

Appendix A

Notice of Preparation and Responses to NOP



NOTICE OF PREPARATION (NOP) Hotel Project Sonoma

Date: August 3rd, 2021
To: Responsible Agencies, Interested Parties, and Organizations
Subject: NOP of a Recirculated Environmental Impact Report for the Hotel Project Sonoma
Location: City of Sonoma, California
Project Proponent: Kenwood Investments, LLC

Project Location: City of Sonoma. One-half block southwest of Sonoma Plaza, bounded by State Route (SR) 12 (West Napa Street) to the north, First Street West to the east, the Best Western Sonoma Valley Inn and Krug Event Center to the south, and the Sonoma Grille Restaurant to the west.

Proposed Project: Hotel Project Sonoma (the proposed project) includes the development of a 62-guestroom hotel, 80-seat restaurant and bar, a spa with 6 treatment rooms, raised swimming pool veranda, 130 on-site parking spaces (consisting of a 113-stall basement parking garage, 9 surface parking spaces, and 8 covered residential parking spaces), an 8-unit residential condominium building, and the designation of 7 existing on-site dwelling units as affordable housing. Attached are the project description, location maps, and preliminary identification of the potential environmental issues to be explored.

Environmental Determination: The City is preparing a Recirculated Draft EIR in compliance with the California Environmental Quality Act (CEQA). The entire EIR will be recirculated and there is no need to review any previous materials in order to participate in public review and input for this Recirculated EIR. Pursuant to CEQA, the City of Sonoma will be the lead agency and is responsible for preparing the EIR for the proposed project. Because the City has determined that a Recirculated EIR should be circulated, an Initial Study will not be prepared.

Requested Input: In accordance with Section 15082 of the CEQA Guidelines, this Notice of Preparation (NOP) describes the project location and the proposed project that will be analyzed in the EIR, and identifies areas of probable environmental impacts of the project. Agencies and interested members of the public are invited to provide input on the scope of the environmental analysis. The City welcomes the views of responsible or trustee agencies as to the scope and content of the environmental information which is germane to each agency's statutory responsibilities in connection with the proposed project. In accordance with the CEQA Guidelines Section 15082, responses must be sent at the earliest possible date, but no later than 30 days after the date of this notice.

Please send your written response, with the name, address, phone number, and email address of your agency contact person, to the following address by or before 5:00 p.m. on September 1st, 2021:

Kristina Tierney, Associate Planner
Planning Department
City of Sonoma
No. 1 The Plaza
Sonoma, CA 95476
ktierney@sonomacity.org

Public Scoping Meeting: A scoping meeting will be conducted at the Planning Commission meeting at 6:00 p.m. on Thursday, August 12 to collect comments from agencies and the public. The meeting will be held in the Community Meeting Room, located at 177 First Street West, Sonoma, CA. If you have questions regarding this NOP or the scoping meeting, please contact Kristina Tierney at (707) 933-2202 or via email at ktierney@sonomacity.org.

Background: This proposed project has been undergoing City review since 2012. The following provides a timeline of previous actions:

- Hotel application was submitted in **June 2012**
- Notice of Preparation (NOP) was released for public and public agency review and comment on **June 15, 2015**
- A public scoping meeting to receive comments on topics and issues to be evaluated in the Draft EIR was held by the City on **June 25, 2015**.
- The City distributed a Notice of Availability (NOA) and the Draft EIR was submitted to the State Clearinghouse for State agency review (State Clearinghouse No. 2015032041) on **January 26, 2016**, which started a 45-day public review period, ending on **March 10, 2016**.
- The Planning Commission held a public meeting on **February 25, 2016** to receive public comments on the Draft EIR.
- The Planning Commission held a public hearing on **April 13, 2017** to review the Final EIR and at that meeting Certified the Final EIR, without taking action on the project itself.
- Before the Project could return to the Planning Commission for consideration of the Project entitlements, the City Council received an appeal regarding the action of the Planning Commission to certifying the FEIR on **April 25, 2017**.
- On **June 22, 2017**, the City Council held a public hearing on the appeal and continued the item to the July 19, 2017 meeting.
- On **July 19, 2017**, the City Council supported the appeal and Kenwood Investments also agreed to amend the EIR.
- On **August 14, 2017**, the City Council adopted Resolution #43-2017 directing revisions to the EIR and for the document to be recirculated.
- The City recirculated the revised Draft EIR and distributed a Notice of Availability for the revised Draft EIR on **July 20, 2018**, which started a 45-day public review period, ending on **September 13, 2018**.
- The Planning Commission held a public hearing to receive comments on the revised Draft EIR on **September 4, 2018**.
- A revised Final EIR was prepared that responded to comments on the revised Draft EIR and was provided to public agencies on **November 8, 2019**.
- The Planning Commission hearing on November 21st was continued to **December 12, 2019**. The City Council did not take action on the project.

David A. Storer, AICP,
Planning & Community Services Director
City of Sonoma

Date



1. Project Information

Title:

Hotel Project Sonoma

Lead Agency Name and Address:

City of Sonoma Planning Department
No. 1 The Plaza
Sonoma, CA 95476

Contact Person and Information:

Kristina Tierney
Phone: (707) 933-2202
Email: ktierney@sonomacity.org

2. Location and Regional Setting

The project site is in southeastern Sonoma County, within the City of Sonoma. The City is situated in the center of the approximately 17-mile-long Sonoma Valley, which is bounded by the Sonoma Mountains to the west, the Mayacamas Mountains to the east, San Pablo Bay to the south, and Santa Rosa to the north.

3. Project Site

The project site comprises approximately 1.24 acres of land area in Downtown Sonoma. The project site is approximately one-half block southwest of the historic Sonoma Plaza, and is bounded by SR 12 (West Napa Street) to the north, First Street West to the east, the Best Western Sonoma Valley Inn and Krug Event Center to the south, and the Sonoma Grille Restaurant to the west.

The project site comprises the following four parcels and Assessor's Parcel Numbers (APN), all owned by the project applicant:

- APN 018-250-017: 153 West Napa Street, Sonoma, CA, former Chateau Sonoma Building

- APN 018-250-068: 135 West Napa Street, Sonoma, CA, Lynch Building (western portions of this parcel)
- APN 018-250-051: 135 West Napa Street, Sonoma, CA, metal office and warehouse (southern parking lot)
- APN 018-250-067: 117 West Napa Street, Sonoma, CA, Sonoma Index Tribune Building (L-shaped parcel fronting First Street West)

The project applicant would provide for all lot line adjustments and utility connections necessary to form a single parcel for the hotel component and a single parcel for the residential condominium component of the project site.

4. Surrounding Land Uses

The project site is immediately surrounded by commercial land uses on all sides. The project vicinity consists of boutique shops, a hotel (the Best Western Sonoma Valley Inn and Krug Event Center), a variety of restaurants, wine tasting rooms, The Marketplace shopping center (which includes a Whole Foods Market), and other commercial uses, including a 76® gas station and convenience store. The nearest residential uses are approximately 100 feet to the southwest of the project site and consist of two-story, multi-family units. The nearest single-family residences are approximately 500 feet north of the project site on Church Street. The project site is approximately 350 feet southwest of the historic Sonoma Plaza, a 8-acre park in the center of the downtown area, which includes the City of Sonoma City Hall, several historic buildings, picnic and play areas, and large expanses of public lawns and green space. The Sonoma State Historic Park is approximately 1,000 feet northeast of the project site, and Vallejo Home State Park is approximately 2,000 feet northwest of the project site. The Sonoma Valley Fire Station No. 1 is approximately 350 feet southwest of the project site.

5. Proposed Project

Hotel Project Sonoma (the proposed project) includes the development of two new buildings: one building housing a 62-guestroom hotel, 80-seat restaurant and bar, a spa with 6 treatment rooms, raised swimming pool veranda, 130 on-site parking spaces (consisting of a 113-stall basement parking garage and 9 surface parking spaces); a separate 8-unit residential condominium building with 8 covered residential parking spaces; and the designation of 7 existing on-site dwelling units as affordable housing. The project will comply with the City's updated inclusionary housing ordinance and the newly designated affordable housing units will be marketed to employees at the project, once operational.

The project site encompasses 1.24 acres of land area and consists of four parcels (Assessor's Parcel Numbers 018-250-017, 018-250-068, 018-250-051, and 018-250-067) all owned by the applicant, which would be developed as a single parcel for the hotel component and a parcel for the residential condominium component following lot line adjustments. Several

existing buildings are located on these parcels. The former Chateau Sonoma Building located at 153 West Napa Street would be demolished. The surface parking lot adjacent to the Lynch Building located at 135 West Napa Street would be used part of the proposed project; the Lynch Building itself would not be modified. A two-story metal warehouse and office building previously used for newspaper production, also located at 135 West Napa Street, would be demolished. Finally, a one-story metal warehouse building at 117 West Napa Street would also be demolished.

The project site is zoned Commercial (C) with a Historic District Overlay, and is designated in the City of Sonoma General Plan for commercial uses. Although the site includes a Historic District Overlay, historic resource studies have been prepared, and no historic buildings or structures would be demolished or modified as part of the proposed project.

The hotel would include a basement parking garage, managed by a 24-hour valet service. The hotel would consist of three floors. The first floor would include an 80-seat restaurant and bar, 6-room treatment spa, lobby, and support spaces. The second and third floors would consist of guest rooms and support spaces.

The separate condominium building would also include three floors. The first floor would consist of 8 covered parking spaces, elevator, stair cores, and circulation. The second floor would consist of three, 2-bedroom units and two, 1-bedroom units. The third floor would consist of two, 2-bedroom units and one, 3-bedroom unit.

The total combined building area would be 131,748 square feet, of which 46,356 square feet would consist of the below-grade hotel parking garage and 8,205 square feet would consist of the covered residential first-floor surface parking.

The hotel would be constructed around three exterior courtyards, including the hotel Plaza Courtyard, an open interior lobby courtyard, and the raised swimming pool veranda area. The courtyards would be landscaped with raised planting beds and tree wells partially irrigated with captured, stored, and recycled rainwater. The hotel's Plaza Courtyard would be open to the public, would provide public circulation, and would be faced by a public-serving restaurant and bar, spa, and hotel guest-serving uses. Existing trees, which are growing primarily around the project site perimeter, that require removal would be replaced on a two-for-one basis for oak trees, and on a one-for-one basis for all other trees.

The hotel would provide a fleet of 12 bicycles or more for its guests, and use of bicycles by the hotel's employees would also be encouraged. Guest vehicles would enter from SR 12 (West Napa Street) into the Hotel's Plaza Courtyard. Guest arrival and departure would take place adjacent to the public lobby, deep in the site to avoid a traffic back-up on SR 12 (West Napa Street). During non-peak traffic periods, departing guests would exit right onto SR 12 (West Napa Street). During peak traffic periods, departing guests would pick up their vehicles in the basement parking garage and exit directly onto First Street West. Exiting of hotel guests at peak times would be managed by the valet service.

For smaller delivery vehicles such as vans, the hotel's loading zone would be located in the basement garage receiving area which would be accessed from the SR 12 (West Napa Street) auto court. For larger delivery vehicles such as box trucks, deliveries would be received at the entry to the First Street West vehicle ramp on First Street West, where deliveries would be met by a hotel forklift and transferred into the hotel basement receiving area. The proposed project includes a request for designation of a truck loading zone on First Street West located adjacent to the hotel garage entry as part of its Use Permit Application. Deliveries would be scheduled to occur before 11:00 a.m. or other off-peak times.

The hotel would have an employee population of approximately 60 full-time employees and 30 part-time employees, with approximately 40 employees working at a time during the primary daytime shift.

To help improve energy efficiency, the proposed project would be designed to achieve Leadership in Energy and Environmental Design (LEED) Certification.

6. Required Permits and Approvals

The proposed project would require a number of permits and approvals, which may include, but is not necessarily limited to the following:

- City of Sonoma certification of the EIR, adoption of the Mitigation Monitoring and Reporting Program, and adoption of the Hotel Project Sonoma
- Conditional Use Permit to operate a hotel and restaurant
- Approval of the tentative and final subdivision map for 8 unit residential units
- Designation of a truck loading zone on First Street West located adjacent to the hotel garage entry (as part of the Conditional Use Permit)
- Approval by the City of Sonoma Planning Commission of the proposed site modifications (improvement plans)
- Encroachment Permits for any work within the City right-of-way, i.e., curb cuts and sidewalk improvements
- Approval of building demolitions by the Design Review and Historic Preservation Commission
- Design review for proposed buildings and landscape by the Design Review and Historic Preservation Commission
- Grading and Building Permits for construction of the project buildings
- Tree removal, relocation, and/or alteration permit
- Caltrans Encroachment Permit
- County of Sonoma Department of Public Health Environmental Health Division approval of construction in a closed and remediated hazardous materials site
- Bay Area Air Quality Management District approval of authority to construct
- Sonoma County Water Agency approval of proposed water supply improvements

- Sonoma Valley County Sanitation District approval of proposed wastewater improvements
- PG&E approval of electrical and natural gas facilities
- Other local, State, or federal approvals or permits as may be necessary pursuant to applicable laws and regulations.

7. California Environmental Quality Act (CEQA)

This proposed project is subject to the requirements of the California Environmental Quality Act (CEQA) because it would require the City of Sonoma to take several discretionary actions to grant the requested land use entitlements. CEQA requires the City, as the CEQA Lead Agency, to identify and document the potential significant environmental effects of the project prior to making a decision to approve the project.

This Notice of Preparation has been prepared under the direction of the City accordance with the requirements of CEQA (Public Resources Code, Section 21000 et seq.), and the CEQA Guidelines (14 CCR 15000 et seq). Specifically, this Notice of Preparation identifies those environmental resource areas where the project has a potential to result in a significant impact and those environmental resource areas where impacts would remain less than significant. Based on the conclusions reached in this Notice of Preparation, the City of Sonoma will prepare a Recirculated Draft EIR to evaluate the project's potentially significant environmental effects.

8. Public Comment

Notice to Agencies: The City of Sonoma requests that public agencies provide comments regarding the scope and content of the EIR as it relates to an agency's statutory responsibilities in connection with the proposed project in accordance with California Code of Regulations, Title 14, Section 15082(b).

Notice to Organizations and Interested Parties: The City of Sonoma requests comments and concerns from organizations and interested parties regarding the environmental effects associated with construction and operation of the proposed project.

9. Potential Environmental Impacts to be Considered

Topics not evaluated in the EIR: As discussed further below, the project is expected to result in no impact or less than significant impacts in the following resource areas:

- **Agricultural and Forestry Resources:** The project site is located in the urbanized area of Downtown Sonoma and has no farmland or forestry resources.
- **Mineral Resources:** The City of Sonoma, including the project site, is not located in a regionally important area of known mineral resources.
- **Population and Housing:** The project site would be redeveloped with an eight-unit residential condominium building estimated to accommodate approximately 17 people and would not involve extension of roads or other infrastructure with the potential to induce population growth. Project implementation would not displace existing people or housing that would require the construction of replacement housing elsewhere.
- **Recreation:** Although hotel guests could use parks in the area during their stay, any increases in demand to parks would be minor given the hotel proposes 62 guestrooms and 8 residential units. The proposed project would not 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.
- **Wildfire:** The project site is located in the urbanized area of Downtown Sonoma, in a Local Responsibility Area. The site is currently developed with, and is surrounded by, commercial land uses. Fire protection services to the project site are currently provided by and would continue to be provided after the site is redeveloped, by the Sonoma Valley Fire District. Demolition of existing buildings and redevelopment of the site would not exacerbate existing conditions related to urban or wildland fires, would not impair emergency evacuation routes, and would not be located in or near areas designated as State Responsibility Areas or very high fire hazard severity zones.

Topics subject to analysis in the EIR: The EIR will describe the reasonably foreseeable and potentially significant adverse effects of the proposed project (both direct and indirect). The EIR also will evaluate the cumulative impacts of the project when considered in conjunction with other related past, present, and reasonably foreseeable future projects. The City anticipates that the proposed project could result in potentially significant environmental impacts in the following topic areas, which will be fully be evaluated in the EIR:

- **Aesthetics:** The EIR will describe the existing visual setting and describe visual changes resulting from the project.
- **Air Quality:** The EIR will describe the existing regional air quality conditions and the potential for the proposed project to result in local and regional air quality impacts during both construction and operation will be evaluated in consideration of the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines.

- **Biological Resources:** The project site has been previously disturbed. The EIR will describe the impacts for potential impacts to sensitive plant and wildlife habitats resulting from the demolition and clearing of the existing buildings and construction of the proposed project in accordance with State and federal law.
- **Cultural and Tribal Cultural Resources:** The potential to impact cultural resources will be described in the EIR, including Tribal Cultural Resources. The EIR will analyze the potential historic significance of existing buildings on the site and determine if the project would have the potential to impact the Plaza historic district or other historic resources in the area.
- **Energy:** The EIR will describe current electricity and natural gas utility providers and evaluate whether the proposed project would have any potentially significant effects related to energy demand, energy resources, transportation energy use, or compliance with energy standards.
- **Geology, Soils, and Paleontological Resources:** The EIR will evaluate whether the project could result in the exposure of people, structures, and/or property to seismic ground shaking, impacts related to soils constraints, or impacts to unique paleontological (fossil) resources.
- **Greenhouse Gas Emissions:** Net new greenhouse gas (GHG) emissions associated with the project will contribute incrementally to climate change. Project GHG emissions will be evaluated pursuant to current BAAQMD methodologies that quantify construction and operational GHG emissions. The EIR will evaluate the types of energy that could be consumed during construction and operation of the proposed project. Mitigation measures will be identified, if needed.
- **Hazards and Hazardous Materials:** The EIR will describe the potential for the proposed construction to result in hazardous material impacts based on the past uses of the site, and for the redeveloped project to expose people to hazards. The project site is on the Cortese list as a result of multiple leaking underground storage tanks from a former Chevron service station. The hazardous materials case for the project site was closed in 2014, assuming continuation of the existing land uses and no new excavation or earthmoving activities. The project applicant and its construction contractor will be required by the Sonoma County Department of Health Services to implement the requirements of a Soil and Groundwater Management Plan that is designed to protect human health and the environment.
- **Hydrology and Water Quality:** Stormwater runoff from the site would be collected onsite in bioretention swales, then conveyed to underground stormwater pipes that would connect to the City's drainage network, using the same point of connection as the

existing stormwater drainage infrastructure within the project site. The EIR will examine the impacts from redeveloping the site with the proposed project on hydrology and water quality during construction and operational phases of the proposed project.

- **Land Use and Planning:** The EIR will describe the existing land uses within and/or adjacent to the proposed project site and evaluate consistency of the project with relevant policies and plans enacted to reduce adverse physical environmental effects.
- **Noise and Vibration:** The EIR will describe the anticipated noise level exposure and vibration during construction and operation of the proposed project, with a focus on noise- and vibration-sensitive uses.
- **Public Services:** The EIR will evaluate the potential for adverse physical environmental effects that could result from physical improvements needed to accommodate increased demand for police, fire, or school services attributable to the project.
- **Transportation:** The EIR will summarize an analysis of vehicular travel demand (vehicle miles traveled or "VMT") and evaluate hazards due to a design feature or incompatible use; inadequate emergency access; and conflicts with adopted plans, policies, or programs regarding public transit, bicycle, or pedestrian facilities that could create a potentially significant adverse environmental effect.
- **Utilities and Service Systems:** The EIR will evaluate physical environmental impacts related to the expansion and extension of utility systems, such as those that are required for water supply, stormwater drainage, wastewater treatment, and solid waste disposal.

As required by the CEQA Guidelines Section 15126.6(a), the EIR will evaluate a "range of reasonable alternatives to the project" that would attain most of the basic objectives of the project but would avoid or substantially lessen potentially significant impacts.



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



August 27, 2021

Ms. Kristina Tierney
City of Sonoma Planning Department
1 Sonoma Plaza
Sonoma, CA 95476
ktierney@sonomacity.org

Subject: Hotel Project Sonoma, Notice of Preparation of a Recirculated Environmental Impact Report, SCH No. 2015062041, City of Sonoma, Sonoma County

Dear Ms. Tierney:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) of a Recirculated Environmental Impact Report (EIR) provided for the Hotel Project Sonoma (Project).

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact fish, plant and wildlife resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386). CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as a California Endangered Species Act (CESA) or Native Plant Protection Act Permit, Lake and Streambed Alteration (LSA) Agreement, and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources. Pursuant to our jurisdiction, CDFW has the following comments and recommendations regarding the Project.

PROJECT DESCRIPTION AND LOCATION

The Project includes the development of a 62-guestroom hotel, 80-seat restaurant and bar, a spa with six treatment rooms, raised swimming pool veranda, 130 on-site parking spaces (consisting of a 133-stall basement parking garage, 9 surface parking spaces, and 8 covered residential parking spaces), an 8-unit residential condominium building, and the designation of 7 existing on-site dwelling units as affordable housing. The Project site encompasses approximately 1.24 acres of land in downtown Sonoma. The Project site address is 153 West Napa Street, Sonoma and adjacent addresses. It is located approximately one-half block southwest of the historic Sonoma Plaza and is bounded by State Route 12 (West Napa Street) to the north, First Street West to the east, the Best Western Sonoma Valley Inn and Krug Event Center to the south, and the Sonoma Grille Restaurant to the west, approximate GPS coordinates 38.291950, - 122.460214.

Ms. Kristina Tierney
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The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) require that the Recirculated EIR incorporate a full project description, including reasonably foreseeable future phases of the Project, and that contains sufficient information to evaluate and review the Project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following Project components in the Project description:

- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes.
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment and crew sizes.

ENVIRONMENTAL SETTING

The EIR should provide sufficient information regarding the environmental setting ("baseline") to understand the Project's, and its alternative's (if applicable), potentially significant impacts on the environment (CEQA Guidelines, §§ 15125 & 15360).

CDFW recommends that the EIR provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The EIR should describe aquatic habitats, such as wetlands and/or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site. Fully protected, threatened or endangered, and other special-status species that are known to occur, or have the potential to occur in or near the Project site include, but are not limited to:

- Swainson's hawk (*Buteo swainsoni*), State Threatened
- Bank swallow (*Riparia riparia*), State Threatened
- Pallid bat (*Antrozous pallidus*), California Species of Special Concern (SSC)
- San Pablo song sparrow (*Melospiza melodia samuelis*), SSC
- Western bumble bee (*Bombus occidentalis*), California Terrestrial and Vernal Pool Invertebrate of Conservation Priority (ICP)¹

¹ The list of California Terrestrial and Vernal Pool Invertebrates of Conservation Priority was collated during CDFW's Scientific Collecting Permit rulemaking process: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline>

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Habitat descriptions and species profiles should include information from multiple sources: aerial imagery, historical and recent survey data, field reconnaissance, scientific literature and reports, and findings from “positive occurrence” databases such as California Natural Diversity Database. Based on the data and information from the habitat assessment, the CEQA document should adequately assess which special-status species are likely to occur on or near the Project site and be impacted.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>), must be conducted during the blooming period for species potentially impacted by the Project within the Project area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrology, and require the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants, and survey report requirements, available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

IMPACT ANALYSIS AND MITIGATION MEASURES

The Recirculated EIR should discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project (CEQA Guidelines, § 15126.2). This includes evaluating and describing impacts such as:

- Encroachments into riparian habitats, wetlands or other sensitive areas;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, vegetation overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

The CEQA document should also identify reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project’s contribution to the impact (CEQA Guidelines, §15355). Although a project’s impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact – e.g., reduction of

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available habitat for a special-status species – should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

Based on the comprehensive analysis of the direct, indirect, and cumulative impacts of the Project, the CEQA Guidelines direct the lead agency to consider and describe all feasible mitigation measures to avoid potentially significant impacts in the EIR, and/or mitigate significant impacts of the Project on the environment (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370). This includes a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, the U.S. Fish and Wildlife Service, and the National Marine Fisheries Service. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Permit must be obtained if the Project has the potential to result in “take” of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, and 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency’s FOC does not eliminate the Project proponent’s obligation to comply with CESA.

Lake and Streambed Alteration Agreement

CDFW will require an LSA Agreement, pursuant to Fish and Game Code sections 1600 et. seq. for Project-related activities within any 1600-jurisdictional waters within the proposed Project area. Notification is required for any activity that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA

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document for the Project. CDFW may not execute the final LSAA until it has complied with CEQA as a Responsible Agency.

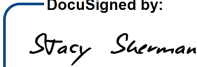
FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

If you have any questions, please contact James Hansen, Environmental Scientist, at James.Hansen@Wildlife.ca.gov, or Melanie Day, Senior Environmental Scientist (Supervisory), at Melanie.Day@wildlife.ca.gov.

Sincerely,

DocuSigned by:



692D021081CA4F7...
Stacy Sherman

Acting Regional Manager
Bay Delta Region

cc: State Clearinghouse #2015062041

August 26, 2021

Here are additional comments on the scoping for an EIR for the Hotel Project Sonoma on W. Napa Street.

Any hotel in Sonoma County, especially one with a spa, will be a destination for tourists and draw additional tourists to Sonoma County. The applicant and the Planning Commission both admitted as such, since both touted the additional transient occupancy tax (TOT) the hotel would generate to the City of Sonoma. If the hotel did not draw additional tourists, instead drawing away tourists from other local hotels, then TOT would not increase and may actually decrease because competition for hotel guests would reduce nightly room rates.

The tourists will come both domestically and internationally. Air travel will be part of many of the tourists means of transportation. The greenhouse gases generated by the entire trip must be included in calculation of GHGs in the EIR.

For details on how GHGs for the entire trip of visitors to Sonoma can be calculated, see the excerpts below from a letter by Tom Conlon, Transition Sonoma Valley, May 1, 2019, to City of Healdsburg. Used with permission.

Regards,
David Eichar

More Complete Analysis and Disclosure of the Actual GHG Impacts

Transition Sonoma Valley is a responsive network of local citizens, groups and businesses raising awareness and taking action to increase the sustainability of Sonoma Valley and the County-wide economy and ecosystem on which we depend. We are an all-volunteer non-profit 501(c)(3) organization, and operate independently under the fiscal umbrella of the Sonoma Ecology Center. Over the past few years as the many environmental, social, and economic impacts of climate change have become undeniable -- and locally devastating -- we have taken an active role in helping our community leaders to rise and deal with this existential threat.

Trips by airplane and other modes of out-of-boundary travel must NOT be ignored. This is because Sonoma County has become such a world-renown tourist destination that common sense requires that emissions resulting from tourists traveling between Sonoma County and their point of origin must be included in all Environmental Impact Reports issued here.

Indeed, we believe this principle has been well established locally in the ruling in California River Watch v. County of Sonoma (SCV-259242), which found that the Respondent in that case "had a feasible ability to include the additional GHG data" (p.16) related to air-travel emissions.

In addition, the recently updated [Technical Advisory](#) on Evaluating Transportation Impacts in CEQA (2017) makes a clear distinction between "Trip-based" and "Tour-based" assessments of Vehicle Miles Travelled (VMT). "A tour-based assessment counts the entire home-back-to-home

tour that includes the project... a tour-based assessment of VMT is a more complete characterization of a project’s effect on VMT. In many cases, a project affects travel behavior beyond the first destination (p.25).”

Now while we believe the burden of impact assessment remains entirely with the applicant, for the benefit of your City Council we offer the following methodological overview of the kind of “tour-based” GHG calculations we believe the EIR should have provided, at a minimum.

(A) All future trips beginning or ending at the hotel should be considered 100% “project induced” (trips between other third-party destinations would not be included unless the hotel had pre-arranged these trips). Therefore, sample itineraries of two hypothetical hotel guests are used to illustrate the calculation of future project-induced travel impacts that the (EIR) should take into account.

(NOTE: The following example is for a new hotel in the City of Healdsburg. A similar itinerary for a new hotel in Sonoma, with Sonoma Valley local trips, would provide similar results.)

| Begin | End | Mode | Miles (VMT) | Project-Induced % | Induced VMT |
|------------------|------------------|------|--------------|-------------------|--------------|
| Palo Alto (home) | New Hotel | Car | 107.0 | 100% | 107.0 |
| New Hotel | Simi Winery | Walk | 0 | 100% | 0 |
| Simi Winery | Salt Point | Car | 53.5 | 0% | 0 |
| Salt Point | New Hotel | Car | 53.5 | 100% | 53.5 |
| New Hotel | Vallete | Car | 5.9 | 100% | 5.9 |
| Vallete | New Hotel | Car | 5.9 | 100% | 5.9 |
| New Hotel | Palo Alto (home) | Car | 107.0 | 100% | 107.0 |
| Total | | | 332.8 | | 279.3 |

A similar itinerary for a visitor originating in Shanghai might look like this:

| Begin | End | Mode | Miles (VMT) | Project-Induced % | Induced VMT |
|--------------------|-----------------|----------|-----------------|-------------------|-----------------|
| Shanghai (home) | SFO | Airplane | 6,150 | 81.7% | 5,024.7 |
| SFO | New Hotel | Car | 86.8 | 100% | 86.8 |
| New Hotel | Simi Winery | Walk | 0 | 100% | 0 |
| Simi Winery | Salt Point | Car | 53.5 | 0% | 0 |
| Salt Point | New Hotel | Car | 53.5 | 100% | 53.5 |
| New Hotel | Vallete | Car | 5.9 | 100% | 5.9 |
| Vallete | New Hotel | Car | 5.9 | 100% | 5.9 |
| New Hotel | SFO | Car | 86.8 | 100% | 86.8 |
| SFO | Shanghai (home) | Airplane | 6,150 | 81.7% | 5,024.7 |
| Grand Total | | | 12,592.4 | | 10,288.3 |

In this example, a “Project-Induced Travel Activity” attribution factor of 81.7% has been applied. This is because the visitor originating in Shanghai traveled by ground to more destinations than just the new hotel during their visit, less than 100% of their air travel activity (to/from home) is attributed directly to the new hotel.

This factor is based on the percentage of “direct” project-induced ground miles over total ground miles for the complete itinerary. ($238.9/292.4 = 81.7\%$).

| Subtotals | Miles (VMT) |
|-----------------------------|--------------------|
| All Ground Miles | 292.4 |
| Project-Induced Ground Only | 238.9 |
| Air Only | 12,300 |
| Grand Total | 12,446.2 |

In this example, the Project-Induced Travel Activity factor is relatively high given the fact that their entire visit involved only one other trip between third-party destinations (i.e., not pre-arranged by the hotel itself). However, if hotel visitors are expected to visit more third-party destinations during a typical stay, a lower factor may be reasonable.

We believe the EIR could have easily provided at least some forecast of the origin and travel mode profiles of anticipated hotel guests. From such estimates it is relatively easy to calculate the resulting VMT impacts of the major new hospitality project.

According to the Sonoma County Economic Development Board’s (EDB) [2018 Annual Tourism Report](#):

- “Day trips by San Francisco residents remain an important source of growth, while vacationers in the rest of the U.S. are taking advantage of rising wages and cheap airfare to visit San Francisco and the broader North Bay (p.6).”
- “Despite less international tourism, the combination of increased domestic visitation and the surge in foreign visitors in prior years has underpinned modest capacity additions at new and existing hotels (p.6).”
- “International visitors made fewer trips to Sonoma County in 2017 but will flock to the area in greater numbers as the Canadian and European economies strengthen and as rising incomes in China and Southeast Asia enable more visitors to take trips to the U.S. International visitors are a small share of total Sonoma County tourists but tend to spend more and stay longer. Despite making up just a tenth of total visitors, international tourists account for a fifth of total direct tourism spending in Sonoma County. China is a small but fast-growing market for Sonoma County wines, and Chinese tourists will grow in importance as their per-capita income rises and they develop a greater taste for wine (p.8).”

- “Despite a substantial increase in direct air travel to Sonoma County in the past two years, most visitors, including domestic and international travelers, arrive by car (p.8).”

(T)hese local findings by EDB suggest that a 10% - 20% international visitor share seems reasonable. These data are well supported by statewide forecasts prepared by [Tourism Economics](#).

CALIFORNIA TRAVEL AND TOURISM FORECAST - STATE



Even generic statewide data show that it is unreasonable to assume that any less than at least 6% (17.6/273.7) of future hotel visitors will originate their travel from outside the US.

California travel forecast summary

| Annual Person Trips to California | | | | | | | | | | | |
|-----------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| (Millions) | | | | | | | | | | | |
| | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 |
| Total | 230.0 | 242.8 | 251.3 | 263.4 | 268.4 | 273.7 | 281.6 | 289.2 | 296.0 | 303.8 | 311.7 |
| Business | 46.6 | 47.1 | 47.5 | 48.9 | 49.4 | 49.8 | 51.4 | 52.8 | 53.5 | 54.6 | 55.5 |
| Leisure | 183.4 | 195.7 | 203.8 | 214.5 | 219.1 | 223.9 | 230.2 | 236.4 | 242.5 | 249.3 | 256.2 |
| Domestic | | | | | | | | | | | |
| Total | 215.1 | 227.2 | 234.8 | 246.3 | 251.1 | 256.1 | 263.4 | 270.3 | 276.3 | 283.3 | 290.2 |
| Business | 42.6 | 42.9 | 43.0 | 44.3 | 44.7 | 45.2 | 46.6 | 47.9 | 48.3 | 49.2 | 49.9 |
| Leisure | 172.5 | 184.2 | 191.8 | 202.1 | 206.4 | 210.9 | 216.8 | 222.4 | 227.9 | 234.1 | 240.4 |
| Day | 113.3 | 120.1 | 124.4 | 131.2 | 133.3 | 136.9 | 141.0 | 145.0 | 148.9 | 153.5 | 158.0 |
| Overnight | 101.8 | 107.1 | 110.5 | 115.2 | 117.8 | 119.2 | 122.3 | 125.3 | 127.4 | 129.8 | 132.3 |
| International | | | | | | | | | | | |
| Total | 15.0 | 15.7 | 16.5 | 17.1 | 17.3 | 17.6 | 18.2 | 18.9 | 19.7 | 20.6 | 21.4 |
| Overseas | 6.2 | 6.6 | 7.3 | 7.7 | 7.8 | 8.2 | 8.6 | 8.9 | 9.3 | 9.7 | 10.1 |
| Mexico | 7.2 | 7.5 | 7.6 | 7.8 | 7.9 | 7.7 | 8.0 | 8.3 | 8.6 | 9.0 | 9.4 |
| Canada | 1.5 | 1.6 | 1.6 | 1.6 | 1.5 | 1.7 | 1.7 | 1.8 | 1.8 | 1.9 | 1.9 |
| Business | 4.0 | 4.2 | 4.4 | 4.6 | 4.7 | 4.6 | 4.8 | 5.0 | 5.2 | 5.4 | 5.6 |
| Leisure | 11.0 | 11.4 | 12.0 | 12.4 | 12.7 | 13.0 | 13.5 | 14.0 | 14.5 | 15.2 | 15.8 |

Source: Tourism Economics; DKSA, TNS Global (domestic); CIC Research, OTTI (international); Dean Ruryan, CIC Research (expenditures)

Many more US residents visit California and many also use airplanes. [Tourism Economics](#) estimates that such “domestic” US travelers fly about 13% of the time, while 87% drive from out-of-state ($33.4/222.7 = 13\%$). The EIR provides no estimates of these air-travel related VMT, or the associated GHG impacts.

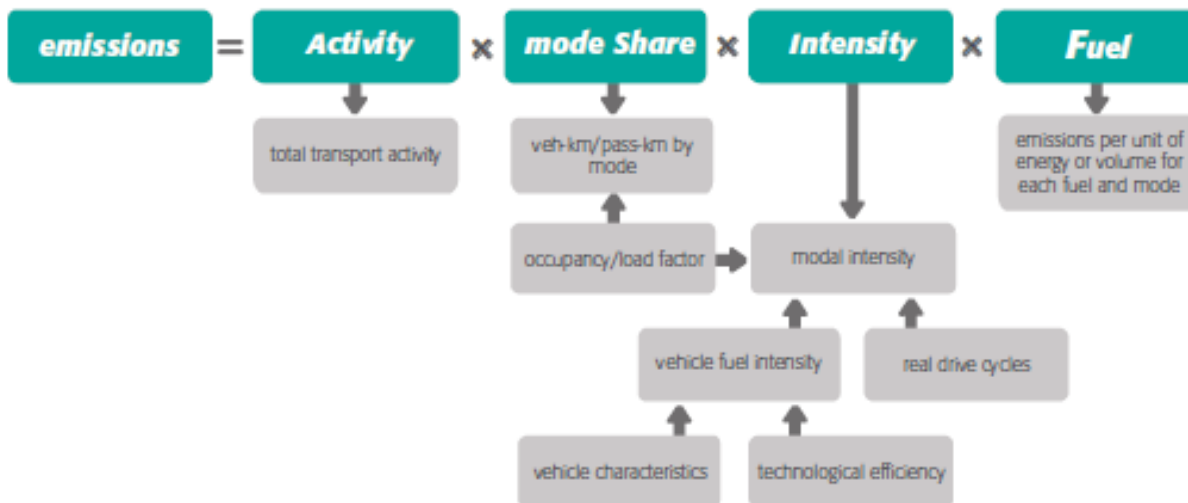
| Domestic Person Trips to California | | | | | | | | | | | |
|-------------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| (Millions) | | | | | | | | | | | |
| | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 |
| Drive | 184.2 | 199.0 | 205.7 | 216.1 | 218.9 | 222.7 | 228.5 | 233.9 | 238.7 | 244.6 | 250.4 |
| Fly | 30.8 | 28.2 | 29.1 | 30.3 | 32.2 | 33.4 | 34.9 | 36.4 | 37.5 | 38.7 | 39.9 |
| Gateway | 107.5 | 110.3 | 113.6 | 116.1 | 117.8 | 118.8 | 121.7 | 124.6 | 128.4 | 132.1 | 135.8 |
| Rural/Other | 125.4 | 130.1 | 136.5 | 142.8 | 146.5 | 150.1 | 153.8 | 156.8 | 159.6 | 162.0 | 164.4 |
| Paid Accommodation | 69.4 | 72.4 | 74.6 | 77.1 | 78.8 | 79.9 | 82.2 | 84.9 | 86.5 | 88.2 | 90.0 |
| Non-paid | 32.4 | 34.7 | 35.9 | 38.0 | 39.0 | 39.4 | 40.1 | 40.4 | 40.9 | 41.5 | 42.3 |

Source: Tourism Economics, TNS Global, STR

Of course many California residents also use airplanes to fly to destinations within the state. Tourism Economics estimates that for such [California-resident travelers](#) the “primary modes of transportation used on trips were personal auto (80.2 percent), airplane (6.9 percent) and rental car (6.4 percent).”

The final step in calculating the emissions impact of the travel resulting from a hotel would be to identify the CO₂e intensity of these travel activities. A straightforward approach such as the “ASIF” framework is recommended, where “activity” includes reasonable estimates of both ground and air Vehicle Miles Traveled.

Figure 7.1 ASIF framework²⁹



In conclusion, we note that the Bay Area Air Quality Management District’s May 2017 [CEQA Guidelines](#) (Cf. Appendix E. Glossary) is unambiguous in that its definition of a “Mobile Source” of pollution includes “Any motor vehicle that produces air pollution, e.g., cars, trucks, motorcycles (on-road mobile sources) or **airplanes**, trains and construction equipment (off-road mobile sources) [emphasis added].”

Scoping Meeting Notes

August 12, 2021

Topics not evaluated in the EIR:

- **Agricultural and Forestry Resources:**
 -
- **Mineral Resources:**
 -
- **Population and Housing:**
 - 50% housing component
 - Additional housing needed nexus study how many at what income level
 - Nexus with new development
 - Housing a Bank of Marin be an alternate
 - Alternate project—small boutique hotel with a residential component
- **Recreation:**
 -
- **Wildfire:**
 - Fire evacuation

Topics subject to analysis in the EIR:

- **Aesthetics:**
 - include
- **Air Quality:**
 - include
- **Biological Resources:**
 -
- **Cultural/Historic and Tribal Cultural Resources:**
 - Lynch building should be included in the diagram and footprint.
- **Energy:**
 -
- **Geology, Soils, and Paleontological Resources:**
 -
- **Greenhouse Gas Emissions:**
 - VMT within convivence scope
 - Need comprehensive study
 - Access international and cross country impact
- **Hazards and Hazardous Materials:**
 -
- **Hydrology and Water Quality:**

- Include
- Contact SCWA on restrictions on water use
- **Land Use and Planning:**
 - Does it meet DC standards: parking and loading zone
 - Complete project description, addresses and map.
 - Neighboring residence and businesses contacted
 - include
- **Noise and Vibration:**
 -
- **Public Services:**
 - Impact on public safety
- **Transportation:**
 - GHG and green housing gasses
 - Spa is a destination
 - Update traffic study at peak traffic time and auxiliary streets, and construction
 - Bicycle lanes
 - Include parking in traffic studies for all buildings.
 - Bank of Marin site should be included.
 - Traffic analysis be reexamined on West Napa Street and review a left turn lane.
 - Loading space issue. Does not appear to be a loading on First Street West.
 - How employees travel to hotel.
 - How visitors travel when they are here.
 - Traffic
 - Parking
- **Utilities and Service Systems:**
 -

Kristina Tierney notes that applicant is directly contracting with W-Trans for transportation

Planning Commissioner O'Neil: is historic analysis required?

Public

CEQA is rigorous, lots to study, would encourage City to limit the scope of analysis

David Eichar: would like to see 50% housing alternative, impact on pedestrian safety of staff parking across the street, walking mid block and truck loading on First Street West because of nearby apartment; want to study housing effect – how many additional

housing units needed based on nexus study; does the underground parking meeting Code requirements length and width; believe that must study Riverwalk case on total VMT and GHG from entire trips including air flight; adding hotel rooms means bringing in new visitors, not rearranging from one hotel to another; also, the spa is a destination and can be a different attractor.

Johanna Patri: want accurate project description, all addresses, all sites, all sites map; no vagueness or surprises coming up at the end, want neighboring businesses and residents due to impacts during construction and the traffic; want traffic to be up to date and in consideration of peak times; and looking at all the auxiliary streets – Andrix, West MacArthur; loading on 1st street west will cause people to use 2nd street west and construction will be immense; all the streets will be used. Want adequate bicycle lanes that do not conflict with traffic; want to know why converting existing houses to permanent low income housing and do not see nexus to new construction.

Vince Conforti: Lynch Building – it is unclear as to whether included in the project or in the footprint of the project, not included on maps, but discussion of converting 7 units on the 3rd floor as a part of the project, so include on mapping; because the project includes parking for the Index Tribune building and so this needs to be a part of the traffic and parking studies because using the same parking lot; also, the site across the street, Bank of Marin, proposed as staff parking, so should be included in the project and mapping and studied relative to pedestrian issues; should re-examine traffic conditions; consider a left turn lane on Napa Street; no loading parking space there apparently (Code conflict); discussion of loading on First Street West no way to get from there to building via dolly, etc.; alternative – housing at the Bank of Marin property across the street should be considered.

Tom Conlon: population and housing out, disagree. Agree to study historic resources, as well as water, sewer, fire evacuation up Highway 12 in the event that one of the other ways out of the Valley is blocked; primary concern is GHGs because habit in EIRs is to only do VMT analysis within convenient scope using CalEEMod and other basic tools that were built for traffic analysis. Need more comprehensive assessment of VMT and GHGs. Specifics of destination hotel for this site are such that are attracting tourists from all over the world, about 26% is international, so unless would not be serving international traffic, it is mandatory that the EIR assess the cross country and international aspects of VMT; mitigation suggestions: if employees not on-site, need to understand how they would travel to work and same for visitors to use non vehicles to get to hotel and then once there, not to use cars for trips in the area.

Bill Willers and Carol Marcus: Several areas of concern outlined in a letter, suggest that land use, aesthetics, traffic, and air quality be included. Land use due to non compliance with GP and zoning and traffic due to scale of the project. Insufficient area of the project dedicated to housing. GP, zoning, and HE were approved on the premise that MU zones will produce housing. Out of scale with community from merging four lots into one. Inconsistent with development patterns in the historic district. Traffic and parking – others are in the written letter. The loading area is concerned because they live nearby. Secondary property to be used indicates does not meet parking. Believe project is too large for the site.

Commissioners

Larry Bartlett: list includes everything the public wants. Support looking at all topics the public mentioned. Particular interest in utilities including water use, note that Water Agency has cut off 130 entities that were drawing water from the Russian River, are in a desperate situation, so particularly interested in CEQA analysis of water and should contact Sonoma Water Agency regarding restrictions on water use. Support AECOM's list of environmental topics to be studied.

Steve Barbose: concerned about water, traffic, and lack of housing.

PC O'Neil: make sure EIR is as comprehensive as possible, extremely detailed as any EIR in Sonoma. AECOM's list of topics is correct. Make sure to look at 50% housing component to be sure that addressing all obstacles.

PC Bohar: next step Initial Study? Kristina: no.

PC Wellander: everything has been mentioned.

Public

David Eichar: alternatives – 50/50 residential, would like to see small 25-room boutique hotel with residential.