

**ADDENDUM TO THE MITIGATED NEGATIVE DECLARATION FOR  
101 GRANT SCHOOL ROAD  
HEALDSBURG**

**Board of Supervisors Resolution No. 13-0480**  
Adopted 3 December 2013

Lead Agency: County of Sonoma  
20 October 2021

Prepared by:  
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## **A. OVERVIEW**

The County of Sonoma (County) has prepared this Addendum to the PLP12-0005, 101 Grant School Road Mitigated Negative Declaration (BOS Resolution No. 13-0480) adopted 3 December 2013 (MND). The MND contemplated on-site industrial uses consistent with the development standards of the Limited Rural Industrial District Zoning District (M3), including a maximum building footprint of 40,000 square feet and a total of 30 full-time employees, and operational hours of Monday through Saturday 6 a.m. to 10 p.m., with the bulk of the employees arriving and leaving between 8:00 a.m. and 5:00 p.m. Expected uses included all uses permitted by right in the M3, with the exception of vehicle and truck repair facilities and recycling collection facilities. This Addendum analyzes the potential impacts of the development proposed by Permit Sonoma File No. DRH19-0015 consisting of three new buildings and the renovation of one existing building having a combined building footprint of 35,950 square feet to be located at 101 Grant School Road and used in accordance with General Plan Policy LU-14m. The analysis will determine whether the proposed use will result in new or more severe environmental impacts than those analyzed in the adopted MND. For purposes of this Addendum, the project as studied in the MND is called PLP12-0005. The modified use, which consists of uses permitted by right in the M3 District (excepting those uses mentioned above) to be located in four buildings not exceeding a footprint of 40,000 square feet is called the proposed Project or DRH19-0015.

## **B. BACKGROUND**

PLP12-0005 consisted of a modification to an existing Use Permit and a General Plan Amendment to adopt a parcel specific policy for the site, LU-14m (PLP12-0005).

As the lead agency, the County prepared an MND analyzing a request for a modified Use Permit to allow diversification and expansion of an existing Spirulina manufacturing facility and the request for a new General Plan Parcel Specific Policy to allow continued on-site industrial uses consistent with the development standards of the M3 Zoning District, including a maximum building footprint of 40,000 square feet under the California Environmental Quality Act (CEQA). The MND disclosed and analyzed the environmental impacts that would result from the full build out and operation of the industrial facility, mitigating them to the maximum extent feasible. The Board of Zoning Adjustments recommended approval of the modified Use Permit and Parcel Specific Policy on 17 October 2013. The Board of Supervisors approved the project and adopted the MND on 3 December 2013.

The 2.7-acre subject property (APN: 086-030-017) is currently developed with 5 light industrial buildings, four of which will be demolished. The site will be redeveloped with four light industrial buildings, the renovated building and three new buildings having a total footprint of 35,950 square feet, and a total floor area of 49,700 square feet.

This Addendum analyzes the proposed Project and any differences this Project would cause to environmental impacts compared to the environmental impacts analyzed in the MND for PLP12-0005.

### **CEQA STANDARD**

The County of Sonoma has prepared this Addendum pursuant to CEQA and the CEQA Guidelines. Specifically, CEQA Guidelines Section 15164, subdivision (b), provides that: *“An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.”*

CEQA Guidelines Sections 15164 further stipulates that: An Addendum need not be circulated for public review or comment, but must be considered by the agency before making its decision on the project. (CEQA Guidelines, §15164, subdivisions. (c) and (d).)

CEQA Guidelines Section 15162: Section 15162 subdivision (a), provides that:

When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following exist:

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

effects or a substantial increase in the severity of previously identified significant effects; or

- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - (A) The project will have one or more effects that are significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

## **ANALYSIS.**

The Addendum analyzes the previously adopted Mitigated Negative Declaration sections that could potentially be affected by the development of a light industrial facility having a combined footprint of up to 40,000 square feet and uses consistent with uses allowed by right in the M3 Zoning District (excepted from the list of permitted uses are vehicle and truck repair facilities and recycling collection facilities). The Addendum specifically evaluates whether County approval of the Design Review application would trigger the need for a subsequent Negative Declaration under CEQA Guidelines sections 15164, subdivision (b) and 15162, subdivision (a).

This Addendum relies on the Mitigated Negative Declaration adopted for PLP12-0005, which is hereby incorporated by reference. For ease of reference, the Addendum follows the order of issues used in the Mitigated Negative Declaration/ Initial Study Checklist.

## 1. Project Description

The applicant requests Design Review approval to allow construction of a light industrial facility consisting of four metal buildings: A 9,600 square foot remodeled building and three new buildings having the following footprints: 5,100, 7,500, and 13,750 square feet in size. The total proposed square footage of building footprint is 35,950 square feet with a total floor area of 49,700 square feet. At this time the precise use(s) of the buildings is not known. However, all uses must be those uses listed in Section 26-50.010 as permitted uses with the exception of vehicle and truck repair facilities and recycling collection facilities, which are not permitted. Discretionary uses under the M3 Zoning District are not allowed.

The proposed buildings have an agrarian architectural style, which is fitting to the area and the past use of the site. The building materials consist of corrugated metal siding with vertical ribs, standing seam metal roof with ribs at 16 inches on center, metal trim, steel framed windows and doors, roll-up steel doors, metal louvers, steel bollards and gooseneck metal wall lights. The maximum height of the buildings is 31 feet to the top of the parapet, with cupolas extending to 33 feet. The maximum height allowed per the General Plan Planning Area Policy LU-14m is 35 ft. The setbacks are consistent with those required by the M3 Zoning District.

The site is accessed from two points off of Grant School Road. On-site circulation is provided by a 20 ft. wide, two-way road. A total of 82 parking spaces are provided as well as 6 bicycle lockers and 3 bike racks. The number of parking spaces are 2 less than that which is required by the zoning code. An exception to the requirement is permitted through sec. 26-86-020; *whereas, each three (3) covered bicycle spaces or bike lockers provided, the required onsite parking requirement may be reduced by one (1) space.*

Waste disposal will be provided by the upgrading and expansion of the existing on-site septic system. According to the "Site Feasibility Report for a Sewage Disposal System" prepared by Questa Engineering, October 2019, the existing septic system was approved and permitted by Sonoma County PRMD (PRMD) in 2002 and constructed shortly afterward. The existing system consists of an at-grade system for a total wastewater flow of 450 gallons a day (gpd) intended to serve 22 employees and a one-bedroom care takers cottage. The report then indicates that the proposed upgraded/expanded septic system design will serve approximately 38,000 sq. ft. of commercial space. Based on Questa Engineering's analysis, the 9,750 sq. ft. of area on the north side of the project site can accommodate up to 2,600 gpd of wastewater using a sub-surface drip system and approximately 1,900 gpd using an at-grade system.

Water will be supplied by a proposed new well. Two 26,500-gallon water storage tanks are proposed for fire protection. A detailed grading and utility plan incorporating the Best Management Practices for the capturing of the 85<sup>th</sup> percentile of a 100-year storm event through bio-retention and filtration is also proposed. The project includes a complete landscape and irrigation plan consistent with the current WELO standards.

## 2. Site Characteristics

The existing 2.7-acre Project site (APN: 086-030-017) is a developed site with existing structures including a warehouse, dryer building, garage, scale shack, well house, portable structures and paved parking. The site is located in the Russian River Valley, west of the Sonoma Mountains and north of the Santa Rosa Valley plain. The project address is 101 Grant School Road in Healdsburg, CA which is on the west side of Hwy. 101 within the Windsor-Healdsburg community separator. The developed portion of the site is essentially flat and vegetated with predominantly grasses and trees located along the property line. Slopes in the area are 0-2 percent. The underlying soil type consists of loam topsoil and gravelly sandy loam, sandy loam and sandy clay loam/clay subsoil.



**FIGURE 1:** Site Characteristics Map

### 3. Surrounding Land Use and Zoning

The project site is designated Diverse Agriculture with a density of one dwelling unit per 20 acres in the Sonoma County General Plan land use element. However, this land use designation was modified through the adoption of a General Plan Planning Parcel Specific Policy, which allows the site to be developed with permitted uses listed in the Limited Rural Industrial (M3) Zoning District, with restrictions. The policy reads:

**Policy LU-14m:** Notwithstanding the existing Diverse Agriculture land use designation of the existing 2.7-acre industrial site identified as Nutradine (APN 086-030-017), continued processing (manufacturing) of nutraceuticals or nutrient related products, including manufacturing of products from substances not grown or raised on site or in the local area and modification to procedures and materials can occur consistent with Use Permit PLP12-005. Uses listed as “permitted uses” not requiring a Use Permit under the Limited Rural Industrial District, with the exception of vehicle and truck repair facilities and recycling collection facilities, are allowed subject to Design Review approval. Design Review shall address visual impacts of site development as viewed from Highway 101. All structures, including reconstruction or replacement structures, shall not exceed a combined footprint of 40,000 square feet, maximum 35-foot building height, and shall otherwise comply with development standards of the M3 (Limited Rural Industrial) Zoning District subject to septic permit compliance. An increase in the number of employees beyond 30 is dependent upon proof of adequate septic capacity and review and approval of a revised Use Permit. (Resolution No. 13-0480, 3 December 2013, PLP12-0005)

The site, situated along the Highway 101 Scenic Corridor, is within the Windsor/Healdsburg Community Separator as depicted in the General Plan Open Space Element.

The site, which is zoned DA-B6-20-SR-VOH, is located on the east side of Old Redwood Highway on Grant School Road which dead-ends at the railroad tracks along Hwy 101. Surrounding land uses include:

North: Adjacent to the north of the project site is a vacant parcel zoned DA-B6-20-SR VOH and owned by the State of California. It appears that the site is utilized by the

State to store equipment for road maintenance, etc. Hwy 101 also borders the site to the north.

East: The Sonoma/Marin Area Rail Transit District tracks run along the east side of the project site. Two additional parcels to the east of the property along Hwy. 101 are planted vineyards owned by Foppiano Vineyards. Across Hwy. 101 to the east are large agriculturally designated parcels developed with residences and planted in vineyard.

South: Directly to the south of the project site is a larger parcel zoned DA-B6-20. The site is developed with a residence and a cabinet shop. The residence is accessed through a driveway on Old Redwood Highway and the Cabinet Shop through a driveway on Grant School Road. There are other smaller residential parcels located south of the project site also zoned DA-B6-20.

West: Lands west of the project site are a plant nursery and smaller residential properties. Foppiano Vineyard owns the larger vineyard properties directly on the west side of Old Redwood Highway. The Russian River and Dry Creek are approximately 0.5 miles west of the project site.

## **ENVIRONMENTAL ISSUES, IMPACTS AND MITIGATION MEASURES**

If none of the conditions described in CEQA Guideline Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred, then an addendum to an adopted EIR or Negative Declaration can be prepared (CEQA Section 15164 (b)). As identified in the above section entitled “CEQA Standard”, Section 15162 sets forth three conditions, any one of which would require the preparation of a subsequent EIR or subsequent Negative Declaration.

They are:

1. Substantial changes in the project which would result in new significant effects or an increase in the severity of previously identified significant effect.
2. Substantial changes in circumstances under which the project is undertaken that would result in new significant effects or an increase in the severity of previously identified significant effect.
3. New information of substantial importance, which was not known or could be known, that shows:

- a) The project will have one or more significant effect not discussed in the previous Negative Declaration.
- b) Significant effects, previously examined, will be more severe than shown.
- c) Mitigation measures previously considered not to be feasible are feasible and would reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives.
- d) Mitigation measures or alternatives that are considerably different than those analyzed in the previous EIR that would substantially reduce one or more significant effects on the environment, but the project proponent declined to adopt the mitigation measure or alternative.

The project analyzed under PLP12-0005 the adopted 2013 MND (MND) was a request for a modified Use Permit to allow the diversification and expansion of an existing Spirulina manufacturing facility to allow continued processing and manufacturing of nutraceuticals or nutrient related products from substances not grown on site for pet and fish foods. The expansion included replacing an existing 9,700 sq. ft. warehouse building with a new 20,000 square foot warehouse building and an increase in the number of full-time employees from 9 to 30. The request also included a General Plan Planning Area Policy, that would allow continued on-site industrial uses consistent with the development standards of the M3 Zoning District, including the construction of structures with a combined maximum building footprint of 40,000 sq. ft.

For purposes of this analysis, the Project analyzed in the MND must be evaluated in light of the criteria establish in CEQA Guidelines Section 15162 to determine if an Addendum is the appropriate environmental document.

Criterion 1: Substantial changes to the project that would lead to new significant effects or more severe significant effect: Among other things, the original MND analyzed a Parcel Specific Policy that allowed on-site industrial uses consistent with those uses permitted in the M3 district, with the exception of vehicle and truck repair facilities and recycling collection facilities, which were not permitted. Furthermore, said project must be consistent with the development standards of the M3 Zoning District and the structures cannot exceed a foot print greater than 40,000 sq. ft. The proposed project fits within the parameters established by the Parcel Specific Policy, which was studied by the MND. Hence, the proposed Project is not considered to be a substantial change from that which was analyzed or to lead to new significant or more severe effects. This criterion has not been met.

Criterion 2: Substantial change in circumstances requiring major revisions to the MND due to the involvement of new significant environmental effects or substantial increase in the severity of previously identified impacts. There has been no significant change in circumstances. This criterion has not been met.

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

The original MND did not include early consultation with Tribal Communities (AB 52). In addition, since adoption of the MND, the Bay Area Air Quality Management District (BAAQMD) has adopted revised CEQA Guidelines (May 2017) and Pursuant to CEQA Guidelines Section 15064.3, subdivision (b), and applicable starting July 1, 2020, Vehicle Miles Traveled (VMT) is now the appropriate metric to evaluate transportation impacts of land use projects, superseding use of the measure of traffic congestion (i.e. Level of Service). In 2019 Wildfire analysis was added to the required analysis under an initial study for CEQA purposes and is included in this addendum. Furthermore, details of the project such as its design, water and wastewater systems have changed. These previously partially examined or unexamined impact areas must be assessed in order to determine if the Project will cause a significant effect in any or all of these areas.

**D. Assessment of Degree of Change**

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

<b>TABLE 3: Impact Analysis – Proposed Project compared to Grant School Road Initial Study/Mitigated Negative Declaration (IS/MND)</b>		
<b>Impact Category</b>	<b>Additional Analysis Required</b>	<b>Discussion</b>
<b>1. AESTHETICS</b>	No	The MND prepared for PLP12-0005 examined the potential aesthetic impact

		<p>of a project having a total footprint of 40,000 square feet and a maximum height of 35 feet. The MND required that an application be submitted to Design Review to address project landscaping, lighting and building design and no building permits be issued until the project is approved by the DRC and Permit Sonoma. This mitigation sufficiently addresses the project's potential aesthetic impacts and no further analysis is required.</p>
<p><b>2. AGRICULTURAL RESOURCES</b></p>	<p>No</p>	<p>The site coverage is within the parameter assessed in the MND. The MND found that although the soil type is considered prime agricultural soil, over three-quarters of the 2.7-acre site has been disturbed, compacted and used for industrial type uses for over 70 years. The adopted MND found the impact to be less than significant. Given the inclusion of the General Plan Planning Area Policy in the project description</p>

		analyzed by the MND, the site coverage and site disturbance has been accounted for. No further analysis is necessary.
<b>3. AIR QUALITY</b>	Yes	The project will be analyzed in relation to the applicable Thresholds of Significance established in the BAAQMD May 2017 CEQA Guidelines.
<b>4. BIOLOGICAL RESOURCES</b>	Yes	The adopted determinations of the biological resources section of the MND are accurate and remain applicable to the proposed Project as regards to no potential impact on sensitive species, riparian habitat, wetlands and habitat or natural community conservation plans. However, based on the analysis prepared by James MacNair, arborist, the project will result in the removal of 15 trees. The impact of vegetation removal will require further analysis.
<b>5. CULTURAL RESOURCES</b>	No	The adopted determinations and mitigations under the Cultural Resources section

		of the MND are accurate, applicable and sufficient as regards to the proposed Project. No further analysis is necessary.
<b>6. GEOLOGY AND SOILS</b>	Yes	A geotechnical investigation report was prepared for the current project by Questa Engineering, dated April 2019. The report's determination is consistent with the findings of the MND as regards earthquake faulting, seismic ground shaking, liquefaction, soil erosion and land sliding. However, the MND did not address the soils capability for supporting a new or expanded septic system. This sub-category will be addressed in Section E, below.
<b>7. GREENHOUSE GAS EMISSIONS</b>	No	A Greenhouse Gas Emissions Study was prepared for the PLP12-0005 by ESA, May 2013. The report found that the amount of emissions per year generated by the project would be 128 metric tons. Although the BAAQMD thresholds of significance (CEQA

		<p>Guidelines) have been updated, the overall operational threshold of 1,100 metric tons is the same as in 2013. As indicated previously, an industrial project having a footprint of 40,000 square feet was considered in the MND. Although the square footage of DRH19-0015 is greater than the MND contemplated, the delta between the BAAQMD threshold of 1,100 metric tons and the projected emission of 128 metric tons can clearly accommodate the difference. Furthermore, construction of DRH19-0015 will be required to meet current Building Code, which requires projects to be constructed to energy efficient standards. The findings of the MND are found to be applicable and sufficient for DRH19-0015. No further analysis is necessary.</p>
<p><b>8. HAZARDOUS AND HAZARDOUS MATERIALS</b></p>	<p>No</p>	<p>The adopted determinations and mitigations under the Hazards and Hazardous</p>

		<p>Materials section of the MND are accurate, applicable and sufficient as regards to the proposed Project with the exception of potential impact subcategory 8.a.: The potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material. Unlike the 2013 MND the actual uses, although limited, are not known at this time. However, the Project will be required to comply with the County’s Hazardous Materials ordinance as a standard condition of approval (COA). It is not anticipated that the proposed use(s) will require the submission of a Hazardous Materials Business Plan (HMBP). In the event one is required, no additional mitigation measures beyond the above referenced standard COA would be necessary. Further analysis is not required.</p>
<p><b>9. HYDROLOGY AND WATER QUALITY</b></p>	<p>Yes</p>	<p>A water supply plan was prepared for the proposed</p>

		Project. The details and findings of the study will subsequently be discussed. Further analysis of this impact category is required.
<b>10. LAND USE AND PLANNING</b>	No	The 2013 MND included the proposed General Plan Amendment, which allowed construction of up to a 40,000 square feet of limited rural industrial uses as long as those uses were those uses permitted by right in the M3 District, excepting previously described excluded uses. The adopted determinations and mitigations under the Land Use and Planning section of the 2013 MND are accurate, applicable and sufficient as regards to the proposed Project. No further analysis is necessary.
<b>11. MINERAL RESOURCES</b>	No	There is no new information regarding mineral resources and no information that would have altered the analysis found in the MND. The adopted determinations and mitigations under the Mineral Resources section

		of the MND are accurate, applicable and sufficient as regards the proposed Project. No further analysis is necessary.
<b>12. NOISE</b>	No	The MND examined the existing noise environment. The mitigation measures required under the MND are applicable to the proposed project. Those mitigation measures include: Compliance with General Plan Table NE-2 and a limit on hours of operation during construction. Said mitigations can be applied to the project as standard conditions of approval (COA). No further analysis is required.
<b>13. POPULATION AND HOUSING</b>	No	General Plan Planning Area Policy LU-14m identifies this site for industrial development consistent with uses permitted by right in the Rural Industrial District, excepting those uses previously identified as excluded uses. The loss of the care taker's unit was determined to be less than significant in the MND. The adopted determinations

		under the Population and Housing section of the MND are accurate, applicable and sufficient as regards to the proposed Project. No further analysis is necessary.
<b>14. PUBLIC SERVICES</b>	No	The MND prepared for the PLP12-0005 anticipated a build-out of 40,000 square feet of industrial use. No further analysis is required.
<b>15. RECREATION</b>	No	The construction of 40,000 square feet of Limited Rural Industrial space on a parcel specifically identified for said use(s) will have no additional impact on Recreation beyond that which was anticipated by the MND prepared for the PLP12-0005. No further analysis is necessary.
<b>16. TRANSPORTATION/ TRAFFIC</b>	Yes	In July 2020, legislation requiring potential traffic impacts to be analyzed on the basis of vehicle miles traveled (VMT) instead of level of service (LOS) was implemented by CalTrans. This potential impact will require further analysis.

<b>17. TRIBAL CULTURAL RESOURCES</b>	Yes	Early consultation with tribal communities is required per AB 52. Further analysis is required.
<b>18. UTILITIES AND SERVICE SYSTEMS</b>	Yes	A water supply report and a wastewater feasibility analysis were prepared for DRH19-0015. This section will require further analysis.
<b>19. MANDATORY FINDINGS OF SIGNIFICANCE</b>	No	No, if analysis determines no significant impacts.
<b>20. WILDFIRE</b>	Yes	New section added to Appendix 'G'.

### **E. Level of Significance**

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

### **3. AIR QUALITY**

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

The Project is located in the San Francisco Bay Area Air Quality Basin. The SFBAAB is currently designated as a nonattainment area for state and national ozone standards

and national particulate matter ambient air quality standards. Air pollution, by its nature, is largely a cumulative impact. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. According to the BAAQMD 2017 CEQA Guidelines, in developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. If the thresholds are not exceeded, additional analysis to assess cumulative impacts is unnecessary.

The proposed Project involves the construction of a light industrial facility having a total building footprint square footage of 35,950 square feet and a total building square footage of 47,9000 square feet. Prospective uses are limited to those permitted by right in the M3 Zoning district excepting vehicle and truck repair facilities and recycling collection facilities.

Table 3-1 of the BAAQMD 2017 CEQA Guidelines establishes Operational-Related Criteria Air Pollutant and Precursor Screening Levels Sizes based on land use. The operational criteria pollutant screening size (threshold) for a light industrial park use is 541,000 sq. ft. The proposed Project has a total square footage of 49,700 square feet, which is nearly 91% less than the adopted threshold. The Guidelines for construction related screening size is 11 acres. The subject parcel is 2.7 acres. Again, the potential impact is significantly below the established threshold of significance.

The MND found the potential impact to Air Quality to be less than significant. The analysis did recommend however, that the standard condition of approval (COA) regarding dust control measures should be incorporated into the project. This Best Management Practices condition should also be incorporated into the proposed School Yard project.

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

## 4. BIOLOGICAL RESOURCES

The Mitigated Negative Declaration adopted with PLP12-0005 (MND) concluded that the project was not located on a biologically sensitive site and that building expansion would occur on currently disturbed or built-on areas. The area of the septic system that includes native grasses and some ornamental vegetation will not be disturbed as part of this project.

The project proposed under DRH19-0015 proposes expansion beyond the developed portion of the parcel that was contemplated by the MND and into the previously undeveloped northerly area of the parcel that was reported to include native grasses. In addition, the project proposes the removal of 10 trees along the easterly border of the site.

As indicated in Table 3 above, the MND did not consider the potential biological impact of tree removal, which will result from the construction of DRH19-0015. An arborist report was prepared for the project by MacNair & Associates, dated 28 September 2019 which found that of the thirty-six trees on-site and on the perimeter, a total of 10 trees will be removed, one of which is in poor health. Given that the arboreal value of the trees to be removed is less than 50% of the total existing tree arboreal value, no mitigation is required under the Sonoma County Tree Ordinance.

Following the arborist's report a Native Grassland Habitat Assessment and Nesting Bird Survey dated 26 March 2021 was prepared for the site, and concluded that the trees that are proposed for removal along the boundary are not suitable for ground nesting or cavity nesting birds or nesting raptors.

The study also evaluated the northerly portion of the site that is currently developed with a raised mound which may have been part of a septic system. The survey concluded that the project site does not support native grassland habitat, and no native grasses were observed. Herbaceous vegetation observed is typical of disturbed soils and areas surrounded by development (e.g. freeway, vineyards, nursery etc.).

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

## 6. GEOLOGY AND SOIL

A detailed Geotechnical Investigation Report was prepared for DRH19-0015 project by Questa Engineering Corp., dated April 2019. Although the report provides detail geotechnical information regarding the project site, the conclusions of the report do not differ from nor contradict any of the level of significance determinations found in the MND. However, the MND analysis of the capability of the soils to support an adequate wastewater disposal system was based on the use of the existing septic system. Because DRH19-0015 proposes to construct a new waste disposal system, the adequacy of the soils to support such a system requires further review.

After taking into consideration all of the regulatory requirements of Sonoma County's OWTS (on-site waste treatment system), examining the data from the previous eleven percolation tests, assuring that the size of the system will adequately serve the proposed use, that the system meets all required setbacks, particularly in regards to the proposed on-site well, and that adequate expansion area exists, the report concluded that the project site meets current Sonoma County OWTS site requirements for an at-grade OWTS or a sub-surface drip disposal system for up to 2,000 gpd to 2,600 gpd. It further determined that existing soils can support such a system.

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

## 9. HYDROLOGY AND WATER QUALITY

The Hydrology and Water Quality section of the MND assumed minimal increase in site coverage even though the Board Resolution granted the authority to construct light industrial buildings having a combined footprint of up to 40,000 square feet and assumed the use of the existing septic system and well. It is therefore necessary to address 9. a) through f) in the Hydrology and Water Quality Initial Study impact category. Those sections relating to the 100-year flood zone, residential use in the flood zone, flooding and the potential impact from a seiche, tsunami, or mudflow (9. f through j) do not need to be reconsidered because, as in the 2013 MND said subsections, they are not applicable to the site. Hence, there would be No Impact.

Section 9. a)

**Would the project:**

**a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

**Analysis**

The Clean Water Act (CWA) governs and authorizes water quality control at the federal level. The CWA established the National Pollutant Discharge Elimination System (NPDES) permit program to regulate municipal and industrial discharge. At the State level, the Porter-Cologne Water Quality Control of 1969 oversees California’s water quality. Under the Porter-Cologne Act, the State must adopt water quality policies, plans, and objectives that protect the State’s waters. Regional authority for the planning, permitting, and enforcement of the State’s policies, plans and objectives is delegated to the Regional Water Quality Control Boards. The project site is located within the jurisdiction of the North Coast Regional Water Quality Control Board (NCRWQCB).

Construction activities for the project will involve disturbing one or more acres of ground, so the project is subject to the requirements of the State Water Resources Control Board (SWRCB) NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction Activity (General Construction Permit). Construction activities include clearing, grading, excavation, stockpiling, and reconstruction of existing facilities involving removal and replacement. Applicants of construction projects must file for coverage under the General Construction Permit by submitting a complete Notice of Intent (NOI) package to the NCRWCB, and developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must contain a site map that shows the construction site perimeter; existing and proposed buildings, lots, roadways, and storm water collection and discharge points; general topography both before and after construction; and drainage patterns across the project site. The SWPPP must include the Best Management Practices (BMPs) that the applicant will use to protect the quality of storm water runoff and the placement of those BMPs.

Implementation of the BMPs identified in the SWPPP would assure that the proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality at the time of construction.

The project involves placement of more than 10,000 square feet of impervious surface area. Therefore, it must both meet the requirements of the Sonoma County Storm Water Quality Ordinance and incorporate Low Impact Development (LID) Best Management Practices (BMPs) contained in the County of Sonoma Storm Water Low Impact Development Technical Design Manual. The BMPs proposed for DRH19-0015

includes bio-retention areas, permeable pavement for the parking stalls, and an infiltration trench.

Implementation of permanent storm water quality features required to obtain grading and drainage permits, and implementation of post-construction BMPs as required under the NPDES permit would ensure that no storm water discharge requirements are violated. Therefore, project proposed under DRH19-0015 would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. The potential impacts would therefore be less than significant.

**b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**Analysis**

The project is located in a Zone 1 Ground Water Availability Zone. A Water Supply Report prepared for the project by Questa Engineering Corp., April 2019, indicates that the new well proposed for the project is likely to yield 60gpm to 80gpm. This production rate far exceeds the estimated water supply need of 10gpm. Furthermore, given the availability of water within a Zone 1 Water Availability Zone no further analysis to assess the potential impact on neighboring water wells is required by General Plan policy. This potential impact is considered to be less than significant and no mitigation measures are required.

**c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river.**

**d) Substantially alter the existing drainage pattern of the site 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?**

**e) Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?**

**f) Otherwise substantially degrade water quality?**

**Analysis**

There are no streams or rivers on or in close proximity to the site that would be altered from on-site grading.

Construction of the proposed project involves grading. Unregulated grading during construction has the potential to increase soil erosion from a site, which could cause downstream flooding and further erosion, which could adversely impact downstream water quality. Construction grading activities shall be in compliance with performance standards in the Sonoma County Grading and Drainage Ordinance. The ordinance and adopted construction site Best Management Practices (BMPs) require installation of adequate erosion prevention and sediment control management practices. These ordinance requirements and BMPs are specifically designed to maintain water quantity and ensure erosion and siltation impacts are at a less than significant level during and post construction. Therefore, construction activities associated with the proposed project will not alter the existing drainage pattern of the site or area in a way that would result in downstream erosion and/or sedimentation.

Furthermore, the proposed project would increase the amount of surface runoff generated on the project site because of an increase in impervious surfaces compared to existing conditions. However, the project includes a storm drainage system consisting of bio-retention areas, permeable pavement and an infiltration trench. These BMPs have been selected to reduce runoff from the site and provide ground water recharge. These potential impacts are considered to be less than significance and no mitigation measures are required.

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

## 14. TRANSPORTATION AND TRAFFIC

An update to the Focused Traffic Study for the DRH19-0015 was prepared by W-Trans, consulting traffic engineers, 6 November 2020. The report found that the proposed project would result in 21 new daily trips, including four fewer trips during the a.m. peak hour than the MND contemplated and one fewer trip during the p.m. peak hour. Although the project proposes larger total square footage than the existing development, fewer trips are estimated during a.m. and p.m. peak hour due to the reduction of manufacturing space and the application of current trip generation rates for manufacturing, which are slightly lower than those applied in the previous analysis.

The report updated the previous analysis regarding collision, sight distance and turn lane warrants. Due to the requirements engendered by the mandatory implementation of Senate Bill 743, a VMT (vehicle miles travel) analysis was added.

The updated report found no change in impacts due to DRH19-0015 and found the number of trips below the threshold of 110 daily trips and found the impact to VMT less than significant.

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

## 17. TRIBAL CONSULTATION

On September 25, 2014, Governor Brown signed Assembly Bill No. 52, which created a new category of environmental resources that must be considered under CEQA: “tribal cultural resources”. Recognizing that tribes may have expertise with regard to their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project. If the tribe requests consultation within 30 days upon receipt of notice, the lead agency must consult with the tribe.<sup>1</sup>

Tribal Consultation falls within criterion #3 of Guidelines Section 15162, that is, new information (in this case new regulation) of substantial importance. The affected tribes were contacted by the Permit and Resource Management Department (Permit Sonoma). No concerns were raised. Based on the response received, the impact is considered less than significant. The proposed Project qualifies for an Addendum per CEQA Section 15164 (b).

## 18. UTILITIES AND SERVICE SYSTEMS

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<sup>1</sup> Synopsis of AB 52 obtained from Perkins/Coie California Land Use & Development Law Report. September 30, 2014.

As indicated previously, although the ability to construct a light industrial project with a footprint of 40,000 square feet was included in the MND project description, the MND assumed the use of the existing well and waste disposal system. As has been evidenced by the Geotechnical Investigation Report, Water Supply Report and Septic Capability Report, all of which prepared by Questa Engineering, Corp., the site is suitable to support the septic system and there is more than adequate water supply to support the use. Mitigation measures from the MND are applicable to DRH19-0015 and shall appear as conditions of approval. The construction of a new waste disposal system and water well has not engendered any new mitigation measure nor rendered any existing mitigation measures non-feasible.

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

## 20. WILDFIRE

**If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:**

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk of that may result in temporary or ongoing impacts to the environment?**

**d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

## ANALYSIS

The project site located at 101 Grant School Rd. is not located within a State Responsibility Area or High Fire Hazard Severity Zone.

General Plan 2020 Public Safety Element Figure PS-1g identifies wildland fire hazard areas. The propose project is located outside of designated fire hazard zone adjacent to an urban service area.

Strong north-east “Santa Ana” winds, typical in Sonoma County, can increase the severity of wildland fire in the fall months. During fire season, gradient winds are generally out of the south/southwest at 5-10 mph, strengthening to 10-15 mph in the late afternoon. These prevailing wind conditions are not unique to the project site.

All construction projects must comply with County Fire Safe Standards (Sonoma County Municipal Code Chapter 13), including but not limited to the following: installing fire sprinklers in buildings, providing emergency vehicle access, and maintaining a dedicated fire-fighting water supply on-site, which includes two 26,500 gallons water storage tanks. Other code-required fire safe standards relate to fuel modification, defensible space, road naming, and addressing.

Application of County and State fire safe standards reduces the project’s potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires to a less than significant level.

Fire service is provided by Windsor Fire Protection District Station 2 which is located on Windsor Rd., about 4 ½ miles south of the project site.

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

## D. CONCLUSION

This Addendum and in the technical reports referenced herein have evaluated the project proposed by DRH19-0015 for significant effects to the environment that were not evaluated under the Mitigated Negative Declaration (MND) prepared for PLP12-0005. Technical reports are available for public inspection at the Permit and Resources Management Department (Permit Sonoma) located at 2550 Ventura Avenue, Santa Rosa, CA and made available electronically by request.

The MND contemplated the effects of on-site industrial uses consistent with the development standards of the Limited Rural Industrial District Zoning District (M3), including a maximum building footprint of 40,000 square feet and a total of 30 full-time employees, and operational hours of Monday through Saturday 6 a.m. to 10 p.m., with the bulk of the employees arriving and leaving between 8:00 a.m. and 5:00 p.m. Expected uses included all uses permitted by right in the M3, with the exception of vehicle and truck repair facilities and recycling collection facilities.

The proposed project, Permit Sonoma File No. DRH19-0015, consists of three new buildings and the renovation of one existing building having a combined square footage of 35,950 square feet to be located at 101 Grant School Road and used in accordance with General Plan Policy LU-14m.

On the basis of the analysis in this Addendum and the technical reports, the proposed Project, DRH19-0015, does not cause new significant environmental effects or substantial increases in the severity of a significant environmental effect identified in the MND prepared for PLP12-0005. There are no substantial changes in circumstances affecting the project proposed under DRH19-0015, which would cause increased environmental impacts. Although there is new information, which was not known and could not have been known at the time of the MND, analysis of that new information or regulations applied to the proposed Project shows no new or more severe environmental effects. Furthermore, no infeasibility of adopted mitigation measures, no new feasible mitigation measures which the applicant declines to adopt, or no alternatives different from those in the MND, which would substantially reduce effects on the environment were discovered.

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

## SOURCE DOCUMENTS USED TO PREPARE THE ADDENDUM

1. Project Application and Narrative: Jazz Builders Inc. Bruce Burman. November 20, 2019.
2. PLP12-0005 BOS Resolution 13-0480
3. PLP12-0005 Mitigated Negative Declaration: 101 Partners and Nutradine Inc.
4. Proposed Project Plans: The School Yard Industrial Park. Design Review Set. November 1, 2019.
5. 101 Grant School Road Healdsburg CA Geotechnical Investigation Report. Questa Engineering Corp. April 2019.
6. Water Supply Plan for 101 Grant School Road Healdsburg CA. Questa Engineering Corp. October 2, 2019.
7. 101 Grant School Road Arborist Report and Tree Protection Specifications. MacNair & Associates, consulting arborists and horticulturalist. September 28, 2019.
8. Native Grassland Habitat Assessment and Nesting Bird Survey for the School Yard Industrial Park Project, 101 Grant School Road, Healdsburg, Sonoma County, California. Huffman-Broadway Group, Inc. March 2021.
9. Site Feasibility Report for a Sewage Disposal System for 101 Grant School Road Healdsburg, CA. Questa Engineering Corp. October 2019.
10. Focus Traffic Study for 101 Grant School Road. W-Trans, Consulting Traffic Engineers. May 6, 2013.
11. Update to the Focused Traffic Study for 101 Grant School Road. W-Trans, Consulting Traffic Engineers. November 6, 2020.
12. Greenhouse Gas Emissions Analysis: 101 Grant School Road, Healdsburg, CA. ESA. May 2013.