

SWCA

Addendum #4 to the City of
Healdsburg 2009 General Plan
Update (2030 General Plan)
Environmental Impact Report for the
Proposed 2024 Growth Management
Ordinance Amendment Ballot
Measure

City of Healdsburg,
Sonoma County, California

JUNE 2024

PREPARED FOR

City of Healdsburg
Community Development Department



PREPARED BY

SWCA Environmental Consultants

**ADDENDUM #4 TO THE
CITY OF HEALDSBURG 2009 GENERAL PLAN UPDATE
(2030 GENERAL PLAN)
ENVIRONMENTAL IMPACT REPORT FOR THE
PROPOSED 2024 GROWTH MANAGEMENT ORDINANCE
AMENDMENT BALLOT MEASURE**

CITY OF HEALDSBURG, SONOMA COUNTY, CALIFORNIA

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ABBREVIATIONS

2009 EIR	2009 General Plan Update Environmental Impact Report
2030 General Plan	Healdsburg 2030 General Plan
AB 32	Assembly Bill 32
ADWF	average dry-weather flow
AG	agriculture
AMI	area median income
BMP	best management practice
Caltrans	California Department of Transportation
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CH ₄	methane
CHAP	Central Healdsburg Avenue Plan
CIP	Capital Improvement Program
City	City of Healdsburg
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CWA	Clean Water Act
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
GMO	Growth Management Ordinance
gpd	gallons per day
HUSD	Healdsburg Unified School District
LOS	Level of Service
mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
MWh	megawatt hour
N ₂ O	nitrous oxide
NPDES	National Pollutant Discharge Elimination System
NSCAPCD	Northern Sonoma County Air Pollution Control District
NWIC	Northwest Information Center
PG&E	Pacific Gas & Electric
RHNA	Regional Housing Needs Allocation

RWQCB	Regional Water Quality Control Board
SCH	State Clearinghouse
SCPRMD	Sonoma County Permit and Resource Management Department
SMARA	Surface Mining and Reclamation Act
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
UGB	urban growth boundary
VMT	vehicle miles traveled

1 PURPOSE OF ADDENDUM

1.1 Introduction

The City of Healdsburg (City), serving as the Lead Agency¹ under the California Environmental Quality Act (CEQA), adopted the Final Environmental Impact Report (EIR) for the 2030 General Plan Update (2030 General Plan, approved project; State Clearinghouse [SCH] No. 2007082030) in July 2009. The Final EIR is herein referred to as the 2009 EIR or approved project. Several Addendums to the 2009 EIR have been prepared, Addendum #1 in 2016, Addendum #2 in 2018, and Addendum #3 in 2020 have been prepared to evaluate various amendments to the 2000 Growth Management Ordinance (GMO) to streamline development of multi-family housing in the city.

This document represents Addendum #4 to the 2009 EIR. It analyzes the environmental impacts of exempting multi-family residential within specific geographic areas (identified in Figure 3) from the GMO.

Figure 1 shows the location of Healdsburg, in Sonoma County, California. Figure 2 shows the jurisdiction of the City of Healdsburg. Figure 3 shows the proposed exemption areas.

1.2 Identification of Addendum as Appropriate CEQA Document

The purpose of this review is to evaluate potential environmental impacts associated with proposed changes to the previously approved project, specifically, the exemption of multi-family residential within specific geographic areas from the GMO. Additional CEQA review beyond this addendum, in the form of a Supplemental EIR, would only be necessary if the proposed changes to the approved project created new significant impacts or a substantial increase in the severity of significant impacts identified in the certified 2009 EIR.

State CEQA Guidelines Section 15164 states that the lead agency shall prepare an addendum to a previously certified EIR if the project sponsor needs to make some changes or additions to a project and if certain conditions are met. These conditions are based on State CEQA Guidelines Section 15162, which specifies the conditions that would require preparation of a Subsequent EIR. If *none* of the conditions described in Section 15162 calling for preparation of a Subsequent EIR have occurred, then an addendum to an EIR is the appropriate document to complete environmental review of changes to a project.

¹ The State CEQA Guidelines define the “Lead Agency” as the public agency that has principal responsibility for carrying out or approving a project.

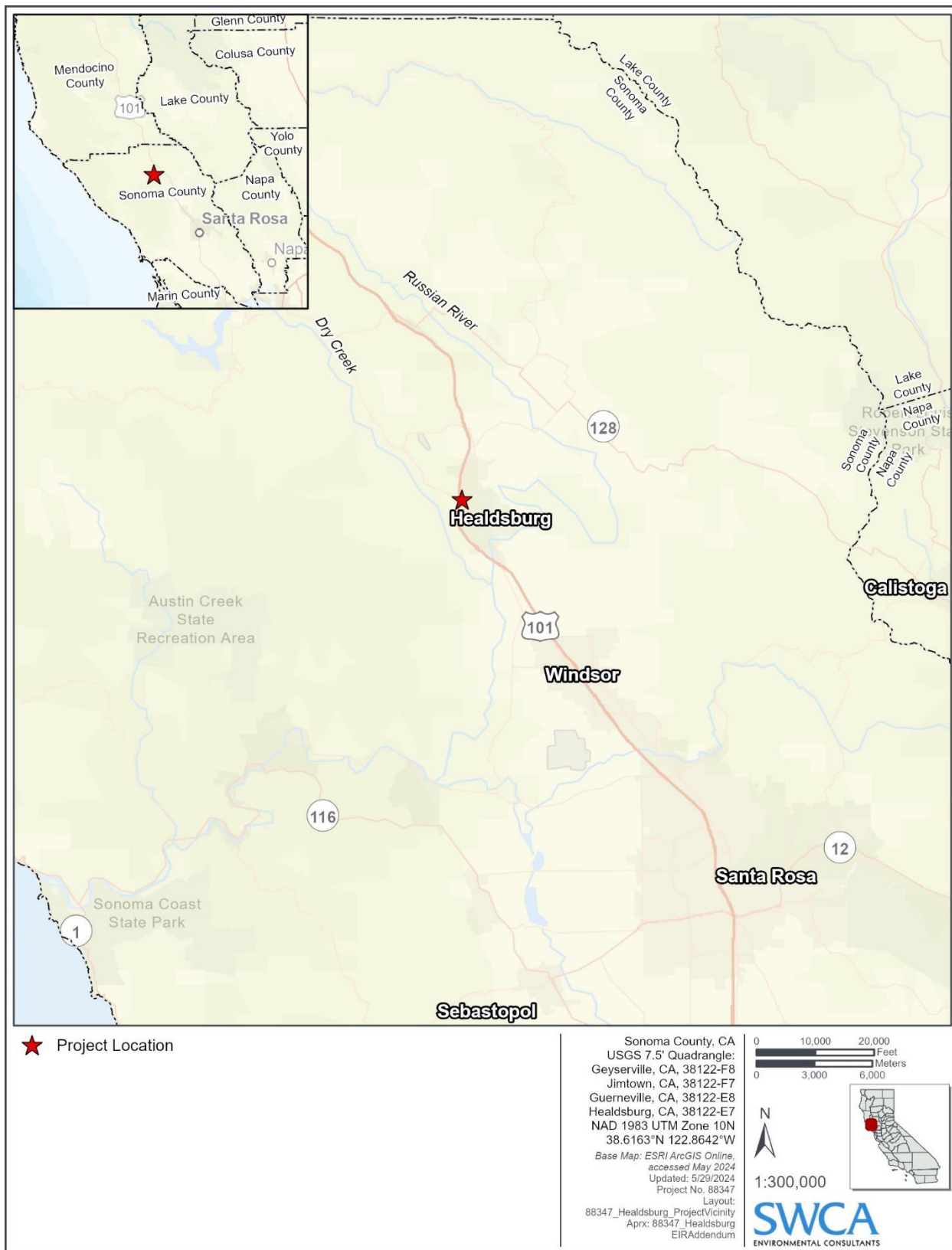


Figure 1. Project vicinity.

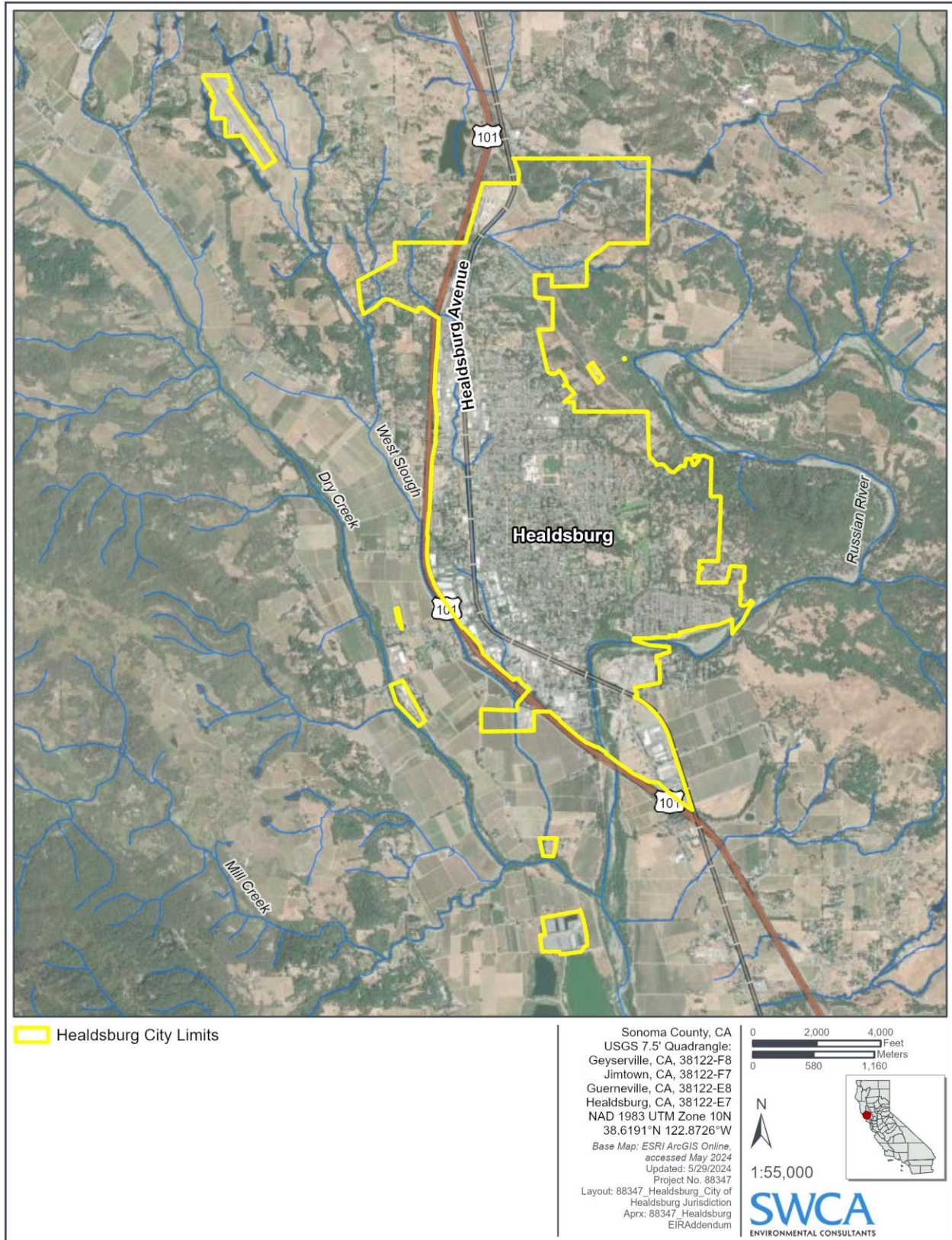


Figure 2. City of Healdsburg City Limits.

According to State CEQA Guidelines Section 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;
 - (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.

Additionally, State CEQA Guidelines Section 15164 provides the following guidance for preparation of an EIR addendum:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's

findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

This document is Addendum #4 to the 2009 EIR and has been prepared to evaluate the impacts of modifications to the approved project identified in the 2009 EIR; those modifications are referred to herein as the “proposed project.” Proposed project modifications would not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact; therefore, preparation of a Supplemental or Subsequent EIR is not required.

1.3 Summary of Addendum Conclusions

This Addendum #4 to the 2009 EIR demonstrates that the environmental analysis, impacts, and mitigation requirements identified in the 2009 EIR remain substantively unchanged by the project modifications described herein and support the finding that the proposed project does not raise any new significant impacts and does not exceed the levels of impact significance identified in the 2009 EIR. Accordingly, preparation of a Subsequent EIR is not necessary pursuant to State CEQA Guidelines Sections 15162 and 15164. This decision is based on substantial evidence, as set forth in the following discussion of the proposed project modifications and the environmental impacts of those modifications.

Circulation of this Addendum #4 for public review is not required (State CEQA Guidelines Section 15164©); however, Addendum #4 will be considered by the decision-making body, along with the previously certified 2009 EIR, prior to taking action to approve or deny the proposed project (State CEQA Guidelines Section 15164(d)).

2 BACKGROUND

2.1 Summary Descriptions of Approved Projects and Plans

2.1.1 Healdsburg 2000 Growth Management Ordinance

In November 2000, Healdsburg voters approved Measure M, an initiative to control residential growth known as the Growth Management Ordinance, which is currently contained within Chapter 17 of the City's Municipal Code.² As stated in the language of Measure M, the 2000 GMO was initially passed due to concerns that the recent rapid increase in residential growth may dramatically change the City's small town character and negatively affect residents' quality of life. The existing 2000 GMO limits the number of building permits for new residences to an average of 30 units per year, not to exceed a total of 90 units over any 3-year period.³ Low-income and affordable residential units, as defined by the State Department of Housing and Urban Development, are exempt from these limitations. Accessory Dwelling Units are also exempt from the GMO, in accordance with State law.

2.1.2 City of Healdsburg 2030 General Plan

In 2009, the City of Healdsburg adopted an updated general plan entitled the Healdsburg 2030 General Plan (2030 General Plan). As the City's principal land use planning and growth policy document, the General Plan provides for buildout of the City of Healdsburg in accordance with the General Plan's Land Use Map and the densities established for each of the land use designations.⁴ Buildout Citywide under the 2030 General Plan identified the potential for construction of up to 872 additional residential units.⁵ Based on the 2030 General Plan, population would increase from 12,200 (2005) to 14,468 at buildout, assuming all 872 residential units would be constructed and occupied. The General Plan buildout would also include commercial, retail, mixed use, and office space (507,508 square feet, 551,683 square feet, 15,000 square feet, and 20,000 square feet, respectively, or 1,014,111 square feet total).

2.1.3 City of Healdsburg 2030 General Plan Update EIR (2009)

Following the preparation of the 2030 General Plan, the City of Healdsburg prepared and certified the General Plan Update EIR (SCH No. 2007082030) that evaluated the potential environmental impacts from allowable development under the plan. The 2009 EIR contains a comprehensive analysis of the environmental impacts associated with the development in the City. The analysis includes discussion of a full range of alternatives and growth inducing impacts associated with urban development in the City. General Plan policies and implementation measures as well as the City's zoning ordinance would apply to new development in order to reduce environmental impacts.

The 2009 EIR evaluated potential environmental impacts associated with the assumed buildout of the General Plan. The EIR considered the full range of impacts and identified applicable policies and

² City of Healdsburg. Municipal Code, Chapter 17.24: Growth Control Measures. Available at: <http://www.codepublishing.com/CA/Healdsburg/>. Accessed May 2024.

³ City of Healdsburg. Municipal Code, Chapter 17.24.020 - Annual building permit allocations. Available at: <http://www.codepublishing.com/CA/Healdsburg/>. Accessed May 2024.

⁴ City of Healdsburg. 2030 General Plan, Policy Document, Chapter 2: Land Use.

⁵ City of Healdsburg. 2009. 2030 General Plan Environmental Impact Report (SCH No. 2007082030), Section IV.J: Land Use and Planning, Table IV.J.3.

implementation measures described in the 2030 General Plan.⁶ For all potentially impacted areas, the EIR either found that all impacts would be less than significant with implementation of updated general plan policies and implementation measures, without the need for mitigation; or found that there were no feasible mitigation measures and that a significant and unavoidable impact would occur. Significant Unavoidable impacts were identified in the following sections:

- Aesthetics Impact IV.B-4: The proposed Project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. (Project and Cumulative)
- Air Quality Impact IV.D-6: It cannot be determined to a reasonable degree of certainty that buildout under the General Plan would not result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change. (Project and Cumulative)
- Noise Impact IV.L-3: The proposed Project would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. (Project and Cumulative)
- Traffic and Circulation Impact IV.O-1: The proposed Project would result in unacceptable operating conditions in the short term at one of the study intersections, resulting in a significant and unavoidable impact in the long term if planned improvements are not allowed by Caltrans. (Project and Cumulative)

As part of these impacts, all mitigation measures were considered infeasible.

The City's planned growth currently may not occur any faster than allowed by the GMO. However, the General Plan, not the GMO, determines the type and overall extent of growth in the City, and ultimate buildout anticipated to occur. The GMO currently only regulates the rate of growth. The 2009 EIR evaluated the environmental effects of anticipated buildout as allowed by the 2030 General Plan, and assumed an assumed maximum allowed growth at full buildout of the City in accordance with the Land Use Map and the densities approved for each category of land use designations. The 2009 EIR did not limit evaluation of environmental impacts to those that would occur by a particular year but assessed all growth in the City and ultimate buildout as determined by the 2030 General Plan.

2.1.4 Healdsburg 2023–2031 Housing Element Update (2023 Housing Element)

Pursuant to State law, the City adopts and updates the General Plan Housing Element every 8 years. As one of the seven required elements of a general plan, the purpose of a housing element is to identify and analyze existing and projected housing needs in order to preserve, improve, and develop housing for all economic segments of the community.

The housing element is a policy document consistent with the General Plan. The housing element identifies sites designated for residential development that is internally consistent with other General Plan policies and land use designations. The housing element does not, in itself, result in development. Rather, the housing element is a comprehensive statement by the City of its broad and specific commitments to facilitate the development of housing in the City. The housing element is an official response to the need to provide housing for all economic segments of the population, establishing goals, policies, and programs that will guide City decision-making and set forth an action plan to implement these housing programs through 2031.

⁶ City of Healdsburg. 2009. 2030 General Plan Update Revised Draft Environmental Impact Report (SCH No. 2007082030). Table II-1: Summary of Environmental Impacts and Mitigation Measures, at page II-7. Available at: www.ci.healdsburg.ca.us/DocumentCenter/View/686/Summary-PDF. Accessed May 2024.

The City updated the Housing Element in 2023 for a state-mandated 8-year period from 2023 through 2031.⁷ The City's Regional Housing Needs Allocation (RHNA) strategy lays out a plan for 981 units – more than double the City's RHNA of 476.⁸ The City's strategy to convert market rate housing to affordable housing, and hotel/motel conversions reflected a 131% buffer for lower-income units, a 155% buffer for Moderate-income units, and a 402% buffer for Above Moderate-income units. An overall buffer of 206% was demonstrated in the 2023-2031 Housing Element.⁹

The 2009 General Plan EIR has an estimated buildout of 872 units. The 2023-2031 Housing Element analyzed pending, approved and permitted residential projects as well as future projections and has an estimated build out of 981 units.¹⁰ Since no proposed land use changes or general plan amendments are proposed that would increase density, these numbers fall within the allowed zoning throughout the city. Addendum #4 is consistent with the estimated numbers in the 2009 General Plan EIR and 2023 Housing Element update.

2.1.5 Ballot Measures to Amend the City Growth Management Ordinance

Healdsburg voters have weighed in on four ballot measures related to growth management, including the original measure in 2000. A summary of those measures is below:

Measure M: In 2000, voters approved the GMO that established growth control measures limiting the number of market rate residential units to 30 per calendar year in the City of Healdsburg. The growth restrictions in the 2000 GMO to approve no more than an average of 30 dwelling units per year have made it difficult to develop market rate multi-family housing within the City. See Section 2.1.1 above.

Measure R: In November 2016, the City placed Measure R on the ballot. Measure R would have increased inclusionary requirements on new residential development, removed existing restrictions on new residential units, and adopted and periodically amended new growth management measures. The City would amend growth management measures in conjunction with updates to the General Plan Housing Element. As part of this ballot measure, an EIR addendum to the 2030 General Plan (Addendum #1) was prepared. However, Measure R failed, and the adopted GMO from 2000 remained in place. See Section 2.1.6 below for a discussion of the 2016 GMO amendment.

Measure P: In November 2018, the City placed Measure P on the ballot. Measure P amended the GMO to allow for the construction of an average of 50 additional multi-family income-restricted rental units per year. Measure P passed, and the GMO was amended. As part of this ballot measure, an EIR addendum to the 2030 General Plan (Addendum #2) was prepared. See Section 2.1.7 below for a discussion of the 2018 GMO amendment.

Measure H: In November 2020, the City placed Measure H on the ballot. Measure H allowed for further flexibility to construct affordable and market rate housing. Measure H passed, allowing the GMO to be amended to permit the currently allowed average of 50 units per year of multi-family, income-restricted rental housing, as authorized by the voters in 2018, to be offered either for rental or for sale. As part of this ballot measure, an EIR addendum to the 2030 General Plan (Addendum #3) was prepared. See Section 2.1.8 below for a discussion of the 2020 GMO amendment.

⁷ City of Healdsburg. 2023a. Adopted 6th Cycle Housing Element. Available at: https://healdsburg.gov/DocumentCenter/View/16801/Healdsburg-Housing-Element_Adopted-and-Certifiedpdf. Accessed May 2024.

⁸ City of Healdsburg. 2023a. Table 7. Page 75.

⁹ City of Healdsburg. 2023a. Page 99.

¹⁰ City of Healdsburg. 2023a. Page 76.

2.1.6 2016 Growth Management Ordinance Amendment Ballot Measure – EIR Addendum #1

City Council directed the following language be analyzed for potential environmental effects and placement on the November 2016 ballot as Measure R (see Section 2.1.6 above). The City of Healdsburg proposed to place two alternative questions on the ballot, and both were analyzed in Addendum #1:

Shall Healdsburg voters amend the existing Growth Management Ordinance to provide housing working families can afford by increasing inclusionary housing requirements on new development to 30%, removing existing restrictions on the number of new residential units allowed per year, adopting and periodically amending new growth management measures at the discretion of the City Council, and adopting and periodically updating a Housing Action Plan to provide a greater variety of housing?

Or, alternatively:

Shall Healdsburg voters amend the existing Growth Management Ordinance to provide housing working families can afford by increasing inclusionary housing requirements on new development to 30%, removing existing restrictions on the number of new residential units allowed per year, adopting and periodically amending new growth management measures in conjunction with updating the Housing Element, and adopting and periodically updating a Housing Action Plan to provide a greater variety of housing?¹¹

Measure R failed, and the 2000 GMO remained in place. Addendum #1 did not affect the type of growth or the total amount of growth under the 2030 General Plan or change the environmental impacts identified by the 2009 EIR. The addendum evaluated the potential environmental impacts of Addendum #1 to the GMO considered by the City Council in 2016 and concluded that there would be no potential impacts beyond those already identified and analyzed in the General Plan EIR.

2.1.7 2018 Growth Management Ordinance Amendment Ballot Measure – EIR Addendum #2

On June 18, 2018, the City Council directed the following language be analyzed for potential environmental effects and placement on the November 2018 ballot as Measure P (see Section 2.1.6 above). Measure P text read as follows:

Shall the City of Healdsburg amend its current Growth Management Ordinance to allow for the construction of an average of 50 additional multi-family income restricted rental units per year?¹²

Measure P passed with 56% voter support. Addendum #2 focused on the potential physical impacts to the environment associated with the City's 2018 proposal to amend the 2000 GMO to allow for an additional average of 50 new multi-family rental units per year. The 2018 GMO amendment allowed for an average of 50 multi-family income-restricted rental units per year, in addition to the average of 30 new residential units per year currently allowed. The City continues to review proposed multi-family development

¹¹ City of Healdsburg. 2018. City Council/Redevelopment Successor Agency, Regular Meeting (June 18, 2018) item 8a) Growth Management Ordinance Amendment Discussion, at pg. 5. Available at: <http://healdsburgca.iqm2.com/Citizens/Calendar.aspx>. Accessed May 2024.

¹² City of Healdsburg. 2016. Addendum to the Healdsburg 2030 General Plan Update EIR GMO Ballot Measure Addendum Project Initial Study Checklist/Addendum. Received via email May 21, 2024.

projects in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, ultimate buildout of the City does not change, regardless of the Measure P passing and implementation of Addendum #2, which affected only the timing of growth. Addendum #2 did not affect the type of growth or the total amount of growth under the 2030 General Plan or change the environmental impacts identified by the 2009 EIR. The addendum evaluated the potential environmental impacts of Addendum #2 to the GMO considered by the City Council in June 2018, and concluded that there would be no potential impacts beyond those already identified and analyzed in the General Plan EIR.

2.1.8 2018 Growth Management Ordinance Amendment Ballot Measure – EIR Addendum #3

On March 3, 2020, the City Council directed the following language be analyzed for potential environmental effects and placement on the March 3, 2020 ballot as Measure H (see Section 2.1.6 above). Measure H text read as follows:

Shall the City of Healdsburg’s Growth Management Ordinance be amended to permit the currently allowed average of 50 units per year of multi-family, income-restricted rental housing, as authorized by the voters in 2018, also be offered for sale?¹³

Measure H passed, allowing the GMO to be amended to permit the currently allowed average of 50 units per year of multi-family, income-restricted rental housing, as authorized by the voters in 2020, to be offered either for rental or for sale. The City continues to review proposed multi-family development projects in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, ultimate buildout of the City does not change, regardless of the Measure P passing and implementation of Addendum #3, which affected only the timing of growth. Addendum #3 did not affect the type of growth or the total amount of growth under the 2030 General Plan or change the environmental impacts identified by the 2009 EIR. The addendum evaluated the potential environmental impacts of Addendum #3 to the GMO considered by the City Council in June 2020, and concluded that there would be no potential impacts beyond those already identified and analyzed in the General Plan EIR.

2.2 Environmental Review Process

The City of Healdsburg, serving as the Lead Agency under CEQA, prepared the Final EIR for the approved project, as well as the Findings and Mitigation Monitoring and Reporting Program (MMRP) in accordance with State CEQA Guidelines Sections 15091 (Findings) and 15097 (Mitigation Monitoring or Reporting), respectively. The Findings document identified impacts resulting from the approved project, and the MMRP outlined mitigation measures to reduce significant impacts to less-than-significant levels.

3 PROPOSED PROJECT CHANGES

3.1 Proposed 2024 Ballot Measure Language “Proposed Project”

The City aims to expedite permitting multi-family housing, increase the percentage of workforce housing, and accommodate a diverse range of income levels in the City. Over the past 5 years, the City has developed 100 units, acquired and rehabilitated 39 units, extended the affordability of 133 units, and has

¹³ City Of Healdsburg. 2020. Growth Management Ordinance Clarification Amendment Project Description Initial Study/Addendum to the Healdsburg 2030 General Plan EIR. Received via email May 21, 2024.

307 units in the housing pipeline. However, since the GMO passed in 2000, no market rate multi-family rental projects of over five units have been constructed in the City. Measure P passed in 2018 but has not resulted in any multi-family middle income units (120%-160% AMI).

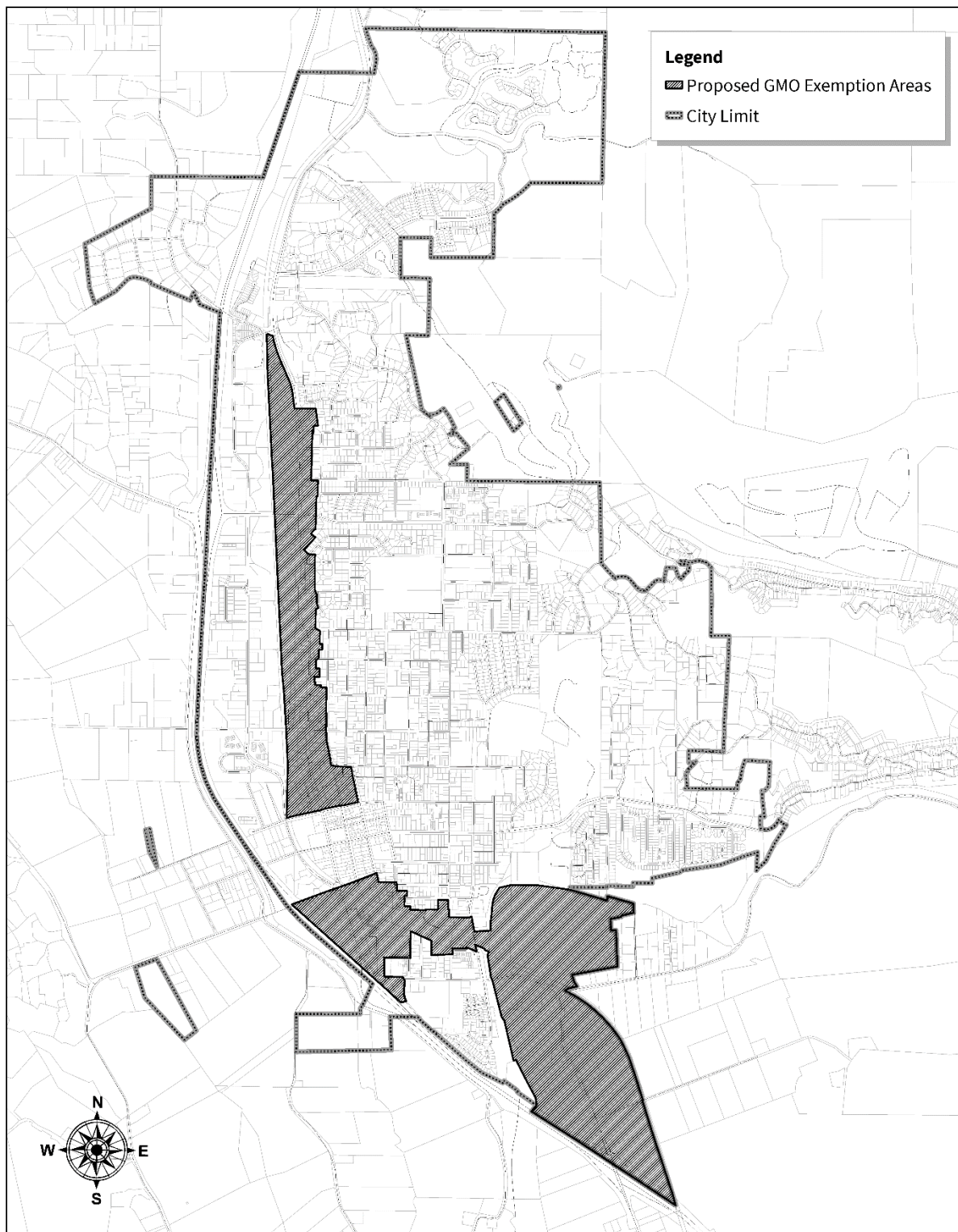
The proposed 2024 GMO amendment would protect established residential neighborhoods and allow the City to target specific areas for growth, including the north Healdsburg Avenue corridor, the Central Healdsburg Avenue Plan (CHAP), and future South Entry Area as shown in Figure 3. The total area to be exempted from the 2000 GMO includes the zoning districts listed in Table 1. While single-family housing is not currently permitted in these zoning districts, adoption of the 2024 Amendment would exempt only multi-family housing within the identified areas from the GMO.

Table 1. Current Zoning Districts in 2024 Exempted Area, and Housing Allowance by Type

Current City Zoning District	Single-Family Allowed in 2024 Amendment?	Multi-Family Allowed in 2024 Amendment?
Multi-Family Residential	–	Permitted
Office & Multi-Family Residential (OFM)	–	Permitted
Service Commercial (CS)	–	Permitted
Downtown Commercial (CD)	–	Permitted
Mixed Use (MU)	–	Permitted
Industrial (I)	–	Conditionally Permitted
Public (P)	–	–

Source: City of Healdsburg. 2024a. Received via email on May 15, 2024.

With approval of the amendment, multi-family housing projects would be allowed to be built without the constraint of the GMO. Underutilized parcels that would be investigated for multi-family housing parcels would be defined as any parcel that contains a passive or underutilized use, including vacant sites, abandoned uses, and strip commercial areas. Sites that have higher development potential or have a higher and better use would be permitted for multi-family housing. The City’s planned growth currently may not occur any faster than allowed by the current GMO. However, the General Plan, not the GMO, determines the type and overall extent of growth in the City and the ultimate buildout anticipated to occur. The Healdsburg 2009 EIR evaluated the environmental effects of anticipated buildout as allowed by the 2030 General Plan. The 2009 EIR evaluated an assumed maximum allowed growth at full buildout of the City in accordance with the Land Use Map and the densities approved for each category of land use designations. The General Plan EIR did not limit evaluation of environmental impacts to those that would occur by a particular year but assessed all growth in the City and ultimate buildout. The GMO currently restricts the rate of growth and restricts the number of allowed residential units in three-year cycles. The proposed 2024 amendment would not change the development potential; as stated above, it would allow for increased pace of multi-family housing development, focused on the exemption areas. The City would continue to review proposed multi-family development projects in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, ultimate buildout of the City would be the same, whether or not the measure passes and the City implements the proposed 2024 amendment to the GMO.



City of Healdsburg

Proposed GMO Exemption Areas

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Figure 3. Areas in which multi-family would be exempted from the Growth Management Ordinance.

At the May 6, 2024, Council Meeting, staff provided a report and presentation to Council laying out three options for consideration. That presentation and report included substantial background on the history of the GMO and City efforts to support housing affordability and workforce housing initiatives. Staff presented the following three options for amending the GMO:¹⁴

1. Exempt Certain Geographic Areas from the GMO.
2. Remove the income restriction on multi-family rental units allowed under Measure P.
3. Permit construction of housing units that were allowed but not constructed in previous years.

After deliberation, Council directed staff to pursue Option 1 as it offered opportunities for both for sale and rental housing. Council requested that staff return with additional details and options for both the geographies to be included as well as potential guardrails to safeguard against future luxury development.

At the June 3, 2024, City Council Meeting, the Council reviewed the proposed geographies and guardrails and provided direction to staff. The City Council provided direction to remove the majority of the Downtown Commercial zoning district, in addition to the Plaza Retail district, from the Downtown geographic exemption area. Council opted to keep the portion of the Downtown Commercial district north of North Street in the proposed exemption area. With that modification the geographic area labeled Healdsburg Avenue North Corridor would begin at North Street and extend north to the intersection of Grove Street at Healdsburg Avenue. In addition, the Council provided direction to include both the Central Healdsburg Avenue Plan Area and the South Entry Area as part of the proposed areas to be exempted from the GMO.

While the zoning districts within the proposed geographic carve out areas are limited to multi-family housing only, the Council directed staff to ensure that the proposed GMO amendment be expressly limited to multi-family housing to protect from any future changes in zoning that might allow single-family housing within those areas.

Based on the direction provided by the City Council at the June 6th meeting staff prepared the following ballot language:

“To encourage creation of workforce housing on underutilized parcels, should the City of Healdsburg exempt multi-family housing along portions of the Healdsburg Avenue corridor from the Growth Management Ordinance?”

The Healdsburg City Council will consider adoption of a resolution including this language, to be finalized at the June 17, 2024, meeting. The resolution would establish November 5, 2024, as the date for a municipal election on a proposed ballot measure, and the election would seek voter approval to amend the 2000 GMO.

Per the Regional Housing Needs Calculator, the City needs to construct approximately 560 low-income units (below 80% of Area Median Income [AMI]) and approximately 333 moderate to market rate units (above 121% AMI) over the next Housing Element Cycle through 2031 at the 30% Policy Target level to ensure compliance with California Housing and Community Development.¹⁵ The 2009 General Plan EIR has an estimated buildout of 872 units. The 2023-2031 Housing Element analyzed pending, approved and

¹⁴City of Healdsburg. 2024. City Council/Redevelopment Successor Agency, Regular Meeting (May 6, 2024) item 8) Growth Management Ordinance Ballot Measure Discussion Staff Report. Available at: https://healdsburgca.iqm2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=2270&MediaPosition=&ID=4437&CssClass=-. Accessed May 2024.

¹⁵ City of Healdsburg. 2023b. Housing Needs Calculator. Excel spreadsheet sent via email on May 16, 2024.

permitted residential projects as well as future projections and has an estimated build out of 981 units.¹⁶ Since no proposed land use changes or general plan amendments are proposed that would increase density, Addendum #4 is consistent with the estimated numbers in the 2009 EIR and 2023-2031 Housing Element update.

The proposed 2024 amendment to the 2000 GMO would affect only the pace of multi-family housing development within specific geographic locations: north Healdsburg Avenue corridor, CHAP, and South Entry Area as shown on Figure 3. The ordinance would not affect the type of growth or the total amount of growth under the General Plan or change the environmental impacts identified by the 2009 EIR. This Addendum #4 evaluates the potential environmental impacts of the proposed amendment to the GMO considered by the City Council in June 2024 and concludes that there would be no potential impacts beyond those already identified and analyzed in the 2009 EIR. The 2030 General Plan¹⁷ and the 2009 EIR¹⁸ are incorporated herein by reference, available for review on the City's website¹⁹ and at City Hall during normal business hours.

¹⁶ City of Healdsburg. 2023a. Page 76.

¹⁷ City of Healdsburg. 2009a. *2030 General Plan*. Available at: <https://www.ci.healdsburg.ca.us/354/General-Plan>. Accessed May 2024.

¹⁸ City of Healdsburg. 2009b. *General Plan Environmental Impact Report*. Available at: <https://www.ci.healdsburg.ca.us/355/General-Plan-Environmental-Impact-Report>. Accessed May 2024.

4 ENVIRONMENTAL IMPACT ANALYSIS

The 2009 EIR for the approved project evaluated environmental issues under the following CEQA topics: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Transportation and Traffic, and Utilities and Service Systems. For all potentially impacted areas, the 2009 EIR either found that all impacts would be less than significant with implementation of updated general plan policies and implementation measures, without the need for mitigation; or found that there were no feasible mitigation measures, and that a significant and unavoidable impact would occur under the topics of Aesthetics, Air Quality, Noise, and Traffic and Circulation.

All CEQA topics are required to be evaluated under the 2009 EIR have been evaluated or reevaluated in this Addendum #4 for the proposed project. This evaluation determines whether the proposed project would result in any new significant impacts or substantially more severe impacts than those identified in the 2009 EIR.

4.1 Explanation of Checklist Evaluation Categories

This section explains the criteria for the checklist evaluation of each environmental issue/CEQA topic listed above and analyzed in the 2009 EIR. The checklist evaluation is presented as a table at the beginning of each environmental issue/CEQA topic area. Section 4.17

4.1.1 ***Conclusion in Prior 2009 General Plan Update EIR***

This column presents the conclusion from the 2009 EIR for the environmental issue listed under each topic.

4.1.2 ***Do the Proposed 2024 Changes Involve New Impacts?***

Pursuant to State CEQA Guidelines Section 15162(a)(1), this column indicates whether the changes represented by the proposed 2024 amendment to the 2000 GMO would result in new significant environmental impacts not previously identified or mitigated by the 2009 EIR, or whether the changes will result in a substantial increase in the severity of a previously identified significant impact.

4.1.3 ***New Circumstances Involving New Impacts?***

Pursuant to State CEQA Guidelines Section 15162(a)(2), this column indicates whether there have been substantial changes in the circumstances under which the project is undertaken that will require major revisions to the 2009 EIR, due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

4.1.4 ***New Information Requiring New Analysis or Verification?***

Pursuant to State CEQA Guidelines Section 15162(a)(3)(A-D), if additional analysis completed as part of this Addendum #4 were to find that the conclusions of the 2009 EIR remain the same and no new significant impacts are identified, or identified impacts are not found to be substantially more severe, or additional mitigation is not necessary, then the question would be answered “no”, and no additional environmental document would be required. Also see Section 1.2, Identification of Addendum as Appropriate CEQA Document.

4.1.5 2009 EIR Mitigation Measures Implemented or Address Impacts

Pursuant to State CEQA Guidelines Section 15162(a)(3), this column indicates whether the 2009 EIR provides mitigation measures to address effects in the related impact category. If these mitigation measures will be implemented with the construction of the project; a “yes” response will be provided in either instance. “None” indicates that the EIR and this checklist have concluded that the impact does not occur with this project or is not significant; therefore, no additional mitigation measures are needed.

4.2 Aesthetics

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Aesthetics					
<i>Would the project:</i>					
a) Have a substantial adverse effect on a scenic vista?	Less-than-significant impact	No	No	No	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No impact	No	No	No	None
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	Less-than-significant impact	No	No	No	None
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Significant and unavoidable impact	No	No	No	None

4.2.1 Discussion

- a) The 2009 General Plan Update EIR concluded that through the implementation of applicable General Plan policies related to aesthetic resources, impacts would be less than significant. The analysis considered policies intended to conserve existing ridgelines, hillsides, and open space and natural settings; to ensure land use developments respect natural constraints and conditions and are aesthetically pleasing; and to protect scenic resources from obstruction from development. In addition, the 2009 EIR noted that the City would require future proposed projects to adhere to Article 26 of the City’s Zoning Ordinance, which maintains the City’s natural resources through Design Review for proposed development. The City may also require, visual simulations along certain roadways specified in General Plan policies NR-C-7 and where necessary pursuant to General Plan Policy NR-10. The City also requires that proposed development comply with all applicable policies and regulations found in the City’s General Plan and Zoning Ordinance. Policies LU-A-6, LU-C-1, TA-14, PS-H7, NR-B-2, and NR-C-1 through NR-C-8 would ensure land use development respects natural constraints and conditions as well as protect the City’s aesthetic resources. The 2009 EIR concluded that impacts related to impact on a scenic vista would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development in areas identified in Figure 3 from the GMO. Similar to the 2009 EIR, the proposed amendment would comply with General Plan policies and Article 26 of the City's Zoning Ordinance. The 2024 amendment to the GMO does not anticipate significant visual changes beyond those analyzed in the 2009 EIR. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- b) As discussed in the 2009 General Plan Update EIR, according to the California Department of Transportation (Caltrans) there are no State designated scenic highways within the City of Healdsburg,²⁰ and concluded that no impact would occur related to damage to scenic resources within a State scenic highway. New development would not be located within or adjacent to a State-designated scenic highway.

Similar to the 2009 EIR, the 2024 amendment to the 2000 GMO would not cause damage to scenic resources, as there are no State scenic highways in the City, nor proposed exemption area. Amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- c) The 2009 General Plan Update EIR considered the potential for buildout to result in degradation of the City's visual character. To preserve the City's visual character, the City would implement General Plan policies through development and building standards as well as ensure future projects adhere to local regulations. In addition, the City will require future proposed projects to demonstrate consistency with applicable area plans. City planning documents and regulations further recognize natural constraints and site conditions within the Urban Growth Boundary (UGB),²¹ promoting the maintenance of downtown Healdsburg's character and aesthetics and preserving and enhancing the most desirable qualities of the City's built environment. The areas proposed for exemption from the 2000 GMO occur within the City of Healdsburg UGB. In addition, the 2009 EIR noted that future proposed projects would be required to adhere to Article 26 of the City's Zoning Ordinance, as described in impact a). The 2009 EIR concluded that with implementation of the General Plan policies, local regulations and area plans, as well as Article 26 of the City's Zoning Ordinance, buildout would not significantly degrade the existing visual character or quality of the City, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.
- d) The 2009 General Plan Update EIR noted that future proposed projects would be required to adhere to Article 21 of the City's Zoning Ordinance and Article 26 (discussed above). The City developed the zoning ordinance to include environmental performance standards, which prohibit lighting from spilling onto adjacent properties. Future proposed projects would have to comply with applicable General Plan policies related to encouraging designing buildings that are in scale and harmony with surrounding development as well as requiring landscaping to minimize glare. The 2009 EIR concluded that despite these measures to reduce lighting impacts associated with development, the overall added glare and sky-glow would result in significant and unavoidable impacts under the

²⁰ City of Healdsburg. 2009b. Page IV.B-45.

²¹ County of Sonoma. 2024. City of Healdsburg Urban Growth Boundary. Available at: <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/GIS/Downloadable%20Map/City-Healdsburg-Urban-Boundaries.pdf>. Accessed May 2024.

2030 General Plan. Mitigation identified for significant impacts was determined not to be feasible. A discussion of those impacts is located in Section 2.1.3 of this addendum.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development on parcels deemed underutilized within the exemption area identified in Figure 3, above. Consistent with the 2009 EIR, development in the exempted area would adhere to Article 26 of the City’s Zoning Ordinance and applicable General Plan policies, local regulations, Citywide Design Guidelines and area plans. The exemption would streamline multi-family housing in the exempted area, and lighting and glare would increase along the Healdsburg Avenue corridor. Overall, however, the number of housing units would remain the same as previously analyzed, and impacts would remain significant and unavoidable. Amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.2.2 **New EIR Mitigation Measures**

None.

4.2.3 **Conclusion**

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, aesthetic impacts associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.3 **Agriculture and Forestry Resources**

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Agriculture and Forestry Resources					
<i>Would the project:</i>					
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?	Less-than-significant impact	No	No	No	None
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	Less-than-significant impact	No	No	No	None

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non- agricultural use or conversion of forest land to non-forest use?	Less-than-significant impact	No	No	No	None

4.3.1 Discussion

a-c) The 2009 General Plan Update EIR concluded that the conversion of farmland or forestland to non-agricultural or non-forestry use at the assumed buildout of the General Plan would be less than significant.²² The City contains a limited amount of farmland and forestland and is primarily classified as Urban or Built-Up Land. No parcels within the City are subject to a Williamson Act contract, and the 16.33-acre parcel located between Magnolia and Kinley Drive was the only parcel identified as being zoned Agriculture (AG) within the City. The proposed 2024 GMO amendment proposes to exempt areas identified in Figure 3 from the GMO and would not impact the 16.33-acre agricultural parcel located between Magnolia and Kinley Drive or alter land use designations in the 2030 General Plan, or directly result in revisions to supporting land use policy documents. The EIR concluded that impacts related to the conversion of farmland or forestland to non-agricultural or non-forestry use would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR or convert farmland or forestland to housing. In the area proposed for exemption, there is no farmland, land subject to a Williamson Act contract, forestry land, or lands designated as a timberland production zone. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 General Plan Update EIR. No additional analysis is required.

4.3.2 New EIR Mitigation Measures

None.

4.3.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. In the area proposed for exemption, there is no farmland, land subject to a Williamson Act contract, forestry land, or lands designated as a timberland production zone. Therefore, impacts to agricultural resources associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

²² City of Healdsburg. 2009b. Page IV.C-17.

4.4 Air Quality

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Air Quality					
<i>Would the project:</i>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	No impact	No	No	No	None
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Less-than-significant impact	No	No	No	None
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	No impact	No	No	No	None
d) Expose sensitive receptors to substantial pollutant concentrations?	Significant and Unavoidable impact	No	No	No	None
e) Create objectionable odors affecting a substantial number of people?	Less-than-significant impact	No	No	No	None

4.4.1 Discussion

a-e) The 2009 General Plan Update EIR concluded that because the North Coast Air Basin is in attainment for all federal ambient air quality standards, the Northern Sonoma County Air Pollution Control District (NSCAPCD) was not required to prepare or implement an air quality plan, and therefore buildout of the 2030 General Plan would not conflict with any applicable air quality plan.²³ The 2009 EIR also concluded that buildout would not result in violation of an air quality standard or contribute substantially to an existing or projected air quality violation due to construction emissions, with implementation of standard dust control measures and General Plan Implementation Measure NR-24.²⁴ The 2009 EIR determined that compliance with NSCAPCD rules and regulations and transportation control measures intended to reduce ozone precursor emissions, operational emissions from the 2030 General Plan would be less than significant.²⁵ The 2009 EIR concluded that buildout of the General Plan would not result in any carbon monoxide (CO) “hotspots” or result in CO concentrations that would exceed State or federal ambient air quality standards.²⁶ Objectionable odors associated with future development under the General Plan would be addressed by NSCAPCD Rule 400, which prohibits air contaminants from being

²³ City of Healdsburg. 2009b. Pages IV.D-26; IV.D-30.

²⁴ City of Healdsburg. 2009b. Page IV.D-27.

²⁵ City of Healdsburg. 2009b. Page IV.D-28.

²⁶ City of Healdsburg. 2009b. Page IV.D-32.

discharged in quantities sufficient to constitute a public nuisance among any considerable number of persons or the public that would endanger comfort or repose. General Plan Policy LU-C-4 requires that development at the interface of different land use designations be designed to ensure compatibility between uses, which could include a buffer zone and the regulation of operations that may create objectionable odors. In addition, an ongoing odor control program has been instituted at the Healdsburg Transfer Station and Healdsburg Landfill. Therefore, impacts related to odors were determined to be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development in areas identified in Figure 3 from the GMO, on parcels deemed underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development within the exemption area without the constraint of the GMO. The 2009 EIR accounted for the development that would occur if the 2000 GMO were amended per the proposed 2024 ballot measure language. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.4.2 New EIR Mitigation Measures

None.

4.4.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, air quality and greenhouse gas emissions impacts associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.5 Biological Resources

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Biological Resources					
<i>Would the project:</i>					
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?	Less-than-significant impact	No	No	No	None

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
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?	Less-than-significant impact	No	No	No	None
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less-than-significant impact	No	No	No	None
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?	Less-than-significant impact	No	No	No	None
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less-than-significant impact	No	No	No	None
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?	Less-than-significant impact	No	No	No	None

4.5.1 Discussion

- a) The 2009 General Plan Update EIR concluded that impacts to candidate, sensitive, or special status species would be less than significant. As discussed in the 2009 EIR, future development within the City has the potential to affect special-status plants and animals.²⁷ To address potential impacts, the City would identify the presence of suitable habitat within areas proposed for future development and require surveys for special-status plants and animals pursuant to applicable federal, State, and local regulations.

The proposed 2024 amendment to the 2000 GMO would not permit more multi-family rental units than previously analyzed in the 2009 EIR. Future projects would need to demonstrate compliance with applicable General Plan policies as well as federal and State regulations that reduce impacts to candidate, sensitive, and special-status species impacts associated with the 2024 amendment to the

²⁷ City of Healdsburg. 2009b. Page IV.E-29.

2000 GMO would be less than significant. Therefore, amending the GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- b) The 2009 General Plan Update EIR concluded that implementation of federal, State, and local regulations and the General Plan policies designed to protect riparian and other sensitive habitats would reduce associated impacts to less than significant.

The proposed 2024 amendment to the 2000 GMO would not permit more multi-family rental units than previously analyzed in the 2009 EIR. Buildout of multi-family units would occur within the exemption area identified in Figure 3 from the GMO and would not disturb sensitive natural communities or riparian habitat outside of areas already considered for potential development, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- c) The 2009 General Plan Update EIR concluded that impacts related to federally protected wetlands would be less than significant. As discussed in the 2009 EIR, implementation of the federal and State regulations under the Clean Water Act would require permits that would identify impact to wetlands and mitigation measures.²⁸

The proposed 2024 amendment to the 2000 GMO would not permit more multi-family rental units than previously analyzed in the 2009 EIR. Buildout of multi-family units would occur at compatible locations identified in Figure 3 from the GMO and would not disturb land other than areas analyzed in the 2009 EIR. As a result, wetlands impacts would be less than significant, and no new impacts to listed wetlands would occur. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- d) The 2009 General Plan Update EIR concluded that impacts related to migratory fish and wildlife species would be less than significant. As discussed in the 2009 EIR, implementation of federal and State regulations related to the protection of migratory fish and wildlife species along with the General Plan policies that protect biological resources (General Plan policy PS-D-2—channel improvements, NR-2—requiring storm water pollution plans, and S-C-3—flood protection measures) would reduce migratory species impacts to less than significant levels.²⁹

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family rental units than previously analyzed in the 2009 EIR. Buildout of multi-family units would occur at compatible locations identified in Figure 3 from the GMO and would not disturb land other than areas previously analyzed in the 2009 EIR. As a result, no new impacts to migratory fish and wildlife species would occur and impacts to migratory species would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- e) The 2009 General Plan Update EIR. concluded that impacts related to heritage trees would be less than significant. As discussed in the 2009 EIR, the City protects “heritage trees,” defined in Article

²⁸ City of Healdsburg. 2009b. Page IV.E-31.

²⁹ City of Healdsburg. 2009b. Pages IV.E-31 to 32.

18, Section 18105 of the City’s Zoning Ordinance, and implementation of this ordinance and general plan policies would reduce impacts to less than significant.³⁰

The proposed 2024 amendment to the 2000 GMO would not permit more multi-family rental units than previously analyzed in the 2009 EIR. Buildout of multi-family units would occur at compatible locations within the exemption area identified in Figure 3 from the GMO and would not disturb land other than that which was previously analyzed in the 2009 EIR. As a result, no new impacts to heritage trees would occur. Consistent with the 2009 EIR, heritage tree impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- f) The 2009 General Plan Update EIR concluded that impacts related to Habitat Conservation Plans, Natural Community Plans, or other approved conservation plans would be less than significant. As discussed in the 2009 EIR, compliance with General Plan policies would ensure buildout of the general plan would not conflict with habitat conservation plans and other approved plans.³¹

The proposed 2024 amendment to the 2000 GMO would not permit more multi-family rental units than previously analyzed in the 2009 EIR. Buildout of multi-family units would occur at compatible locations within the exemption area identified in Figure 3 from the GMO and would not disturb land other than that which was previously analyzed in the 2009 EIR. Consistent with the 2009 EIR, future proposed projects would be required to adhere to General Plan policies that reduce impacts to habitat conservation plans or natural community plans and impacts to habitat conservation or natural community plans would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.5.2 New EIR Mitigation Measures

None.

4.5.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, impacts to biological resources associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

³⁰ City of Healdsburg. 2009b. Page IV.E-32.

³¹ City of Healdsburg. 2009b. Page IV.E-33.

4.6 Cultural Resources

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Cultural Resources					
<i>Would the project:</i>					
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	Less-than-significant impact	No	No	No	None
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less-than-significant impact	No	No	No	None
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less-than-significant impact	No	No	No	None
d) Disturb any human remains, including those interred outside of formal cemeteries?	Less-than-significant impact	No	No	No	None

4.6.1 Discussion

a-d) The City includes two areas governed by the Historic District Overlay, along with 10 buildings and one site (Healdsburg Plaza) that are currently locally listed as historic. Policy CD-B-1 supports the preservation of the Plaza as the historic and cultural center of the City, and Policy LU-D-3 prohibits formula businesses around the Plaza to protect its character. Both Policies HCR-A-1 and HCR-A-2 promote historic preservation through the protection and enhancement of the City’s historically significant districts, buildings, and landscape features and the support of efforts of owners of qualified properties in seeking local historic designation listing on the California Register and/or the National Register of Historic Places. In addition, the 2030 General Plan contains implementation measures HCR-1 and HCR-3 that direct the City to inventory and protect historic resources.

The City Zoning Ordinance directs the City Historic Committee to review any alteration of a building within a Historic District.³² This includes accessory buildings over 400 square feet in floor area (except for accessory dwelling units) as well as demolition of any designated historic building or structure that contributes to the area’s historic character. The City also requires Design Review for any significant alterations to designated individual historic buildings and sites and significant alterations to buildings within a designated historic district.³³

Design Review is also required prior to any alteration to an existing building within a historic overlay. A project that may increase the floor area of more than 25%, adds a second story, or significantly changes front elevations is subject to prior City approval. The City further reviews and requires approval for any new construction less than 25% as well as exterior alterations, repair, and rehabilitation of a primary structure in an historic overlay.³⁴ The City’s review would determine

³² City of Healdsburg. Municipal Code, Title 20: Land Use, Article III Historic District Overlay, Section 20.12.065.

³³ City of Healdsburg. 2009b. Pages IV.F-8 and 9.

³⁴ City of Healdsburg. Municipal Code, Title 20: Land Use, Article III Historic District Overlay, Section 20.12.066.

consistency with applicable design guidelines for historic properties intended to protect historical resources. With implementation of applicable General Plan policies and land use regulations, the 2009 EIR concluded that impacts related to significant historical resources would be less than significant.

General Plan Policies HCR-B-1 through HCR-B-4 would protect archaeological resources by requiring consultation with culturally affiliated Native American tribes prior to the adoption of any plans or actions to place sacred sites permanently in open space areas. The policies require that the City work with tribal governments to identify, address, and mitigate impacts to cultural resource sites and to encourage voluntary landowner efforts to do the same, consistent with State law. Specifically, Policy HCR-B-3 requires that the City avoid or mitigate to the maximum extent feasible impacts of development on Native American archaeological and cultural resources. In addition, General Plan implementation measures HCR-8 through HCR-10 require the City to coordinate with tribal governments to avoid impacts to cultural resources. The City would continue to refer future project applications that require discretionary permits to the Northwest Information Center (NWIC) in order to determine if the site might contain archaeological resources. If a site is likely to contain these resources, the City would require further study of the site if recommended by the NWIC and require protective mitigation measures if necessary. Therefore, the 2009 EIR concluded that potential disturbance of archaeological resources would be less than significant.³⁵

No unique geologic features were found to exist in areas that could be impacted by General Plan buildout. Therefore, the 2009 EIR determined that impacts to paleontological resources would be less than significant.³⁶

California Health and Safety Code Section 7050.5 states that if human remains are unearthed during construction, no further disturbance shall occur until the Sonoma County Coroner Unit has made the necessary findings as to origin and disposition. If the remains are determined to be those of a Native American, the coroner must contact the Native American Heritage Commission within 24 hours of identifying the remains as being those of a Native American. In addition, General Plan implementation measures HCR-8 and HCR-9 call for the City to identify, protect, and preserve cultural resources during the City's development and environmental review process. These implementation measures also require monitoring of earth-disturbing activities in archaeologically and culturally sensitive areas, as well as evaluation by a qualified archaeologist of cultural resources found prior to or during construction and application of appropriate mitigation measures. Therefore, the 2009 EIR concluded that impacts related to potential disturbance of human remains would be less than significant.³⁷

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR. Thus, the effect of the amended ordinance would not result in disturbance of more structures or ground area than previously analyzed. Amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.6.2 New EIR Mitigation Measures

None.

³⁵ City of Healdsburg. 2009b. Page IV.F-9.

³⁶ City of Healdsburg. 2009b. Page IV.F-9.

³⁷ City of Healdsburg. 2009b. Page IV.F-10.

4.6.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan, all potential impacts to historic resources would be mitigated on a project-by-project basis. Therefore, impacts to cultural resources associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.7 Geology and Soils

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Geology and Soils					
<i>Would the project:</i>					
a) Expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death involving:					
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?	Less-than-significant impact	No	No	No	None
ii) Strong seismic ground shaking?	Less-than-significant impact	No	No	No	None
iii) Seismic-related ground failure, including liquefaction?	Less-than-significant impact	No	No	No	None
iv) Landslides?	Less-than-significant impact	No	No	No	None
b) Result in substantial soil erosion or the loss of topsoil?	Less-than-significant impact	No	No	No	None
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?	Less-than-significant impact	No	No	No	None
d) Be located on expansive soil, as defined in Table 18-1- B of the Uniform Building Code (1994), creating substantial risks to life or property?	Less-than-significant impact	No	No	No	None

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less-than-significant impact	No	No	No	None

4.7.1 Discussion

- a) The 2009 General Plan Update EIR concluded that impacts related to seismic hazards would be less than significant. As discussed in the 2009 EIR, the City is in a seismically active region and may experience strong ground shaking, but implementation of federal, State, and General Plan policies would minimize seismic hazard risks.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development in areas within the exemption area identified in Figure 3 from the GMO, on parcels deemed underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Consistent with the General Plan, multi-family units built would not be located within a designated Alquist-Priolo fault zone. Adherence to federal and State regulations and General Plan policies would reduce the risks associated with exposure of people and property to seismically related hazards. Furthermore, implementation of these regulations and policies would ensure 2024 amendment to the 2000 GMO impacts related to ground failure and landslides from seismic activity would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- b) The 2009 General Plan Update EIR concluded that impacts related to erosion would be less than significant. As discussed in the 2009 EIR, implementation of California Building Code guidelines and General Plan policies would prevent or limit soil erosion due to development. Implementation of General Plan policies would limit grading activity and ensure that a stormwater pollution prevention plan (SWPPP) is prepared prior to construction activities, and impacts would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development in areas identified in Figure 3 from the GMO. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Any future proposed projects in the exemption area would adhere to applicable California Building Code guidelines and General Plan policies, reducing soil erosion impacts to less than significant. Therefore, amending the GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- c) The 2009 General Plan Update EIR concluded that impacts related to exposure of people and property to geologic hazards such as landslides, land subsidence, or unstable or expansive soils were determined to be less than significant. As discussed in the 2009 EIR, adherence with federal

and State regulations and General Plan policies would ensure risks associated with exposure of people and property to geologic hazards are limited.

Implementation of the 2024 GMO amendment would not change the development potential, but rather allow for increased pace of multi-family housing development, focused on the exemption area. The implementation of federal and State regulations and General Plan policies would minimize risks associated with geologic hazards (landslides, lateral spreading, subsidence, or liquefaction), and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- d) The 2009 General Plan Update EIR concluded that impacts related to expansive soils would be less than significant. As discussed in the 2009 EIR, adherence with federal and State regulations and General Plan policies would ensure that future developments would be sited in accordance with geological limitations and employ structurally sound building practices.

The proposed 2024 amendment to the 2000 GMO would not change the development potential, but rather allow for increased pace of multi-family housing development, focused on the exemption area, within the General Plan area previously analyzed. Since implementation of federal and State regulations and General Plan policies would minimize risks associated with expansive soils, and impacts would be less than significant. Amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- e) The 2009 General Plan Update EIR concluded that impacts related to soils and the use of septic tanks where sewer service is not available would be less than significant. As discussed in the 2009 General Plan Update EIR, future development in the City that cannot be served by City sewer service would be required to adhere to the guidelines of the Sonoma County Permit and Resource Management Department (SCPRMD) septic system permitting process.

The proposed 2024 amendment to the 2000 GMO would not change the number or type of multi-family units that would occur within the General Plan area previously analyzed. Since the 2024 GMO amendment would not change the area of development and implementation of the guidelines of the SCPRMD septic system permitting process would apply. Impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.7.2 New EIR Mitigation Measures

None.

4.7.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, impacts to geology and soils associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.8 Hazards and Hazardous Materials

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Hazards and Hazardous Materials					
<i>Would the project:</i>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less-than-significant impact	No	No	No	None
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?	Less-than-significant impact	No	No	No	None
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	Less-than-significant impact	No	No	No	None
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?	Less-than-significant impact	No	No	No	None
e) Be located within 2 miles of a public airport or private use airport and result in a safety hazard for people residing or working in the project area?	Less-than-significant impact	No	No	No	None
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	Less-than-significant impact	No	No	No	None
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less-than-significant impact	No	No	No	None
h) Be located in an area designated as having a high, extreme, or severe fire hazard, or otherwise expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Less-than-significant impact	No	No	No	None

4.8.1 Discussion

- a) The 2009 General Plan Update EIR concluded that impacts related to residential hazardous materials would be less than significant. As discussed in the 2009 EIR, buildout of the General Plan could result in the additional transport, use, and disposal of hazardous materials but residential land uses do not use significant amounts of hazardous materials.

The proposed 2024 amendment to the 2000 GMO would permit the same number and type of multi-family units as analyzed in the 2009 EIR. The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. Similar to the 2009 EIR, under the amended ordinance the same types and amounts of hazardous materials would be used because the same types and amounts of residential land uses would be built. As described in the 2009 EIR, the transport and storage of household hazardous materials would not be a significant impact because they can be disposed of at two sites. Furthermore, implementation of federal, State, and local programs, plans, policies and permits would ensure impacts are less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- b) The 2009 General Plan Update EIR concluded that impacts related to the risk of accidental upset would be less than significant. As discussed in the 2009 General Plan Update EIR, General Plan policies are in place to ensure that adequate emergency procedures are in place to respond to and recover from accidental upset of hazardous materials.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. Similar to the 2009 EIR, the proposed amendment would comply with General Plan policies adopted to reduce the risk of accidental upset. In addition, conditions analyzed under the 2009 EIR would be the same under the GMO amended language resulting in the same risk of accidental upset. Similar to the 2009 EIR, impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- c) The 2009 General Plan Update EIR concluded that impacts related to risks associated with locating hazardous materials within one-quarter mile of schools would be less than significant. As discussed in the 2009 EIR, implementation of federal, State, and General Plan policies would minimize potential impacts by protecting schools from hazardous materials and emissions.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed underutilized. As the ordinance does not change the number and type of units analyzed in the 2009 EIR, the same impacts would occur. Additionally, all previously analyzed federal, State, and General Plan policies would minimize potential impacts from hazardous materials and emissions within one quarter mile of a school, and impacts would be less than significant. Amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- d) The 2009 General Plan Update EIR concluded that impacts to the public or the environment resulting from a State response site located within the City would be less than significant. As discussed in the General Plan EIR, federal, State, and General Plan policies are in place to minimize impacts related to response sites.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. While the proposed 2024 amendment could allow for multi-family housing to be conditionally permitted on industrial sites, any proposed project would undergo a project-specific analysis prior to construction, and all federal, State, and General Plan policies regulations previously analyzed under the 2009 EIR would minimize potential impacts from State response sites. Similar to the 2009 EIR, impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- e-f) The 2009 General Plan Update EIR concluded that impacts of a public airport or private use airport would be less than significant. As discussed in the 2009 EIR, buildout would not expose people residing and working in the Planning Area to a safety hazard due to operation of a public airport.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed are to be exempted from the GMO would not be located in the Healdsburg Municipal Airport's safety zones or other airports' safety zones as defined in the Sonoma County Comprehensive Airport Land Use Plan,³⁸ and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- g) The 2009 General Plan Update EIR concluded that impacts to an adopted emergency response plan or emergency evacuation plan would be less than significant. As discussed in the 2009 EIR, implementation of General Plan policies would ensure that adequate emergency procedures are in place to respond to and recover from human-made and natural disasters.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The exemption could increase traffic along the Healdsburg Avenue corridor. In 2023, the City adopted an evacuation map covering all areas of the City, including the area proposed to be exempted from the GMO.³⁹ The areas proposed to be exempted would fall within the following evacuation zones: HE-2, HE-5, HE-11, and HE-13. Similar to the 2009 EIR, implementation of General Plan policies would minimize potential impacts on emergency operations and ensure emergency vehicle access, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot

³⁸ Permit Sonoma. 2006. Healdsburg Airport Safety Zones. Available at: <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Long%20Range%20Plans/healdsburg-Airport-Safety-Zones.pdf>. Accessed May 2024.

³⁹ City of Healdsburg. 2023c. Evacuation Zones. Available at: <https://healdsburg.gov/1051/Evacuation>. Accessed May 2024.

measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- h) The 2009 General Plan Update EIR concluded that impacts to the exposure of people or structures to wildland fire would be less than significant. As discussed in the 2009 EIR, implementation of General Plan policies would minimize associated potential wildfire risks.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development with the exemption area, on parcels deemed to be underutilized. Per the California Department of Forestry and Fire Protection’s Fire Hazard Severity Zones in State Responsibility Areas GIS Viewer,⁴⁰ the area proposed to be exempted under the proposed project does not fall within an area designated as having a high, extreme, or severe fire hazard. Similar to the 2009 EIR, implementation of General Plan policies would minimize potential impacts to wildfire hazards through fire hazard reduction methods, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.8.2 New EIR Mitigation Measures

None.

4.8.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, impacts related to hazards and hazardous materials associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.9 Hydrology and Water Quality

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Hydrology and Water Quality					
<i>Would the project:</i>					
a) Violate any water quality standards or waste discharge requirements?	Less-than-significant impact	No	No	No	None

⁴⁰ California Department of Forestry and Fire Protection. 2024. Fire Hazard Severity Zones in State Responsibility Areas GIS Viewer. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed May 2024.

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less-than-significant impact	No	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Less-than-significant impact	No	No	No	None
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less-than-significant impact	No	No	No	None
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less-than-significant impact	No	No	No	None
f) Otherwise substantially degrade water quality?	Less-than-significant impact	No	No	No	None
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Less-than-significant impact	No	No	No	None
h) Place within a 100- year flood hazard structures which would impede or redirect flood flows?	Less-than-significant impact	No	No	No	None
i) Expose people or structures to significant risk or loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Less-than-significant impact	No	No	No	None
j) Inundation of by seiche, tsunami, or mudflow?	Less-than-significant impact	No	No	No	None

4.9.1 Discussion

- a) The 2009 General Plan Update EIR concluded that impacts related to potential violation of water quality and waste discharge requirements would be less than significant. Future development would be consistent with the Clean Water Act (CWA) and applicable Regional Water Quality Control Board (RWQCB) measures that would ensure water quality standards are not violated. As discussed in the 2009 EIR, General Plan policies and policy implementation measures would carry out federal and State regulations. These policies, including those implemented as part of the approval process for future projects, and compliance with federal, State, and local regulations would ensure water quality standards or waste discharge requirements are met.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area from the GMO, on parcels deemed to be underutilized. Because the same total of number of units would be allowed as analyzed in the 2009 EIR, the same impacts to water quality would occur as analyzed in the 2009 EIR. Consistent with the 2009 EIR, projects built in the exempted GMO area would be required to comply with all existing federal, State, and local water quality regulations that prevent water quality impacts, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- b) The 2009 General Plan Update EIR concluded that the change of some parcels previously proposed for development to Open Space would result in less-than-significant impacts to groundwater and groundwater supplies. As discussed in the 2009 EIR, buildout of the General Plan is expected to result in an increased demand for water and the City would be adequately served by water from the Russian River and Dry Creek.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The area proposed for exemption would not increase impervious surfaces, nor would allow development on watershed areas compared to what was previously analyzed in the 2009 EIR. Additionally, in accordance with policy PS-A-9, the City has been awarded grant funding to construct half of the planned recycled water facilities needed. This reuse of water would lessen the need for water supply from the Russian River and Dry Creek via Lake Sonoma.⁴¹

Groundwater supplies and recharge impacts would not change compared to what was analyzed in the 2009 EIR under the proposed project, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- c) The 2009 General Plan Update EIR concluded that no alteration is proposed to streams or rivers that would result in substantial erosion or siltation on or off site. As discussed in the 2009 EIR, proposed projects would have to adhere to General Plan policies, California State Water Resources Control Board (SWRCB) permitting requirements, National Pollutant Discharge Elimination System (NPDES) Phase II regulations, grading regulations of the City's Municipal Code, and best management practices (BMPs) that would reduce impacts to less than significant.

⁴¹ City of Healdsburg. 2024b. Municipal Recycled Water Pipeline. Available at: <https://cityofhealdsburg.org/1114/Municipal-Recycled-Water-Pipeline>. Accessed May 2024.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. As a result, consistent with the 2009 EIR, projects built under the 2024 amendment to the 2000 GMO would be required to adhere to all applicable federal, State, and local policies to reduce erosion or siltation on and off-site, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- d) The 2009 General Plan Update EIR concluded that no alteration to streams or rivers is proposed that would result in a substantial increase in the rate or amount of stormwater and flooding. Implementation of General Plan policies PS-D-1 and PS-D-3 would increase the capacity of the City's drainage systems and ensure the project is served by adequate stormwater drainage. As discussed in the 2009 EIR, projects would have to adhere to General Plan policies PS-D-1 and PS-D-3, the City's municipal code and applicable BMPs that would prevent substantial polluted runoff.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed exemption would allow for multi-family development in a focused area that has been previously developed, and the less-than-significant impacts related to stormwater runoff rates and amounts would be the same as analyzed in the 2009 EIR. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- e) As discussed in the 2009 General Plan Update EIR, the City would implement General Plan policies PS-D-1 and PS-D-3 that would complete gaps in the storm drainage system and increase capacity using development fees to fund improvements. With implementation of those policies, the 2009 EIR concluded that impacts from runoff and stormwater drainage system capacity were determined to be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The area proposed to be exempted would not create more impervious surfaces. As a result, impacts to stormwater drainage system capacity would not change because the GMO revisions would not change the amount of stormwater that would be captured. Additionally, the City has been awarded funds to construct part of a recycled water pipeline, anticipated to offset demand of potable water by approximately 27 million gallons per year, or about 4% of current demand.⁴² Compliance with General Plan policies would ensure stormwater drainage capacity is adequate, and impacts would remain less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- f) The 2009 General Plan Update EIR concluded that compliance with the provisions of the General Construction Activity Stormwater Permit adopted by the SWRCB, employment of BMPs, General

⁴² City of Healdsburg. 2024b. Municipal Recycled Water Pipeline. Available at: <https://cityofhealdsburg.org/1114/Municipal-Recycled-Water-Pipeline>. Accessed May 2024.

Plan policies, and grading regulations of the City’s Municipal Code would reduce the impacts related to risk of water quality degradation to less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Therefore, the same impacts to water quality would occur as analyzed in the 2009 EIR, and projects built under the 2024 amendment would be required to comply with federal, State, and local water quality regulations. Implementation of these measures, and all BMPs, would prevent eroded materials and other pollutants from entering the City’s drainage system and degrading water quality, and impacts would be less than significant. Therefore, the 2024 amendment to the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- g) The 2009 General Plan Update EIR concluded that impacts due to flooding and 100-year flood zones would be less than significant. General Plan policies S-C-1 and S-C-2 would ensure development is in compliance with Federal Emergency Management Agency (FEMA)–adopted standards. These policies set requirements for development in 100-year flood zones or flood plains and ensure conformance with federal regulations.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. In the exempted area, there are FEMA-mapped Special Flood Hazard Areas around Foss Creek.⁴³ Any projects constructed in the exempted area would be required to adhere to General Plan policies regarding flood zone hazards, specifically policy S-C-2, which requires that new residential development in flood prone areas shall be constructed so that the lowest floor is at least one foot above the 100-year flood level. Existing development shall comply with these requirements when improvements are made costing at least 50% of the current market value of the structure before the improvements.⁴⁴ Any residential development would be required to also comply with the City’s floodplain management ordinance and federal regulations. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- h) The 2009 General Plan Update EIR concluded that impacts due to flooding and 100-year flood zones would be less than significant. As discussed under threshold discussion 4.10.g), above, local policies would ensure development is in compliance with FEMA adopted standards.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Any projects constructed in the exempted area would be required to adhere to General Plan policies regarding flood zone hazards and the City’s floodplain management ordinance, in

⁴³ Federal Emergency Management Agency. 2024. FEMA Flood Map Service Center: Search by Address. Available at: <https://msc.fema.gov/portal/search?AddressQuery=city%20of%20healdsburg>. Accessed May 2024.

⁴⁴ City of Healdsburg. 2009b. Hydrology and Water Quality.

conformance with federal regulations, and impacts would be less than significant. Amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- i) The 2009 General Plan Update EIR concluded that impacts due to flooding from dam or levee failure would be less than significant. As discussed in the 2009 EIR, the Warm Springs Dam and Coyote Dam have the potential to inundate the City in the event of failure. The City's implementation measures would ensure General Plan policies intended to reduce impacts would be carried out.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. The exempted area is mapped in a dam inundation area, and there is the possibility that the 2024 exemption could expose more people or structures to flooding related to dam or levee failure along Healdsburg Ave. However, as noted in the 2009 EIR, Implementation Measures proposed for the revised Safety Element of the proposed General Plan include S-4 which states that the city will "Maintain and periodically update the City's Emergency Operations Plan, Recovery Manual and Hazard Mitigation Plan. As part of the periodic updates, the City shall review county and state emergency response procedures to ensure that they are coordinated with city procedures" and S-5, which states that the City will "Conduct periodic emergency response exercises to test the effectiveness of City emergency response procedures." These measures would minimize risks associated with flooding due to dam failure for projects built after the proposed 2018 amendment to the 2000 GMO. Similar to the 2009 EIR, impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2018 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- j) The 2009 General Plan Update EIR concluded that impacts due to inundation of a seiche, tsunami, or mudflow are less than significant. As discussed in the 2009 EIR, projects would have to adhere to General Plan policies aimed at reducing impacts from mudflows.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. As described in the 2009 EIR, the City is not adjacent to the ocean or an enclosed body of water and therefore, there is no risk from a tsunami or seiche. Projects built after the 2024 amendment to the 2000 GMO would have to adhere to General Plan policies that reduce impacts from mudflows, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.9.2 New EIR Mitigation Measures

None.

4.9.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, impacts related to hydrology and water quality associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.10 Land Use and Planning

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Land Use and Planning					
<i>Would the project:</i>					
a) Physically divide an established community?	Less-than-significant impact	No	No	No	None
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Less-than-significant impact	No	No	No	None
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	No impact	No	No	No	None

4.10.1 Discussion

a-c) The 2009 General Plan Update EIR concluded that much of the buildout under the General Plan would occur as infill development and not divide an established community. Furthermore, the General Plan does not include any extension of roadways or other development features through currently developed areas that could divide existing communities. Roadway extensions in areas with new residential development would be part of a comprehensive development plan that would establish linkages among new land uses and to existing land uses.⁴⁵ The 2009 EIR found that buildout of the General Plan was consistent with the Sonoma County General Plan, the Sonoma County Comprehensive Airport Land Use Plan, the City of Healdsburg Zoning Ordinance, and all City of Healdsburg Specific and Neighborhood Plans, in addition to conservation plans.⁴⁶ Policy LU-C-4 would ensure development between uses is compatible, and Policy S-G-1 would help

⁴⁵ City of Healdsburg. 2009b. Page IV.J-21.

⁴⁶ City of Healdsburg. 2009b. Pages IV.J-22 to IV.J-24.

ensure compatibility between land uses by requiring consistency with the Community Noise Environments guidelines.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. The type and overall extent of growth within the City is determined by the 2030 General Plan. The proposed amendment to the GMO would not change the type or extent of growth analyzed under the 2009 EIR, however, the 2024 amendment to the GMO could alter the annual growth rate within the City.

While the General Plan determines the type and extent of growth, the proposed exemption would allow for multi-family housing to be a permitted use in several different Zoning Districts, listed in Chapter 3. Proposed Project Changes, Table 1. Multi-Family housing could be conditionally approved in industrial districts. All proposed projects within the exemption area would be subject to the City’s environmental review process, which includes project-specific environmental review under CEQA, including mitigation of significant impacts to the extent feasible. Therefore, implementation of the General Plan was found to not result in incompatibilities between land uses.

The proposed 2024 exemption would not physically divide an existing community, nor conflict with any applicable land use plan. The environmental impacts identified in the 2009 EIR, would not change due to the proposed amendment to the GMO, and the proposed 2024 ballot measure language would not change or introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.10.2 New EIR Mitigation Measures

None.

4.10.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, land use impacts associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.11 Mineral Resources

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Mineral Resources					
<i>Would the project:</i>					

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
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?	Less-than-significant impact	No	No	No	None
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 impact	No	No	No	None

4.11.1 Discussion

- a) The 2009 General Plan Update EIR concluded that impacts related to the loss of availability of a known mineral resource that is of value to the region and the residents of the State would be less than significant. As discussed in the 2009 EIR, State policies would preserve existing known mineral resources zones and manage mineral resource extraction. For example, the State Surface Mining and Reclamation Act (SMARA) identifies and protects areas containing significant mineral resources.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. The amended ordinance would apply to previously developed parcels and would not introduce new loss of mineral resources. Similar to the 2009 EIR, implementation of SMARA would preserve existing known mineral resources zones and manage mineral resource extraction. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- b) The 2009 General Plan Update EIR concluded that impacts related to the availability of a locally important mineral resource recovery site would be less than significant. As discussed in the 2009 EIR, policies contained in the Sonoma County Aggregate Resources Management Plan, City of Healdsburg General Plan, and Zoning Ordinance Article 22 would preserve locally important mineral resource recovery sites and ensure SMARA regulations are implemented.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Implementation of General Plan policies would preserve locally important mineral resources sites. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.11.2 New EIR Mitigation Measures

None.

4.11.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, impacts to mineral resources associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.12 Noise

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Noise					
<i>Would the project:</i>					
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less-than-significant impact	No	No	No	None
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less-than-significant impact	No	No	No	None
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Significant and unavoidable impact	No	No	No	None
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less-than-significant impact	No	No	No	None
e) For a project located within an airport land use plan, or where such a plan has not been adopted, within 2 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?	Less-than-significant impact	No	No	No	None
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	No impact	No	No	No	None

4.12.1 Discussion

- a) The 2009 General Plan Update EIR concluded that the proposed Implementation Measure S-25 (requiring noise-reducing measures for construction activities) would reduce construction noise impacts resulting from buildout of the 2030 General Plan. The analysis also concluded that there would be no changes in noise and land use compatibility impacts compared to existing conditions with implementation of the General Plan Update. Furthermore, implementation of Policies LU-C-4, S-G-1, and S-G-2, and Implementation Measure S-16, would ensure that new noise-generating development that could occur under the General Plan would not be exposed to noise levels in excess of acceptable standards. The conclusion in the 2009 EIR was that the impact from the exposure of persons to or generation of noise levels in excess of standards established in an applicable plan or noise ordinance was found to be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. With the 2024 exemption, there is a possibility that sensitive land uses could be introduced to industrial or commercial areas. However, any projects built in the exempted area to the 2000 GMO would be required to adhere to City's Noise Ordinance and applicable General Plan policies, local regulations, and area plans. Similar to the 2009 EIR, impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- b) The 2009 General Plan Update EIR concluded that new permanent sources of ground-borne vibration would not be introduced under General Plan buildout. Perceptible ground-borne vibration may result on an infrequent basis during construction activities but were determined to be well below thresholds for potential cosmetic or structural damage to buildings. General Plan implementation measure S-24 requires the use of the FTA vibration impact criteria to evaluate the land use compatibility of sensitive uses proposed along the railroad corridor using the best available information (without active railroad operations) or site-specific analyses (with active railroad operations). Developers of sensitive uses would also be required to demonstrate that potential impacts of existing or potential vibration have been minimized to the maximum feasible extent. Therefore, the 2009 General Plan Update EIR determined that exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more residential development than what was analyzed in the 2009 EIR. Consistent with the General Plan EIR, any projects built in the exempted area from the GMO would be required to adhere to City's Noise Ordinance and applicable General Plan policies, local regulations, and area plans, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- c) The 2009 General Plan Update EIR concluded that approximately 56,459 daily vehicular trips could be added to roadways in the City as development occurs under the General Plan. The traffic increases would increase noise levels throughout the community over time. The 2009 EIR determined this to be a significant and unavoidable impact, as the efficacy of mitigation measures could not be determined with certainty.

The proposed GMO amendment would not allow for more residential development than what was analyzed in the 2009 EIR and, thus, would not result in additional on- or off roadway noise than

anticipated under the 2009 General Plan Update EIR. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- d) The 2009 General Plan Update EIR concluded that General Plan implementation measure S-25, which requires noise-reducing measures for construction activities, and compliance with the City's Noise Ordinance limiting permissible hours for construction activities would reduce construction noise impacts associated with General Plan buildout. Therefore, due to construction hour limitations and implementation of BMPs, the 2009 EIR determined that impacts related to a substantial temporary or periodic increase in ambient noise levels would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more residential development than what was analyzed in the 2009 EIR. Any projects built in the exempted area of the GMO would be required to adhere to City's Noise Ordinance and applicable General Plan policies, local regulations, and area plans, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- e) Aircraft operations associated with Healdsburg Municipal Airport and Charles M. Schulz Sonoma County Airport are sources of intermittent noise in the City. New noise-sensitive uses are not planned in areas within the 60 or 65 dBA CNEL noise contours for either airport. Thus, the 2009 General Plan Update EIR concluded that impacts related to aviation-related noise in proximity to a public airport would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more residential development than what was analyzed in the 2009 EIR. The impacts described above were based on buildout of the General Plan and account for the development that would occur if the proposed amendment was approved. Similar to the 2009 EIR, impacts would be less than significant associated with people residing or working within the vicinity of a public airport being exposed to excessive noise levels. Therefore, amending the 2000 GMO via the proposed 2018 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- f) There are no private airstrips located within the City, and new noise-sensitive uses are not planned in areas within the 60 or 65 dBA CNEL noise contours for a private airstrip. The 2009 General Plan Update EIR concluded no impact related to aviation-related noise in proximity to a private airstrip.

The proposed 2024 amendment to the 2000 GMO would not impact noise-sensitive uses near private airstrips. Per the findings in the 2009 EIR, no impacts would occur associated with people residing or working within the vicinity of a private airstrip being exposed to excessive noise levels. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.12.2 New EIR Mitigation Measures

None.

4.12.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, noise impacts associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.13 Population and Housing

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Population and Housing					
<i>Would the project:</i>					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	Less-than-significant impact	No	No	No	None
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	Less-than-significant impact	No	No	No	None
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	Less-than-significant impact	No	No	No	None

4.13.1 Discussion

a-c) The 2009 General Plan Update EIR concluded that buildout of residentially designated land in the City’s UGB could result in the construction of up to 872 additional residential units. The City of Healdsburg is expected to experience the smallest percent change in population (approximately 6.5%) from 2010 to 2030 compared to the rest of Sonoma County.

The 2009 EIR evaluated the potential environmental impacts from an assumed full buildout of the General Plan, a total of 872 units at full occupancy, and a maximum of approximately 14,468 new residents within the UGB, while the 2023-2031 Housing Element analyzed pending, approved and permitted residential projects as well as future projections and has an estimated build out of 981 units. The 2009 EIR considered how the City would accommodate population growth and evaluated the potential for development consistent with General Plan land use designations, and impacts related to population growth upon full residential buildout were considered be less than significant.⁴⁷ However, since no proposed land use changes or general plan amendments are proposed that would increase density, Addendum #4 is consistent with the estimated numbers in the

⁴⁷ City of Healdsburg. 2009b. Page IV.M-9.

2009 EIR and 2023 Housing Element update. The 2009 EIR also assumed residential development would occur primarily on vacant and underutilized parcels within the City. Individual projects could result in the demolition of existing housing units to develop other permitted uses on-site, but the 2009 EIR determined that impacts related to the displacement of existing housing or people were determined to be less than significant.⁴⁸

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development in areas identified in Figure 3 from the GMO from the GMO. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Any projects proposed within the exemption area would be required to be consistent with the General Plan and area plans. Residential development resulting in increased demand for public services, infrastructure, and utilities would be accounted for in the City's Capital Improvement Program (CIP). Furthermore, the City would review proposed residential development for consistency with the General Plan and applicable regulatory standards.

The impacts described above were based on buildout of the General Plan and, therefore, account for the development that would occur as part of the 2024 exemption to the 2000 GMO. The 2024 exemption would meet General Plan Policy H-B-2, which recommends amending the 2000 GMO to allow for increased multi-family residential development. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.13.2 New EIR Mitigation Measures

None.

4.13.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, impacts related to population and housing associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

⁴⁸ City of Healdsburg. 2009b. Page IV.M-9.

4.14 Public Services

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Public Services					
<i>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 public services:</i>					
a) Fire protection?	Less-than-significant impact	No	No	No	None
b) Police protection?	Less-than-significant impact	No	No	No	None
c) Schools?	Less-than-significant impact	No	No	No	None
d) Parks?	Less-than-significant impact	No	No	No	None
e) Other public facilities?	Less-than-significant impact	No	No	No	None

4.14.1 Discussion

- a) The 2009 General Plan Update EIR concluded that any development resulting from General Plan buildout would be required to comply with all applicable fire code requirements associated with adequate fire truck access, fire flows, and number of hydrants. General Plan Policy T-A-4 would ensure adequate access for emergency vehicles, including adequate street widths and vertical clearance on new streets. Pursuant to Policy T-A-4, the City shall strive to maintain a Level of Service (LOS) D operation during periods of peak flow at critical intersections, and LOS C operation during all other times. Policy PS-E-2 requires all new commercial, industrial, institutional, multiple-unit residential, and mixed-use developments to have built-in fire protection equipment, thus offsetting the need for new Fire Department staff and equipment. General Plan implementation measure PS-12 seeks to develop funding sources sufficient to attain and maintain adequate fire service levels, thereby mitigating potential impacts related to provision of fire facilities. The 2009 EIR determined that impacts related to fire protection would be less than significant.⁴⁹

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development in within the exemption area from the GMO, on parcels deemed underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Any projects proposed within the exemption area would be required to be consistent with the General Plan and area plans, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not

⁴⁹ City of Healdsburg. 2009b. Page IV.N-9.

introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- b) With regard to police protection, the 2009 General Plan Update EIR concluded that General Plan policies will maintain adequate staffing levels, equipment, and facilities in order to maintain a minimum feasible response time to emergency calls. Therefore, the policies and implementation measures of the 2030 General Plan would ensure that acceptable levels of service are maintained, and impacts associated with police protection were determined to be less than significant.⁵⁰

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area from the GMO, on parcels deemed underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Any projects proposed within the exemption area would be required to be consistent with the General Plan and area plans, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- c) The 2009 General Plan Update EIR concluded that General Plan buildout would result in the construction of approximately 872 residential units within the Healdsburg Unified School District (HUSD) resulting in an enrollment increase of 524 students, based on a student generation rate of 0.6 per unit. HUSD and private schools have the capacity to accommodate 4,774 students. At the time the 2009 General Plan Update EIR was prepared, these schools had 2,831 students enrolled, with space for an additional 1,943 students. Schools in Healdsburg have adequate capacity to serve the additional 524 students generated under General Plan buildout conditions with existing facilities. General Plan policies, combined with the available capacity at HUSD schools, would ensure that the approximately 524 additional students would be provided with sufficient educational facilities, and impacts related to school services would be less than significant.⁵¹

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. The expected total enrollment increase of 524 students would not change. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- d) Buildout of the General Plan could result in an increase of approximately 2,268 residents, resulting in a total population of approximately 14,468 persons within the City's UGB. Based on the existing 43.32 acres of parkland within the City plus the addition of the 36-acre community park to be constructed as part of the Montage (formerly Saggio Hills) project, the ratio of acres of parkland per one thousand residents in the City would increase to 5.48:1, which exceeds the City's goal of 5:1. General Plan policies address the need for additional development of neighborhood and community parkland, and future development of parks and/or recreational facilities would be subject to project-specific CEQA analysis, if such development is not exempt from CEQA. The 2009 EIR determined that impacts related to parks would be less than significant.⁵²

⁵⁰ City of Healdsburg. 2009b. Page IV.N-13.

⁵¹ City of Healdsburg. 2009b. Page IV.N-18.

⁵² City of Healdsburg. 2009b. Page IV.N-25.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. The expected total increase of residents would not change. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- e) The 2009 General Plan Update EIR concluded that buildout of the General Plan would result in an increase demand for other public facilities. Development facilitated by the General Plan may require investment in new or upgraded infrastructure. However, the City anticipated certain areas to absorb future growth within a designated the UGB. Consistent with the General Plan and area plans, the demands for public services, infrastructure, and utilities from future land use development projects would be accounted for in the City’s process to review and update the CIP. The City prioritizes maintenance and capacity upgrades to ensure that adequate public facilities would meet future growth demands. Furthermore, the City would review proposed land use developments for consistency with the General Plan and applicable building standards. The 2009 EIR determined that impacts related to parks would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Any increase in population within the exempted area would be subject to review for consistency with the General Plan and applicable regulatory standards. The City would require projects to either construct necessary future facilities or contribute to the cost of replacing inadequate infrastructure to increase capacity. No additional analysis is required.

4.14.2 New EIR Mitigation Measures

None.

4.14.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, impacts related to public services associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.15 Transportation and Traffic

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Transportation and Traffic					
<i>Would the project:</i>					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Significant and unavoidable impact	No	No	No	None
b) Conflict with an applicable congestion management program, including but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for the designated roads or highways?	Significant and unavoidable impact	No	No	No	None
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Less-than-significant impact	No	No	No	None
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less-than-significant impact	No	No	No	None
e) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	Less-than-significant impact	No	No	No	None

4.15.1 Discussion

a-b) The 2009 General Plan Update EIR contains a number of policies related to addressing the need to reduce reliance on passenger vehicles. The General Plan also contains associated implementation programs that focus on constructing improvements that will increase roadway capacities and promote development patterns that support increased use of alternative modes, provide improved pedestrian, bicycle, and transit infrastructure. The 2009 EIR concluded that implementation of the

applicable programs and policies would ensure that impacts associated with buildout traffic would be less than significant, with the exception of the Dry Creek Road/U.S. 101 interchange, which would be significant and unavoidable. The 2009 EIR determined buildout would result in a significant and unavoidable impact at the Dry Creek Road/U.S. 101 interchange due to the allowed increment of population growth within the City's UGB.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. The 2009 EIR projected a daily trip budget of 56,549 trips, and the amended ordinance would not allow for more multi-family rental units than what the 2009 EIR evaluated. However, multi-family development would occur in a focused area, which has the potential to increase vehicle trips within the exemption area identified in Figure 3 from the GMO, and the Dry Creek Road/U.S. 101 interchange. While the exemption would focus development, the impacts would remain significant and unavoidable, as concluded in the 2009 EIR. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- c) The General Plan includes policies and implementation measures that provide for the continued operation of the Healdsburg Municipal Airport to serve the needs of City residents, resulting in no change in air traffic patterns. Thus, the 2009 EIR concluded that impacts related to air traffic patterns would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. New residents would be served by Healdsburg Municipal Airport. Since projects built under the amended ordinance would be required to adhere to General Plan programs and policies, similar to the 2009 EIR, impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- d) As stated in the 2009 General Plan Update EIR, the General Plan includes policies that address the need to meet design standards intended to promote safety on both new and existing streets, provide adequate sight distance at intersections, identify high collision locations and address any deficiencies, and implement traffic calming measures to retain the character of residential streets. Implementation of General Plan policies and programs relative to safety would result in the development and maintenance of a street system that meets minimum adopted standards and avoids introducing any new hazards. Therefore, the 2009 EIR determined that impacts related to hazards associated with new streets, street connections, and traffic added to existing streets would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Each project in the exempted area would be evaluated at a project-specific level to ensure adequate emergency access and emergency vehicle circulation is provided pursuant to California

Fire Code requirements. Projects built in the exempted area would be required to adhere to the programs and policies set forth in the General Plan, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- e) As stated in the 2009 General Plan Update EIR, the General Plan includes policies and programs that address pedestrian safety such as providing appropriate pedestrian facilities, filling in gaps in the network, improving pedestrian safety and access, and developing pedestrian infrastructure needed to accommodate proposed developments. The General Plan also incorporates policies and programs related to bicycle circulation and infrastructure including providing appropriate trails, bike lane, and transit service. The 2009 EIR concluded that implementation of General Plan programs, policies, and projects related to pedestrian, bicycle, and transit facilities would result in beneficial impacts to pedestrian, bicycle, and transit access.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Project approved in compliance with the General Plan may require investment in new or upgraded infrastructure that includes the City's circulation system. Consistent with the General Plan and area plans, the demands from that growth for public infrastructure—integrated roadway, pedestrian, and bicycle networks—would be accounted for in the City's process of continually reviewing and updating the CIP. Furthermore, the City would review proposed development in the exempted area for consistency with the General Plan and applicable regulatory standards. The City would require projects to either construct necessary circulation improvements or contribute to the cost of replacing inadequate or increasing circulation capacities.

Since projects built under the amended ordinance would be required to adhere to the programs and policies set forth in the General Plan to address pedestrian, bicycle, and transit facilities, similar to the 2009 EIR, impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.15.2 New EIR Mitigation Measures

None.

4.15.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, transportation impacts associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.16 Utilities and Service Systems

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
Utilities and Service Systems					
<i>Would the project:</i>					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Less-than-significant impact	No	No	No	None
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less-than-significant impact	No	No	No	None
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less-than-significant impact	No	No	No	None
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Less-than-significant impact	No	No	No	None
e) Result in inadequate wastewater treatment capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less-than-significant impact	No	No	No	None
e) Result in inadequate wastewater treatment capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less-than-significant impact	No	No	No	None
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less-than-significant impact	No	No	No	None
g) Comply with federal, state, and local statutes and regulations related to solid waste?	No impact	No	No	No	None
h) Encourage activities that result in the use of large amounts of energy, or use of energy in a wasteful manner?*	Less-than-significant impact	No	No	No	None

Environmental Issue Area	Conclusion in 2009 EIR	Do the Proposed Changes Involve New Impacts?	New Circumstances Involving New Impacts?	New Information Requiring New Analysis or Verification?	2009 EIR Mitigation Measures
i) Require or result in the construction or expansion of electrical and natural gas facilities, which could cause significant effects?*	Less-than-significant impact	No	No	No	None

* This environmental issue question is included for purposes of addressing State CEQA Guidelines Appendix F.

4.16.1 Discussion

- a) Buildout of the General Plan would comply with all provisions of waste discharge permits, which regulate discharges throughout the City. Through compliance with the City’s waste discharge permit program, which is administered subject to the requirements and limitations of the National Pollutant Discharge Elimination System (NPDES) program, as enforced by the Regional Water Quality Control Board (RWQCB), General Plan buildout would not result in an exceedance of wastewater treatment requirements, as analyzed in the 2009 EIR. The California Department of Public Health (CDPH)’s Title 22 reclamation requirements are implemented by inclusion in waste discharge requirements adopted by the RWQCB. The NPDES permit system also regulates both point source discharges (a municipal or industrial discharge at a specific location or pipe) and non-point source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the State (e.g., stormwater systems). The NPDES Phase I and Phase II requirements regulate discharge from construction sites. Future projects under the General Plan are required to comply with applicable wastewater discharge requirements issued by the State Water Resources Control Board (SWRCB) and RWQCB, and buildout was found to not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system within the City. Therefore, the 2009 EIR determined that impacts associated with wastewater treatment requirements of the RWQCB for development under buildout conditions would be less than significant.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Projects built under the amended ordinance would be required to adhere to RWQCB discharge requirements, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- b) The 2009 General Plan Update EIR concluded that growth under buildout conditions would generate wastewater, requiring treatment. At the time the 2009 EIR was prepared, the City’s treatment plant had a permitted dry-weather capacity of 1.4 million gallons per day (mgd), with a minimum of 0.42 mgd remaining unused capacity available to accommodate development and growth in the near term. Based on wastewater flow generation factors provided by the City, buildout under the General Plan was anticipated to generate an estimated wastewater flow of 428,015 gpd (0.428 mgd) within the City. When added to the highest historic average dry-weather flow (ADWF) (0.98 mgd) of the base year, the total average sewage flow would increase to approximately 1.41 mgd, which is less than 1% above the treatment plant’s permitted capacity. However, the City’s ADWF is defined in its NPDES permit as the minimum running 30-day

average. The treatment plant has a sustained capacity of 4.0 mgd,⁵³ because it must be able to accommodate peaking events, including higher wet-weather flows in the winter, and higher solids loadings that can occur at any time. Peak uses for individual users throughout the system never occur simultaneously and flows during the period when ADWF is determined are typically far lower, typically at least 15% below the summer peaking period. The expected ADWF generation would reasonably be expected to be at least 15% lower (i.e., 363,813 gpd/0.364 mgd). The total resulting flow of 1.34 mgd at buildout would leave an unused capacity of 0.06 mgd.⁵⁴

In addition to wastewater capacity, the City's Water Reclamation Facility (WRF) operates under a NPDES permit administered by the North Coast RWQCB. The NPDES permit prohibits discharge to the Russian River from May 15 to September 30. Currently, the City can only store approximately 25 million gallons, or 17% of the approximately 138 million gallons of water reclaimed during the prohibition period. The City is now expanding its recycled water system facilities and activities to meet the North Coast RWQCB discharge prohibition,⁵⁵ and has been awarded funds to construct part of a recycled water pipeline, anticipated to offset demand of potable water by approximately 27 million gallons per year, or about 4% of current demand.⁵⁶ The grant award is in accordance with General Plan policy PS-A-9, which states "The City will pursue agricultural and urban reuse of recycled water in accordance with state law to minimize the use of potable water in serving existing and planned development." This reuse of water would lessen the need for water supply from the Russian River and Dry Creek via Lake Sonoma.⁵⁷ Per the 2020 Urban Water Management Plan, approximately 50 million gallons of recycled water was used across the City.⁵⁸ Additional grant applications have been submitted for the remaining recycled water infrastructure, pending award.

In addition to recycled water planning efforts adopted General Plan policies to mitigate the construction and/or upgrades of wastewater infrastructure include the following: Policy PS-B-3 promotes water conservation to minimize sewer flows and Policy PS-B-5 requires the assessment of sewer development fees to obtain sufficient funding for system-wide capacity improvements. Pursuant to Policy PS-B-3, new, expansion, repair of private septic systems shall be allowed where the City determines that it cannot feasibly provide public sewer service, and such systems shall be used until such time as city sewer service becomes available. Pursuant to Policy PS-B-6, project applicants would need to pay a sewer development fee as assessed by the City. Additional wastewater generated by development could be accommodated by existing treatment facilities and will not require any plant expansion. Furthermore, future upgrades to the City's sewer distribution system that are not a part of the General Plan would be subject to a separate environmental review per CEQA. Thus, the potential to require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; and the potential for insufficient wastewater capacity to serve buildout was determined to be less than significant.⁵⁹

⁵³ City of Healdsburg. 2008. City of Healdsburg Membrane Wastewater Treatment Facility. Available at: <https://healdsburg.gov/DocumentCenter/View/1039/New-State-of-the-Art-Facility-PDF?bidId=>. Accessed May 2024.

⁵⁴ City of Healdsburg. 2009b. Pages IV.P-8, IV.p-9

⁵⁵ City of Healdsburg. 2019. WWTP Upgrade Project Final SEIR. Available at: <https://cityofhealdsburg.org/DocumentCenter/View/10715/2019-Final-SEIR->. Accessed May 2024.

⁵⁶ City of Healdsburg. 2024b. Municipal Recycled Water Pipeline. Available at: <https://cityofhealdsburg.org/1114/Municipal-Recycled-Water-Pipeline>. Accessed May 2024.

⁵⁷ City of Healdsburg. 2024b. Municipal Recycled Water Pipeline. Available at: <https://cityofhealdsburg.org/1114/Municipal-Recycled-Water-Pipeline>. Accessed May 2024.

⁵⁸ City of Healdsburg. 2021. 2020 Urban Water Management Plan. Available at: <https://healdsburg.gov/DocumentCenter/View/15962/2020-UWMP-Report-w-Errata-and-Council-Resolution>. Accessed May 2024.

⁵⁹ City of Healdsburg. 2009b. Pages IV.P-10

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area, and demand for wastewater treatment would remain the same as analyzed in the 2009 EIR. Projects built under the amended ordinance would have to adhere to the General Plan policies, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- c) Development that is greater than 1 acre in size will be required to comply with the provisions of the General Construction Activity Stormwater Permit adopted by the SWRCB. Under this permit, project applicants are required to prepare, retain, and implement a SWPPP at the construction site. In addition, the permit will require the implementation of BMPs to limit the extent of eroded materials from discharging into the City's drainage system and affecting water quality. BMPs will consist of any activity, prohibition, practice, procedure, program, or other measure designed to prevent or reduce the discharge of pollutants directly or indirectly into the City's drainage system. Development that is between one and five acres will be required to comply with the provisions of the NPDES Phase II regulations concerning the discharge of pollutants from construction sites. Policies NR-A-2 and NR-1 call for the City to minimize siltation, sedimentation, and pollution discharge into receiving waters and to develop and apply standard mitigation measures and conditions of approval on development permits. Pursuant to NR-A-2, the City prohibits the establishment of new individual septic systems within City limits. Pursuant to NR-1, the City would require project applicants to develop and apply standard mitigation measures and conditions of approval on development permits to reduce siltation, sedimentation, and pollution discharge into receiving waterways, both pre- and postconstruction. Per the 2009 EIR, these policies, in addition to compliance with SWRCB's General Construction Activity Stormwater Permit, NPDES Phase II regulations, and the grading regulations of the City's Municipal Code would ensure that the risk of water degradation within the City would be less than significant.⁶⁰

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Projects built under the amended ordinance would be required to adhere to provisions set by the SWRCB, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- d) General Plan future water supply projections assume that the City will continue to obtain groundwater from its three well fields and possibly from expanding the City's two Russian River water rights permits to full beneficial use. Per the 2009 EIR, buildout could increase the population within the City's UGB to 14,468, which is less than the 2020 Urban Water Management Plan's projected of 14,771 in 2025.⁶¹ Assuming that the same proportion of water demand among residential, commercial, industrial lands, the 2025 projected water demand would leave a surplus of supply. Even if no additional water rights were approved, the City's existing water rights totaling

⁶⁰ City of Healdsburg. 2009b. Pages IV.I-18

⁶¹ City of Healdsburg. 2024c. 2020 Urban Water Management Plan. Available at: <https://healdsburg.gov/DocumentCenter/View/15962/2020-UWMP-Report-w-Errata-and-Council-Resolution>. Accessed May 2024.

3,665 acre-feet/year were determined more than adequate to provide the projected water demands under buildout of the General Plan. Implementation of General Plan policies would ensure that water conservation measures are implemented, and potential impacts to groundwater supply would be less than significant. Because implementation of these policies will reduce future water demand and the City has identified sufficient water supplies are available to serve buildout of the General Plan, buildout will not require new or expanded water entitlements, and water supply impacts were determined to be less than significant.⁶²

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. The increase in demand for water supply would remain the same as analyzed in the 2009 EIR. Since projects built under the amended ordinance would have to adhere to the General Plan policies, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- e) The second phase of the Gauntlett/Fitch Water Treatment Facility was previously addressed in a mitigated negative declaration of environmental impact for both phases of the facility, adopted by the Healdsburg City Council on April 21, 2003. No additional water treatment facilities are required to serve development that could occur under buildout of the General Plan. Therefore, the 2009 General Plan Update EIR determined that impacts related to water treatment facilities would be less than significant.⁶³

As discussed in threshold discussion 4.17.b), above, the City has secured partial funding and is applying for additional funding for development of a recycled water facility. This would lessen reliance on groundwater and surface water, while supplying recycled water in place of potable water. Consistent with the General Plan and area plans, the demands from new development for public services, infrastructure, and utilities would be accounted for in the City's process of continually reviewing and updating the CIP. Furthermore, the City would review proposed development for consistency with the General Plan and applicable regulatory standards. The City would require projects to either construct necessary future facilities or contribute to the cost of replacing inadequate infrastructure to increase capacity.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. The increase in water demand and the demand for wastewater treatment associated with the buildout would remain the same as the General Plan EIR. Since projects built under the amended ordinance would have to adhere to General Plan policies, impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- f) The 2009 General Plan Update EIR concluded that the transfer station has sufficient permitted capacity to accommodate solid waste disposal needs for buildout of the General Plan. From this

⁶² City of Healdsburg. 2009b. Pages IV.I-19, IV.I-20

⁶³ City of Healdsburg. 2009b. Pages IV.P-20

transfer station, solid waste is transported to any of four landfills available to Sonoma County. As of May 2024, these landfills (Redwood Sanitary Landfill, Potrero Hills Landfill, Vasco Road Sanitary Landfill, and Keller Canyon Landfill) have a remaining permitted capacity of 31,006,910.7 tons,⁶⁴ an increase from the 22,018,525.5 tons analyzed in the 2009 EIR and could accommodate the solid waste disposal needs under 2030 General Plan. General Plan Policy PS-J-1 seeks to minimize the amount of solid waste deposited in landfills and maximize the amount of waste that is recycled. Therefore, the 2009 EIR determined that buildout would not result in insufficient landfill disposal capacity, and the associated impact would be less than significant.⁶⁵

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. The estimated increase in solid waste generation due to an increase in residential, commercial and industrial, and hotel land use would remain 15.8 TPD. Projects built under the amended ordinance would have to adhere to General Plan policies and federal, State and local regulations related to solid waste, including the Sonoma County Integrated Waste Management Plan, similar to the 2009 EIR, impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- g) The 2009 General Plan Update EIR concluded that future development in the City must comply with federal, State and local regulations related to solid waste, including the Sonoma County Integrated Waste Management Plan. The 2009 EIR determined that these policies, including those implemented as part of the approval process for future projects, and compliance with federal, State, and local regulations would result in less-than-significant impacts.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Projects built under the amended ordinance would be required to comply with federal, State, and local water quality regulation, impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- h) The 2009 General Plan Update EIR concluded that buildout would increase energy consumption via electricity and natural gas within the City. The General Plan includes policies and implementation measures to promote energy conservation. The City would comply with State climate protection goals and programs to the maximum extent feasible within the City's jurisdictional authority. Because the City has available capacity, facilities and power sources to provide electrical service, impacts related to electrical service were determined to be less than significant.⁶⁶ Development within the City will be required to conform to the State Building Energy Efficiency Standards (Title 24 of the California Code of Regulations) and the California Green Building Code. The 2009 EIR

⁶⁴ CalRecycle. 2024. Solid Waste Information System (SWIS) Facility/Site Search. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>. Accessed May 2024.

⁶⁵ City of Healdsburg. 2009b. Pages IV.P-25

⁶⁶ City of Healdsburg. 2009b. Pages IV.P-32

determined that these General Plan policies would avoid wasteful, inefficient, or unnecessary consumption of electricity and natural gas, and therefore, impacts would be less than significant.⁶⁷

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. Projects built under the amended ordinance would adhere to Title 24 of the California Code of Regulations, the California Green Building Code, and General Plan policies, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

- i) The 2009 General Plan Update EIR concluded that buildout would increase electrical and natural gas demand within the City. The City would provide electric services by connecting to existing facilities, and future development would connect to existing gas lines maintained and operated by Pacific Gas & Electric (PG&E). With planned improvements, existing City electrical and natural gas facilities are expected to meet future demand.⁶⁸ Because the City and PG&E have available capacity, facilities and power sources to provide electrical and natural gas service, impacts related to electrical and natural gas service were determined to be less than significant.⁶⁹

New land use development projects would increase energy demands. However, the increase in demand is not considered substantial in relation to the total amount of energy supplied by City and PG&E facilities that service the area. In addition, the City would implement applicable General Plan policies and implementation measures that promote energy conservation to reduce demand for those services. Development would connect to extensions of existing service lines, with the ultimate configuration subject to City and PG&E's review.

The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the 2009 EIR but would rather exempt multi-family housing development within the exemption area, on parcels deemed to be underutilized. The proposed 2024 amendment would allow for increased pace of multi-family housing development, focused on the exemption area. As discussed in threshold discussion 4.17.b), above, the City anticipated certain areas to absorb future growth, including the proposed exemption area, within the designated UGB. Consistent with the General Plan and area plans, the demands from development for public services including electrical and natural gas services would be accounted for in the City's process of continually reviewing and updating the CIP. The City would review proposed residential development for consistency with the General Plan and applicable regulatory standards and would require projects to either construct necessary future facilities or contribute to the cost of replacing inadequate infrastructure to increase capacity.

All projects built under the amended ordinance would be required to adhere to Title 24 of the California Code of Regulations, California Green Building Code, and General Plan policies. There is sufficient capacity to provide electrical and natural gas services for increase in demand, and impacts would be less than significant. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

⁶⁷ City of Healdsburg. 2009b. Pages IV.P-32

⁶⁸ City of Healdsburg. 2009b. Page IV.P-32.

⁶⁹ City of Healdsburg. 2009b. Page IV.P-32.

4.16.2 New EIR Mitigation Measures

None.

4.16.3 Conclusion

The proposed 2024 amendment to the 2000 GMO would not change the type or extent of growth allowed under the 2030 General Plan but could alter the locations of development by allowing for a geographic exemption to the GMO. Development must still be in accordance with the densities otherwise permitted under the 2030 General Plan. Therefore, impacts to utilities and service systems associated with the residential development that could occur upon voter approval of the proposed 2024 amendment to the 2000 GMO have already been accounted for and analyzed within the 2009 EIR, and no new impacts would occur.

4.17 Updated General Impact Categories

Since certification of the 2009 EIR, legislative changes at the state level have occurred, which resulted in comprehensive amendments to the State CEQA Guidelines, including new and/or modified topics of energy, greenhouse gas emissions, vehicle miles traveled and wildfire. For informational purposes, below is a qualitative discussion of how these new environmental topics would be impacted by this GMO Amendment.

4.17.1 Energy

Energy resources were not discussed in the 2009 General Plan EIR. On December 28, 2018, California adopted the revised guidelines, which incorporate a new subdivision on energy impacts (Section 15126.2(b)), which clarifies that CEQA requires consideration of whether a project will result in significant environmental effects due to “wasteful, inefficient, or unnecessary consumption of energy” and states that agencies “shall mitigate” any wasteful energy use giving rise to significant impacts.

The proposed 2024 GMO amendment would result in an increase in direct and indirect energy consumption as a result of buildout of the general plan and increased traffic in the proposed exemption area. Although the 2024 GMO amendment would result in increased indirect energy consumption, the amount of transportation fuel and potential electricity use required for construction and operation of multi-family housing is not considered an inefficient or wasteful use of energy. While the 2024 GMO amendment would allow for land uses resulting in increased energy use, any projects proposed in the exempted area would have more efficient energy systems and would not be considered wasteful or inefficient. Therefore, the proposed 2024 GMO amendment would not represent a substantial increase in energy consumption or a wasteful, inefficient, or unnecessary use of energy. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.17.2 Greenhouse Gas Emissions

Greenhouse Gas Emissions were discussed under Section IV.D, Air Quality, in the 2009 General Plan EIR. Potential greenhouse gas (GHG) emissions related to buildout under the 2030 General Plan were calculated in the 2009 EIR using the Clean Air and Climate Protection Software (released May 2003). The software converts fuel types (gas, electricity, etc.) and fuel units (therms, megawatt hours [MWh], etc.) into carbon dioxide equivalents (CO₂e) for carbon dioxide (CO₂), nitrous oxide (N₂O), and methane (CH₄) emissions. Standard emissions factors related to the production of electricity were changed to

reflect the Northern California Power Agency’s energy mix. In all cases, estimates were based on 2007 per capita emissions data applied to the General Plan buildout population estimate (14,468); therefore, presenting a “business-as-usual” scenario is not reflective of changing habitats, new State regulations, General Plan policies, etc.⁷⁰ Greenhouse gas emissions for year 2007 were estimated at 58,504 tons. Nearly half of all emissions were attributed to the transportation sector, 45% to the use of electricity and natural gas (from buildings and municipal operations), and 6% to the disposal of solid waste. Emissions under General Plan buildout were projected from 2007 per capita use and the estimated 2030 General Plan buildout population of 14,468; they were estimated to be 73,926 tons (or an increase of 15,422 tons). The 2009 EIR estimated that with implementation of Air Resources Board Scoping Plan measures and General Plan policies, the City would achieve a reduction of 11,129 tons of CO₂e. The City identified and estimated the probable GHG emissions reductions from State measures and General Plan policies and implementation measures. The City determined the effectiveness of applicable measures, and the 2009 EIR concluded that GHG emissions could not be determined to a reasonable degree of certainty under future buildout conditions. However, the City concluded that the General Plan would not result in a cumulatively considerable contribution to the significant cumulative impact of global climate change. Therefore, the 2009 EIR concluded that cumulative global climate change impacts would be significant and unavoidable upon General Plan buildout.⁷¹ A discussion of those impacts is located in Section 2.1.3 of this addendum.

The City supports the implementation of Assembly Bill 32 (AB 32) through numerous policies and implementation measures throughout the 2030 General Plan, particularly Policy NR-E-6, which requires compliance with State climate protection goals and programs. In addition, the City of Healdsburg continues to develop programs and measures in support of GHG emission reductions, including an energy efficiency program and a green building program. In addition, the City is part of the County-wide Climate Action 2020 and beyond program, which is the Sonoma County Regional Climate Action Plan. Therefore, the 2009 EIR concluded that buildout of the General Plan would not conflict with AB 32 or its governing regulations and impacts are less than significant.⁷²

The GHG emissions described above were based on buildout of the General Plan and, therefore, account for the development that would occur under the 2024 amendment to the 2000 GMO. In addition, regulatory requirements related to vehicle and building efficiency since the 2009 EIR was prepared will result in further reductions in GHG emissions. However, with the 2024 exemption, impacts would remain significant and unavoidable. Therefore, amending the 2000 GMO via the proposed 2024 ballot measure language would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the 2009 EIR. No additional analysis is required.

4.17.3 Transportation

Transportation resources were discussed under Section IV.O, Traffic and Circulation, in the 2009 EIR. Since certification of the 2009 EIR, the 2019 update to the CEQA checklist has added one question and altered language in the remaining CEQA Transportation section questions. The change in the State CEQA Guidelines resulting from implementation of SB 743, adding Section 15064.3, became effective in 2019. It requires the analysis of VMT instead of a vehicle level of service (LOS) analysis. VMT per capita is calculated as the total annual miles of vehicle travel divided by the total population in an urbanized area. LOS measures vehicular delay, or the additional driving time encountered by drivers during the most congested times of travel (the a.m. and p.m. peak periods). SB 743 prohibits the use of LOS to measure impacts under CEQA and requires agencies to adopt alternative measures of such impacts. Prior to

⁷⁰ City of Healdsburg. 2009b. Page IV.D-32.

⁷¹ City of Healdsburg. 2009b. Page IV.D-35.

⁷² City of Healdsburg. 2009b. Page IV.D-38.

implementation of SB 743, the City used LOS analysis to determine transportation-related environmental impacts under CEQA. The method now being used by the City to measure development-related environmental impacts under CEQA is to assess VMT, using modified California Office of Planning and Research (OPR) recommendations.⁷³

State CEQA Guidelines Section 15064.3(b) contains criteria for analyzing transportation impacts. Projects that may have a significant impact include land use projects that result in an increase in VMT that exceed an applicable threshold of significance and transportation projects that increase VMT. The 2024 GMO amendment falls within the exempted area from VMT impacts per the City's the Residential VMT Per Capita Screening Map.⁷⁴ All impacts and mitigations identified in the 2009 EIR remain applicable to the 2024 GMO amendment. No new impacts would occur.

4.17.4 Wildfire

Wildfire was discussed under Section IV.H. Hazards and Hazardous Materials, in the 2009 General Plan EIR. Since certification of the Final EIR in February 2016, legislative changes at the state level have altered the CEQA checklist for evaluating wildfire. Changes to the State CEQA Guidelines approved as part of the 2018 State CEQA Guidelines Update identifies wildfire as a separate environmental resource area, breaking it out so it is no longer a subset of hazards and hazardous materials.

Per the California Department of Forestry and Fire Protection's Fire Hazard Severity Zones in State Responsibility Areas GIS Viewer,⁷⁵ the area proposed to be exempted under the does not fall within an area designated as having a high, extreme, or severe fire hazard. Additionally, the area proposed for exemption to the 2000 GMO is considered an infill area and has been previously developed. The exemption area is not in a wildland-urban interface zone. See section 4.8g-h and 4.15.d for a discussion of wildfire impacts. The proposed 2024 amendment to the 2000 GMO would not allow for more multi-family units than previously analyzed in the General Plan EIR but would rather exempt multi-family housing development in areas identified in Figure 3 from the GMO. Any project proposed in the exempted area would be reviewed at a project level for compliance with General Plan Policies and California Fire Code compliance. All impacts and mitigations identified in the 2009 EIR remain applicable to the 2024 GMO amendment. No new impacts would occur.

5 ENVIRONMENTAL CONCLUSION

The proposed project revisions do not involve any conditions that require preparation of a subsequent or supplemental EIR. This Addendum #4 demonstrates that the proposed amendment will not require major revisions to the 2009 EIR because the changes do not result in any new or substantially increased significant environmental effects pursuant to State CEQA Guidelines Sections 15162(a)(1) and 15162(a)(2). The proposed project revisions will not result in a new significant impact or a substantial increase in the severity of an impact identified in the 2009 EIR pursuant to State CEQA Guidelines Sections 15162(a)(3)(A) and 15162(a)(3)(B). Furthermore, no new information of substantial importance exists indicating that there are mitigation measures or alternatives that differ considerably from those analyzed in the 2009 EIR that will substantially reduce one or more significant effects on the

⁷³ City of Healdsburg. 2023c. Vehicle Miles Traveled (VMT) Implementation Guidelines for evaluating transportation impacts under the California Environmental Quality Act (Senate Bill 743). Available at: <https://healdsburg.gov/AgendaCenter/ViewFile/Item/3297?fileID=32158>. Accessed May 2024.

⁷⁴ City of Healdsburg. 2023c. Figures 1 and 2.

⁷⁵ California Department of Forestry and Fire Protection. 2024. Fire Hazard Severity Zones in State Responsibility Areas GIS Viewer. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed May 2024.

environment, and that the project proponents have declined to adopt pursuant to State CEQA Guidelines Section 15162(a)(3)(D). Therefore, based on the criteria established in State CEQA Guidelines Sections 15162 and 15164, an addendum is the proper CEQA documentation for proposed project revisions.