be within the scope of the 2005 Mitigated Negative Declaration because there had been no significant changes in the Project, no changes in the circumstances of the Project, and no new information that would trigger a need for additional environmental review (CEQA Guidelines Section 15162).

C. EXISTING PROJECT

The 33.8-acre subject property (APN: 044-180-016) is developed with Sonoma Academy, a private high school, consisting of the school grounds, ±124,000 sq. ft. of campus buildings, athletic fields, maintenance area and parking. All buildings under Phase 1 and the 2016 Design Review approval have been constructed with the exception of a 17,984 sq. ft. ±400-seat visual and performing arts building.

This technical memorandum analyzes any potential environmental impacts that might arise from the replacement of this 17,984 sq. ft. theater building with a 18,167 sq. ft. theater building of a different design and a slightly modified location.

D. CEQA STANDARD

CEQA Guidelines Section 15162: Section 15162 subdivision (a), 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 exist:

- (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 effects that are 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.

It is on the basis of this standard that the revised project will be reviewed.

E. MODIFICATIONS TO THE PROJECT AND REQUIREMENTS OF CEQA GUIDELINES SECTION 15162

1. Modifications to the Project

The general location of the project site remains the same as described in the 2005 Mitigated Negative Declaration. The 33.8-acre site is located at 2500 Farmers Lane, within the southeast area of the City of Santa Rosa. The parcel has a General Plan land use designation of Residential Very Low Density (0.2 – 2 units per acre)¹ and carries a Southeast Santa Rosa Area Plan PD district, which was specifically modified in 2005 to allow development of a private school on this site.

¹ Semi-public facilities are allowed in any General Plan land use category.

Architectural elevation drawing of the Theater for the New York City Ballet. The drawing shows a long, low building with a flat roof and a series of vertical wooden slats. The building is shown in a perspective view, with a small inset showing a detail of the slats. To the right of the drawing is a vertical scale bar with measurements in feet and inches: 0', 10', 20', 30', 40', 50', 60', 70', 80', 90', 100'. The scale bar is labeled "THEATER FOR THE NEW YORK CITY BALLET" at the top and "ARCHITECTURAL ELEVATION OF LEVEL 1" at the bottom.

Architectural elevation drawing of the exterior of the building. The drawing shows a gabled roof structure with various window types and materials. Callouts include: TA, TB, TC, TD, TE, TF, TG, TH (roof points); THEATER TOP OF ROOF 42'-0"; WOOD SCREEN ELEVATOR CORE; EXTENDING BEAM METAL ROOF; VISION GLAZED WINDOWS; WOOD SCREEN SITE STAIR 37'-0" GARDEN 12'-0"; 11'-0" LEVEL 13'-0"; 11'-0" CONTROL ROOM 11'-0" COMMONS 12'-0" ELEVATION; and BOWLS FORM CONCRETE PLINITY. A line of electrical runs along the base.

Sonoma Academy

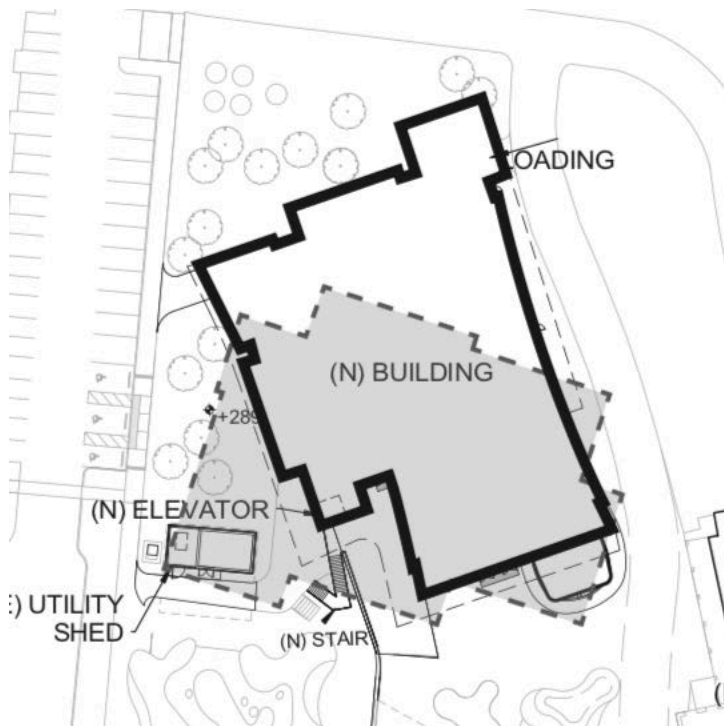


Figure 2: Site Plan: Rotation of Proposed Building

2. Revised Project

In 2016, after the preparation of several technical reports, it was determined that the 2005 MND sufficiently addressed the potential environmental impacts of the then proposed and subsequently approved Sonoma Academy project. This same analysis will be performed for the revised Sonoma Academy project under the criteria set forth in CEQA Guidelines Section 15162. The revised Sonoma Academy project is the replacing of the previously analyzed and approved Visual and Performing Arts building with a similar building that is ± 183 sq. ft. larger and in a slightly different location.

CEQA Guidelines Section 15162

Criterion 1: Substantial changes to the project that would lead to new significant effects or more severe significant effect: The replacement of the performing arts building with a building of similar size, in substantially the same location of the same general is not considered to be a substantial change from that which was analyzed or to lead to new significant or more severe effects. This criterion has not been met.

Criterion 2: Substantial change in circumstances requiring major revisions to the MND due to the involvement of new significant environmental effects or substantial increase in

the severity of previously identified impacts. There has been no significant change in circumstances relative to the Project site. This criterion has not been met.

Criterion 3: New information which was not known or could not have been known, which could result in: a) one or more significant effects; b) significant effects not previously examined; c) mitigations previously found not to be feasible would now become feasible; d) mitigation measures which are considerably different from those previously analyzed that would reduce one or more significant effects.

Due to changes in the regulatory environment, a review of the project in light of the 2005 MND revealed that the original MND did not and could not have included early consultation with Tribal Communities (AB 52). However, prior analysis of cultural and tribal resources set forth in the prior approved MND and certified EIR concluded that the impacts of tribal resources were known at the time the prior documents were adopted. The prior documents analyzed impacts to cultural, tribal and archeological resources and that analysis was relevant to the entire project site, not just the project footprint. As such, a slight rotation of the footprint would not result in impacts to any lands that were not already analyzed. Further, AB 52 consultation by the City of Santa Rosa did occur prior to the project being reviewed and acted upon by the Design Review Board and the Planning Commission in April and November 2016, and again for the current project. In addition, since adoption of the MND, the Bay Area Air Quality Management District (BAAQMD) has adopted revised CEQA Guidelines (May 2017), the California Department of Transportation (CalTrans) has changed their method of traffic analysis from one based on Level of Service (LOS) to one based on vehicle miles travelled (VMT) (Effective July 1, 2020) and Urban Wildfire has become a CEQA category (2018). The revised Project will be examined in light of these new CEQA/regulatory requirements in order to determine if the Project will cause a significant effect in any or all of these areas.

F. ASSESSMENT OF DEGREE OF CHANGE

The analysis will begin by assessing the degree of possible change to each category as a result of the proposed Project. (Categories are listed in the order they appear in a standard Environmental Checklist: Appendix G)).

TABLE 3: Impact Analysis – Proposed Project compared to 2005 Sonoma Academy Initial Study/Mitigated Negative Declaration (IS/MND)		
Impact Category	Additional Analysis Required	Discussion
1. AESTHETICS	No	<p>The revised project is of similar size and mass. Although a portion of the building is located ± 90 ft. to the north, it does not interrupt any ridgelines or public views. As in the previous submittal, the building is located within the developed campus envelop. The IS/MND required that the Planning and Economic Development Department and the Design Review Board make certain that the project design meets the criteria set forth in the General Plan Design Guidelines. The project is subject to Design Review Board review and approval. This mitigation sufficiently addresses the project's potential aesthetic impacts and no further analysis is required.</p>
2. AGRICULTURAL RESOURCES	No	<p>The 2005 IS/MND found that the Sonoma Academy site is not designated as Farmlands of Local Importance. No mitigation</p>

		was required. No further analysis is necessary.
3. AIR QUALITY	Yes	The project will be analyzed in relation to the applicable Thresholds of Significance established in the BAAQMD May 2017 CEQA Guidelines.
4. BIOLOGICAL RESOURCES	No	The adopted determinations of the biological resources section of the 2005 IS/MND are accurate and remain applicable to the proposed Project as regards potential impact on sensitive species, riparian habitat, wetlands and habitat or natural community conservation plans. The site is substantially developed. The theater building is to be located on the portion of the site previously graded and compacted. This area is not considered biologically sensitive. No further analysis is required.
5. CULTURAL RESOURCES	No	The adopted determinations and mitigations under the Cultural Resources section of the 2005 MND are accurate, applicable and sufficient as regards to the proposed Project. No

		further analysis is necessary.
6. GEOLOGY AND SOILS	No	A geotechnical investigation report was prepared for the Sonoma Academy project. The 2005 IS/MND required that all recommendations of that report be followed. Furthermore, a soils report attesting to the suitability of the foundation design will be required to be submitted at the time of building permit. No further analysis is necessary.
7. GREENHOUSE GAS EMISSIONS	No	Although Greenhouse Gas Emissions were not an impact category in the 2005 IS/MND, the City of Santa Rosa Climate Action Plan Worksheet was required at the time of project submittal. The revised project is in compliance with all applicable items. No further analysis is necessary
8. HAZARDOUS AND HAZARDOUS MATERIALS	No	The adopted determinations and mitigations under the Hazards and Hazardous Materials section of the 2005 IS/MND are accurate, applicable and sufficient as regards to the proposed

		Project. Further analysis is not required.
9. HYDROLOGY AND WATER QUALITY	No	The adopted determinations and mitigations under the Hydrology and Water Quality section (formerly Water) of the 2005 IS/MND are accurate, applicable and sufficient as regards to the proposed Project. Further analysis is not required.
10. LAND USE AND PLANNING	No	The 2005 IS/MND examined a project that included the proposed rezoning to specifically allow a private school on the Sonoma Academy site. The Land Use section adopted mitigations regarding outdoor lighting of the sports field, which are not applicable to the modified project under review. No further analysis is necessary.
11. MINERAL RESOURCES	No	The proposed modified project is to be constructed on a portion of the property that has been previously graded and compacted. The minor shift in the location of the building would not alter the non-significant impact to Mineral

		Resources. No further analysis is necessary.
12. NOISE	Yes	The 2005 IS/MND determined noise to be a less than significant impact. The minor increase in the size of the building and the minor shift in location is likely to not alter the potential to create a noise impact. Given the nature of the use itself, that is, a Visual and Performing Arts building it would be important to make certain that neither noise from the outside enters the building or sound from the performances are heard outside. This will be reviewed and commented on by the project's architect.
13. POPULATION AND HOUSING	No	The use is a non-residential use specifically allowed with a Conditional Use Permit on this parcel. No further analysis is necessary.
14. PUBLIC SERVICES	No	The proposed modification would not alter the level of required public services. No further analysis is required.
15. RECREATION	No	The modified project will not alter the project's

		impact on recreation. As part of the original project an access easement along the south side of the project site was to be granted to Sonoma County Regional Parks for access to public open space lands east of the project site. No further analysis is necessary.
16. TRANSPORTATION/ TRAFFIC	Yes	In July 2020, legislation requiring potential traffic impacts to be analyzed on the basis of vehicle miles traveled (VMT) instead of level of service (LOS) was implemented by CalTrans. This potential impact will require further analysis.
17. TRIBAL CULTURAL RESOURCES	No	Early consultation with tribal communities is required per AB 52. This occurred in 2016 prior to the project being reviewed and acted upon by the Design Review Board and the Planning Commission. Further analysis is not required.
18. UTILITIES AND SERVICE SYSTEMS	No	The proposed project is a replacement of a like building. No additional impact on Utilities and Service Systems would be engendered. No further analysis is necessary.

19. WILDFIRE	Yes	Wildfire as a potential impact category was not part of the Initial Study Checklist in 2005. Further analysis is required.
20. MANDATORY FINDINGS OF SIGNIFICANCE	No	No, if analysis below determines no significant impacts.

G. LEVEL OF SIGNIFICANCE

The impact categories identified in the above assessment, which require additional review to determine their potential level of significance are discussed below in the order they appear in Table 3, above. (Numbering relates to the specific impact category.)

3. AIR QUALITY

The May 2017 version of the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines includes revisions made to their 2010 Guidelines to address the California Supreme Court's 2015 opinion in Cal. Bldg. Industry Association vs. Bay Area Air Quality Management District., 62 Cal. 4th 369. Said guidelines set screening criteria to determine if a project will have a significant impact. Emissions below the stated thresholds are considered less than significant.

The Project is located in the San Francisco Bay Area Air Quality Basin. The SFBAAB is currently designated as a nonattainment area for state and national ozone standards and national particulate matter ambient air quality standards. Air pollution, by its nature, is largely a cumulative impact. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. According to the BAAQMD 2017 CEQA Guidelines, in developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. If the thresholds are not exceeded, additional analysis to assess cumulative impacts is unnecessary.

The proposed Project involves the construction of a visual and performing arts building that has a total square footage of 18,187 sq. ft. Table 3-1 of the BAAQMD 2017 CEQA

Guidelines establishes Operational-Related Criteria Air Pollutant and Precursor Screening Levels Sizes based on land use. The operational criteria pollutant screening size (threshold) for a High School use is 311,000 sq. ft. or 2,390 students. The proposed modified Project has a total square footage of 18,187sq. ft., and a current enrollment of ± 350 students. The Guidelines for construction related screening size is 277,000 sq. ft. or 3,012 students. As is apparent, the potential impact is significantly below the established threshold of significance. Hence, the impact is non-significant.

The 2005 IS/MND found the potential impact to Air Quality to be less than significant. The analysis did recommend however, that the standard condition of approval (COA) regarding dust control measures should be incorporated into the project. These Best Management Practices will become conditions of approval and implemented at the time of building permit.

Although the impact category of Air Quality meets criterion #3 of CEQA Guideline Section 15162, that is, new information that was not known or could not have been known, the analysis did not result in: a) one or more significant effects; b) significant effects not previously examined; c) mitigations previously found not to be feasible would now become feasible; or, d) mitigation measures which are considerably different from those previously analyzed that would reduce one or more significant effects. This being the case, a subsequent or new Negative Declaration or mitigated Negative Declaration is not required. The project meets the criteria set forth in CEQA Guidelines Section 15162.

12. NOISE

The potential for a noise impact was identified as a less than significant in the 2005 MND and the review of the project in 2016. The potential for noise intrusion from the modified project was addressed by the project's architects, Quattrocchi Kwok Architects in a letter dated March 29, 2021. Given the project's design and materials it was found that the exterior sound levels will not exceed the day, evening or nighttime ambient noise levels allowed by the city. The impact is considered less than significant, no new or subsequent Negative Declaration or mitigated Negative Declaration is required. The project meets the criteria set forth in CEQA Guidelines Section 15162.

14. TRANSPORTATION AND TRAFFIC

A Traffic Assessment Relative to a CEQA Exemption for the Sonoma Academy Project was prepared by W-Trans, consulting traffic engineers, March 18, 2021. The report reviewed the Traffic Impact Study (TIS) prepared for the original project by TJKM Transportation Consultants, November 25, 2002. The assessment found that trip generation for the project was based on students as an independent variable and that the

sizes of buildings as well as their locations and orientations were irrelevant to the traffic analysis.² The report concluded that subsequent VMT traffic analysis was not warranted.

Although the impact category of Transportation and Traffic meets criterion #3 of CEQA Guideline Section 15162, that is, new information that was not known or could not have been known, the analysis did not result in: a) one or more significant effects; b) significant effects not previously examined; c) mitigations previously found not to be feasible would now become feasible; or, d) mitigation measures which are considerably different from those previously analyzed that would reduce one or more significant effects. This being the case, a subsequent or new Negative Declaration or mitigated Negative Declaration is not required. The proposed project qualifies for a 15162 CEQA Guidelines exemption.

19. Wildfire

The Sonoma Academy project site is not located within the City of Santa Rosa Wildland-Urban Interface (WUI) Fire Area. Construction of the modified project will be required to comply with the latest building and fire codes.

Wildfire falls within criterion #3 of Guidelines Section 15162, that is, new information (in this case new regulation) of substantial importance. The project is not within that area designated WUI by the City of Santa Rosa. The project meets the criteria set forth in CEQA Guidelines Section 15162.

H. CONCLUSION

The proposed Project has been evaluated for any related environmental consequences in this Technical Memorandum.

On the basis of this analysis and the W-Trans technical report, the proposed Project does not cause new significant environmental effects or substantial increases in the severity of a significant environmental effect identified in the 2005 MND prepared for the Sonoma Academy project. There are no substantial changes in circumstances affecting the Sonoma Academy modified project, which would cause increased environmental impacts. Although there is new information, which was not known and could not have been known at the time of the 2005 Sonoma Academy MND, analysis of that new information or regulations applied to the proposed Project shows no new or more severe environmental effects. Furthermore, no infeasibility of adopted mitigation measures, no new feasible mitigation measures which the applicant declines to adopt, or no alternatives

² Traffic Assessment Relative to a CEQA Exemption for the Sonoma Academy Project. W-Trans, March 18, 2021.

different from those in the 2005 Sonoma Academy MND, which would substantially reduce effects on the environment were discovered.

Approval of the proposed Project would not meet any of the requirements in Public Resources Code Section 21166 or in CEQA Guidelines Section 15162 for preparation of a subsequent Negative Declaration or a supplement to the Negative Declaration. Therefore, the project is considered exempt.

Source Documents Used to Prepare the Technical Memorandum

1. Design Review Application: Quattrocchi Kwok Architects. March 18, 2020
2. Project Plans: Sonoma Academy Visual and Performing Arts Center. Design Review Submittal. March 9, 2020.

Architect: Quattrocchi Kwok, Architects

Landscape Architect: Carducci, Associates

Civil Engineer: Brelje and Race.
3. Mitigated Negative Declaration: Sonoma Academy. File No. MNP02-077. Adopted April 5, 2005.
4. Administrative Record: Sonoma Academy. City Council Agenda Item 11.2. March 22, 2005 including all attachments.
5. Administrative Record: Sonoma Academy. Design Review, April 21, 2016.
6. Administrative Record: Sonoma Academy. File No. PRJ16-020 Planning Commission Agenda Item No. 9. October 13, 2016 and November 17, 2016 including all attachments.
7. Traffic Assessment Relative to a CEQA Exemption for the Sonoma Academy Project. W-Trans, Consulting Traffic Engineers. March 18, 2021.
8. Noise Impacts at the Sonoma Academy Visual and Performing Arts Center. Quattrocchi Kwok Architects. March 29, 2021.