



## MacArthur Place Hotel & Spa Improvements Project

### Initial Study – Mitigated Negative Declaration

*prepared by*

**City of Sonoma**  
Planning Department  
No. 1 The Plaza  
Sonoma, California 95476  
Contact: Kristina Tierney, Associate Planner

*prepared with the assistance of*

**Rincon Consultants, Inc.**  
449 15th Street, Suite 303  
Oakland, California 94612

**June 2020**

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**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

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Appendix AQ	Air Quality and Greenhouse Gas Analysis
Appendix ARB	Arborist Report
Appendix BRA	Biological Resources Assessment
Appendix CR	Historic Resource Impact Analysis
Appendix EN	Energy Fuel Consumption Calculations
Appendix GEO	Soil Investigation Report
Appendix HRE	Historic Resource Evaluation
Appendix NOI	Noise Analysis
Appendix RCNM	Roadway Construction Noise Model Results

# Initial Study

---

## 1. Project Title

MacArthur Place Hotel & Spa Improvements Project

## 2. Contact Person and Phone Number

Kristina Tierney, Associate Planner  
707-933-2202

## 3. Project Location

The project site encompasses 5.08 acres (221,416 square feet) on one parcel at 29 East MacArthur Street (Assessor's Parcel Number 128-091-008) in the City of Sonoma. The site is bordered by East MacArthur Street to the north, Broadway (State Route 12) to the west, the Nathanson Creek Preserve to the east, and Sonoma Valley High School to the south. Figure 1 shows the regional location of the project site and Figure 2 shows the project site's immediate location and selected nearby land uses. The "project area," where the proposed renovations would occur, is located near the center of the parcel and includes the existing pool, pool deck, and spa building, as shown on Figure 3.

## 4. Project Sponsor's Name and Address

Joe Walsh, Vice President Development  
L'Auberge de Sonoma, LLC  
7001 N. Scottsdale Road, Suite 2050  
Scottsdale, Arizona 85253

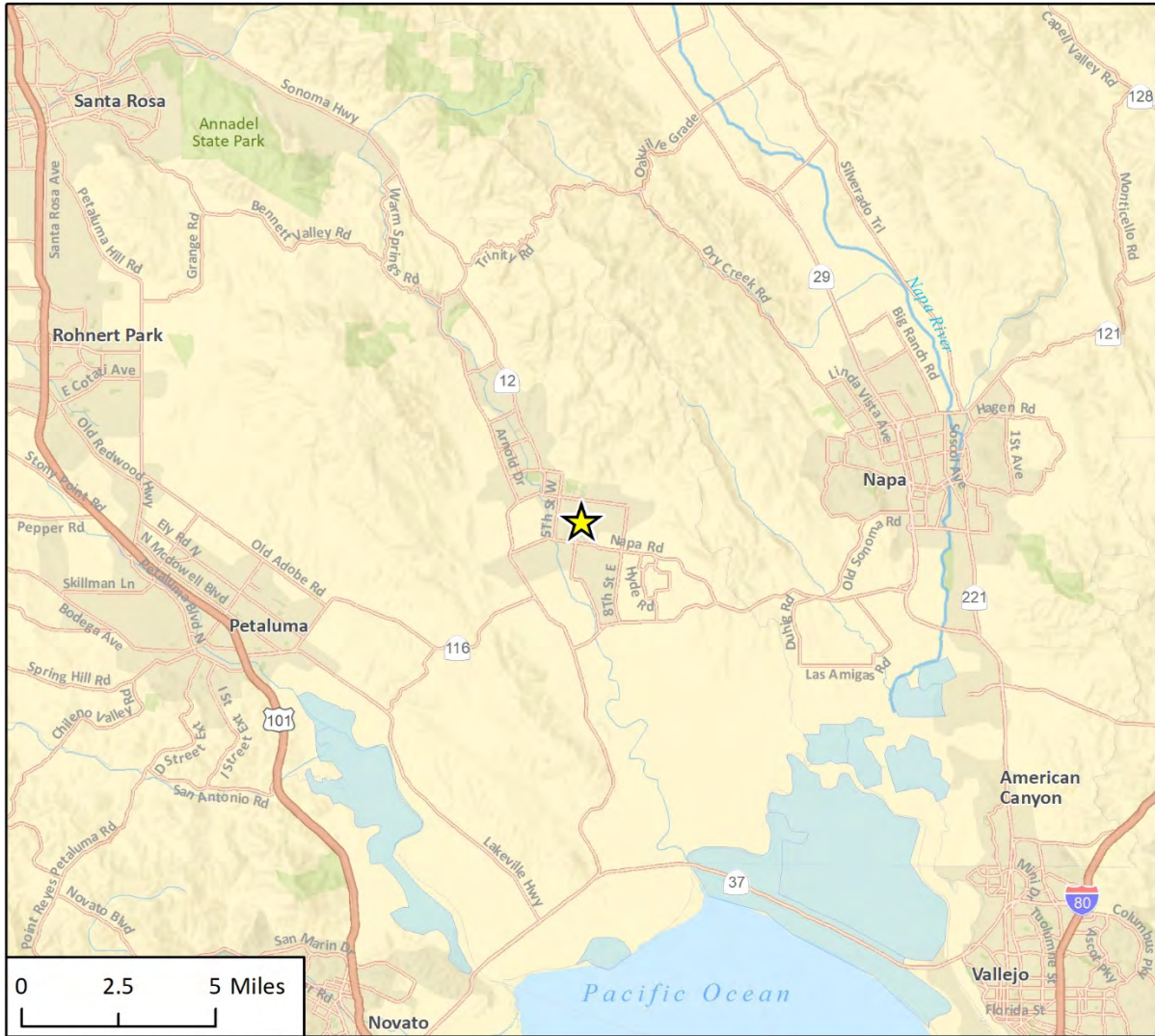
## 5. General Plan Designation

The project site is designated as Mixed Use (MX) by the City of Sonoma 2020 General Plan (City of Sonoma 2006).

## 6. Zoning

The project site is located within the Mixed Use (MX) zoning district (City of Sonoma 2018).

Figure 1 Regional Location



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★ Project Location

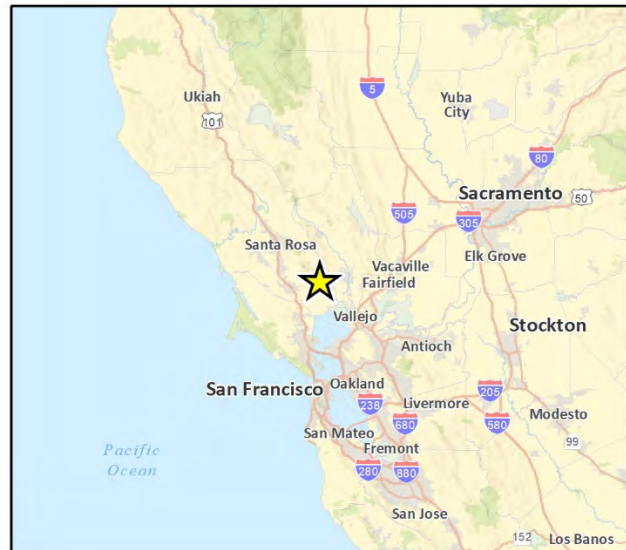


Fig. 1 Regional Location



Figure 2 Project Location



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Fig. 2 Project Site Location



## 7. Surrounding Land Uses and Setting

The project site is located near the southern portion of the City of Sonoma, approximately 0.6 mile south of the Sonoma Plaza. The surrounding area is characterized by a mix of uses, including commercial, residential, educational, and open space. Nathanson Creek abuts the project site at its northeast corner and continues northward and southward. The Nathanson Creek Preserve runs along a portion of the creek, including the portion that abuts the project site, and includes a pedestrian and bicycle trail. Nearby commercial uses are located primarily along Broadway and East MacArthur Street, and include restaurants, retail, and other hotel buildings that are between one and two stories in height. The site is also near several schools, including Sonoma High School, which abuts the site to the south, Adele Harrison Middle School, which abuts Sonoma High School to the south, and Prestwood Elementary School, which is approximately 0.3 mile east of the site. Nearby residential uses are concentrated north and east of the site, across East MacArthur Street and 2nd Street East. Those residential uses are primarily single-family dwellings that range from one to two stories.

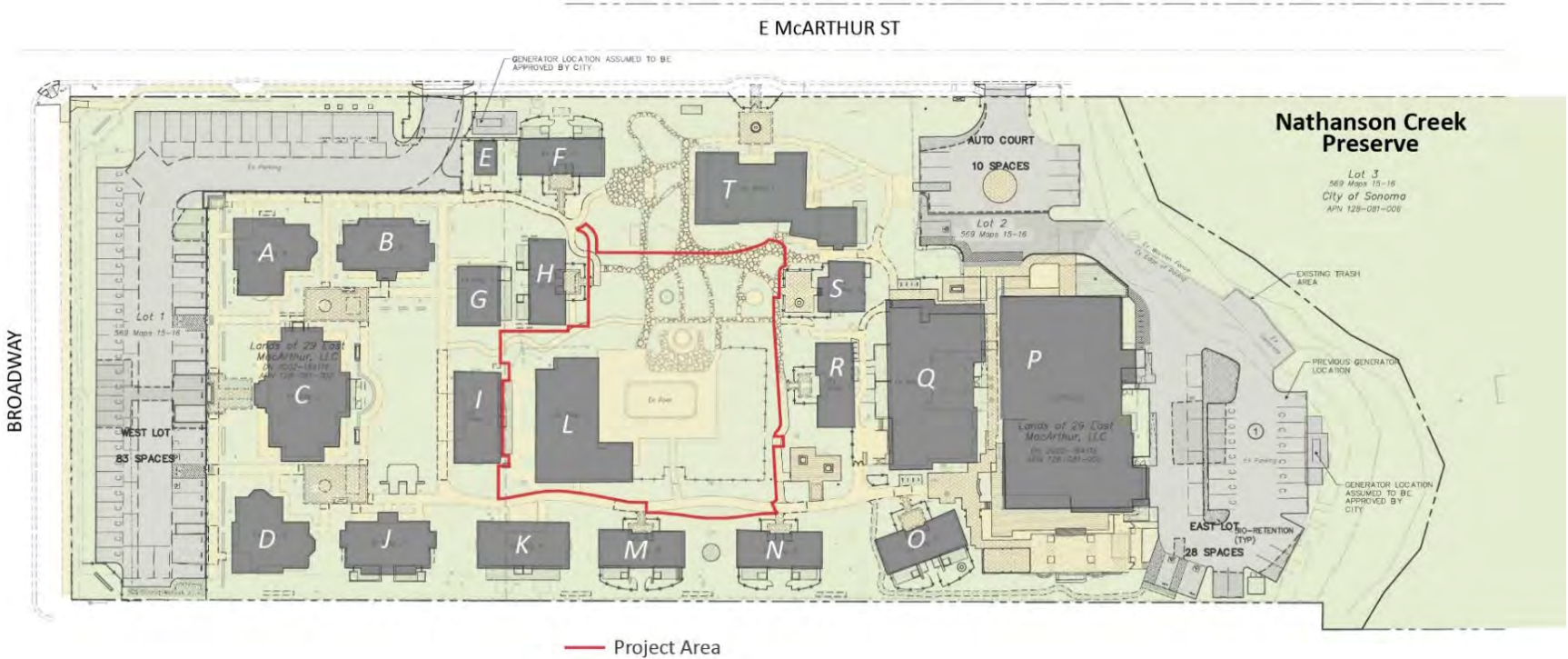
The project site is developed with the MacArthur Place Hotel and Spa. The hotel includes 64 guest rooms, a restaurant and bar, meeting rooms, and a spa, which are distributed in 20 separate buildings. The site is accessed via two driveways on East MacArthur Street which lead to surface parking lots at the eastern and western edges of the site. The hotel buildings are distributed evenly between the parking areas and are surrounded by gardens and landscaped pathways. The buildings range between one and two stories and include guest houses, a restaurant and reception building, maintenance building, and a Spa and Fitness Center building. The building ages on the site range widely: the oldest building, the Burris House (also called “Building T”) was constructed in 1869, while the majority of the buildings on the site, including most of the guest houses, were constructed between 1999 and 2000. The style of the buildings is also varied, from Italianate and Greek Revival to Streamline Moderne and Vernacular. An outdoor swimming pool and pool deck are located near the center of the site. Figure 3 illustrates the existing conditions at the site. The figure also identifies the “project area” where the proposed construction activities would occur. Figure 5 and Figure 6 include photographs of the project area and surrounding site.

## 8. Description of Project

The proposed project would involve renovation of the hotel complex’s spa area, which is labeled as project area on Figure 3. Renovation activities would include construction of an addition to the existing spa and fitness center building, renovation of the existing pool deck area outside the building including construction of a new pool and hot tubs. Figure 4 illustrates the proposed site plan, and Figure 5 provides information about the proposed project.

Aside from the proposed building expansion, pool deck renovations and new pool and hot tubs, the other portions of the site would remain the same. Project-related ground disturbance and building alterations would be limited to the project area. The hours of operation, meeting room and restaurant capacities, and the number of employees, guest rooms, and spa treatment rooms would not change as a result of the proposed project.

Figure 3 Existing Site Plan



**BUILDING LEGEND**

- |                        |               |                               |
|------------------------|---------------|-------------------------------|
| A Guest House          | H Guest House | O Guest House                 |
| B Guest House          | I Guest House | P Barn / Meeting / Restaurant |
| C Carriage House       | J Guest House | Q Coach House                 |
| D Guest House          | K Guest House | R Guest House                 |
| E Maintenance Building | L SPA         | S Chef's Cottage              |
| F Guest House          | M Guest House | T Guest House                 |
| G Guest House          | N Guest House |                               |

**PARKING COUNT**

West Lot	83
Auto Court	10
East Lot	28
<b>Total</b>	<b>121 Spaces</b>

Source: Ross Drullis Cusenbery Architecture.

Not to Scale

Figure 4 Proposed Site Plan



— Project Area

Source: Girvin Associates, Inc., April 2020.

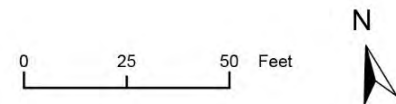




Figure 5 Site Photographs – Photographs 1 and 2



**Photograph 1.** View of spa and fitness building (identified as Building L in Figure 3), looking west



**Photograph 2.** View of barn building, looking east from western parking lot



**Figure 6** Site Photographs – Photographs 3 and 4



**Photograph 3.** View of Burris House (identified as Guest House T in Figure 3), looking west



**Photograph 4.** View of garden area, looking southwest toward spa and fitness building



**Table 1 Project Summary**

Site Feature	Existing	Proposed New	Proposed Total
Spa and Fitness Building Area	3,874 sf	4,411 sf	8,285 sf
Vehicle Parking Spaces <sup>1</sup>	121	10	131
Hotel Guest Rooms	64	No change	64
Conference Capacity	150 persons	No change	150 persons
Restaurant Capacity	165 seats	No change	165 seats
Impervious Area	119,291 sf	8,829 sf	128,120 sf

sf: square feet

<sup>1</sup> Additional parking spaces were approved on June 11, 2020 by the Sonoma Planning Commission. They are not part of this approval; however, the additional parking spaces do not exist as of the publishing of the Draft IS/MND.

## Building Renovation and Construction

The proposed project would involve renovation and expansion of the existing spa and fitness center building near the pool deck area, labeled “Building L” on Figure 3 and Figure 4. The renovation would include the following work:

- Demolition of the single-story eastern portion of the building, including the locker rooms.
- Construction of a new two-story addition within the footprint of the demolished portion, which would include new locker rooms and spa treatment rooms.
- Remodel of the remaining existing building, including entire second floor of the building and the exercise room at the first floor.
- Construction of a new public entry and fitness center, which would extend the building east across the pool deck. The new floor area would include a reception and retail space at the first floor, stretching room at the second floor, and a roof-top sun deck at the north edge of the building.

The proposed renovation and additions would result a net addition of 4,411 square feet. The renovated building would include a total of 8,285 square feet of floor area.

## Renovation of Pool Deck

The project would also involve renovation of the exterior portion of the project area, including the pool deck adjacent to the Spa and Fitness Center Building. The existing swimming pool would be demolished and replaced with an expanded pool that would be rotated to accommodate the Spa and Fitness Center building addition. A new raised hot tub would be installed to the west of the new pool. In addition, two new outdoor hydrotherapy areas would be installed at the eastern edge of the renovated building. Each hydrotherapy area would include one hot tub, one cold plunge, one sitting area, and one outdoor shower. Finally, new landscaping, irrigation, hardscape, cabanas, gates, and fences would be installed within the project area.

## Landscaping

The project would involve removal of two trees within the project area at the pool deck, a Valley Oak tree and a Silver Maple. In addition, two existing trees at the pool deck would be transplanted

to accommodate the proposed renovation work: a Chinese Magnolia would be moved approximately three feet to the west to accommodate the new cabana and jacuzzi area, and a Crepe Myrtle would be moved approximately 10 feet northeast to accommodate the expanded spa building (refer to Appendix BIO, which includes the Arborist Report prepared for the proposed project).

New landscaping would also be planted across the outdoor areas of the project area. New landscaping would include a lawn at the north portion of the pool deck, lawns around pool cabanas and the jacuzzi area, and perimeter plantings around pedestrian pathways and lounging areas.

## Parking

The project site currently contains 121 parking spaces. On June 11, 2020, the Planning Commission approved a parking lot restriping plan that increased the parking spaces onsite to 131 spaces.

## Construction

To complete the construction of the proposed project, grading would take place over most of the project area, and approximately 195 cubic yards of soil would be exported. Excavation for the pool replacement would reach a maximum depth of approximately six feet. Including demolition, renovation, and construction, project implementation would take approximately nine months.

## 9. Other Public Agencies Whose Approval is Required

The project would require approval of a use permit modification and design review application by the City of Sonoma Planning Commission. No additional discretionary public agency permits or approvals would be required for this project.

## 10. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

The City of Sonoma consulted with the Graton Rancheria, in compliance with AB 52 through a notice which was sent via certified mail on June 5, 2020. No California Native American Tribes have requested consultation pursuant to Public Resources Code Section 21080.3.1 as of the publishing of this document.

## Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                                   |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources      | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology/Soils        | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials               |
| <input type="checkbox"/> Hydrology/Water Quality         | <input type="checkbox"/> Land Use/Planning                  | <input type="checkbox"/> Mineral Resources                             |
| <input type="checkbox"/> Noise                           | <input type="checkbox"/> Population/Housing                 | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                      | <input type="checkbox"/> Transportation                     | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems       | <input type="checkbox"/> Wildfire                           | <input checked="" type="checkbox"/> Mandatory Findings of Significance |


## Determination

Based on this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

**MacArthur Place Hotel & Spa Improvements Project**

- I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
\_\_\_\_\_  
Signature

6/17/20  
\_\_\_\_\_  
Date

\_\_\_\_\_  
David A. Storer, AICP

\_\_\_\_\_  
Planning and Community  
Services Director

# Environmental Checklist

## 1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Except as provided in Public Resources Code Section 21099, would the project:

- |   |                          |                          |                                     |                                     |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

a. *Would the project have a substantial adverse effect on a scenic vista?*

City of Sonoma Municipal Code (SMC) Section 19.40.130.C defines “scenic vistas” as public views, benefiting the community at large, of significant features, including hillside terrain, ridgelines, canyons, geologic features, and community amenities (e.g., parks, landmarks, permanent open space). This would also include public views from road corridors of the hillsides that adjoin Sonoma Valley. Moreover, the SMC requires that new structures be constructed in a manner that preserves scenic vistas by maintaining view corridors (SMC Section 19.40.130.D), including unbuilt space between buildings, view opportunities created from undeveloped lots, airspace created from public parks and open spaces, and open spaces created from the deliberate spacing of buildings on the same lot or adjacent lots.

The proposed project is in a relatively flat area of the City of Sonoma. Views of hillsides are available looking northward from Broadway and looking eastward from East MacArthur Street. Given the existing development and vegetation on the project site and adjacent properties, such views of the hills or other features at a distance are not available from or through the project site. Views of the Nathanson Creek Preserve, a public open space adjacent to the east edge of the site, are available



from the parking lot and buildings at the eastern portion of the site; however, they are limited by existing infrastructure, accessory structures, and fencing.

The proposed project would involve an expansion of the existing spa building on the interior portion of a developed, privately owned site. Given the location of the proposed addition and the existing development near it, the project would not obstruct views of the hillside or the Nathanson Creek Preserve. Moreover, while the expansion would result in a reduction of open space between existing buildings on the site, the proposal would be consistent with the site's existing development pattern and open space design: the height of the proposed two-story addition would be consistent with the existing two-story buildings on the site, and the addition would extend the east wing to end at the edge of the existing pool deck. Existing landscaped pedestrian paths would remain unchanged. Impacts related to scenic vistas would therefore be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

State Route 12 crosses through the City of Sonoma, including along the portion of Broadway abutting the project site. A portion of SR 12 is a designated State scenic highway. However, the designated portion extends from Danielli Avenue east of Santa Rosa to London Way near Agua Caliente, which is located approximately three miles to the northwest of the project site in unincorporated Sonoma County (Caltrans 2011). Therefore, the project site is not located within view of a State scenic highway. Moreover, given the existing development and vegetation on the site, the proposed addition and remodel would not be visible from the portion of SR 12 that is adjacent to the site. No impact would occur.

#### **NO IMPACT**

- c. Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The project site is in the City of Sonoma, a non-urbanized area per CEQA Guidelines Section 15387. The visual character surrounding the project site is primarily characterized by one to two-story low-density commercial and residential development with a variety of architectural styles. Most of the residential buildings are located north and east of the site and are one- and two-story single-family dwellings sited on individual lots with generous front and rear yards that tend to include yards, swimming pools, and other landscaping. Educational uses are clustered south and southeast of the site and include one and two-story utilitarian school buildings surrounded by landscaped yards and outdoor sports fields. Commercial uses tend to be clustered south of the site, along Broadway, and are primarily automobile-oriented shopping centers, with one- to two-story buildings surrounded by concrete parking lots.

As Figure 5 and Figure 6 show, the existing visual quality of the project site is relatively high. It includes 20 buildings that make up the MacArthur Place Hotel and Spa, including one building that is eligible for listing on the National Register of Historic Places (the Burris House), arranged across a landscaped site with pedestrian pathways, a pool deck, and an event lawn. The buildings range between one and two stories and feature Italianate and Greek Revival architectural styles.

The proposed project would involve an expansion of the spa building and replacement of the existing pool and pool deck. These proposed changes would change the visual quality of the interior of the project site. However, the height, massing, and materials of the proposed building expansion would be consistent with the existing development on the site. In addition, the proposed project would generally maintain the existing development and landscaping pattern within the project site.

Per SMC Section 19.54.080, the project is subject to design review by the Planning Commission and the Design Review and Historic Preservation Commission (DRHPC). Approval of design review of the project would be subject to the following findings:

- a. The project complies with applicable policies and regulations, as set forth in this development code (except for approved variances and exceptions), other city ordinances, and the general plan;
- b. On balance, the project is consistent with the intent of applicable design guidelines set forth in this development code; and
- c. The project responds appropriately to the context of adjacent development, as well as existing site conditions and environmental features.

On May 19, 2020, the DRHPC reviewed the project and recommended that the Planning Commission approve the Design Review application. Given compliance with the above findings, the design of the project would be sensitive to the context of adjacent development, including the existing buildings and landscaping within the project site. The proposed project would involve modifications at the interior portions of the site, which would be minimally visible from public viewpoints, including surrounding streets. Given the location and scale of the proposed modifications, public views of the site and its surroundings would be minimally affected. Therefore, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and this impact would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

The neighborhood surrounding the project site is a developed area with moderate levels of existing lighting. The adjacent residential, educational, commercial, and roadway uses generate light and glare along the north, west, and south sides of the property; Nathanson Creek Preserve, which abuts the site at the east does not generate substantial light and glare. Primary sources of light adjacent to the project site include lighting associated with the existing residential and commercial buildings, including building-mounted and perimeter lighting as well as interior lighting visible through windows; streetlights; and headlights from vehicles on nearby streets. Sources of light within the site include interior lighting visible through windows, headlights from vehicles, and exterior building lighting to illuminate signage, pathways, and parking areas. The primary source of glare adjacent to the project site is the sun's reflection from metallic and glass surfaces on buildings and on vehicles parked on adjacent streets and in adjacent parking areas. Vehicles parked within the site are the primary source of daytime glare on the project site.

The proposed project would involve new exterior lighting in the form of pedestrian walkway and pool deck lighting and other safety-related lighting. Additionally, new interior lighting would be visible through windows in the expanded spa building. These light sources would not have a significant impact on the night sky, as they would only incrementally add to the existing background

light levels already present as a result of the surrounding buildings, parking areas, and street lighting. Because of the existing moderate ambient lighting levels in the vicinity of the site, project development would not substantially alter this condition. Consistent with surrounding land uses, the project would also incorporate materials, such as wood paneling and grey roof shingles to match existing materials, that reduce the amount of glare reflected off the building and pool deck.

In addition, all proposed exterior lighting would be subject to the exterior lighting standards of SMC Section 19.40.030, including the following:

- **Exterior Fixtures.** Lighting fixtures shall be architecturally compatible with the character of the surrounding structure(s) and shall be energy efficient. Fixtures shall be appropriate in height, intensity, and scale to the use they are serving. Generally, pole-mounted fixtures shall be low in height (up to 20 feet) and be equipped with light shields to reduce or eliminate light spillage beyond the project's boundaries.
- **Intensity.** The level of parking lot light projected onto any ground or wall surface shall not be less than two footcandles nor more than five footcandles at the base of the light fixture. Pedestrian courts, plazas, and walkways shall have a light level at the ground surface of one footcandle. The electrical or lighting plan shall demonstrate the dispersal of light on the ground surface and compliance with the requirements of this section. Building-mounted decorative lights shall not exceed five footcandles measured five feet from the light source.
- **Shielding.** Where the light source is visible from outside the project boundary, shielding shall be required to reduce glare so that neither the light source nor its image from a reflective surface shall be directly visible from any point five feet or more beyond the property line. This requirement shall not apply to single-family residential uses, traffic safety lighting, or public street lighting.

Given required compliance with the approve requirements and the modest level of additional lighting in the existing context of the site and surroundings, impacts related to light and glare would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

## 2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use or a Williamson Act contract?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. 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?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- 
- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*
- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*
- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

- e. *Would the project 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?*

The project site is located on Urban and Built-Up Land, per the Department of Conservation's (DOC) Important Farmland Finder (DOC 2018). This area is not identified as a farmland type, it is not enrolled in Williamson Act contracts, and it does not support forest land or resources. The project site is not located on or adjacent to agricultural land or forest land and the proposed project would not involve development that could result in the conversion of farmland to non-agricultural uses. The site is occupied by hotel and spa buildings and associated outdoor recreational areas. Therefore, the proposed project would have no impact with respect to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use; conflict with existing agricultural zoning or Williamson Act contracts; result in the loss of forest land or conversion of forest land to non-forest use; or other conversion of farmland to non-agricultural use. The proposed project would have no impact on agriculture and forestry resources.

**NO IMPACT**



### 3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section incorporates the findings of the Air Quality and Greenhouse Gas Analysis conducted by Yorke Engineering, LLC, dated April 29, 2020. This report is included as Appendix AQ.

#### Air Quality Standards and Attainment

Sonoma is located in southeastern Sonoma County, which is a subregion of the San Francisco Bay Area Air Basin (SFBAAB) that is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The SFBAAB includes the counties of San Francisco, Santa Clara, San Mateo, Marin, Napa, Contra Costa, and Alameda, along with the southeast portion of Sonoma County and the southwest portion of Solano County. Sonoma County is bounded on the west by the Pacific Ocean, on the southwest by Marin County, on the south by the San Pablo Bay, on the east by Napa and Lake Counties, and on the north by Mendocino County.

As the local air quality management agency, the BAAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet them. Depending on whether or not standards are met or exceeded, a local air basin is classified as in “attainment” or “non-attainment.” The BAAQMD is in non-attainment for the national standards for ozone (O<sub>3</sub>) and particulate matter smaller than 2.5 microns in diameter (PM<sub>2.5</sub>) and in non-attainment for the state standard for O<sub>3</sub>, PM<sub>2.5</sub>, and particulate matter smaller than 10 microns in diameter (PM<sub>10</sub>) (BAAQMD 2020).

#### Air Quality Management

The BAAQMD is primarily responsible for assuring national and state ambient air quality standards are attained and maintained in its jurisdiction. The BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary

sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities. The BAAQMD has jurisdiction over much of the nine-county Bay Area, including southeastern Sonoma County.

The BAAQMD adopted the 2017 Clean Air Plan (2017 Plan) as an update to the 2010 Clean Air Plan. The 2017 Plan provides a regional strategy to protect public health and the climate. Consistent with the greenhouse gas (GHG) reduction targets adopted by the state, the 2017 Plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. To fulfill state O<sub>3</sub> planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of O<sub>3</sub>precursors— reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>)—and reduce transport of ozone and its precursors to neighboring air basins. In addition, the 2017 Plan builds upon and enhances the BAAQMD’s efforts to reduce emissions of fine particulate matter and toxic air contaminants (BAAQMD 2017a).

### Air Emission Thresholds

Table 2 presents the significance thresholds for construction/demolition and operational-related criteria air pollutant and precursor emissions used for the purposes of this analysis. These represent the levels at which a project’s individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB’s existing air quality conditions. For the purposes of this analysis, the proposed project would result in a significant impact if construction or operational emissions would exceed one or more of the thresholds shown in Table 2.

**Table 2 Air Quality Thresholds of Significance**

<b>Pollutant/ Precursor</b>	<b>Construction: Average Daily Emissions (lbs/day)</b>	<b>Operation: Maximum Annual Emissions (tpy)</b>	<b>Operation: Average Daily Emissions (lbs/day)</b>
ROG	54	10	54
NO <sub>x</sub>	54	10	54
CO	n/a	n/a	n/a
SO <sub>2</sub>	n/a	40	n/a
PM <sub>10</sub>	82 (exhaust)	15	82
PM <sub>2.5</sub>	54 (exhaust)	10	54

Notes: lbs/day = pounds per day; tpy = tons per year; ROG = reactive organic gases; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>2</sub> = sulfur dioxide; PM<sub>10</sub> = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less.; PM<sub>2.5</sub> = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; n/a = not applicable

Source: BAAQMD 2017a: Table 2-1.

## Impact Analysis

*a. Would the project conflict with or obstruct implementation of the applicable air quality plan?*

The California Clean Air Act requires air districts to create a Clean Air Plan that describes how the jurisdiction will meet air quality standards. These plans must be updated every three years. The most recently adopted air quality plan for the SFBAAB is the 2017 Clean Air Plan. To fulfill State ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors (reactive organic gases [ROG] and nitrogen oxides [NO<sub>x</sub>]) and reduce the transport of ozone and its precursors to neighboring air basins. In addition, the 2017 Clean Air Plan builds upon and enhances BAAQMD's efforts to reduce emissions of PM<sub>2.5</sub> and toxic air contaminants (TACs). The 2017 Clean Air Plan does not include control measures that apply directly to individual development projects. Instead, the control strategy includes measures related to stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-greenhouse gas pollutants (BAAQMD 2017b).

The 2017 Clean Air Plan focuses on two paramount goals (BAAQMD 2017b):

- Protect air quality and health at the regional and local scale by attaining all state and national air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TACs; and
- Protect the climate by reducing Bay Area greenhouse gas emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050

Under BAAQMD's methodology, a determination of consistency with the 2017 Clean Air Plan should demonstrate that a project (BAAQMD 2017c):

- Supports the primary goals of the 2017 Clean Air Plan;
- Includes applicable control measures from the 2017 Clean Air Plan; and
- Would not disrupt or hinder implementation of any control measures in the 2017 Clean Air Plan.

A project that would not support the 2017 Clean Air Plan's goals would not be considered consistent with the plan. On an individual project basis, consistency with BAAQMD's quantitative thresholds is interpreted as demonstrating support for the 2017 Clean Air Plan's goals. As shown in the discussions under criteria (a) and (b) (see below), the project would not result in exceedances of BAAQMD's thresholds for criteria air pollutants and thus would not conflict with the 2017 Clean Air Plan's goal to attain air quality standards. Therefore, the proposed project's impacts related to consistency with the 2017 Clean Air Plan would be less than significant.

### **LESS THAN SIGNIFICANT IMPACT**

- b. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Construction and operation emissions were estimated in the project's Air Quality and Greenhouse Gas Analysis conducted by Yorke Engineering, LLC using the California Emissions Estimation Model (CalEEMod), version 2016.3.2. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions from energy use, solid waste disposal, and water use. The model can also identify project design features, regulatory measures, and mitigation measures to reduce criteria pollutant emissions along with calculating the benefits achieved from the selected measures. In general, CalEEMod defaults were assumed for the project (e.g., energy use, water use, architectural coating volatile organic compound content, etc.). The following basic modifications to defaults were used in developing the emission estimates for the proposed project using CalEEMod:

- Project design, including parcel dimensions and size of the spa, fitness, and pool areas, were defined by the project applicant.
- Construction phases of site preparation, building construction, paving, and architectural coating were assumed.
- The paving phase was reduced from five days to two days.
- The number of daily worker trips during construction was increased from 10 to 18.
- Default construction equipment horsepower ratings and load factors contained in CalEEMod were applied to all phases of the project.
- Including demolition, renovation, and construction, project implementation would take approximately nine months.

## Construction

Project construction would result in several types of emissions, with PM<sub>10</sub> (including PM<sub>2.5</sub>) in fugitive dust and diesel engine exhaust as the pollutants of greatest concern. Fugitive dust emissions can result from excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle exhaust. CalEEMod was used to estimate construction air quality emissions, which are shown in Table 3. As shown therein, construction emissions would be below the BAAQMD threshold of significance, and impacts would be less than significant. Moreover, the project applicant would also be required to comply with all applicable BAAQMD rules and regulations regarding emission control measures during construction, including the Basic Construction Measures, which include reducing idling time and imposing speed limits for construction equipment.

**Table 3 Construction Emissions (pounds/day)**

Pollutant	Maximum Daily Emissions	BAAQMD Significance Threshold	Significant Impact?
ROG	12.3	54	No
NO <sub>x</sub>	9.1	54	No
CO	7.6	n/a	No
SO <sub>x</sub>	<0.1	n/a	No
PM <sub>10</sub> (Exhaust)	0.5	82	No
PM <sub>2.5</sub> (Exhaust)	0.5	54	No

Notes: ROG = reactive organic gases; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less.; PM<sub>2.5</sub> = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; n/a = not applicable

Source: Appendix AQ, Yorke Engineering, LLC, 2020

## Operation

Long-term emissions associated with operation would include emissions from vehicle trips (mobile sources), natural gas (energy sources), and landscape maintenance equipment, consumer products, and architectural coating associated with on-site development (area sources). As described above in the *Description of the Project*, the project would involve expansion of the fitness and spa building and renovation of the pool deck; the project would not result in an increase in the guest capacity or number of employees at the project site. As shown in Table 4, project-related operational emissions are below the BAAQMD significance thresholds for operation, and air quality impacts would be less than significant.

**Table 4 Operational Emissions (pounds/day)**

Pollutant	Total Emissions	BAAQMD Significance Threshold	Significant Impact?
ROG	0.4	54	No
NO <sub>x</sub>	1.2	54	No
CO	2.7	n/a	No
SO <sub>x</sub>	<0.1	n/a	No
PM <sub>10</sub>	<0.1	82	No
PM <sub>2.5</sub>	<0.1	54	No

Notes: lbs/day = pounds per day; tpy = tons per year; ROG = reactive organic gases; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less.; PM<sub>2.5</sub> = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; n/a = not applicable

Source: Appendix AQ, Yorke Engineering, LLC, 2020

## LESS THAN SIGNIFICANT IMPACT

c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Certain population groups, such as children, the elderly, and people with health problems, are particularly sensitive to air pollution. Sensitive receptors are defined as population groups that are more susceptible to exposure to pollutants and examples include health care facilities, retirement homes, school and playground facilities, and residential areas. The closest sensitive receptors to the project site are the residences to the north and staff and students associated with Sonoma Valley High School, which abuts the site to the south, and Prestwood Elementary School, which is approximately 0.3 mile east of the site. However, as discussed above in the response to *question b*, the project would not create emissions that would exceed BAAQMD criteria emissions thresholds and would not generate new sources of toxic air contaminants. Moreover, construction activities and associated emissions would be temporary and typical for construction sites. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant. **LESS THAN SIGNIFICANT IMPACT**

d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

During construction activities, temporary odors from vehicle exhaust and construction equipment engines would occur. However, construction-related odors would disperse and dissipate and would not cause substantial odors at the closest sensitive receptors (adjacent residences and high school). Such odors would be largely clustered in the center of the project site. In addition, construction-related odors would be temporary and would cease upon completion of construction. Construction odor impacts would be less than significant.

Typical sources of objectionable odors include landfills, rendering plants, chemical manufacturing, food processing facilities, wastewater treatment plants, and refineries (BAAQMD 2017b). The project would not include such a facility. No operational odor impacts would occur.

**LESS THAN SIGNIFICANT IMPACT**

## 4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Information contained in this section comes primarily from a Biological Resources Assessment (BRA) report prepared by Lucy Macmillan in 2020, included as Appendix BRA, and an Arborist Report prepared by Johnson's Tree & Garden Service in 2020, included as Appendix ARB.

## Environmental Setting

Situated on the valley floor, the project site is topographically flat. Development within the project area consists of an existing spa (one building), pool, and associated courtyard. The site is situated in an urban setting within the City of Sonoma, surrounded by residential and commercial development, bordered by East MacArthur Street to the north, Highway 12 to the west, the Sonoma Valley High School to the south, and Nathanson Creek Preserve to the east.

The site does not contain natural vegetation communities and is characterized by ornamental landscape (lawn and trees). Most of the site consists of a mix of ornamental shrubs, trees, and non-native turf grasses including canyon oak (*Quercus chrysolepis*), valley oak (*Quercus lobata*), redwood (*Sequoia sempervirens*), fir (*Abies* sp.), Chinese magnolia (*Magnolia soulangeana*), crepe myrtle (*Lagerstroemia* sp.), and silver maple (*Acer saccharinum*) (Appendix ARB).

Based on the most recent soil survey for Sonoma County, California, Western Part (U.S. Department of Agriculture, Natural Resources Conservation Service [USDA, NRCS] 2019), the study area contains two soil map units: Huichica loam 2 to 9 percent slopes and Wright loam 0 to 9 percent slopes. However, the site has been developed since the 1860s; therefore, most of the soils have been disturbed or contain fill.

## Regulatory Setting

### *Federal and State*

Regulatory authority over biological resources is shared by federal, state, and local agencies under a variety of laws, ordinances, regulations, and statutes. Primary authority for biological resources lies within the land use control and planning authority of local jurisdictions (in this instance, the City of Sonoma).

The California Department of Fish and Wildlife (CDFW) is a trustee agency for biological resources throughout the state under CEQA and has direct jurisdiction under the California Fish and Game Code (CFGC). Under the California Endangered Species Act (CESA) and the federal Endangered Species Act (FESA), the CDFW and the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS), respectively, have direct regulatory authority over species formally listed as threatened or endangered (and listed as rare for CDFW). Native and/or migratory bird species are protected under the federal Migratory Bird Treaty Act (MBTA) and CFGC Sections 3503, 3503.5, and 3511.

Statutes in the Clean Water Act (CWA), CFGC, and the California Code of Regulations (CCR) protect wetlands and riparian habitat. The U.S. Army Corps of Engineers (USACE) has regulatory authority over wetlands and waters of the United States under Section 404 of the CWA. The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) ensure water quality protection in California pursuant to Section 401 of the CWA and Section 13263 of the Porter-Cologne Water Quality Control Act. The CDFW regulates Waters of the State under the CFGC Section 1600 et seq.

Special status species are those plants and animals that are: 1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS and NMFS under the FESA; 2)



listed or proposed for listing as Rare, Threatened, or Endangered by the CDFW under the CESA; 3) recognized as California Species of Special Concern (CSSC) by the CDFW; 4) afforded protection under MBTA or CFGC; and 5) occurring on Lists 1 and 2 of the CDFW California Rare Plant Rank (CRPR) system.

### *City of Sonoma*

The City of Sonoma Municipal Code Section 12.08; Tree Ordinance and Section 12.09; Heritage Tree Ordinance, require a permit for the removal of landscaped trees, heritage trees, significant trees, or in the public right of way or on public property. The City defines a tree under Municipal Code Section 12.08.020 as “any woody plant having a single trunk, or a combination of multiple trunks, with a natural growth pattern that includes a definitely formed branching crown.” Trees requiring a permit are defined as follows:

- “Significant tree” means any tree having a single trunk circumference greater than one and one-half feet at a height of four and one-half feet, except for those located on a single-family residential property or a multifamily residential property.
- “Significant tree, private” means any tree having a single trunk circumference greater than four and one-half feet at a height of four and one-half feet, located on a single-family or multifamily residential property within a front yard or street-side yard setback as defined in SMC Title 19.
- “Landscape tree” means any tree required under a landscaping plan, approved by the design review and historic preservation commission, associated with commercial or multifamily development, except for trees located in private yard areas associated with an individual dwelling.
- "Heritage tree" means a tree or group of trees specifically designated by official act of the parks and recreation commission that:
  - A. The tree or group of trees has historical significance or has taken on the aura of historical appeal; or
  - B. The tree or group of trees is mutually dependent upon each other for survival; or
  - C. The tree or group of trees is considered an outstanding specimen of its species; or
  - D. The tree or group of trees is the size of 50 inches or more in diameter measured at 24 inches above natural grade; and
  - E. The tree or group of trees has been recommended as such by the parks and recreation commission and dedicated and accepted by the city council of Sonoma.

The City’s Tree Ordinance also requires the preparation of an arborist report, to include a description of all trees on-site; genus and species, the shape, the trunk diameter of each tree and the “non-intrusion zone” around each tree as defined in Section 12.08.020. Replacement trees must be installed on-site to account for tree removal and must, at a minimum, occur at a 1:1 ratio using a 15-gallon box size for each six inches of tree diameter removed. Section 12.08.050 also includes the requirement to obtain a permit to alter or relocate trees.

## Impact Analysis

- a. *Would the project 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?*

Sixty-five (65) special status plants and 41 special status animal species have been previously documented within the regional vicinity of the project site. These species were evaluated for the potential to occur on the project site based on the habitat present and the project site's general condition and location. Based on the analysis in the BRA, the site only contains suitable habitat for nesting birds, including a variety of passerine birds and raptors protected under the federal MBTA, and special status bats. No special status plants are expected to occur (Appendix BRA).

If nesting birds are present on-site during construction, direct effects could include injury or mortality from construction activity, or nest abandonment from construction noise, dust, and other activities. Implementation of Mitigation Measures BIO-1(a) and BIO-1(b) would ensure that migratory birds would not be significantly impacted as a result of project development by requiring surveys to identify nesting birds in the vicinity of the project area and implementing construction buffers. Therefore, impacts to nesting birds would be less than significant with mitigation.

If roosting bats are present in trees during construction, direct effects could include injury or mortality from construction activity, or maternal colony abandonment from construction noise, dust, and other activities. Implementation of Mitigation Measures BIO-1(c) and BIO-1(d) would ensure that special status bats would not be significantly impacted as a result of project development by requiring surveys to identify bats in the vicinity of the project area and implementing bat avoidance measures during construction. Therefore, impacts to bats would be less than significant with mitigation.

## Mitigation Measures

The following mitigation measures are required:

### *BIO-1(a) Nesting Bird Survey*

To avoid disturbance of nesting birds protected by Sections 3503, 3503.5, and 3513 of the CFGC, activities related to the project, including, but not limited to, vegetation and/or tree removal shall occur outside of the bird breeding season (February 1st through August 30th) if feasible. If ground disturbance, vegetation removal or heavy equipment work must begin within the breeding season, then a pre-construction nesting bird survey shall be conducted no more than 14 days prior to the start of ground disturbance, site clearing and/or vegetation removal. The nesting bird pre-construction survey shall be conducted within the disturbance footprint and a 150-foot buffer for passerines, and a 300-foot buffer for raptors as feasible. The survey shall be conducted by a qualified biologist familiar with the identification and behavior of avian species.

### *BIO-1(b) Preconstruction Nesting Bird Avoidance*

If nests are found, an avoidance buffer shall be established by a qualified biologist. The buffer shall be established to ensure nesting activity is not disturbed by construction activity and shall be determined by the qualified biologist based on the location of the nest in relation to the work area (e.g. line of site to construction) and specific construction activities to be performed within the

vicinity of the nest (e.g. level of noise and vibration). The buffer shall be demarcated by the biologist with bright construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the avoidance buffer, and access into the avoidance buffer while the nest is active is prohibited. No construction activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest, or the nest has become otherwise inactive. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.

*BIO-1(c) Preconstruction Bat Survey*

A pre-construction roost assessment and emergence survey shall be conducted in suitable habitat on or adjacent to the project site. If a maternity roost is located, that roost must remain undisturbed until September 15 or until a qualified biologist has determined the roost is no longer active.

*BIO-1(d) Bat Avoidance*

Tree removal, tree relocation and construction-related activities shall be conducted between September 15 and April 15 to avoid impacts to pregnant females and active maternity roosts (colonial or solitary). To avoid impacts to solitary roosters, trees should be removed in pieces, rather than felling the entire tree. Felled tree pieces shall be shaken gently to rouse bats and then left overnight prior to removal from the site or on-site chipping to allow bats to exit the roost.

## Significance After Mitigation

With implementation of mitigation measures BIO-1(a)-(d), impacts related to special status species would be reduced to a less than significant level.

### LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The project area consists of developed areas and ornamental landscape as shown on Figure 4. As described in the BRA prepared for the site, there are no riparian habitats or sensitive natural communities present in the project area (Appendix BRA). Nathanson Creek and Preserve abuts the project site to the east; however, the project area is approximately 250 feet west of the Preserve, and the proposed project would not affect the existing vegetation, water quality or habitat located along the creek. Therefore, no impacts would occur as a result of project activities.

### NO IMPACT

- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The project area consists of developed areas and ornamental landscape. According to the BRA, no federally protected wetlands are located within the project area (Appendix BRA). As described above under criterion (b), the project would not involve ground disturbance or disturbance of species or vegetation at Nathanson Creek or in the Preserve. Therefore, there would be no impacts to state or federally protected wetlands.

### NO IMPACT

- d. *Would the project 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?*

The project area consists of developed areas and ornamental landscape and do not support wildlife movement. The site is within the City of Sonoma and surrounded by existing development. The project would not result in substantive changes to the land use and would not result in a change to locally or regionally important wildlife corridors. The project would not involve changes to Nathanson Creek or the Preserve; no ground disturbance, vegetation or habitat is proposed within approximately 250 feet of the creek corridor. Therefore, no impacts to wildlife movement corridors would occur as a result of project activities.

**NO IMPACT**

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

The proposed project would involve the removal of two trees and the relocation of two trees. SMC Section 12.08.035 requires that trees designated for removal be replaced on-site and at a minimum 1:1 ratio and a 15-gallon box size for each six inches of tree diameter removed, subject to the approval of the review authority. Table 5 below provides the list of trees proposed to be removed and relocated and the replacement trees that would be required.

**Table 5 Tree Removal and Relocation**

Species	Diameter Size (inches)	Replacement Trees Required (15 gallon) <sup>1</sup>
<b>Removal</b>		
Valley Oak	6	1
Silver Maple	28	5
<b>Relocation</b>		
Chinese Magnolia	24	N/A <sup>2</sup>
Multi Trunk Crepe Myrtle	18	N.A <sup>2</sup>

<sup>1</sup> Per SMC Section 12.08.035, the Design Review and Historic Preservation Commission would review and approve tree removal and replacement plans.

<sup>2</sup> Per SMC Section 12.08.065, in the event that a landscape tree, dies or is substantially damaged within one year of its planting, the property owner shall be responsible for replacing the tree within 60 days with a tree of the same or similar species, unless an alternative is approved by the Design Review and Historic Preservation Commission.

Source: Appendix ARB, Johnson’s Tree & Garden Service 2020.

Additionally, approximately 18 trees on or adjacent to the site would require delineation of a “nonintrusion zone” as defined in SMC Section 12.08.020. The arborist report does not include nonintrusion areas, but they would be required to be shown on project plans under City ordinance. The arborist report prepared for the project would be reviewed by the City’s Tree Committee, and their recommendations would be considered by the Planning Commission as part of their review of the proposed development. With an approved tree removal permit and implementation of Mitigation Measure BIO-2 to protect trees during construction, impacts would be less than significant with mitigation.

## Mitigation Measures

### *BIO-2 Tree Protection*

Prior to the start of construction all delineated non-intrusion zones for trees on or adjacent to the site shall be fenced off based on tree size and in accordance with Section 12.08.020 of the City of Sonoma Municipal Code. High visibility fencing and signage shall be applied to indicate the tree protection zone. This fencing shall remain in place for the duration of all work undertaken in connection with the development. The fenced-off area shall not be used as a storage area or altered or disturbed except as may be permitted by the City.

## Significance After Mitigation

With implementation of Mitigation Measure BIO-2, impacts related to potential conflicts with applicable ordinances would be reduced to a less than significant level.

### **LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

- f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The project site is not within the boundaries of an adopted habitat conservation plan or natural community conservation plan or other approved local, regional, or state habitat conservation plan. Therefore, the proposed project would not conflict with adopted habitat conservation plans or natural community conservation plans or other approved local, regional, or state habitat conservation plans. There would be no impact.

### **NO IMPACT**

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## 5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

This section incorporates the findings of the Historic Resource Evaluation (HRE), dated January 17, 2017 and included as Appendix HRE, and the Historic Resource Impact Analysis dated June 2, 2020 and included as Appendix CR, both conducted by Page & Turnbull.

CEQA requires that a lead agency determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). A historical resource is a resource listed in, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (*CEQA Guidelines*, Section 15064.5[a][1-3]).

A resource shall be considered historically significant if it:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b]).

PRC, Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

## Impact Analysis

- a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

There are five age-eligible buildings located on the project site, one of which was determined to be eligible for listing in the National Register of Historic Places (NRHP) in 2001. The HRE (Appendix CR) evaluated this building (the Burris House) to determine if it retained historic integrity and remains eligible, as well as evaluated the four additional buildings (a barn, a pool house, a caretaker's cottage, and a carport/garage).

The Burris House was determined to retain its historic resource eligibility and is considered a historic resource for the purposes of CEQA. The remaining four age-eligible buildings were determined ineligible for the California Register under the criteria, based on documented alterations and the lack of significant association to the Burris House's original owner, David Burris. These four buildings are not considered historic resources for the purposes of CEQA. Additionally, project site buildings are not well associated with each other chronologically and would not be considered as a potential historic district.

The project would involve modifications to the spa building (described as the pool house in the HRE) and the pool deck. The spa building is not considered an historic resource or part of a historic district, nor is it attached to or directly adjacent to the Burris House. Moreover, according to the Historic Resource Impact Analysis, the proposed alterations to the spa building would not impact the Burris House's character-defining features or introduce materials, massing, or other architectural characteristics to the site that would impair the historic significance of the Burris House, the only historic resource on the site (Appendix CR). The project would not involve alteration to the Burris House. Given these findings, the Historic Resource Analysis concludes that project would comply with The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Building (Appendix CR). Impacts related to historical resources would be less than significant.

### **LESS THAN SIGNIFICANT IMPACT**



- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

The City of Sonoma contains several sites where archaeological resources have been discovered in the past. A total of 19 archaeological sites and two isolated finds have been officially recorded within the city's planning area by the California Historic Research File System. Nine additional archaeological sites have been reported. The creeks which pass through the city provide a favorable environment for discovery of such prehistoric cultural deposits.

Since the site has been developed in the past, associated ground disturbing activities are likely to have already disturbed or resulted in the discovery of archeological resources that may exist on the site. Moreover, because the project would involve a limited area of ground disturbance and relatively shallow depth of excavation (six feet maximum), it is unlikely that previously unknown archaeological resources would be encountered during construction activities.

However, given the general archaeological sensitivity of the city and its surroundings, there may be unrecorded resources present on the project site. Therefore, there is a possibility that construction-related activities, such as excavation and grading, could unearth or disturb archaeological resources that may be present at the site. This impact is potentially significant, and mitigation is required.

## Mitigation Measures

### *CR-2 Unanticipated Archaeological Resources*

If prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, all work within 50 feet of the resources shall be halted and a qualified archaeologist shall be consulted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If a find is determined to be significant, representatives from the City and the archaeologist shall meet to determine the appropriate avoidance measures or other appropriate mitigation. All significant cultural materials recovered shall be, as necessary and at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. In considering suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the City shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, Project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is being carried out.

## Significance After Mitigation

Mitigation Measure CR-1 below would reduce impacts by ensuring that archaeological resources encountered during construction are treated appropriately. Impacts would be less than significant with mitigation incorporated.

### **LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

The project would result in a significant impact if it would disturb human remains, including those interred outside of formal cemeteries. The project would include ground disturbing activities during

construction, which could potentially disturb human remains. Since the site has been developed in the past, ground disturbing activities are likely to have already disturbed or resulted in the discovery of buried human remains that may exist on the site. Nonetheless, it is possible that unknown human remains could be discovered through ground disturbing construction activities. However, federal and State regulations would minimize the likelihood of disturbance and set procedures in the unlikely event human remains are found.

Sections 7052 and 7050.5 of the California Health and Safety Code state that disturbance of Native American cemeteries is a felony, and that construction or excavation must be stopped in the vicinity of discovered human remains until the County coroner can determine whether the remains are those of Native Americans. If discovered remains are found to be Native American, the coroner must contact the California Native Heritage Commission. Additionally, compliance with Section 15064.5 of the *CEQA Guidelines* would set forth procedures in the event of an unexpected discovery of Native American human remains on non-federal land. Compliance with State and federal regulations would reduce the likelihood of disturbing or discovering human remains and set procedures in the event that human remains are found. For these reasons, impacts would be less than significant

**LESS THAN SIGNIFICANT IMPACT**

## 6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

### Construction

During project construction, petroleum-based fuels would be used for construction vehicles and equipment on the project site, travel by construction workers to and from the project site, and vehicles used to deliver materials to the site. The project would involve demolition of an existing building; utilities trenching and grading; pool and pavement installation; building construction; architectural coating; and installation of landscaping and hardscaping.

The total consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod (see Appendix AQ, Yorke Engineering, LLC, 2020) used to estimate construction air emissions in the air quality analysis (Appendix EN). Table 6 presents the estimated construction phase energy consumption, indicating construction equipment, vendor trips, and worker trips would consume approximately 6,656 gallons of fuel over the project construction period.

**Table 6 Estimated Fuel Consumption during Construction**

<b>Fuel Type</b>	<b>Gallons of Fuel</b>	<b>MMBtu<sup>4</sup></b>
Diesel Fuel (Construction Equipment) <sup>1,2</sup>	6,457.2	823.0
Other Petroleum Fuel (Worker Trips) <sup>3</sup>	199.0	21.9
<b>Total</b>	<b>6,656.2</b>	<b>844.9</b>

<sup>1</sup> Fuel demand rate for construction equipment is derived from the total hours of operation, the equipment’s horsepower, and the equipment’s fuel usage per horsepower per hour of operation, which are taken from CalEEMod outputs (Appendix AQ, Yorke Engineering, LLC, 2020). Fuel consumed for construction equipment is assumed to be diesel fuel.

<sup>2</sup> Fuel demand rates for hauling and vendor trips are derived from hauling and vendor trip number, hauling and vendor trip length, and hauling and vendor vehicle class from “Trips and VMT” Table contained in Section 3.0, *Construction Detail*, of the CalEEMod results (Appendix AQ, Yorke Engineering, LLC, 2020). The fuel economy for hauling and vendor trip vehicles is derived from the United States Department of Transportation (United States Department of Transportation 2019). Fuel consumed for hauling trucks is assumed to be diesel fuel.

<sup>3</sup> The fuel economy for worker trip vehicles is derived from derived from U.S. Department of Transportation National Transportation Statistics (24.2 mpg) (United States Department of Transportation 2019). Fuel consumed for worker trips is assumed to be gasoline fuel.

<sup>4</sup> CaRFG CA-GREET 3.0 fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for worker trips specified above (California Air Resources Board [CARB] 2018). Low-sulfur Diesel CA-GREET 3.0 fuel specification of 127,464 Btu/gallon used to identify conversion rate for fuel energy consumption for construction equipment specified above (CARB 2018). Due to rounding, numbers may not add up precisely to the totals indicated.

Source: Appendix EN

Construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites. Additionally, the City of Sonoma Municipal Code incorporates the California Green Building Standards Code. This code includes specific requirements related to recycling, construction materials, and energy efficiency standards that would apply to project construction to minimize wasteful, inefficient, and unnecessary energy consumption. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

## Operation

Operation of the project would result in energy demand from electricity consumption for heating and cooling systems, lighting, appliances, and water use. Overall, energy demand could increase slightly as a result of the additional building area; however, the new buildings and fixtures would be more efficient than the existing structure and fixtures and therefore overall, operational energy demand is anticipated to be similar to existing conditions. The number of spa rooms is not proposed to increase and therefore the number of guests served would be the same or similar to baseline conditions. The project would not increase daily trips and therefore would not increase vehicle fuel use during operation of the project. Table 7 shows the estimated total annual energy consumption associated with operation of the project.

**Table 7 Estimated Annual Operational Energy Consumption**

Energy Source	Annual Consumption	Annual Consumption in MMBtu
Natural Gas	147,728 kBtu	147.7
Electricity	45,917 kilowatt-hours	156.7
<b>Total</b>	<b>–</b>	<b>304.4</b>

Note: Totals may not add up due to rounding.

Source: Appendix AQ, Yorke Engineering, LLC, 2020

As shown in Table 7, project operation would require permanent grid connections for electricity. Approximately 45,917 kilowatt-hours of electricity per year, or 157 MMBtu, would be required from PG&E and would be used for lighting, large appliances, and heating and cooling within the renovated spa. The proposed expansion would total approximately 4,411 square feet, which is an average energy use intensity (EUI) of 0.0355 MMBtu per square foot<sup>1</sup>. According to the U.S. Energy Information Administration (EIA), average EUI for commercial buildings less than 10,000 square feet in the Pacific region of the United States is 0.0704 MMBtu per square foot (EIA 2016). Therefore, the project’s EUI for commercial buildings less than 10,000 square feet would be below the average EUI in the Pacific region of the U.S.; project operation would not result in significant impacts due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

The project would comply with standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California’s Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires pool and spa facilities to implement efficiency measures. As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance, so the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards.

Overall, project operation would result in consumption of fuels from vehicle trips and electricity from proposed buildings. Project energy consumed would represent an incremental increase in energy usage compared to existing conditions. Therefore, impacts would be less than significant.

Construction of the project would be temporary and typical of similar projects, and not result in wasteful energy use. Project operation would increase energy use on the site compared to existing conditions. However, the energy use would be in conformance with the latest version of California’s Green Building Standards Code and the Building Energy Efficiency Standards, and is below the average EUI in the Pacific region of the U.S. Therefore, the project would not result in wasteful or unnecessary energy consumption, and impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

<sup>1</sup> Calculation: 156.7 MMBtu divided by 4,411 square feet = 0.0355 MMBtu per square foot.

b. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Table 8 provides Sonoma County Community Climate Action Plan energy efficiency goals and policies and summarizes the project’s compliance with these policies.

**Table 8 Project Compliance with Energy Efficiency Goals and Policies**

Energy Efficiency Goal or Policy	Project Consistency
Goal 1: Increase building energy efficiency	<b>Consistent.</b> The project would be constructed to CALGreen standards and 2019 Building Energy Efficiency Standards for building efficiency.
Goal 4: Reduce travel demand through focused growth	<b>Consistent.</b> The project would not increase the capacity of the hotel or spa. Improved services at the hotel would encourage guests to stay on site and potentially reduce associated travel. It would not result in an increased in vehicle trips to the site or unanticipated growth.
Goal 8: Reduce idling	<b>Consistent.</b> Expansion of the spa facilities would not affect driving or idling.
Goal 11: Reduce water consumption	<b>Consistent.</b> The project would include installation of new irrigation in landscaped areas, which would reduce water use by eliminating inefficiencies or leakages in the existing irrigation system.

Source: County of Sonoma 2016

As shown in Table 8, the project would be compliant with applicable energy efficiency goals and policies. Therefore, potential impacts associated with renewable energy and energy efficiency would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

# 7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Setting

A Soil Investigation Report (soil report) was prepared for the project by Reese & Associates, dated January 30, 2020 and included as Appendix GEO. This analysis of geology and soils is based on Appendix GEO and other applicable sources.

The project site is gently sloping, with an approximately one- to two-foot difference in elevation across the site. The site is underlain by discontinuous layers of sandy silts, sandy clays, silty sands, and clayey sands. The upper soils consist of relatively weak, soft to medium stiff sandy silt and loose silty coarse sand. Groundwater occurs at a depth of approximately four feet below the existing ground surface (Appendix GEO, Reese & Associates, 2020).

## Impact Analysis

*a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?*

There are no known active faults at the project site and the site is not within a designated Alquist-Priolo Earthquake Fault Zone (Appendix GEO, Reese & Associates, 2020). The closest fault considered to be active is the Rodgers Creek fault zone located approximately 4.5 miles to the southwest. Therefore, there is no risk of fault rupture at the project site and this impact would be less than significant.

### **LESS THAN SIGNIFICANT IMPACT**

*a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

*a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

Liquefaction is defined as the sudden loss of soil strength due to a rapid increase in soil pore water pressure resulting from seismic ground shaking. According to Figure P1-1 of the City's General Plan, the project site is located in an area of Very Low Liquefaction Hazard level (City of Sonoma, 2006). Therefore, the proposed project is not anticipated to directly or indirectly cause the risk of loss, injury, or death related to liquefaction.

The project site is within a seismically active area in Northern California. As with any site in this region, the project site is susceptible to strong seismic ground shaking in the event of a major earthquake caused by a nearby active fault. However, the 2019 California Building Code (CBC), as adopted in SMC Section 14.10.015, contains requirements for structural design, including seismic design specifications. The 2019 CBC requires that structures be designed and constructed to resist seismic hazards, including through foundation design and the completion of soil investigations prior to construction. The CBC also requires site specific geotechnical investigations to evaluate soil stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness; and that the report provide recommendations on foundation type and design criteria. The soil report prepared for this site meets these CBC requirements and concludes that "because of the proximity of active faults in the region and the potential for strong ground shaking, it will be necessary to design and construct the project in strict accordance with current standards for earthquake-resistant construction"



(Appendix GEO, Reese & Associates, 2020). The City of Sonoma Building Department would review the project plans and soil report prior to approval of building permits to ensure compliance with CBC requirements related to earthquake-resistant construction. Compliance with the mandatory building code structural specifications would result in a project that adequately resists adverse effects from seismic ground shaking. This impact would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- c. *Would the project 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?*
- d. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Expansive soils can change dramatically in volume depending on moisture content. When wet, these soils can expand; conversely, when dry, they can contract or shrink. Sources of moistures that can trigger this shrink-swell phenomenon include seasonal rainfall, landscape irrigation, utility leakage, and/or perched groundwater. The soil report prepared for the project notes that the most significant geotechnical engineering concern for the project is the presence of weak, compressible upper soils: “these soils can undergo considerable strength loss and settlement when loaded in a saturated condition. Where evaporation is inhibited by footings, slabs or fill, eventual saturation of the underlying soils can occur” (Appendix GEO, Reese & Associates, 2020).

In order to address concerns about unstable and weak, compressible soils, the soil report provides several recommendations, including removal of weak, compressible soils from construction areas and replacement with properly compacted fill. In order to ensure that these recommendations are incorporated in the final building plans for the project, Mitigation Measure GEO-1, below, is required.

#### **Mitigation Measures**

##### *GEO-1 Adherence to Soil Investigation Report Recommendations*

Final building plans for the proposed project shall be submitted for review to the author of the Soil Investigation Report prepared by Reese & Associates for the site or to a similarly qualified engineer approved by the City. The purpose of the review shall be to verify that the recommendations included in the Soil Investigation Report are understood and reflected on the plans. Such recommendations shall include but not be limited to: removal of weak, compressible soils from construction areas and replacing them as properly compacted fill; establishing excavation depths to provide space for at least 12 inches of properly compacted fill of low expansion potential below all footings and slabs; and other recommendations to ensure stability and safety. The engineer shall also be retained to provide observation and testing services during construction. Observations and tests will allow for verification that materials encountered are consistent with those found during soil testing and will allow for supplemental on-site recommendations, as needed.

#### **Significance After Mitigation**

Mitigation Measure GEO-1 would ensure that impacts related to unstable soils would be reduced during project construction. Impacts would be less than significant with mitigation incorporated.

#### **LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

*a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

Earthquakes or other natural events can trigger landslides that may cause injuries and damage many types of structures. However, landslides are typically a hazard on or near slopes or hillside areas, rather than generally level areas like the program area and vicinity. According to the DOC Earthquake Hazards Zone Mapping Application, the project site and its surroundings are not at risk for landslides (DOC 2019). The project site is relatively flat and not at risk for a landslide event, therefore this impact would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

*b. Would the project result in substantial soil erosion or the loss of topsoil?*

The project site is developed and generally level, which limits the potential for substantial soil erosion. Grading and excavation, when soils are exposed, present the highest potential for erosion. The project would be required to obtain a grading permit, which would require submission of an erosion and sediment control plan. SMC Section 14.20.205 describes requirements for erosion and sediment control plans, which include descriptions of dust control measures and vegetative measures to minimize erosion. Therefore, compliance with existing regulations would reduce impacts related to soil erosion and topsoil loss to a less than significant level.

**LESS THAN SIGNIFICANT IMPACT**

*e. Would the project 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?*

The project would be connected to the local wastewater treatment system. Septic systems would not be used. No impact would occur.

**NO IMPACT**

*f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Project activities would include excavation at depths of approximately six feet and export of approximately 195 cubic yards of soil. Given the small disturbance area, shallow depth of ground disturbance, and the previously disturbed condition of the site, it is highly unlikely that previously unknown paleontological resources would be encountered during construction activities. However, ground disturbing activities always involve the possibility of such a discovery. Therefore, this impact is potentially significant and mitigation is required.

## Mitigation Measures

### *GEO-2 Discovery of Paleontological Resources*

In the event a previously unknown fossil is uncovered during project construction, all work shall cease until a certified paleontologist can investigate the find and make appropriate recommendations. The qualified paleontologist shall determine the significance of the discovery and identify whether additional mitigation or treatment is warranted. Measures may include testing, data recovery, reburial, archival review and/or transfer to the appropriate museum or educational institution. All testing, data recovery, reburial, archival review or transfer to research institutions related to

monitoring discoveries shall be determined by the qualified paleontologist and shall be reported to the City. Work in the area of the discovery will resume once the find is properly documented and authorization is given to resume construction work.

### **Significance After Mitigation**

Implementation of Mitigation Measure GEO-2 would reduce impacts related to the unanticipated discovery of paleontological resources to a less than significant level.

**LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

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# 8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section incorporates the findings of the Air Quality and Greenhouse Gas Analysis conducted by Yorke Engineering, LLC, dated April 29, 2020, included as Appendix AQ.

## Climate Change and Greenhouse Gases

Project implementation would generate GHG emissions through the burning of fossil fuels or other emissions of GHGs, thus potentially contributing to cumulative impacts related to climate change. In response to an increase in man-made GHG concentrations over the past 150 years, California has implemented AB 32, the “California Global Warming Solutions Act of 2006.” AB 32 codifies the Statewide goal of reducing emissions to 1990 levels by 2020 (essentially a 15% reduction below 2005 emission levels) and the adoption of regulations to require reporting and verification of statewide GHG emissions. Furthermore, on September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, which requires the State to further reduce GHGs to 40 percent below 1990 levels by 2030. SB 32 extends AB 32, directing the California Air Resources Board (ARB) to ensure that GHGs are reduced to 40 percent below the 1990 level by 2030.

On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) CO<sub>2</sub>e by 2030 and two MT CO<sub>2</sub>e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State.

The vast majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project’s contribution towards an impact would be cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in

connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

## Sonoma County Community Climate Action Plan

The Sonoma County Community Climate Action Plan (CCAP) was prepared by the Sonoma County Regional Climate Protection Authority, on behalf of the City of Sonoma, Sonoma County, and other incorporated cities and towns in the county. The CCAP provides goals and associated measures in the sectors of building energy, transportation and land use, solid waste, water and wastewater, livestock and fertilizer, and advanced climate initiatives.

### Thresholds

Pursuant to the requirements of SB 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines for the feasible mitigation of GHG emissions and analysis of the effects of GHG emissions. The adopted CEQA Guidelines provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

To evaluate whether a project may generate a quantity of GHG emissions that may have a significant impact on the environment, state agencies have developed operational bright-line significance thresholds. Significance thresholds are numeric mass emissions thresholds that identify the level at which additional analysis of project GHG emissions is necessary. Projects that attain the significance target, with or without mitigation, would result in less than significant GHG emissions.

In the 2017 BAAQMD *CEQA Air Quality Guidelines*, the BAAQMD outlines an approach to determine the significance of projects. For residential, commercial, industrial, and public land use development projects, the thresholds of significance for operational-related GHG emissions are as follows:

- Compliance with a qualified GHG reduction strategy
- Annual emissions less than 1,100 metric tons (MT) of carbon dioxide equivalent (CO<sub>2</sub>e) per year (MT CO<sub>2</sub>e/yr)
- Service person threshold of 4.6 MT CO<sub>2</sub>e/service person/year (residents + employees)

For this analysis, the GHG emissions thresholds contained in the BAAQMD's May 2017 *CEQA Air Quality Guidelines* are the appropriate thresholds to use, specifically the annual emissions of 1,100 MT CO<sub>2</sub>e/yr. This threshold has been reduced by 40 percent, to 660 MT CO<sub>2</sub>e/yr, for consistency with the SB 32 goal of a 40 percent reduction in GHG emissions from 1990 levels by 2030. BAAQMD guidelines have set this threshold as a numeric emissions level below which a project's contribution to global climate change would be less than significant.

## Impact Analysis

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

Project construction would generate temporary short-term GHG emissions through travel to and from the worksite and from the operation of construction equipment such as graders, backhoes, and forklifts. Construction activity would generate approximately 57 MT CO<sub>2</sub>e over the entire construction period. As there is no applicable construction GHG threshold in the BAAQMD, this calculation is included for informational purposes. Nonetheless, the project applicant would be required to comply with all BAAQMD rules and regulations regarding emission control measures, including the Basic Construction Measures, which include reducing idling time and imposing speed limit for construction equipment, and Regulation 8, Rule 3, which requires the use of low volatile organic compound containing paints, which reduces GHG emissions during the architectural coating phase.

Table 9 provides the estimated GHG emissions resulting from the project. Estimated GHG emissions would be approximately 161 MT CO<sub>2</sub>e per year with the primary source of emissions from mobile sources (Appendix AQ). This is below the BAAQMD significance threshold of 660 MT CO<sub>2</sub>e per year; therefore, GHG impacts would be less than significant.

**Table 9 Greenhouse Gas Operational Emissions (metric tons/year)**

Greenhouse Gas	Maximum Annual Emissions	Significance Threshold	Significant Impact?
CO <sub>2</sub>	151.2	–	–
CH <sub>4</sub>	0.4	–	–
N <sub>2</sub> O	<0.1	–	–
CO <sub>2</sub> e	161.4	660	No

Notes: ROG = reactive organic gases; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less.; PM<sub>2.5</sub> = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; n/a = not applicable

Source: Appendix AQ, Yorke Engineering, LLC, 2020

### LESS THAN SIGNIFICANT IMPACT

- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

SB 32 requires GHG emissions to be reduced to 40 percent below 1990 levels by 2030. CARB's 2017 Scoping Plan establishes goals and policies to meet this target. In 2016, the County approved a CCAP that identifies 20 goals to achieve or exceed an emissions reduction of 838,300 MT CO<sub>2</sub>e. In addition to the CCAP, the City's General Plan has several applicable policies related to GHG emissions. Table 10 provides applicable policies and an explanation of the project's consistency with these policies.

**Table 10 Consistency with Local GHG Reduction Plans**

Applicable Goal, Policy, or Measure	Project Consistency
<b>2017 Scoping Plan</b>	
<p><b>VMT Reduction Goals.</b> Implement and support the use of VMT as the metric for determining transportation impacts under CEQA, in place of level of service (LOS).</p>	<p><b>Consistent.</b> This IS-MND provides an analysis of VMT in Section 17, <i>Transportation</i>. Since the project would not result in an increase of guest capacity or total number of employees, there is no anticipated change in the number of trips to the site, and no change in VMT associated with the project.</p>
<b>Sonoma County CCAP</b>	
<p><b>Goal 4:</b> Reduce travel demand through focused growth.</p>	<p><b>Consistent.</b> Since the project would not result in an increase of guest capacity or total number of employees, it would not result in an increase in vehicle trips to the site or unanticipated growth.</p>
<p><b>Goal 11:</b> Reduce Water Consumption.</p>	<p><b>Consistent.</b> The project would include installation of new irrigation in landscaped areas, which would reduce water use by eliminating inefficiencies or leakages in the existing irrigation system.</p>
<b>City of Sonoma General Plan</b>	
<p><b>Policy ER-3.2:</b> Encourage construction, building maintenance, landscaping, and transportation practices that promote energy and water conservation and reduce green-house gas emissions.</p>	<p><b>Consistent.</b> The project would include installation of new irrigation in landscaped areas, which would reduce water use by eliminating inefficiencies or leakages in the existing irrigation system.</p>
<p><b>Goal CE-3:</b> Minimize vehicle trips while ensuring safe and convenient access to activity centers and maintaining Sonoma’s small-town character.</p>	<p><b>Consistent.</b> Since the project would not result in an increase of guest capacity or total number of employees, there is no anticipated change in the number of trips to the site.</p>
<p><b>Policy CE-3.4:</b> Encourage shared and “park once” parking arrangements that reduce vehicle use.</p>	

As shown in Table 10, the project would be consistent with the 2017 Scoping Plan, Sonoma County CCAP, and City General Plan policies adopted for the purpose of reducing GHG emissions. Therefore, impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**



# 9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site that is included on a list of hazardous material 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. *Would the project 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?*

## Construction

Project construction would involve the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, and solvents. Heavy construction equipment would be used in project construction, the operation of which could result in a spill or accidental release of hazardous materials, including fuel, engine oil, engine coolant, and lubricants. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, state, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Hazardous materials would be required to be transported under U.S. Department of Transportation (DOT) regulations (U.S. DOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the Resources Conservation and Recovery Act (RCRA). The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California H&SC Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, California Code of Regulations, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and State requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction. Impacts would be less than significant.

## Operation

Typically, hotel and spa uses do not involve the use or storage of large quantities of hazardous materials. The project would not involve the use, storage, transportation, or disposal of hazardous materials other than those used for cleaning, maintenance, and landscaping, the use of which would be subject to applicable state and local regulations. Operation of the hotel and spa would be similar to existing conditions; chemicals used to clean and operate the pool, whirlpool, and spa facilities (including chlorine and other cleaning supplies) would not substantially increase as a result of project operation.

The proposed project would result in less than significant impacts concerning the use of hazardous materials and proximity to known hazardous materials sites.

## **LESS THAN SIGNIFICANT IMPACT**

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The nearest school to the project site is Sonoma Valley High School, which abuts the site at the south. Little School Preschool and Prestwood Elementary School are also within 0.25 mile of the site. As described above, construction activities may involve the use, storage, and transport of hazardous materials. However, given required compliance with the rules and regulations described above under items (a) and (b), impacts to schools would be less than significant. Impacts related to hazardous material use in proximity to schools would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- d. *Would the project be located on a site that is included on a list of hazardous material 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?*

*Hazardous Materials Sites*

The following databases compiled pursuant to Government Code Section 65962.5 were checked for known hazardous materials contamination within the vicinity of the project site:

- EnviroStor Database, California Department of Toxic Substances Control (DTSC)
- GeoTracker Database, California State Water Resources Control Board (SWRCB)

According to the database search, there are no known hazardous material sites within the project site (DTSC 2020 and SWRCB 2020). The nearest documented hazardous material cleanup site is a leaking underground storage tank site at 899 Broadway Avenue, approximately 180 feet northwest of the site (case T0609788606). The 899 Broadway site has been used as a service station since at least 1923 and has several underground storage tanks (USTs). Remediation activities were completed during 2000 and 2020, during which contaminated groundwater and soil were removed. On January 9, 2020, the Regional Water Quality Control Board reviewed the remediation at the site, confirmed that all criteria had been met, and closed the case. There are no unresolved hazardous materials cleanup sites within the project site or its immediate vicinity. Therefore, project construction or operation would not result a hazard to the public or environment concerning a known hazardous materials site. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

The nearest airport to the project site is the Sonoma Skypark, located approximately 2 miles southeast of the site. At this distance, the Sonoma Skypark does not result in safety hazards or excessive noise at the project site. The project would not change or intensify the existing hotel and spa land use at the project site, nor add new residents or work sites in close proximity to an airport. This impact would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The project would not involve changes in circulation or access routes that potentially could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As described in Section 17, *Transportation*, the project would not expand guest capacity or staff size at the existing hotel, and therefore would not result in an increase in traffic, other than a temporary and minor increase during construction. Therefore, the project would not affect emergency response or evacuation. There would be no impact.

**NO IMPACT**

- g. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

The project site is located within an urbanized area of the City of Sonoma and is surrounded primarily by existing urban development. The site is not within a Very High Fire Hazard Severity Zone (VHFHSZ) and does not fall within an area of state firefighting responsibility (CAL FIRE 2008). The nearest VHFHSZ is located more than five miles north of the project site. The project site is currently developed with hotel and spa facilities; the project would involve renovations of those existing facilities and would not introduce fire hazards to the project. Therefore, the project would not expose people or structures to a significant risk involving wildland fires. This impact would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

# 10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) 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; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Setting

The generally level and fully developed project site is located west-adjacent to Nathanson Creek and the Nathanson Creek Preserve. As Figure 3 illustrates, the project area is approximately 250 feet west of the creek.

The project site is identified by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Number 06097C0937E (FEMA 2008). The eastern portion of the site is designated “Zone X, 0.2 Percent Annual Chance Flood Hazard” and the western portion of the site, including the project area, is designated “Zone X, Area of Minimal Flood Hazard.” Approximately 46% of the project site is covered with impermeable surfaces, including the existing hotel and paved parking areas.

## Impact Analysis

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- c.(i) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*
- c.(ii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- c.(iii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would 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?*
- c.(iv) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

The proposed project would involve redevelopment of a portion of the project site, including an addition to the existing spa building, renovation of the existing pool deck area including construction of a new pool and hot tubs. The project would involve a net increase of 8,829 square feet of impermeable surface area. This increase would be relatively small; most of the permeable surfaces on the project site, including the landscaped gardens and walkways, would remain. Therefore, the addition impervious surface cover associated with this project would not substantially alter the drainage characteristics of the project site. Drainage would be slightly altered by allowing for greater percolation of stormwater onsite, decreasing the flow of stormwater into the City’s drainage system, to which the site is already connected.

The project site is currently developed, and the proposed project would not substantially alter drainage in a manner that would create additional runoff water that would exceed stormwater drainage capacity or impede or redirect flood flows. Nor would the project alter the course of a

stream or river. The project would not impact flows of Nathanson Creek, which runs approximately 250 feet east of the project area.

Construction activity would be subject to Section 14.20.205 of the Sonoma Municipal Code, which requires erosion control measures, thus reducing the potential for temporary impacts on water quality. Therefore, compliance with existing regulations would reduce impacts to a less than significant level.

**LESS THAN SIGNIFICANT IMPACT**

- b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As discussed in Section 19, *Utilities and Service Systems*, the project would not result in a substantial increase in water demand at the existing hotel and spa facility. As described above, the project would not result in a substantial increase in permeable surface area at the project site. Groundwater recharge would not be substantially affected by the proposed project. Therefore, impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

As described in the *Setting* section, the project site is not in proximity to the ocean or other large bodies of water, and thus is not at risk for tsunami or seiche. The site is designated “Zone X, 0.2 Percent Annual Chance Flood Hazard” and “Zone X, Area of Minimal Flood Hazard.” The proposed project would involve redevelopment of portions of the site but would not alter the existing hotel and spa land use. As discussed above, the project would not substantially alter the site’s drainage. Therefore, the project would not substantially alter existing conditions in relation to flood hazards. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

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# 11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a. Would the project physically divide an established community?*

The proposed project would involve expansion of an existing building and replacement of a pool and pool deck on an existing parcel. The project would not separate connected neighborhoods or land uses from each other. No new roads, linear infrastructure, or other development features are proposed that would divide an established community or limit movement, travel, or social interaction between established land uses. This impact would be less than significant .

**LESS THAN SIGNIFICANT IMPACT**

*b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

### Consistency with General Plan

The project site is designated as Mixed Use in the City of Sonoma 2020 General Plan (City of Sonoma 2006). According to the General Plan, “the Mixed Use designation is intended to accommodate uses that provide a transition between commercial and residential districts, to promote a pedestrian presence in adjacent commercial areas, and to provide neighborhood commercial services to adjacent residential areas... The Mixed Use designation also is intended to recognize the continued existence of uses that contribute to the character or function of their neighborhood and to allow for the possibility of their expansion” (City of Sonoma 2006). The proposed project, which would allow the continued use and minor expansion of an existing hotel and spa facility, would therefore be consistent with the uses intended for the Mixed Use designation.

The City’s General Plan identifies goals and policies to guide land use patterns to strategically accommodate future growth while preserving and enhancing the city as a whole. The proposed project’s consistency with selected applicable City goals and policies is described in Table 11.

**Table 11 General Plan Consistency**

General Plan Goal or Policy	Proposed Project Consistency
<p><b>Policy 1.1.</b> Focus on the retention and attraction of businesses that reinforce Sonoma’s distinctive qualities—such as agriculture, food and wine, history and art—and that offer high-paying jobs.</p>	<p><b>Consistent.</b> The proposed project would involve renovation of a portion of an existing hotel and spa. The existing business would be retained and improved.</p>
<p><b>Policy 5.1.</b> Preserve and enhance the scale and heritage of the community without imposing rigid stylistic restrictions.</p>	<p><b>Consistent.</b> As described in Section 1, <i>Aesthetics</i>, the design of the proposed project would be consistent with the existing scale and design of surrounding development, including the existing hotel and spa structures and neighboring development.</p>
<p><b>Policy 5.8.</b> Encourage the designation and preservation of local historic structures and landmarks and protect cultural resources.</p>	<p><b>Consistent.</b> As described in Section 5, <i>Cultural Resources</i>, the proposed renovation would not adversely affect the historic structures on the project site, including the Burris House.</p>
<p><b>Policy 2.9.</b> Require development to avoid potential impacts to wildlife habitat, air quality, and other significant biological resources, or to adequately mitigate such impacts if avoidance is not feasible.</p>	<p><b>Consistent.</b> As described in Section 3, <i>Air Quality</i>, and Section 4, <i>Biological Resources</i>, the project would not result in significant impacts related to air emissions or nearby biological resources.</p>

The proposed project would be consistent with these General Plan policies and with the land use designation.

### Consistency with Sonoma Municipal Code

The project site is located within the Mixed Use (MX) zoning district. According SMC Section 19.10.020, within the MX zoning district, “longstanding commercial and industrial uses in otherwise residential areas may be preserved and, subject to use permit review, modified or intensified.” The proposed project would involve renovation to an existing hotel and spa and would therefore be consistent with the allowed uses in the MX district.

In addition, the proposed project would be consistent with applicable development standards in the SMC, including height (the renovated building would be approximately 29 feet at its highest point, below the 30-foot maximum for the district), setbacks (the proposed project would not reduce existing setbacks at the project site), and parking.

The project would also be subject to the discretionary approval of a Use Permit Modification and a Design Review application by the City of Sonoma Planning Commission. In order to approve such permits, the Planning Commission must make specific findings, including that “the proposed use is allowed with a conditional use permit within the applicable zoning district and complies with all applicable standards and regulations of this development code” (SMC Section 19.54.040). Given that the project would be required to comply with applicable regulations in the SMC, impacts would be less than significant.

### LESS THAN SIGNIFICANT IMPACT

# 12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *Would the project 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?*
- b. *Would the project 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?*

The DOC Geological Survey (CGS) classifies lands into Aggregate and Mineral Resource Zones based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. These MRZs identify whether known or inferred significant mineral resources are present in areas. Pursuant to Public Resources Code Section 2762(a)(1), lead agencies are required to incorporate identified MRZs resource areas delineated by the State into their General Plans. The City of Sonoma has no General Plan land use designation for mineral resources (City of Sonoma 2006). Therefore, there would be no impact with regard to the loss of a valuable mineral resource.

**NO IMPACT**

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# 13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section incorporates the findings of the Noise Analysis conducted by Salter, Inc., dated April 28, 2020. This report is included as Appendix NOI.

## Background

### *Noise*

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3dB decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as

one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Crocker 2007).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line, the path the sound will travel, site conditions, and obstructions). Noise levels from a point source typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance (e.g., construction, industrial machinery, ventilation units). Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and man-made features such as buildings and walls, can significantly alter noise levels. Generally, a large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2018). Structures can substantially reduce exposure to noise as well. The FHWA’s guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level ( $L_{eq}$ ); it considers both duration and sound power level.  $L_{eq}$  is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. Typically,  $L_{eq}$  is summed over a one-hour period.  $L_{max}$  is the highest root mean squared (RMS) sound pressure level within the sampling period, and  $L_{min}$  is the lowest RMS sound pressure level within the measuring period (Crocker 2007).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level ( $L_{DN}$ ), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.); it is also measured using Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by  $L_{DN}$  and CNEL usually differ by about 1 dBA. The relationship between the peak-hour  $L_{eq}$  value and the  $L_{DN}$ /CNEL depends on the distribution of traffic during the day, evening, and night. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60-plus CNEL range. Normal conversational levels are in the 60 to 65-dBA  $L_{eq}$  range; ambient noise levels greater than 65 dBA  $L_{eq}$  can interrupt conversations (Federal Transit Administration [FTA] 2018).

Some land uses are more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses.

## *Vibration*

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body starts from a low frequency of less than 1 Hz and goes to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration [FTA] 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may actually amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

## **Existing Conditions**

The project site lies on the southwest corner of East MacArthur Street and Broadway. Sensitive receivers near the project site include residences approximately 170 feet north, 300 feet west, and 350 feet east. Sonoma Valley High School lies adjacent to the south approximately 140 feet from the hotel spa improvement.

## **Regulatory Setting**

### *City of Sonoma General Plan Noise Element*

**Goal PS-1:** Achieve noise compatibility between existing and new development to preserve the quiet atmosphere of Sonoma and quality of life.

- 1.1 Apply the following standards for maximum Ldn levels to citywide development:  
 45 L<sub>dn</sub>: For indoor environments in all residential units.  
 60 L<sub>dn</sub>: For outdoor environments around all residential developments and outdoor public facilities.
- 1.3 Require adequate mitigation of potential noise from all proposed development.
- 1.4 Evaluate proposed development using the Noise Assessment Guide and require an acoustical study when it is not certain that a proposed project can adequately mitigation potential noise impacts.

*City of Sonoma Municipal Code*

The SMC (Title V, Offences Against Public Peace, Chapter 9.56, Noise) includes various noise limits intended to protect community residents from prolonged unnecessary, excessive, and annoying sound levels that are detrimental to the public health, welfare, and safety, or are contrary to the public interest. No person may produce, suffer or allow to be produced by any machine, animal or device, or by any other means, a noise level greater than the noise limits shown in Table 12 for residential, commercial and public properties.

**Table 12 City of Sonoma Municipal Code 9.56.040 General Noise Limits**

<b>Zone</b>	<b>Daytime Limits</b>	<b>Nighttime Limits</b>
Residential Zones	60 dBA Intermittent 50 dBA Intermittent	50 dBA Constant 40 dBA Constant
Commercial/Mixed Use Zones	65 dBA Intermittent 55 dBA Constant	65 dBA Intermittent 55 dBA Constant
Public Property	Most restrictive noise limit applicable to adjoining private property	

\* Subject to provisions of Ord. 03-2006 § 2, 2006  
 Source: City of Sonoma 2020

Section 9.56.050 exempts construction noise from the above limits. The section states that construction, alteration, demolition, maintenance of construction equipment, deliveries of materials or equipment, or repair activities shall be allowed as follows: (1) between 8:00 a.m. and 6:00 p.m., Monday through Friday, (2) between 9:00 a.m. and 6:00 p.m. on Saturday, and (3) between 10:00 a.m. and 6:00 p.m. on Sundays and holidays; however, the construction noise level at any point outside of the property plane of the project shall not exceed 90 dBA.



## Impact Analysis

- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

## Construction Noise

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation rate of 6 dBA per doubling of distance for stationary equipment.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the  $L_{eq}$  of the operation (FHWA 2018). Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some have high-impact noise levels.

Construction activity would result in temporary noise in the project site vicinity, exposing surrounding nearby receivers to increased noise levels. Construction noise would typically be higher during the heavier periods of initial construction (i.e., site preparation and grading) and would be lower during the later construction phases (i.e., building construction and paving). Typical heavy construction equipment during project site preparation could include graders and front-end loader. It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location. In addition, construction equipment would not be in constant use during the 8-hour operating day.

Project construction would occur nearest to Sonoma Valley High School, south of the project site and single-family residences north of the project site. Over the course of a typical construction day, construction equipment would be located as close as 100 feet to the properties but would typically be located at an average distance farther away due to the nature of construction and the lot size of the site. For example, during a typical construction day, the equipment may operate across the horizontal distance of the site (125 to 180 feet) from a nearby noise receiver. Therefore, it is assumed that over the course of a typical construction day the construction equipment would operate at an average distance of 140 feet from the nearest classrooms at Sonoma Valley High School. Additionally, construction equipment would operate as close as 170 feet and at an average distance of 200 feet from the nearest single-family residences to the north.

Construction noise is typically loudest during activities that involve excavation and move soil, such as site preparation. A potential construction scenario includes a grader and a front-end loader working during site preparation to excavate and move soil. Table 13 shows construction noise levels at distances of 140 feet, 170 feet, and 200 feet from the nearest sensitive receivers.

**Table 13 Construction Equipment Noise Levels**

Distance	Noise Level $L_{eq}$
140 feet	76
170 feet	74
200 feet	73

Note: Noise levels were calculated assuming simultaneous use of a grader and front-end loader.

At 140 feet, a grader, front-end loader would generate a noise level of 76 dBA  $L_{eq}$  (RCNM calculations are included in Appendix RCNM). The City’s construction noise limit is 90 dBA  $L_{eq}$ ; therefore, project construction noise levels would not exceed the applicable construction noise limit. In addition, the construction activities would be temporary and consistent with typical suburban construction projects; no unusually loud demolition or construction equipment, such as pile drivers, would be used. Impacts from construction noise would be less than significant.

### Operational Noise Sources

The pool and spa renovation would include the addition of several pieces of mechanical equipment. This equipment includes pool pumps, whirlpool jets, water treatment equipment, and HVAC. This equipment would be housed in a mechanical room that would be attached to the new spa building.

Table 14 lists the proposed equipment, its corresponding noise data, and noise levels at the nearest sensitive receivers based on the Salter report (Appendix NOI). Sensitive receivers are identified based on where they are located in relation to the project site. Noise level calculations assumed a 24 dBA reduction from enclosure attenuation, distance attenuation from soft ground, building shielding reductions based on path length difference, and an added 6 dBA for a conservative calculation.

**Table 14 Operational Equipment Noise Levels**

Equipment	Equipment Noise at 3 Feet (dBA)	Project Noise at Sensitive Receiver (dBA)			
		North <sup>1</sup>	South <sup>2</sup>	East <sup>3</sup>	West <sup>4</sup>
Main pool pump 2 HP	75	16	11	11	13
Main spa pump ¾ HP	70	11	6	6	8
Main spa jet pump 3 HP	78	19	14	14	16
Men’s/Women’s spa ¾ HP	70	11	6	6	8
Men’s/Women’s jet 2 HP	75	16	11	11	13
Men’s/Women’s cold plunges: ½ HP	68	9	4	4	6
Main pool heater	70	11	6	6	8
Main spa heater	70	11	6	6	8
Men’s/Women’s heater	70	11	6	6	8
3 Ton chiller	69	10	5	5	7
<b>Total Noise</b>	<b>82</b>	<b>23</b>	<b>18</b>	<b>18</b>	<b>20</b>

<sup>1</sup> North: residences approximately 170 feet north from the site

<sup>2</sup> South: Sonoma Valley High School, approximately 140 feet from the site

<sup>3</sup> East: residences approximately 350 feet north from the site

<sup>4</sup> West: residences approximately 300 feet north from the site

Source: Appendix NOI, Salter 2020

The highest noise levels from project operation would occur at the residential receiver to the north, located across East MacArthur Street 170 feet from the pool equipment (the North sensitive receptor identified in Table 14 above). At this distance with ground attenuation and shielding provided by the buildings and the enclosure, the calculated noise is 23 dBA. The closest receiver is the high school to the south at 140 feet (the South sensitive receptor identified in Table 14 above); due to additional noise attenuation from hotel buildings in between the pool equipment and the high school, noise would be lower at this location and was calculated at 18 dBA. Based on comparable noise levels, site topography, and distance, the noise levels specified above from spa and pool equipment would not exceed the nighttime 40 dBA limit or the 50 dBA daytime limit in the SMC, nor would they perceptibly increase noise levels over existing conditions at nearby receivers. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

*b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Thresholds used for the vibration analysis include a threshold for structure damage and a threshold for human annoyance. The threshold for structure damage is from Caltrans’ *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020, which lists 0.2 PPV in./sec. at residential structures as the limit that would prevent structural damage regardless of building construction

type. The threshold for human annoyance is from the FTA *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018). This document provides a vibration level threshold at which transient vibration sources (such as construction equipment) are considered to be distinctly perceptible as 0.24 PPV in./sec.

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the project. A vibratory roller was used for the purpose of this analysis as they create the highest anticipated vibration levels during construction activities. A vibratory roller generates approximately 0.21 in./sec. PPV at a distance of 25 feet (Caltrans 2020). This would equal a vibration level of 0.032 in./sec. PPV at 140 feet. This vibration level is lower than the residential structural damage threshold of 0.2 in./sec. PPV and the distinctly perceptible human annoyance threshold of 0.24 PPV in./sec. Therefore, temporary impacts associated with construction would be less than significant.

The project would not include substantial vibration sources associated with operation. Therefore, operational vibration impacts would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two 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?*

The Napa County Airport is the nearest public airport, located approximately 11 miles to the southwest of the project site. According to the noise compatibility contours figure for Napa County Airport on the Airport Land Use Compatibility Plan (Napa County Airport Land Use Commission 2004), the project site is located outside the airport's 60 CNEL noise contour. The nearest private airport is the Sonoma Skypark, approximately 2 miles southeast of the site. According to Figure AT-7 of the Sonoma County General Plan Air Transportation Element, the site is located outside the airport's 75 CNEL noise contour (County of Sonoma 2008). Therefore, no substantial noise exposure from airport noise would occur. This impact would be less than significant.

#### **LESS THAN SIGNIFICANT IMPACT**

# 14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The project would not involve the construction of new residences. Therefore, the project would not directly induce localized residential growth. In addition, as described above in *Description of Project*, the project would not result in a change to the number of employees needed to operate the hotel and spa buildings or in the hotel's guest capacity. Therefore, the project would not indirectly induce population growth because it would not increase employment opportunities within the City of Sonoma. No impact would occur.

**NO IMPACT**

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project would involve expansion of an existing spa building and renovation of the pool deck on a site where there is an existing hotel and spa complex; there are no existing housing units on the project site. Moreover, as described above in the *Description of Project*, the project would not involve a change to the number of employees or hotel guest rooms. Therefore, the project would not displace existing housing units or people. No impact would occur.

**NO IMPACT**

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# 15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
1 Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2 Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3 Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4 Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5 Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The project site is located within City of Sonoma limits where fire protection services are provided by Sonoma Valley Fire & Rescue Authority (SVFRA) staff and facilities. The project would involve expansion of an existing building and renovation of the existing pool deck on the site. As described above in Section 14, *Population and Housing*, the project would not result in an increase in the number of employees or hotel guest rooms within the project site and would therefore not result in a substantial increase in intensity of use at the site which would require increase fire service. Moreover, the project would not result in a substantial increase in the use of hazardous materials that could cause a fire hazard at the site. The project would be required to comply with the California Fire Code and California Building Code and would be reviewed by City staff to verify code compliance and adequate fire access. The project would not result in the need for new or physically altered fire protection facilities and impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- a.2. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The proposed project would not create excessive demand for police services or introduce development to areas outside of normal service range that would necessitate new police protection facilities; the program area is within the Sonoma County Sheriff's Department (SCSD) service area and is currently serviced by the SCSD. Moreover, as described in Section 14, *Population and Housing*, the project would not induce population growth within the City. The proposed project would thus not create the need for new or expanded police protection facilities and impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- a.3. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

The project would involve expansion and renovation of a portion of an existing hotel and spa complex. As described in Section 14, *Population and Housing*, the project would not induce population growth within the City and would therefore not result in increased demand of schools within the City of Sonoma. No impact would occur.

**NO IMPACT**

- a.4. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

Refer to Section 16, *Recreation*.

**LESS THAN SIGNIFICANT IMPACT**

- a.5. *Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

As discussed in Section 10, *Hydrology and Water Quality*, impacts related to stormwater facilities would be less than significant. As discussed in Section 19, *Utilities and Service Systems*, impacts related to water and wastewater water facilities would be less than significant. No significant impacts to other public services are anticipated. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**



# 16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

As described above in Section 14, *Population and Housing*, the project would not directly or indirectly induce population growth within the City of Sonoma. Therefore, the project would not result in an increased use of recreational facilities by City residents. Moreover, since the project would not result in increased guest capacity at the hotel facility, it would not result in an increase in the use of nearby recreational facilities by guests. The proposed project would include expanded and renovated outdoor and indoor recreational facilities within the project site, which would be available to hotel and spa guests. Impacts related to use of nearby parks or recreational facilities would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The proposed project would include expanded and renovated outdoor and indoor recreational facilities within the project site, including expanded spa and fitness rooms and a renovated pool and pool deck. These facilities would replace and expand existing recreational facilities associated with the MacArthur Place Hotel and Spa. However, the project would not require construction or expansion of recreational facilities beyond those within the project area. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

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# 17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

East MacArthur Street is a collector roadway, characterized by continuous sidewalks and street lighting along the project frontage. The site is located adjacent to the signalized intersection with Broadway, which includes pedestrian crossing facilities. Most streets in the vicinity of the project also have continuous sidewalks along both sides of the street, the exceptions being local residential streets. There are no bicycle facilities along East MacArthur Street, but there are existing bike lanes on West MacArthur Street and the General Plan has identified Broadway for a “road diet,” which would remove travel lanes and add bike lanes. There is a transit stop for Sonoma County Transit Routes 30 and 32 at Broadway and East MacArthur Street, the nearest intersection to the project site, but no service on East MacArthur Street.

The proposed project consists of on-site modifications that would not expand the capacity to accommodate guests or result in an increase in total employees. Regarding transit users, bicyclists, and pedestrians, there are no notable gaps in the multimodal circulation network and the project would not conflict with the existing or planned facilities, as no off-site improvements are proposed. The project is therefore consistent with adopted policies and plans regarding public transit, bicycle, and pedestrian facilities and supports City of Sonoma General Plan Circulation Element Policy 1.1, “Ensure that the City’s circulation network is a well-connected system that effectively accommodates vehicular and non-vehicular traffic in a manner that considers the context of surrounding land uses and the needs of all roadway users.” This impact would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

CEQA Guidelines Section 15064.3(b) indicates that land use projects would have a significant impact if the project resulted in vehicle miles traveled (VMT) exceeding an applicable threshold of significance. It further notes that if existing models or methods are not available to estimate the VMT for the project being considered, a lead agency may analyze the project's VMT qualitatively. Since the project proposes to modify an existing facility without expansion of guest capacity or total number of employees, there is no anticipated change in the number or length of trips to the site, and no anticipated change in VMT associated with the project. This impact would be less than significant.

**NO IMPACT**

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

The proposed project does not include modifications to the existing transportation and street network or changes to existing driveway geometrics that would increase hazards. Site access would continue to be via the existing driveways. In the event that minor modifications are required at the site, the on-site circulation system would be designed to meet applicable design standards. This impact would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- d. *Would the project result in inadequate emergency access?*

The proposed project does not include modifications to the existing transportation and street network. The project is therefore consistent with City of Sonoma General Plan Policy CE-8, Review of Development Impacts, which states, "As part of the development review process, the Planning and Public Works Departments shall review development projects to ensure that developers provide adequate emergency vehicle access." The fire department has reviewed the project plans and would also be responsible for reviewing and approving the building permits. This impact would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

# 18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>				
<p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Regulatory Setting

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

## Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

The City of Sonoma prepared and mailed an AB 52 notification letter to the Federated Indians of Graton Rancheria on June 5, 2020. As of the date this document was published, no request for consultation has been received. At this time, no specific tribal cultural resources have been identified. Therefore, for the purposes of this analysis, the City assumes that no tribal resources are present on the project site. However, because the project involves ground disturbance, there is the possibility of encountering undisturbed subsurface tribal cultural resources during construction. Therefore, the project could result in potentially significant impacts to tribal cultural resources and mitigation is required.

## Mitigation Measure

### *TCR-1 Unanticipated Discovery of Tribal Cultural Resources*

If cultural resources of Native American origin are identified during construction, all earth-disturbing work in the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the City determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archeologist and the appropriate Native American tribal representative.

**LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

# 19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

The existing hotel and spa facilities within the project site are connected to water, wastewater, stormwater, electric power, natural gas, and telecommunication utilities. The proposed new pool and hot tub would replace an existing pool and hot tub with larger facilities that would generate more water demand. However, this increase would be relatively small given the water demand generated by the existing hotel and restaurant uses at the project site. Moreover, the project would involve replacement of existing faucets, toilets, and showers with modern low flow alternatives

(Appendix AQ), which would result in reduced water demand within the building. Therefore, the project would not result in a substantial increase in water demand at the project site. As described in Section 10, *Hydrology and Water Quality*, the project would not result in a substantial increase in demand for storm water drainage facilities. The project would not expand guest services or require an increase in staff size. Therefore, a substantial increase in demand for other utilities, including electric power, natural gas, or telecommunications facilities would not occur. The project would not result in the need for new or expanded utility facilities. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The project site receives potable water service from the City of Sonoma Water Division. The project would not add new substantial new water-demanding components to the existing hotel and spa facilities. As described above under criterion (a), the project would not involve a substantial increase in water demand at the project site. The project would involve a larger pool and hot tub than existing facilities, which would generate a relatively small increase in water demand. However, the project would also involve replacement of existing faucets and toilets with low flow alternatives within the spa building, which would help offset increases in water demand at pool. The project would not add guest rooms or result in an increase in staff size. Therefore, there would be no substantial permanent effect on water demand. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- c. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The project site receives wastewater treatment and collection service by the Sonoma Valley County Sanitation District. As described above under criteria (a) and (b), the project would not result in an increase in water demand. Therefore, the project would not result in an increased demand for wastewater collection or treatment. Impacts would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- d. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Solid waste collection in the City of Sonoma is provided by Sonoma Garbage Collectors and landfill service is provided by the Republic Services of Sonoma County Landfill. As described above, the project would not result in an increase in guests at the hotel or otherwise substantially alter activity at the project site in a manner that would increase solid waste generation. Therefore, impacts related to solid waste disposal would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**



## 20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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 or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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 or that may result in temporary or ongoing impacts to the environment?*

- d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project site is located within an urbanized area of the City of Sonoma and is surrounded primarily by existing urban development. The site is not within a Very High Fire Hazard Severity Zone (VHFHSZ) and does not fall within an area of state firefighting responsibility (CAL FIRE 2008). Implementation of the project would not increase risks associated with wildfires and therefore, this impact would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

# 21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

As noted in Section 4, *Biological Resources*, impacts to special status plants and wildlife could be potentially significant and therefore Mitigation Measures BIO-1(a-d) and BIO-2 would be required to reduce potential impacts to migratory nesting birds and special status bat species. Incorporation of this mitigation measure would reduce impacts to wildlife to a less than significant level. As noted under Section 5, *Cultural Resources*, the proposed project would not impact known cultural or historic resources. Moreover, Mitigation Measures CUL-1, CUL-2, and TCR-1 would ensure that unanticipated archaeological resources encountered during construction activities would be

properly protected. These measures would reduce the potentially significant impact related to cultural and tribal cultural resources to a less than significant level. Impacts would therefore be less than significant with mitigation.

**LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

Implementation of the project would result in less than significant environmental impacts with implementation of mitigation measures. Cumulative impacts associated with some of the resource areas are addressed in the individual resource sections above, including air quality, greenhouse gas emissions, noise and traffic. Impacts would be less than significant for all topics. Other impacts associated with the project would generally be localized at the project site and would not combine with other projects to cause cumulatively considerable environmental impacts. Moreover, as described in the discussion of environmental checklist Sections 1 through 20, the project would have no impact, a less than significant impact, or a less than significant impact after mitigation with respect to all environmental issues. Therefore, cumulative impacts would also be less than significant within mitigation (not cumulatively considerable).

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- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Effects to human beings are generally associated with air quality, noise, traffic safety, geology/soils and hazards/hazardous materials. As discussed in this Initial Study, implementation of the proposed project would result in less than significant environmental impacts with respect to these issue areas with mitigation incorporated. Mitigation Measure GEO-1 would reduce health and safety risks to human beings and would result in less than significant impacts. With mitigation, the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be less than significant with mitigation.

**LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

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