CITY OF PETALUMA
MEMORANDUM

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DATE: April 16, 2019

TO: Brittany Bendix, Deputy Planning Manager

FROM: Olivia Ervin, Principal Environmental Planner

SUBJECT: Home 2 Suites: 140-Room Hotel Project
1205 Redwood Way, Petaluma, CA 94952
Consistency Determination with Redwood Technology Center EIR and
Class 32 In-Fill Exemption Justification
File No. PLSR-18-0025

The City of Petaluma has received a development application for Site Plan and Architectural Review (SPAR) of the proposed 4-story, 85,802 square foot Home 2 Suites Hotel containing 140 guest rooms (project), located at 1205 Redwood Way within the Redwood Technology Center Planned Unit Development (APN 007-411-034), Petaluma, Sonoma County, California.

The project site is located on an approximately 1.18-acre vacant parcel within the Redwood Technology Center Planned Unit Development (PUD), which underwent environmental review as part of the Redwood Technology Center Project. On June 10, 2003, the Redwood Technology Center EIR, SCH #1999062121 was certified and the Redwood Technology Center project was approved by the City of Petaluma, which provided for the development of approximately 30 acres including 7,500 square feet of restaurant use, 262,500 square feet of office/research and development campus land uses, 94,918 square feet of an independent retail store with an associated 20,405 square foot garden center, two smaller retail spaces totaling 34,250 square feet, two restaurant spaces totaling 10,454 square feet, and appurtenant improvements. The Redwood Technology Center Planned Unit Development provides for the following permitted principal uses[1]:

1. Offices: Professional, administrative, executive, editorial, and general business offices
2. Motels and Hotels
3. Restaurants (excluding fast-food), cafes, delicatessens, coffee shops, and other service retail uses
4. Manufacturing, assembly or packaging of products from previously prepared materials
5. Manufacture and assembly of electric and electronic instruments and devices
6. Laboratories, research, experimental film or testing
7. Wholesale business, storage, or warehousing

[1] Redwood Technology Center Planned Unit District, adopted March 3, 2003.

8. Day Care Centers

Except for two undeveloped lots including the subject project site, nearly the entirety of the Redwood Technology Center property has been developed and is now occupied by a mix of office, commercial, retail and supporting services, consistent with the development intensity analyzed in the Redwood Technology Center EIR and allowed through the Redwood Technology Center PUD.[2] Established uses within the Redwood Technology Center include Synergy Health Club, Kohl's, Michael's, general business offices, a variety of eateries and service commercial uses, and parking. The two vacant lots include a building pad at 1395 N McDowell Boulevard which received SPAR approval in September of 2018 to construct a 6,380 square foot four-unit commercial building. The second vacant building pad is the project site at 1205 Redwood Way. The project site is adjacent to the existing 2-story 41,000 square foot building containing the Synergy Health Club and is served by an existing 357 stall parking lot designed to City standards including landscaping, curbs, striping, signage, ADA stalls, pavement marking and lighting.

As proposed, the Home 2 Suites Hotel Project would develop a 4-story 85,802 square foot hotel containing 140 guest rooms, landscaping, an inground pool, patio and spa area, and appurtenant improvements. The proposed project is consistent with the development intensity analyzed in the certified Redwood Technology Center EIR and no further environmental analysis is warranted. A review of CEQA Guidelines Section 15162, Subsequent EIRs and Negative Declarations, did not identify any conditions warranting subsequent environmental review. The proposed Home 2 Suites Project is consistent with the certified Redwood Technology Center EIR and no further environmental review is warranted.

In addition, and as documented herein, the proposed project meets the conditions for the In-Fill Development Project Categorical Exemption pursuant to Section 15332 of the State California Environmental Quality Act (CEQA) Guidelines. Specifically, the project qualifies for an exemption for the following reasons:

- The project is consistent with the City of Petaluma General Plan land use designation and complies with the established zoning regulations;
- The project is located within City limits on a site that is less than 5 acres and is substantially surrounded by established urban uses;
- The site is void of natural vegetation and there is no habitat that would support endangered, rare or threatened species;
- The project would not result in any significant effects relating to traffic, noise, air quality, or water quality;
- The project is adequately served by all required utilities and public services; and
- There are no exceptions that would preclude application of the exemption.

a) The project is consistent with the applicable General Plan Designation, applicable policies and applicable zoning designation and regulations.

The project site has a land use designation of Business Park (BP) per the 2025 General Plan. The site's zoning regulations are established through the Redwood Technology Center Planned Unit District

[2] Redwood Technology Center Environmental Impact Report, prepared by Design, Community & Environment, certified by the City of Petaluma on March 3, 2003.

(PUD), which provides for a variety of office, retail, hotel, and manufacturing uses as described above. The BP land use designation is intended to provide for a variety of business and professional office, research and development, service establishments, and light industrial operations with a maximum floor area ratio (FAR) of 1.5 to 3.0.

The project proposes to introduce a 4-story, 140-room Hotel contained within an 85,802 square foot building area. The project is part of an 8.19-acre development site that includes the adjacent 41,000 square foot fitness building and the shared parking lot. As proposed, the project will increase the site's total FAR from 0.115 to 0.356, which is consistent with the FAR established by the General Plan for the BP land use designation.

Pursuant to Redwood Technology Center Planned Unit District the proposed Hotel is a principally permitted land use and is allowed by right subject to the Development Regulation established therein. As demonstrated in the following Table, the proposed Hotel Project complies with the Development Regulation set forth in the Redwood Technology Center PUD.

Table 1: Redwood Technology Center Development Regulations

	Development Regulation (Redwood PUD)	Proposed Hotel Project
Minimum Lot Area	6,000 square feet	51,318 square feet (1.18 Acres)
Minimum Lot Width	60 Feet	~ 180
Minimum Lot Depth	100 Feet	~120 feet
Max Coverage	60%	17.69% (total lot coverage combined with health club)
Max Height	60 feet	59 feet 7.5 inches (top of parapet)
Parking Regs[1]	1 parking stall per room 1 parking stall for hotel manager	141 parking stalls including 7 EVC and 5 ADA
1. Parking regulation are from Table 11.1 of the IZO, which requires 1 parking stall for each living or sleeping unit plus 1 parking stall for the manager.		

As a 140-room hotel, the project is consistent with the zoning regulation established by the Redwood Technology Center PUD. As a principally permitted use, the project is subject to Site Plan and Architectural Review in accordance with IZO Chapter 24.

An existing parking lot that currently serves the existing Synergy Health Club is established and contains a total of 357 parking stalls, curbs, landscaping and lighting. The Shared Parking Analysis[3] prepared for the project site identified a peak existing demand of 154 parking stall for the Synergy Health Club. To accommodate the proposed Hotel project a total of 141 parking stalls including 7 electric vehicle charging stations and 5 Americans with Disabilities Act (ADA) parking stalls are required pursuant to the City parking requirements. As such, there are sufficient parking stalls onsite to serve the established uses in addition to the proposed Hotel project.

Furthermore, the project is subject to the applicable conditions of approval and mitigation measures identified for the Redwood Technology Center as set forth in Resolution 2003-051 approving the Redwood Technology Center Unit Development Plan. Applicable conditions of approval and measures from the Redwood Technology Center Unit Development Plan have been added to the list of conditions imposed on the proposed project.

b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by Urban Uses.

The project site occupies approximately 1.18 acres within the City of Petaluma's Urban Growth Boundary, north of Highway 101 and east of Old Redwood Highway. The project site is located within the southern portion of the Redwood Technology Center PUD, which was previously approved for development in 2003 when the Redwood Technology Center EIR (SCH # 1999062121) was certified. Established uses within the Redwood Technology Center include Synergy Health Club, Kohl's, Michael's, general business offices, a variety of eateries and service commercial uses. Redwood Technology Center is surrounded by established roadways, Highway 101 to the south, Old Redwood Highway to the west, industrial uses to the east, and community commercial to the north.

The site has been previously grubbed and graded, with access roads extending to the project site and utilities stubbed out for future connection.

The project site surrounded on all sides by established urban uses including arterials, commercial/retail, and is wholly contained within the approved Redwood Technology Center project site. Thus, the proposed project is located on a site of no more than 5 acres and is substantially surrounded by established urban uses.

c) The project has no value as habitat for endangered, rare or threatened species.

The project site has been previously graded and prepared for development as part of the Redwood Technology Center project. As part of the Redwood Technology Center EIR mitigation was required to preserve existing wetlands at the site margins including the adjacent drainage channel and to secure mitigation credits to offsets the loss of onsite wetlands that occurred when the Redwood Technology Center project site was initially graded. The Redwood Technology Center EIR determined that there were no special-status plant or wildlife species onsite or in the immediate vicinity, and that the site's urban nature and proximity to Highway 101 limits the potential of special-status species. The Redwood

[3] Shared Parking Analysis 1205 Redwood Way, Petaluma, prepared November 30, 2018.

Technology Center is now almost entirely built out with buildings, parking areas, drive aisles and landscaping. Thus, the project site has no value as habitat for sensitive species.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

As mentioned above, the project site was previously evaluated as part of the Redwood Technology Center EIR. The following discussion describes the proposed project as it relates to traffic, noise, air quality and water quality concerns:

Traffic

Trip generation for the Redwood Technology Center Project evaluated traffic impacts associated with development of 90,000 square feet of general office development, whereas the proposed project would provide for a 140-room Hotel. To evaluate the difference in trip generation and relative impacts on project area intersections, a Trip Generation Comparison letter was prepared.[4]

The Trip Generation Comparison relies on standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual, 10th Edition* for the proposed 140-room Hotel (All Suites Hotel, ITE Use Code 311). For the 90,000 square feet of general office, previously approved for the project site, General Office Building (ITE Use Code 710) was utilized.

The Redwood Technology Center Project as approved in 2003 and subsequently amended anticipated traffic volumes at the subject project site associated with 90,000 square feet of general office land use. As documented in Table 2, the proposed 140-room hotel project would generate relatively fewer trips compared to what was analyzed under the Redwood Technology Center EIR. Although the total AM peak hour would result in a net increase of 4 outbound trips and the PM peak hour would result in a net increase of 7 inbound trip, overall, the proposed hotel project would result in a net reduction of 350 daily trips compared to the general office development previously approved.

Table 2: Proposed Project Trip Generation Summary

Land Use	Qty.	Daily Trips	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
BASELINE								
General Office Building	90 ksf	958	112	96	16	103	16	87
PROPOSED HOTEL								
Home 2 Suites Hotel	140 rooms	608	42	22	20	48	23	25
Net Change in Trips		**-350**	**-70**	**-74**	**+4**	**-55**	**+7**	**-62**

The proposed project will not generate vehicle trips at a level that would adversely affect the transportation network or impact level of service at nearby intersections at a rate higher than what was

[4] Trip Generation Comparison Letter for the Redwood Technology Center, prepared by Traffic Works, dated September 28, 2018.

certified in the 2003 EIR for the Redwood Technology Center Project. Rather, daily trips generated by the 90,000 square feet of general office development on the project site as analyzed in the Redwood Technology Center EIR will be reduced by 37% under the proposed Hotel project. Overall, the proposed residential project will result in a net reduction in the trip generation relative to what was approved under the Redwood Technology Center Project. Therefore, the 140-room hotel project would not result in significant traffic impacts beyond those anticipated by the certified Redwood Technology Center EIR.

Noise

The proposed project will introduce a Hotel to an area within the 70-dBA noise contour of Highway 101 (Figure 10-1 of the General Plan). In accordance with the City's Land Use Compatibility Standards (Figure 10-2), hotel land uses are conditionally acceptable only after a detailed noise analysis is completed. The Redwood Technology Center EIR included a noise analysis which found that the project site would be exposed to noise levels approaching 71 dBA with widening on the Highway 101, which is now complete.

Environmental impacts to noise generally relate to changes in the ambient noise conditions caused by the proposed project relative to the existing ambient noise setting without the project. Under the 2015 CEQA case *California Building Industry Association v. Bay Area Air Quality Management District* (BAAQMD), clarification was provided by the court that "in light of CEQA's text, statutory structure, and purpose, we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents." CEQA is concerned with impacts of the project on the physical environment, rather than the environment's impact on the project.

The proposed Home 2 Suites Hotel Project is consistent with the certified Redwood Technology Center EIR and would not introduce any new or more substantial noise impacts beyond those identified in the EIR. Furthermore, the proposed project is subject to NOISE-1a, b, and c, which provide for routing construction traffic via Highway 101 and Old Redwood Highway, notifying adjacent building occupants, and posting the construction schedule. Therefore, the Project would not result in significant impacts to the ambient noise environment.

The City's General Plan does include policies that protect public health and welfare including the Land Use Compatibility Standards set forth in Figure 10-2, which provide for detailed analysis of noise reduction requirements and incorporation of noise insulation features into the design.

Due to the proposed siting of the hotel building, within approximately 180 feet from the centerline of Highway 101, the exterior to interior noise insulation requires a reduction of approximately 26 dBA to achieve an interior noise standard of 45 dBA. Typical construction in California generally provides an exterior-to-interior noise reduction of approximately 25 dBA with closed windows.[5] Other noise reduction strategies, such as introducing a solid wall or berm between the noise source and receptor,

[5] Federal Transit Administration (FTA). 2006. Transit Noise and Vibration Impact Assessment. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf.

can reduce noise levels by 5 to 10 dBA.[6] Enhanced construction techniques such as sound rated windows, doors and walls provide for additional exterior to interior noise reduction.

As proposed, the Home 2 Suites Hotel will be sited in a location that experiences noise levels in the 70-dBA range, which is considered by the General Plan land use compatibility standards to be "Conditionally Acceptable" or "Normally Unacceptable." The General Plan requires noise insulation features to be incorporated in project design for development exposed to "Conditionally Acceptable" and "Normally Unacceptable" noise levels. Specifically, General Plan Policy 10-P-3 requires that noise insulation features must achieve an interior noise level of 45 dBA.

Although the proposed project will not result in an environmental impact due to increasing ambient noise levels, the project will introduce a new Hotel to an area with elevated ambient noise levels. To ensure that Hotel guests and employees are not exposed to excessive noise levels due to the ambient noise environment, the project has incorporated the following design features:

1. A fresh air supply system or air conditioning system provides for closed window conditions that insulate noise exposure (use of a ductless Heating Ventilation and Air Conditioning system in lieu of Packaged Terminal Air Conditioning units).
2. The exterior building façades exposed to Highway 101 and the offramp to Old Redwood Highway provide for noise insulation including a Sound Transmission Class (STC) rating to reduce interior noise level in habitable rooms to below 45 dBA. Additional layers of interior drywall or exterior siding reduce exterior to interior noise attenuation. All exterior windows and exterior wall assemblies meet SCT rating to ensure adequate attenuation of noise.
3. The placement of the Hotel building serves to obstruct Highway 101 traffic noise from outdoor spaces including the courtyard, pool and spa area.

The project's contribution to ambient noise levels would be negligible. Although the project would introduce new receptors (hotel guests and employees) to an elevated noise environment, noise exposure will be reduced through noise insulation design features, compliance with the California Building Code 1207.4, and through installation of STC rated windows, doors, and exterior building materials. The project will result in temporary noise from construction and at operation noise levels from the proposed Hotel will not be discernable from surrounding noise sources. Therefore, the project would not result in a significant environmental impact due to increased noise. With installation of noise attenuating building materials and design features, the project would not conflict with the City's Land Use Compatibility Standard and new guests/employees would not be exposed to excessive noise levels.

Air Quality

The Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines provide screening criteria for a lead agency to consider in making a conservative determination of a project's potential impacts on air quality based on proposed land-use. Health risk screening is required for projects that have the potential to affect sensitive receptors, which are defined by the BAAQMD as facilities or land use that include members of the population that are particularly sensitive to the effects of air pollutants,

[6] Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual. Accessed at https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

such as children, the elderly, and people with illnesses. Examples include schools, hospitals and residential areas. Hotels are not considered sensitive receptors because hotels do not result in long term exposure due to the nature of hotel visits, which are short term.

The proposed Home 2 Suites Hotel Project is consistent with the certified Redwood Technology Center EIR and would not introduce any new or more substantial air quality impacts beyond those identified in the EIR. Furthermore, the proposed project is subject to AIR-1, 2a, 2b, and 2c, which provide for BAAQMD control measures, building techniques that reduce area-source emissions, and automobile trip reduction. The proposed Home 2 Suites Hotel project is not subject to Mitigation Measure AIR-2c, which requires preparation of an air quality analysis demonstrating that NOx emissions will not be exceeded. In accordance with the BAAQMD screening Table 3-1, hotels with fewer than 489 rooms would not result in the generation of operational-related criteria pollutants in excess of BAAQMD thresholds for NOx. As a 140-room hotel, the proposed Home 2 Suites Hotel Project is well below the screening criteria for NOx emissions and further air quality analysis is not warranted.

The proposed project will not generate air quality emissions during construction or at operation that would result in new or more severe impacts relative to what was analyzed in the Redwood Technology Center EIR. Applicable mitigation measures identified in the certified EIR to reduce air quality emissions will be implemented. Therefore, the project would not result in significant air quality impacts.

Water Quality

The project site has been previously graded and is generally flat. A drainage channel is located offsite to the south between the subject property and the Highway 101 offramp. The project does not involve any activities that would alter the adjacent drainage channel and best management practices and compliance with uniformly applied development standards such as the City's erosion and sediment control provisions, will ensure that water quality of the adjacent drainage channel is protected during construction and at operation.

A Stormwater Control Plan has been prepared for the proposed Hotel project.[7] Currently, paved parking, landscaping, curbs, and drive aisles, and a compacted building pad occupy the project area. Runoff from the existing parking lot and impervious surfaces flows to existing storm drain facilities that discharge to the existing drainage channel to the south and east of the project site. Runoff from the project site, the 1.18-acre compacted building pad, flows downgrade to the existing drainage channel.

As proposed the Hotel project would introduce impervious surfaces on the 1.18 project site including 22,097 square feet from the hotel footprint, concrete patio and walkway in the outdoor pool and spa area, and the 6 foot wide concrete path that extends around the perimeter of the building. Landscaping areas would be introduced around the perimeter of the Hotel including groundcover, shrubs, and trees.

As proposed the Stormwater Control Plan provides adequate onsite facilities and control measures to achieve the standards and criteria outlined by the Bay Area Stormwater Management Agencies Association (BASMAA) Post Construction Manual (January 2019). Stormwater will be controlled, and

[7] Stormwater Control Plan, Sheet C-6 of Site Plan and Architectural Review Drawing Set, prepared by BKF, December 14, 2018.

water quality protected by directing runoff from impermeable surfaces such as the roof, hardscaped, and paved areas to existing treatment areas.

The mandatory requirements of the National Pollution Discharge Elimination System (NPDES) General Permit apply to the project's construction and post-construction stormwater discharges. Compliance is initiated through submittal of a Notice of Intent (NOI) to the State Water Resources Control Board (SWRCB) and carried out through a Storm Water Pollution Prevention Plan (SWPPP). In addition to storm water collection, discharge points, and drainage patterns across the project site, the SWPPP must also identify Best Management Practices (BMPs) to protect storm water runoff. Typical Best Management Practices (BMP) that are applied during construction activities include use of fiber filter rolls, sand bags or interceptors at storm drain inlets, track pads at access points, and spill prevention, amongst others. Furthermore, construction activities within the City of Petaluma are covered by the State Water Resources Control Board Construction General Permit (2009-009-DWQ) and post construction activities are covered by the Phase II Small MS4 general permit dated July 1, 2014, Order # 2013-001 DWQ.

As the project site has been previously graded in preparation for development as part of the Redwood Technology Center Project, the proposed Hotel development will require limited grading to achieve finish floor elevations. Compliance with the City's erosion control ordinance, the City's stormwater permit requirements and the SWPPP will ensure that construction activities do not result in significant water quality impacts. In addition, as a condition of approval the project is required to prepare a construction level stormwater quality report that demonstrates complies with BASMAA in accordance with provision E.12 of the City's stormwater permit. Therefore, the proposed Home 2 Suites Hotel Project would not result in water quality impacts during construction or at operation.

e) The project can be adequately served by all required utilities and public services.

The project site is directly adjacent to existing uses that are fully served by utilities and public services. The project site has been planned for development as part of the Redwood Technology Center Project and all utilities extend to the project site. The site is located within an urbanized area of the North McDowell Boulevard Subarea and is fully within the Urban Growth Boundary. It is well served by all utilities and public services.

Exceptions to Exemptions

It has been further considered whether the project is subject to any of the exceptions outlined in CEQA Guidelines Section 15300.2. An exemption would be prohibited pursuant to Section 15300.2 if any of the following circumstances are found to exist:

a) For certain classes of projects (Classes 3, 4, 5, 6 and 11) due to location where the project may impact an environmental resource or hazardous or critical concern;

Section 15300.2(a) does not apply to the infill exemption.

b) When the cumulative impact of successive projects of the same type in the same place, over time, is significant.

Since the project is located in an urbanized area with surrounding commercial uses, and the proposed hotel land use is comparable to the previously approved general office development on the same site,

there is no expectation that the project will contribute to cumulative impacts of successive projects of the same type in the same place over time.

c) Where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

There is no expectation that the project will have a significant effect on the environment resulting from unusual circumstances. The proposed project involves the introduction of a 140-room hotel on a previously graded site that has been previously approved for urban development. There are no unusual circumstances of the proposed project or the project site that would result in an environmental impact. Therefore, no significant effects generated by the presence of unusual circumstances would result from the proposed project.

d) Where the project may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway;

Section 15300.2(d) is not applicable; the project is not located in the vicinity of a highway officially designated as a state scenic highway, nor is it located in the vicinity of a locally recognized or designated scenic corridor. Therefore, the project will have no impacts relating to scenic resources.

e) Where the project is located on a state designated hazardous waste site; and

The Redwood Technology Center EIR did not identify any contaminants onsite and determined that the site was not included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5. This finding was affirmed in 2019, by conducting searches of both the Envirostor and Geotracker databases. The project site is not identified as a contaminated or spill site, nor is it near an active contaminated or spill site. A closed Cleanup Program Site was identified northwest of the project site at 1309 Dynamic Street, however since the case is closed and the project site is not located on a State designated hazardous waste site, there would be no potential for exposure due to contamination. As such, the project is not located on a Hazardous Waste Site.

f) Where the project may cause a substantial adverse change in the significance of a historical resource.

There are no structures on the project site and there is no record of past historical resources on the project site or in the study area of the Redwood Technology Center project. The subject 1.18-acre project site was previously graded and is currently comprised of an undeveloped compacted building pad. There are no structures (historic or otherwise) on the project site or in the vicinity that would be impacted by the proposed development. In the absence of any buildings or structure onsite, the proposed project will not result in impacts to historic resources.