



Proposed Mitigated Negative Declaration

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March 6, 2023

State Clearinghouse Number:
Permit Sonoma File Number: PLP18-0012
Prepared by: Georgia McDaniel
Phone: 707-565-4919

Pursuant to Section 15071 of the State CEQA Guidelines, this proposed Mitigated Negative Declaration and the attached Initial Study, constitute the environmental review conducted by the County of Sonoma as lead agency for the proposed project described below:

Project Name: The Lodge on Russian River (formerly Guernewood Park Resort)

Project Applicant/Operator: Lok Guernewood Park Development Company, LLC

Project Location/Address: 17155 Highway 116, Guerneville

APN: 072-130-005, -007 and -009

General Plan Land Use Designation: Recreation and Visitor Serving Commercial

Zoning Designation: K (Recreation and Visitor-Serving Commercial) with Combining Zones for LG/RRC and LG/116 (Local Area Development Guidelines for Russian River Corridor and Highway 116 Scenic Corridor), F1 (Floodway), F2 (Floodplain), SR (Scenic Resources), RC 25/50 (Riparian Corridor with 50-foot and 25-foot setbacks), and VOH (Valley Oak Habitat)

Decision Making Body: Board of Zoning Adjustments (BZA).
Action by BZA is appealable within 10 calendar days.

Appeal Body: Sonoma County Board of Supervisors

Project Description: **See Item III, below**

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact or “Less than Significant with Mitigation” as indicated in the attached Initial Study and in the summary table below.

Table 1. Initial Study

Topic Area	Abbreviation	No Impact	Less than Significant Impact	Potentially Significant Unless Mitigated	Potentially Significant or Significant Impact
Aesthetics	VIS			X	
Agricultural & Forest Resources	AG			X	
Air Quality	AIR		X		
Biological Resources	BIO			X	
Cultural Resources	CUL			X	
Energy	ENE	X			
Geology and Soils	GEO			X	
Greenhouse Gas Emission	GHG		X		
Hazards and Hazardous Materials	HAZ	X			
Hydrology and Water Quality	HYDRO			X	
Land Use and Planning	LU		X		
Mineral Resources	MIN	X			
Noise	NOISE			X	
Population and Housing	POP		X		
Public Services	PS		X		
Recreation	REC		X		
Transportation	TRAF			X	
Tribal Cultural Resources	TCR		X		
Utility and Service Systems	UTL		X		
Wildfire	WILD		X		
Mandatory Findings of Significance	MFS		X		

RESPONSIBLE AND TRUSTEE AGENCIES

The following lists other public agencies whose approval is required for the project, or who have jurisdiction over resources potentially affected by the project.

Agency	Activity	Authorization
Northern Sonoma County Air Pollution Control District (NSCAPCD)	Stationary air emissions	Emissions thresholds from BAAQMD Rules and Regulations (Regulation 2, Rule 1– General Requirements; Regulation 2, Rule 2– New Source Review; Regulation 9– Rule 8– NOx and CO from Stationary Internal Combustion Engines; and other BAAQMD administered Statewide Air Toxics Control Measures (ATCM) for

		stationary diesel engines
Californian Department of Transportation (Caltrans), District 4	Manages the state's highway system, which includes the California Freeway and Expressway System, and is involved with public transportation systems throughout the state	California Department of Transportation authorities; California State Transportation Agency
Sonoma County Department of Transportation and Public Works (DTPW)	Traffic and road improvements	Sonoma County Municipal Code, Section 15
Army Corps of Engineers (ACOE)	Permits for activities that involve any discharge of dredged or fill material into "waters of the United States," including wetlands	Section 404 of the Clean Water Act
California Department of Fish and Wildlife (CDFW)	Permits for projects that could result in the take of a species state listed as threatened or endangered; Lake and Streambed Alteration Permit for all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that supports wildlife resources.	California Endangered Species Act (CESA), Section 2081 of the Fish and Game Code, Section 1600 of the California Fish and Game Code
North Coast Regional Water Quality Control Board (NCRWQCB)	Water quality control basin plans; waste discharge requirements; water quality certification or waiver under Section 401 of the Clean Water Act	Porter-Cologne Water Quality Control Act
Department of Forestry and Fire Protection (CAL FIRE – Sonoma Lake Napa Unit)	Timber operations; permits to cut timber.	Public Resources Code PRC § 4581
California State Lands Commission	Public's access rights to natural navigable waterways and the coastline; preservation of irreplaceable natural habitats for wildlife, vegetation, and biological communities	State Lands Act of 1938
Sonoma County Regional Parks	New public access trail to Russian River beach	Public access and maintenance agreement.

ENVIRONMENTAL FINDING:

Based on the evaluation in the attached Initial Study, I find that the project described above will not have a significant adverse impact on the environment, provided that the mitigation measures identified in the Initial Study are included as conditions of approval for the project and a Mitigated Negative Declaration is proposed. The applicant has agreed in writing to incorporate identified mitigation measure into the project plans.



February 3, 2023

Prepared by: Georgia McDaniel

Date:



Initial Study

I. INTRODUCTION:

Sonoma County Permit and Resource Management Department (Permit Sonoma) has prepared an Initial Study for an application to obtain a Use Permit to construct and operate a new 108-room resort, allow for 2,740 square feet of impermeable surface within the Riparian Corridor, and improved public river access parking lot and trail at the former Guernewood Hotel Resort location. The project includes two main hotel buildings with 72 rooms and 8 suites, lobby and hotel services, bar, small restaurant and spa, and 18 rooms and 10 suites located in four detached Treehouse buildings. , dedicated public parking (25 spaces), public restroom facility, and an ADA-compliant public trail to the Russian River on a 9.61-acre parcel located at 17155 Highway 116, Guerneville. The project also requires relocating an existing public access easement across the center of the parcel to an existing stair and trail to the side of the parcel parallel to Hulbert Creek. The applicant proposes to do this by constructing a new parking area and engineered trail system that would be located within the Riparian Corridor of Hulbert Creek and below the ordinary high-water mark of the Russian River. Encroachments into the Riparian Corridor are proposed to be addressed and mitigated on-site in a Streamside Conservation Plan. A Certificate of Modification for the relocation of the public access easement after project approval is proposed.

This report is the Initial Study prepared pursuant to the California Environmental Quality Act (CEQA). The report was prepared by Georgia McDaniel, Project Review Planner III with the Sonoma County Permit and Resource Management Department, Project Review Division. Information on the project was provided by Lok Guernewood Park Development Company, LLC. Technical studies were provided by qualified consultants including BKF, Coastland Engineers, Illingworth & Rodkin, FirstCarbon Solutions, Kapolchok & Associates, Kjeldsen Biological Consulting, MacNair & Associates, PJC & Associates, Ted Winfield & Associates and Resource-Design, and W-Trans to support the conclusions in this Initial Study. Technical studies, other reports, documents, and maps referred to in this document are available for review through the Project Planner, or the Permit and Resource Management Department (Permit Sonoma) Records Section.

Please contact Georgia McDaniel, Planner III, at (707) 565-4919 or Georgia.McDaniel@sonoma-county.org for more information.

II. ENVIRONMENTAL SETTING

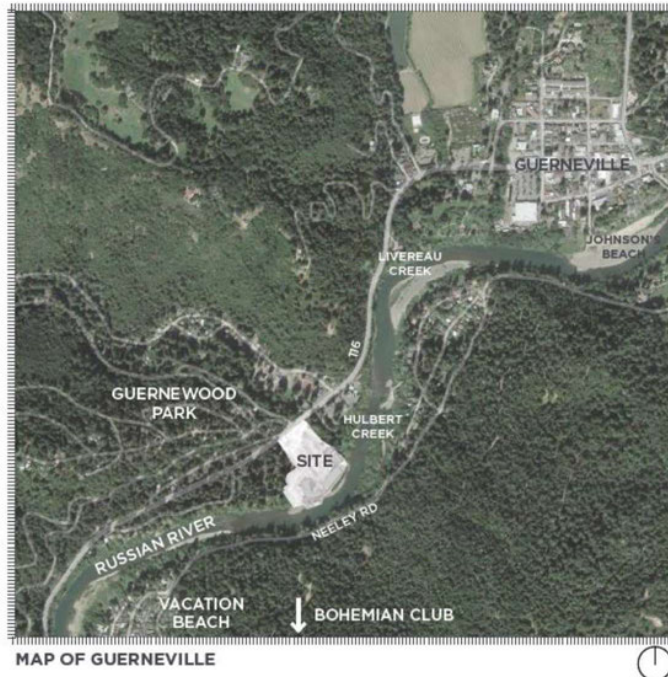
The project is located at 17155 Highway 116, Guerneville (Figures 1 and 2). The site comprises a 9.61-acre parcel (comprised of three Assessor's Parcel Numbers identified as 072-130-005, -007 and -009) overlooking the Russian River. It is located southeast and adjacent to Highway 116, west of Old Monte Rio Road and across from Guernewood Lane. The property is presently undeveloped, although remnants of the former resort use (concrete slabs, pavement, steps to the river, etc.) remain scattered around the flat terrace areas of the parcels.

All three parcels are zoned K (Recreation and Visitor Serving Commercial) with Combining Zones for LG/RRC and LG/116 (Local Area Development Guidelines for Russian River Corridor and Highway 116 Scenic Corridor), F1 (Floodway), F2 (Floodplain), SR (Scenic Resources), RC 25/50 (Riparian Corridor with 50-foot and 25-foot setbacks), and VOH (Valley Oak Habitat).

Figure 1: Vicinity Map



Figure 2: Project Site and Surrounding Area



The project proposes a resort with infrastructure on a site that contained a hotel complex from 1920 until the early 1970's, when it was destroyed by fire (Figure 3). The main building, parking and driveways of the project footprint occupy the center of the parcel mostly avoiding the 50-foot riparian corridor setback that starts at the top of bank of Hulbert Creek and the Russian River. However, the relocated public access and engineered trail system are proposed to be constructed within the 50 riparian corridor setback

of Hulbert Creek and below the ordinary high-water mark (within the riparian forest areas) of the Russian River. The project parcels consist of four main community types: 1) active channel and floodway of the Russian River, 2) California Bay-Oregon Ash Riparian Forest (primarily below the ordinary high water mark of Hulbert Creek and the Russian River), 3) Redwood Groves (primarily above the ordinary high water mark) and 4) former developed areas and open fields on the flat terrace where most of the project development is located (a mix of non-native grasses and other ruderal vegetation in the herbaceous layer). Most of the project development is proposed to be located on the flat terrace of community type Nos. 3 and 4, above (Redwood Groves and former developed areas and fields) with two exceptions. First the project proposes to relocate the existing public access easement from its current location which crosses areas of Nos. 3 and 4 (Redwood Groves and former developed areas) to an existing set of steps which lead users to the Russian River channel. The project proposes to build a public access trail connecting the connecting Highway 116 to a new Public Parking Lot and a Russian River public beach. The upper portion of the public access trail (from Highway 116 to the top of bank of the Russian River) will be ADA (Americans with Disabilities Act) accessible. The lower portion of the public access trail (from top of bank to the public river beach) will be constructed in accordance with the California State Park Accessibility Guidelines (2015 or later) and/or the Federal Access Board Outdoor Developed Areas (May 2014 or later) in order to provide the most access while protecting the sensitive environment. Second, the project proposes to construct a new stormwater outfall which will discharge stormwater runoff from the project site during flood events which exceed the design capacity of required engineered low impact development (LID) features.

Figure 3: Guernewood Hotel Resort, circa 1920



Existing Uses:

The property is presently undeveloped, excepting the presence of remnant slabs and asphalt pavement, remains of an old chimney, concrete stairway and landing from a former resort; a partially abandoned homeless encampment and, significant debris. There is public use of the existing public access easement to the river beach.

Surrounding Land and Land Uses:

The property is situated in a densely-treed area surrounded by residentially developed property to the south, east and west and residential and commercially developed properties to the north (Figure 4). The commercial center of Guerneville lies approximately .76 - 1 mile to the east. Immediately adjacent to the site is Highway 116 to the north, Dubrava Village (residential development with 55 homes) to the west, Hulbert Creek to the east and the Russian River to the south. The surrounding residential parcel sizes are typical of those generally found in a resort community, namely, 5,000 sq. ft. or less.

Figure 4: Project Site and Surrounding Areas



Cultural Resources:

A Cultural Resources Evaluation of the proposed project was conducted by Archaeological Resource Service. A search of the Sacred Lands File did not indicate the presence of a Native American cultural resource in the immediate project area (Karen for Sanchez 2008). No prehistoric artifacts, features or sites were observed. The remains of the former resort do not retain integrity to convey the former use of the property. They have lost integrity of design, setting, materials, workmanship, feeling, and association. It only retains integrity of location. The resort was associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (California Register Criterion 1), as it was part of the summer resort culture along the Russian River in the 1920s through 1940s; it does not meet any of the other California Register criteria as it is not associated with the lives of persons important to local, California or national history (California Register Criterion 2); it does not embody the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values (California Register

Criterion 3); and it has not yielded, and does not have the potential to yield, information important to the prehistory or history of the local area, California or the nation (California Register Criterion 4). No further archaeological investigation is necessary for this project at this time.

Topography and Soils:

Per the Geotechnical Investigation (PJC & Associates, April 3, 2008), the site is generally level and located near an elevation of 47 feet above mean sea level according to USGS Duncans Mills, California Quadrangle. However, the northeast and southeast perimeters of the site are bounded by irregular and sloping banks of the Russian River and Hulbert Creek. The banks of the Russian River are gently to steeply sloping with gradients that vary from approximately 4 to 69 percent. The banks along Hulbert Creek are moderate to steeply sloping with gradients that vary from approximately 30 to 80 percent. Relief across the site is about ±39 vertical feet. The resort buildings and associated improvements will occupy ±3.74-acre area of the ±9.61-acre project site. The 9.61-acre site consists of three legal lots that will be merged as a condition of approval. This development area is generally level and has a topographic elevation, which ranges from 56 to 58 feet above mean sea level.

The soils on the site are Wright loam (W), 0 to 5 percent slopes; primarily Yolo loam (YnA), 0 to 2 percent slopes and Yolo sandy loam, overwash, 0 to 5 percent slopes; plus Hugo-Atwell complex (H1G), 50 to 75% slopes. Surface soils on the site have been altered by the development of the former resort and logging. The surface for the majority of the site is blanketed with artificial fill consisting of asphalt and/or gravel, or sandy silts that extended to depths of one to five feet below the existing ground surface. The fill is dry, loosely to moderately compacted, and contains minor to significant concentrations of man-made debris.

Below the fill, there are deposits consisting predominantly of silty sands, interbedded with discontinuous strata of gravelly sands, sandy silts and sandy clays that extended to the maximum depths explored. The silty sands vary from dry to saturated, loose to dense, and fine-grained. The gravelly sands are saturated, fine to coarse grained, and dense. The fine-grained sandy silts and sandy clays are dry to very moist, stiff to very stiff, and low to medium plastic.

Drainage and Storm Water:

The site is located within the Russian River Drainage Basin. Site drainage extends south and east and to the Russian River or Hulbert Creek. Site drainage consists of sheet flow and surface infiltration. Drainage extends south and east and to the Russian River or Hulbert Creek.

Vegetation, Habitats, and Biological Resources:

According to the Biological Assessment prepared for the project (Kjeldsen Biological Consulting, July 16, 2008), the property consists of ruderal habitat, residual redwood habitat (second growth groves) and riparian corridor along the Russian River and Hulbert Creek (Figure 5). Second growth redwood groves (stump sprouts that are around decades old stumps that represent a previous timber harvest) dominate the project site. Much of the ruderal habitat is a result of previous use of the site and is present on old roads and parking lots in the center of the property. The site is in many areas overgrown with non-native and invasive English ivy and French broom. The project footprint does not contain habitat which would support special-status species. The Russian River to the south and Hulbert Creek on the east side of the property contain riparian corridors. The Russian River and Hulbert Creek with their associated riparian corridors are sensitive habitat by all standards. Ted Winfield accessed the California Natural Diversity Data Base (CNDDB) on August 28, 2017 for preparation of the Streamside Conservation Plan (Ted Winfield & Associates and Resource-Design December 11, 2017, updated February 17, 2020) and found there are no new species of special-status plants identified as occurring within five miles of the Project site.

The Russian River is critical habitat for the federally threatened Central California Coast Distinct Population Segment of the steelhead (*Oncorhynchus mykiss*), and is also habitat for the federally threatened and state endangered coho salmon (*Oncorhynchus kisutch*) and the federally threatened California coastal Chinook salmon ESU (*Oncorhynchus tshawytscha*) pursuant to the Streamside Conservation Plan (Ted Winfield & Associates and Resource-Design December 11, 2017, updated

February 17, 2020).

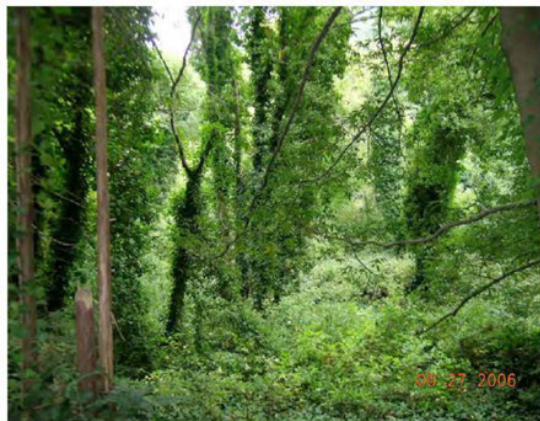
According to the Arborist Report prepared for the project (McNair July 2008, updated November 2017, updated October 2018, updated February 2020), mature clusters, or small groves of coast redwoods dominate the site. The redwood groves are typically multiple trunk clusters originating as sprouts from the below ground root collar or stump of the original tree. The trees appear to be second growth trees based upon the size and uniformity of the stumps. The clusters range in number from two to 18 trunks per cluster with the multiple trunk trees either having fused and/or existing as co-dominant trunks structures.

Other native tree species occurring on the site include bay laurel (*Umbellularia californica*), box elder (*Acer negundo*), Oregon ash (*Fraxinus oregana*), Pacific bigleaf maple (*Acer macrophyllum*), tan oak (*Lithocarpus densiflorus*), white alder (*Alnus rhombifolia*), and willow (*Salix* spp). The number of the above listed trees is limited within the proposed grading limits. Only limited removal of smaller diameter trees is likely to be required. The non-native tree species black locust (*Robinia pseudoacacia*) occurs in significant numbers on the southwest slope above the Russian River.

Figure 5: Photos of Existing Conditions (Kjeldsen Biological Consulting)



Existing entrance road (open area w/ ruderal habitat)



Riparian corridor dominated by non-native ivy



Redwood groves on the site



Foundations of the former resort

Noise:

The project site is located to the southeast of Highway 116, between Old Cazadero Road and Guerneville Lane. The existing site is vacant and consists of mostly forest. Multi-family residential land uses border the project site to the southwest, and a restaurant and other commercial uses border the site to the northeast. Opposite Highway 116 are single-family residences. The southeast boundary of the

project site is formed by the Russian River.

Per the Noise and Vibration Assessment prepared for the project (Illingworth and Rodkin, August 12, 2016), a noise monitoring survey was performed at the site. The monitoring survey included two long-term and two short-term noise measurements. The noise environment at the site results primarily from vehicular traffic along Highway 116. In addition, local traffic along the other nearby roadways contributes to the ambient noise environment.

Traffic and Parking:

Per the Final Traffic Impact Study prepared for the project (W-Trans, December 11, 2018), all three intersections along SR 116 included in the study area for traffic operations analysis are currently operating acceptably. These intersections are: SR 116 (Main Street)/River Road; SR 116 (Main Street)/Armstrong Woods Road; and SR 116/Guernewood Lane. Based on the existing volumes, all three study intersections are operating acceptably at LOS C or better overall during the weekday p.m. and weekend midday peak periods.

A center two-way left-turn lane currently existing along the entire project frontage is available for left turns into and out of the site. Left-turn storage on westbound SR 116 is adequate to serve project traffic without adversely affecting left turn storage at the nearby intersection at Old Monte Rio Road. Sight distance at the project driveway location for both entering and exiting drivers is adequate. While there are no existing bicycle lanes near the project, a wide shoulder on SR 116 in this area provides space for bicyclists to ride outside the stream of vehicular traffic.

Aside from an existing bus stop and existing crosswalk striped on SR 116 at Old Monte Rio Road, there are currently no pedestrian facilities near the project. Pedestrians walking in the area walk along the paved shoulder of SR 116. Transit facilities serving the project site are adequate and are expected to remain adequate.

Scenic Corridors and Landscapes:

The project site is within the Sonoma County's General Plan Scenic Corridor designation for State Route 116. The project received Design Review by the Russian River Corridor Design Review Committee in 2008, and the general direction to the applicant was to ensure appropriate building siting, minimizing development impact to the site, and ensuring adequate parking on the site. The project site is subject to the subsequently adopted 2010 Russian River Corridor Design Guidelines. The Guidelines were developed in order to preserve and enhance the built environment of the Russian River area and to promote new development that respects the context of its unique setting. The project is subject to final Design Review by the Design Review Committee, who will determine compliance of the project with the Guidelines.

The project received Preliminary Review by the Design Review Committee (DRC) on November 17, 2018. DRC supports the overall design concept provided that the requested plan revisions to reduce building massing and accommodate additional landscaping come back for further consideration. DRC supports building encroachment within riparian corridor with riverfront access improvements working to benefit the greater community as proposed. DRC requested minimizing use of exterior lighting that could result in off-site light spillage and considering conducting additional community outreach to clarify the scope of the current design proposal.

Water, Wastewater, and Waste Disposal:

The project proposes a connection to the Sweetwater Springs Water District for provision of water supplies. The required Will Serve Letter from the Water District has been submitted. The letter is conditioned on the applicant using construction building Types IA, IB, IIA and/or IIIA. If the type of construction is not Type IA, IB, IIA or IIIA, then the applicant will have to construct additional water storage at the applicant's expense. A study of the water system showed the Water District has capacity to serve the project. The Russian River Sanitation District service lines are within the Highway 116 right-of-way along the frontage of the parcel. The Sanitation District has confirmed capacity to serve the resort. Since the parcel is currently undeveloped, there is no waste disposal company serving the site.

III. PROPOSED PROJECT

Project History

Recreational/resort use has taken place on the project site since the 1920s. The former Guerneville Hotel Resort which overlooked the Russian River existed on the site until the early 1970's when it was destroyed by fire. The application for a Use Permit and Design Review (PLP08-0090) for the Guerneville Park Resort was originally submitted on July 17, 2008 and was not subject to any riparian corridor setbacks. Due to the state of the economy, activity on the application ceased. In 2014, the Board of Supervisors adopted a Riparian Corridor Ordinance which established a 50-foot riparian corridor setback along Hulbert Creek and the Russian River. When the project was re-activated in 2014/2015, the need for the building footprint to comply with the 50-foot riparian setback was raised. Permit Sonoma determined that encroachment into the Riparian Corridor would be possible if a Streamside Conservation Plan, as allowed by the Zoning Code, was prepared and submitted. The project was then assigned a new file number - PLP18-0012.

The proposed IS/MND for the project was circulated for public comment from August 27, 2021 – September 27, 2021. Staff presented the project to the Board of Zoning Adjustments (BZA) in a public hearing on February 24, 2022. The BZA continued the hearing to a date uncertain and requested the following design changes to the project: a maximum 35-foot building height for all resort buildings, additional landscaping, reduced building massing, increased visibility of public parking lot, and electric vehicle chargers in both the resort parking lot and public parking lot.

Revised Project

The project is a request for a Use Permit and Design Review, followed by a Certificate of Modification, to develop a 108-room resort on a 9.61-acre property located at 17155 Highway 116, Guerneville (APNs 072-130-005; -007; -009). See Figure 6 below.

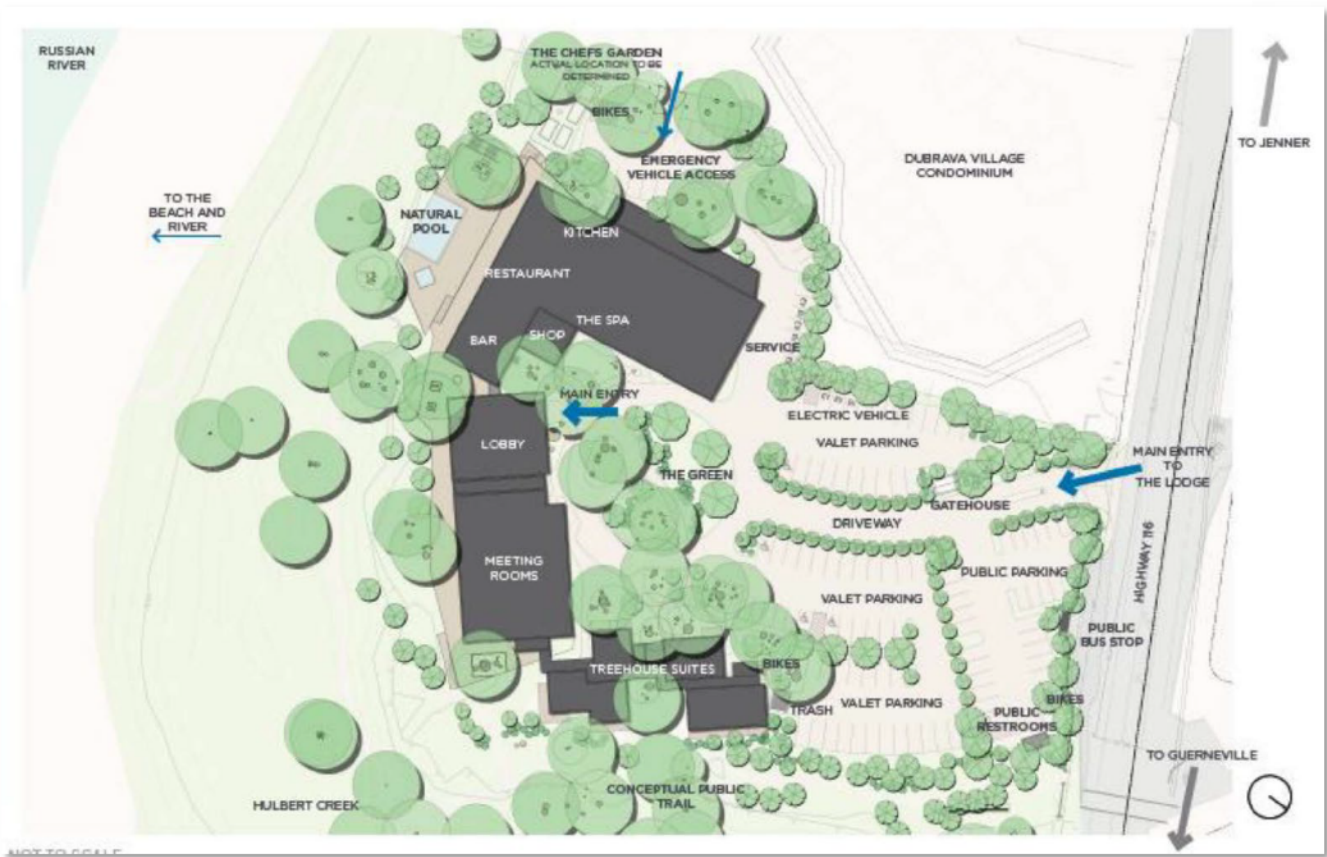
The resort facility consists of:

- a. Construction of a resort with a maximum building height of 35 feet and 108 guest rooms on approximately 3.74 acres of the 9.61-acre site, including:
 - Two main hotel buildings with a combined total of 72 guest rooms and 8 suites, lobby and hotel services, a public restaurant and bar, plus a guest spa and gym.
 - 18 guest rooms and 10 suites located in four detached Treehouse buildings northwest of the main buildings
 - Accessory buildings including a public restroom, a pool house and a gate house.
- b. A sound wall six to eight feet in height at the western property boundary.
A low stone frontage wall and landscaping between Highway 116 and the parking areas to increase visibility of the public parking lot from the highway.
- c. Public access improvements open from sunrise to sunset:
 - Construction of a public access trail connecting Highway 116 to a new Public Parking Lot and a Russian River public beach. The upper portion of the public access trail (from Highway 116 to the top of bank of the Russian River) will be ADA (Americans with Disabilities Act) accessible. The lower portion of the public access trail (from top of bank to the public river beach) will be constructed in accordance with the California State Park Accessibility Guidelines (2015 or later) and/or the Federal Access Board Outdoor Developed Areas (May 2014 or later) in order to provide the most access while protecting the sensitive environment;
 - A 25-space public parking lot and restroom facility developed on the north side of the site, open sunrise to sunset;
- d. New landscaping installed throughout the site to integrate the project with the existing visual setting and to enhance the quality of the existing riparian habitat;
- e. Construction of site improvements including driveways, parking lots, walkways, decks, patios, entry signage and landscaping plus public utilities and drainage infrastructure;
- f. Ingress and egress for vehicles via an entrance directly off of Highway 116;
- g. Parking lots providing 175 parking spaces overall, consisting of

- 25 public spaces reserved for public use while the public trail is open (sunrise to sunset); and
 - 150 parking spaces for use by resort and restaurant guests and employees (includes a zone for 22 stacked parking spaces);
- h. 35 bicycle parking spaces;
- i. Relocation of the existing bus stop at the front of the property;
- j. Implementation of the Streamside Conservation Plan for the following:
- Permanent loss of 4,490 square feet of the Riparian Corridor habitat due to building structures, patios, decks and walkways;
 - Loss of habitat includes encroachment into the Riparian Corridor with 2,740.5 square feet of impermeable areas and 1,746 square feet of permeable areas;
 - A total of approximately 0.32 acre impact for the public access trail from the public parking lot plus the pathway to the river from the hotel. The total impact in the Riparian Corridor created by hotel buildings, walkways, decks and patios plus the public access trail and pathway to the river is 0.42 acre (18,425 sq. ft.).
 - Mitigation of the encroachment into the Riparian Corridor at a 3:1 ratio for a total of 1.26 acres (55,276 sq. ft.) of non-native vegetation removal and planting with native riparian vegetation.
- k. Implementation of greenhouse gas emissions reduction measures;
- l. Hours of operation for the resort to be 24 hours per day, seven days per week;
- m. Special events, such as corporate events or meetings and potentially receptions, with amplified speech and amplified music confined to indoors only; and,
- n. Creation of up to 37 jobs during peak periods:
- The largest shift will occur 7am to 3pm on weekdays when up to 18 employees may work on site.
 - The number of employees will drop in the late afternoon as housekeeping is completed.
 - The total number of employees starting the evening shift (3 – 11 pm) will drop to no more than 15 and are primarily people who work in the lobby or guest services (including restaurant).
 - No more than 4 employees are needed on-site during the late-night shift from 11pm to 7am.

The existing public access easements encumbering the project site will be relocated to allow construction of the resort buildings. Following action on the Use Permit, an application to obtain a Certificate of Modification is required to modify the Dubrava Village Subdivision Map (85-043927, recorded on July 10, 1985), to reflect the vacation of the existing right of way for the public access easement to the Russian River and the public parking easement; and a grant of right of way for the public access and public parking easements.

Figure 6: Project Site Plan



The project development site will occupy approximately 3.74 acres (39%) of the 9.61-acre property. The project includes two main hotel buildings (31,074 SF total and 44,199 SF total), three stories in height, with 72 guest rooms and 8 suites, lobby including lounge, reception and restrooms (2,760 SF), two meeting rooms (3,500 SF total), prefunction area (1,130 SF), BOH (850 SF), retail (400 SF), hotel services area (5,725 SF), restaurant (2,300 SF), bar (1,320 SF), spa (1,660 SF) and gym (980 SF). The main hotel buildings would be constructed over 320 feet from the centerline of River Road (Highway 116). Detached from the main hotel buildings would be 18 guest rooms and 10 suites, three stories in height, located in four Tree House buildings (14,070 SF total) to be located near the northeast edge of the site, upslope from the Hulbert Creek. Accessory buildings include a public bathroom (128 SF), a pool house (92 SF) and a gate house (188 SF). The project includes parking lots with a total of 175 parking spaces (25 public spaces, 22 stacked parking spaces and 128 spaces for hotel resort guests and employees). The square footage of permeable and non-permeable surfaces are provided in the Drainage and Stormwater section below.

The resort buildings will border the south and east sides of the development site, away from the highway, and set back and away from neighboring residential uses. These structures will be built on pier foundations to allow for construction amongst the redwoods without damaging their roots as well as to elevate and support the buildings to withstand flooding and seismic shaking. The landscaped parking areas, noise barrier fence and landscaped western (Dubrava Village) property boundary, and the use of a stone wall and landscaping between the highway and the parking areas, will visually separate the resort from the highway and the adjoining residential uses. The public trail (current location conceptual), a 25-space public parking lot and restroom facility will be developed on the north side of the development site,

where it will be accessible from Highway 116 and located away from neighboring residential development. New landscaping will be installed throughout the development site to integrate the project with the existing visual setting and to enhance the quality of the existing riparian habitat. See Conceptual Landscaping Plan under Attachment 19.

Buildings and Landscaping:

The proposed resort hotel consists of two main buildings, connected by a breezeway, which face the Russian River and a series of 4 Tree House suite buildings oriented towards Hulbert Creek. Each of the two main buildings are 3 stories in height (maximum 35 feet) and contain a total of 80 rooms. The building to the right, as you enter the site, contains the restaurant/bar, commercial kitchen, spa and gym on the first floor. The first floor of the wing to the left of the entry contains the meeting rooms, prefunction area, administrative offices, lobby, reception area and lobby lounge. The upper two stories of both buildings contain the 72 guest rooms and 8 suites, 36 rooms and 4 suites per floor. The Tree House buildings are located on the east side of the development area in a staggered line, overlooking Hulbert Creek. These four buildings are three story structures, one containing six suites that could accommodate families or groups for extended visits, one containing six guest rooms, one containing eight guest rooms, and one containing six guest rooms and 1 suites. The suites include a separate master bedroom and a great room with a kitchen. See Figures 7 and 8 below.

The resort will offer guests both an indoor and outdoor living experience with generous decks and outdoor fireplaces. New landscaping will be installed throughout the development site to integrate the project with the existing visual setting and to enhance the quality of the existing riparian habitat. The maximum number of redwood trees are being preserved and the buildings are being sited to blend in with the surrounding redwood groves. Setting the use within the trees helps to achieve compatibility with the surrounding residential area. Landscaping around the perimeter of the parking areas will provide screening. The removal of a significant amount of non-native invasive vegetation and replanting with native vegetation will enhance the riparian corridor.

The landscaped parking areas, fenced and landscaped western (Dubrava Village) property boundary, and the use of a stone wall and landscaping between the highway and the parking areas, will visually separate the resort from the highway and the adjoining residential uses. Both native and ornamental plants will enhance the resort landscape. Permeable pavings to be used on the driveway, parking areas and pathways between the buildings will be chosen from these options: porous Portland cement concrete, porous asphalt concrete, pavers, grass pave and open celled paving grids. Decking will be constructed between and off of the Tree House Suites and behind the Hotel around the pool plus behind the Lobby and Restaurant. A stone/tile walkway connects the Lobby and Restaurant building with the Hotel building. A stone pile landing is at the entry to the Lobby. Bio-retention swales and areas are located within with the landscape areas.

Figure 7: Photo simulation- Entry Drive and Public Parking



Figure 8: Photo simulation- Arrival View at The Lodge



Figure 9: Photo simulation- View from River



Figure 10: Photo simulation- Tree House View



Hours of Operation and Number of Employees:

Hours of operation for the resort hotel will be 24 hours a day, seven days per week. The resort hotel will create as many as 37 jobs during peak periods to serve various hotel resort functions including hotel registration and guest services, management and business development, housekeeping and maintenance, plus food and spa services. The largest shift will occur 7am to 3pm on weekdays when up to 18 employees may work on site. The number of employees will drop in the late afternoon as housekeeping is completed. The total number of employees starting the evening shift (3 – 11 pm) drops to no more than 15 and are primarily people who work in the lobby or guest services (including restaurant). No more than 4 employees are needed on-site during the late-night shift from 11 pm to 7 am. The 18 employees are sufficient for special events.

Special events, such as corporate events or meetings and potentially receptions, would be indoor events at the proposed hotel. These ground-floor rooms would open to a terrace overlooking the river from the hotel east wing building. While amplified speech and amplified music could potentially be included at these events, it would be confined to indoors only. Pursuant to conditions of approval, amplified speech and amplified music shall be confined to indoors only and the doors to the terrace shall remain closed. This condition applies to indoor special events, such as corporate events or meetings, receptions and other indoor special events. In addition, amplified sound and the very loud musical instruments (such as horns, drums and cymbals) are not permitted outdoors. The quieter, non-amplified musical instruments (such as piano, stringed instruments, woodwinds, flute, etc.) are allowed outdoors when in compliance with the Noise Element of the Sonoma County General Plan. Based upon the traffic study (W-Trans, December 11, 2018) and the Updated Parking Study (W-Trans, June 1, 2022), during the peak season (June to October), valet parking will need to be implemented for any special events that will attract non-guests of the resort. Approximately 145 non-guests could be accommodated. During the off-peak season (December to April), special events with up to 120 non-guest attendees could be accommodated without the use of valet parking. Approximately 275 non-guests could be accommodated with the use of valet parking. There are two meeting rooms, 1750 SF each, for a total of 3500 SF. During rainy weather when special events cannot open to the terrace, the number of guests would be limited to the maximum number of persons for 3500 SF. The International Building Code (IBC) recommends for spaces with un-concentrated use of chairs and tables, such as a restaurant, that 15 square feet on that floor of the building be dedicated to each occupant. For 3500 SF, the maximum occupancy in this case would be approximately 233 people. However the IBC recommends areas with concentrated use of chairs have 7 square feet of floor space on that floor of the building per person. A meeting set up with chairs in both rooms would have a maximum capacity of approximately 500 people. Therefore, the maximum number of guests attending a special event in the meeting rooms is restricted to the number of parking spaces available for those guests on-site during the special event time period.

Circulation:

The proposed driveway, parking lot and circulation aisles are designed to accommodate parking and access needs for the hotel resort and the river trail. The traffic study prepared for the project (W-Trans, February 2016, updated December 11, 2018) found the location of the driveway entrance on the west side of the Highway 116 frontage provides adequate sight distance to allow vehicles to safely enter and exit the site and to avoid turning movements at nearby intersections. The hotel driveway entrance and traffic circle at the hotel lobby and restaurant entrance also provides sufficient access for emergency vehicles, buses, and service trucks.

Highway 116 is a major public transit corridor that offers convenient and direct bus service to residential and commercial areas along the Russian River, including Guerneville. The bus stop at the front of the property will be relocated, as shown above on the project site plan (Figure 6), and a shelter and bench will be added.

Parking:

The parking lot provides 175 parking spaces overall, including the 25 public spaces and a zone for 22 stacked parking spaces (Figure 12). The 25 public parking spaces will be reserved for public use while the public trail is open (Sunrise to Sunset). The remaining 150 parking spaces are for use by hotel resort guests and employees.

An Updated Parking Study for the Project was prepared by W-Trans on June 1, 2022 and reflects a reduction in project size from 120 rooms to the currently proposed 108 rooms (See Figure 11 below and Attachment 20). This evaluation was prepared to assess the reduced hotel size and supersedes the parking analysis contained in the Final Traffic Impact Study for the Guernewood Resort Project (W-Trans, December 2018), as well as the Addendum to the Final Traffic Impact Study for the Guernewood Park Resort Project (W-Trans, September 2020). The methodologies contained in the updated Urban Land Institute publication Shared Parking, Third Edition, 2020, were still utilized and is explained below.

Methodologies contained in the updated Urban Land Institute (ULI) publication Shared Parking, Third Edition, 2020, were utilized to determine parking demand for the resort and its affiliated uses during different time periods. The Second Edition of Shared Parking from 2005 was previously used in the Final Traffic Impact Study and methodologies have undergone significant refinement. The ULI shared parking methodology ties recommended parking supply to the maximum demand period.

Shared Parking for the Leisure Hotel land use includes the total number of rooms, restaurant square footage and meeting room space. The shared parking analysis projects a peak season weekday parking demand of 167 spaces and a peak season weekend demand of 174 spaces. The parking demand projections include that generated by the river access public parking lot. Both weekday and weekend parking demand would peak in the evenings near 9:00 pm. Peak season demand would be somewhat lower in the morning and afternoon. Overall parking demand is projected to be approximately 30 percent lower during the off-peak winter months.

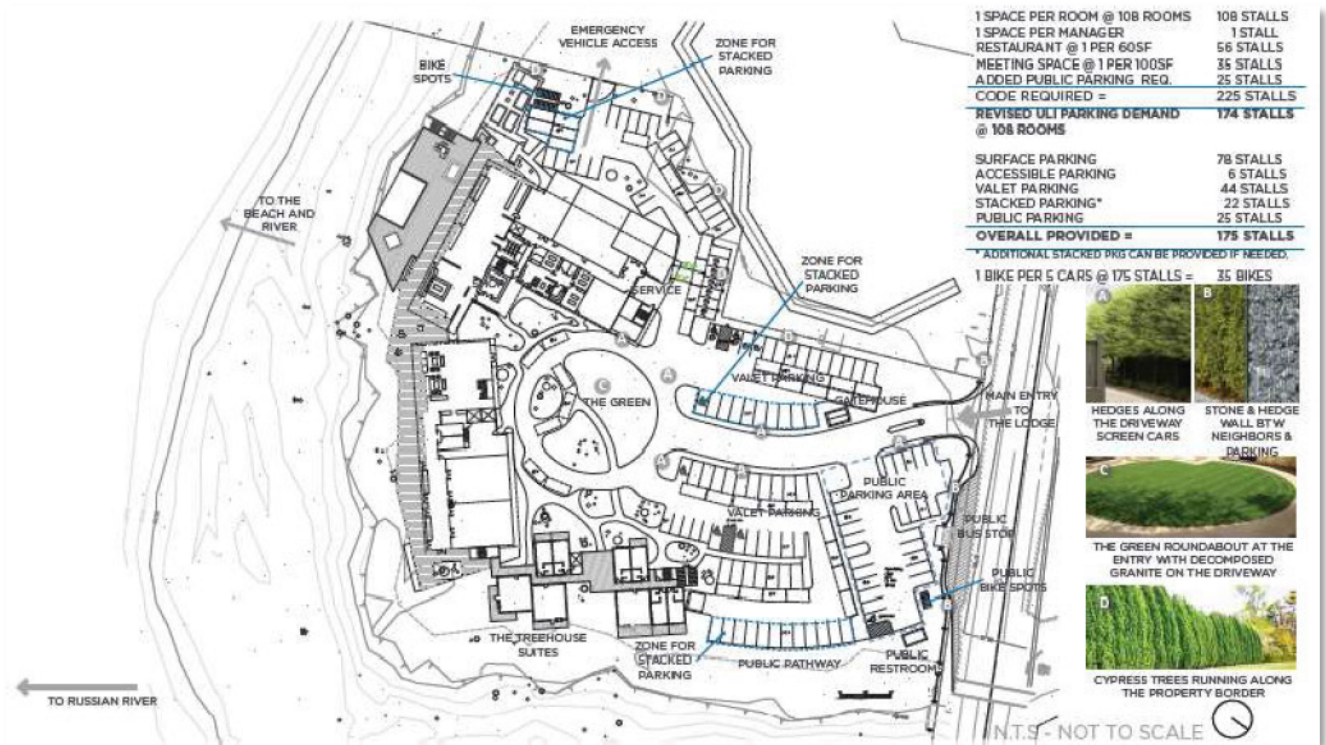
The river access lot is projected to serve 16 users on weekdays and 18 users on weekends during the afternoon between 1:00 pm and 2:00 pm. This corresponds to a period when the hotel's parking demand is relatively low. Conversely, in the evenings when the hotel's parking demand peaks, the river access parking lot would have no public parking demands. The 25 public parking spaces will be available for hotel use when the public trail is closed, that is, after sunset and before sunrise. These patterns demonstrate the efficiencies that can be gained through the use of shared parking arrangements. Even if river access related parking demand reaches 25 vehicles, sufficient parking supply would be available for these users during the daytime. Based on application of ULI shared parking demand methodologies, analysis concludes the resort's proposed 175-space parking supply would be expected to accommodate the projected peak-season demand for 174 spaces.

Pursuant to the conditions of approval and the parking management plan, signs must be posted at the entrance to the 25-space parking lot indicating the time restrictions and hotel guests informed of the time restrictions at check in. There is a gate house at the entrance with a parking attendant. Public parking and guest parking will be managed by the hotel. No parking is allowed on Highway 116 or local roadways.

The parking supply falls short of the individual requirement's specified in the County's zoning code for the complimentary uses, unless stacked valet parking is counted. However, by using valet service and shared parking concepts and methodologies, the W-Trans traffic analysis determined that the proposed parking supply could still effectively meet the anticipated demand (including public parking spaces for river access) through implementation of a parking management plan. The W-Trans traffic analysis was reviewed and accepted by the County's Transportation and Public Works Department on November 6, 2018. The Board of Zoning Adjustments must determine if the shared parking concept is acceptable when acting on the project Use Permit.

In addition to the vehicle parking spaces, 35 bicycle spaces for visitors and guests of the hotel have been incorporated into the design plans in accordance with the Sonoma County Zoning Code.

Figure 11: Parking Plan



Traffic:

The W-Trans Traffic Impact Study, dated December 11, 2018, made the following findings:

- The study intersections are expected to continue operating acceptably at the same levels of service upon the addition of project-generated traffic to existing conditions.
- The project would be expected to have negligible effects on 95th percentile queue lengths in the signalized intersection turn pockets that are already projected to exceed storage without the project and would not directly cause turn pocket storage to be exceeded.
- Left-turn queues on SR 116 at the project driveway are projected to remain within the available two-way left-turn lane storage.
- The project is expected to generate an average of 53 weekday pm peak hour and 133 weekend midday peak hour trips.
- Pedestrian facilities should be improved between the project site and the adjacent transit stop.
- Bicycle facilities serving the project site are expected to be adequate, and 40 bicycle parking spaces will be provided. The number of bicycle parking spaces to be provided with the current project is 35 due to the reduction in the number of rooms and, thus, the reduction in the required number of vehicle parking spaces.
- Transit facilities serving the project site are expected to be adequate.
- The project access point on SR 116 would be located at an appropriate location and minimize the potential for conflicts with adjacent intersection.
- The project access intersection at SR 116/Guernewood Lane would not meet the peak hour signal warrant during either the weekday pm peak or weekend midday peak hours under Future plus Project conditions.
- The available sight distance at the project driveway on SR 116 would substantially exceed minimum sight distance criteria.

- Onsite circulation would be intuitive to unfamiliar drivers and is designed using standard roadway and parking dimensions.

The W-Trans traffic study recommended improvements to circulation are included in the Project conditions of approval.

Pedestrian Crosswalk

More pedestrians are expected to use the crosswalk at Lovers Lane due to the public access trail connecting to the Russian River. In addition to restriping the crosswalk, Rectangular Rapid Flashing Beacons will be installed as a project condition of approval to enhance pedestrian safety. A level concrete landing area and guardrail modifications will also be constructed to make the crossing ADA compliant.

Public Access Trail:

The existing public access easement (recorded under Sonoma County OR #85-043934, July 10, 1985), which runs across the west side of the site from Highway 116 to the Russian River, will be relocated and developed to run adjacent to Hulbert Creek (Figure 13). This easement provides access to a public recreation area which is further defined by easement as the area below 14-foot elevation contour (NGVD 29) corresponding to north bank of the Russian River (OR #85-043933, July 10, 1985). The easement was established in 1985 as a condition of approval for the approval of the Dubrava Village Subdivision Map, the residential development to the west.

In the Staff Report for the General Plan Amendment, Specific Plan Amendment and Zone Change for the property (PLP95-0440), the conditions of approval to provide public access to the Russian River in the original Dubrava project and their status are listed. They are provided below.

43. *The Clubhouse and public beach access walk shall be constructed and a public beach parking area for 25 cars shall be constructed or an easement for a public parking area for 25 cars shall be dedicated as part of Phase 1 of the project.*

Status: This condition was fulfilled by the applicant through the recordation of a 10-foot wide public pedestrian easement along the east side of the lodge parcel (Lot 3). And by the recordation of a 52-foot wide vehicular access easement along with a floating 25 car parking lot easement over the commercial parcel (Lot 1). No physical improvements to the easements have been constructed. The fence securing the site has been set back far enough from Highway 116 to allow parking on the dirt access easement area, and a break in the fence is present allowing pedestrian access across the site.

Status Update: The 25 parking spaces for the public to park from sunrise to sunset will be provided in the northeast corner of the project site and are part of the total 175 parking spaces that will be provided. The 25 parking spaces will be available for hotel guests between sunset and sunrise.

44. *The developer shall execute an easement and access agreement to insure public access to the beach. Such agreement shall be submitted to County Counsel for approval and shall include provisions for maintenance.*

Status: This condition was fulfilled by the applicant through the recordation of a public recreational easement over the portion of the parcel containing the existing 55 condo units (Lot 2) and that portion of the lodge parcel (Lot 3) that lie below the elevation of 14 feet mean sea level (NGVD 29.). No recreational easement exists over the designated remainder parcel which was to contain the 25 units to be built.

Status Update: The existing public access easement was established as part of the adjacent 55-unit Dubrava Village. This existing easement starts within the proposed entry driveway at Highway 116 running parallel to the western property line and runs straight back in the same alignment to the Russian River. The location is shown on the Conceptual Landscape Plan. Pursuant to a condition of approval, a Certificate of Modification must be obtained to move the existing public access easement

to within the Hulbert Creek Riparian Corridor over the location where the ADA-compliant public access trail will be constructed.

53. *Installation and maintenance of public beach facilities is the responsibility of the subdivider and/or his assignees. A maintenance plan providing for implementation of trash removal, public drinking water, and sanitary facilities shall be submitted to the Planning Director for approval. This condition shall be satisfied prior to the issuance of building permits for the hotel and shall run with the land upon which those uses are located.*

Status: This condition was fulfilled by the applicant through the recordation of a public recreational easement over that portion of the parcel containing the existing 55 condo units (Lot 2) and that portion of the lodge parcel (Lot 3) that lie below the elevation of 14 feet mean sea level (NGVD 29.). No recreational easement exists over the designated remainder parcel which was to contain the 25 units to be built.

Status Update: The existing public access trail is an unimproved trail that has not been maintained and portions of the trail have been lost to erosion and vegetation growth. Access has extensive vandalism, litter, major homeless encampments and all the associated health issues (Regional Parks letter, August 26, 2016). The existing public access trail provides limited access since it is not clearly defined and is not ADA-compliant. There is currently trail located along Hulbert Creek used by the public to access the Russian River. The project proposes to relocate the recorded public access easement to align with the existing foot trail currently used by the public. This foot trail has been established by the placement of logs and wood along the edge and is located in the Riparian Corridor.

The existing public access easement will be relocated along Hulbert Creek within the Riparian Corridor, As a condition of approval, the applicant shall submit a complete application to Permit Sonoma to vacate the existing public right-of-way for the pedestrian access easement and public parking easement, shown on the Dubrava Village Condominium Project Tract No. 648, recorded under Book 373 of Maps, Page 30-32 of Sonoma County Records and more particularly described in Grant Deed of Easement recorded under Document No. 1985-043934 of Sonoma County Records; and a grant of public right-of-way for the pedestrian access and public parking easements—realigned to the current project specs—as shown on that site map prepared for PLP18-0012, dated February 20, 2020, subject to final review and approval by the Sonoma County Board of Supervisors.

After the vacation described above is complete, per the condition of approval the applicant shall submit an application to Permit Sonoma to obtain and record a Certificate of Modification reflecting the vacation of the public right-of-way for the pedestrian access easement and parking easement shown on the Dubrava Village Condominium Project Tract No. 648, recorded under Book 373 of Maps, Page 30-32 of Sonoma County Records and more particularly described in Grant Deed of Easement recorded under Document No. 1985-043934 of Sonoma County Records; and the grant of public right-of-way for the pedestrian access and public parking easement approved by the Sonoma County Board of Supervisors.

The relocation described above requires the applicant to obtain approval of a Certificate of Modification (CMO) which will modify the Dubrava Village Subdivision Map. A CMO is required to reflect the vacation of these right-of-ways and the grant of new right-of-ways The CMO will be processed by the Project Review Advisory Committee (PRAC). A condition of approval requires that the CMO be obtained prior to the issuance of any development permits for the project. A maintenance plan providing for implementation of trash removal, public and sanitary facilities shall be submitted to the Planning Director for approval. This condition shall be satisfied prior to the issuance of building permits for the hotel and shall run with the land upon which those uses are located.

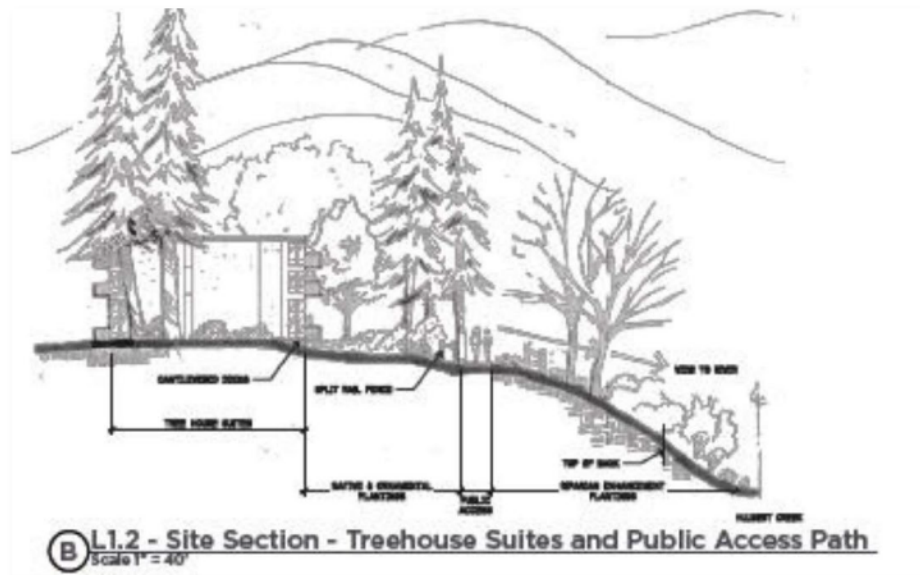
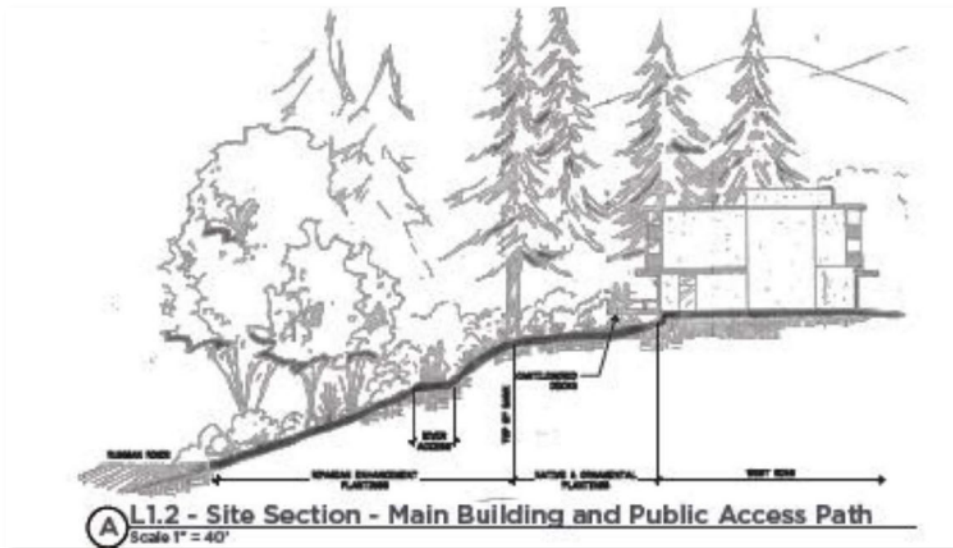
The applicant recognizes Sonoma County Regional Parks has stated that the applicant lay out the trail in the spirit of the ADA (Americans with Disabilities Act) accessibility guidelines, using the natural topography, while avoiding structures and biotic impacts to the greatest extent possible. One possible means of providing such access is provided in the project plans. However, the applicant may explore alternatives, consistent with CEQA, prior to final Design Review. Therefore, the trail has been identified on the design and engineering plans as "conceptual public trail". The trail is designed as a 5-foot wide pathway bordered by a low fence. The installation of a low fence will protect the new riparian vegetation by restricting foot traffic off the pathway (see Attachment 21). The public trail will have a sustainable Park Tread surface that is resistant to harsh coastal and tidal environments.

The legal description and plat survey for the relocated river access easement needs to be submitted to Regional Parks for review and approval. The public access easement must connect the Russian River to the public parking lot and to Highway 116. Obtaining a Certificate of Modification for the approved relocation of the public access easement prior to issuance of grading and building permits is a condition of approval.

Regional Parks believes this project will significantly benefit the environment and the public access at this location for the following reasons (Regional Parks letter, August 26, 2016). "First, the project will drastically improve the safety of this public access site at the project ingress/egress, the parking lot, on the trail, and at the river. Second, the project will clean-up the property from the existing trash and health hazards. Third, the project will create a trail that is accessible to a broader segment of the population. Fourth, the relocation of the north-south 10 foot wide trail easement will allow for a business plan that can responsibly manage this site."

The public trail will be required to meet ADA standards from Highway 116 to the public parking lot, and from the public parking lot to the top of bank. The lower portion of the public access trail (from top of bank to the public river beach) will be constructed in accordance with the California State Park Accessibility Guidelines (2015 or later) and/or the Federal Access Board Outdoor Developed Areas (May 2014 or later) as a condition of approval. Although there is a vertical drop of 30-40 feet, the property has a large land base, sufficient horizontal distance, and a variety of undulating topography to create a trail that is much more accessible than a simple sandy drop to the river (Regional Parks letter dated August 26, 2016). Per Regional Parks' request, the public access trail was conceptually designed to be consistent with the level of detail that has been provided for the rest of the project. The conceptual design includes: the alignment from the top of the bank to the river, typical sections, details for any non-typical features, and public access amenities.

Figure 12: Conceptual Public Trail Sections



Topography and Soils:

Most of the site where the development will occur is relatively flat. The development area has a topographic elevation, which ranges from 56 to 58 feet above mean sea level. The decks are set back from the top of bank of the Russian River and Hulbert Creek and cantilevered out over the steeper slopes. The finished grade of the site and the design of the buildings will take flooding into account. No

net fill will be brought on the site and all of the structures will be located outside the floodway. Pursuant to a condition of approval, a final flood elevation study will be prepared to certify that first floor elevations of the project structures, including the hotel buildings and Treehouse suites, are constructed at least one foot above 100-year flood elevations related to Hulbert Creek and the Russian River. The study must submit the required flood elevation study to the Permit Sonoma Engineering Division for review and approval prior to issuance of a grading permit for the project. Finished grades throughout the site will direct storm water to vegetated swales and bio-retention areas. As stated in the Notes for the Grading Plan, all quantities shown on the plan are approximate. The engineer's earthwork estimate is 1148 cubic yards of cut, 1148 cubic yards of fill, net fill is 0 cubic yards and the maximum depth of fill is 2 feet. See the preliminary Grading Plan (See Attachment 22).

The grading of the 5-foot wide conceptual public trail design is shown on the Grading Plan and the Conceptual Streamside Conservation Planting Plan (Figure 20). Due to the decrease in elevation of ± 39 vertical feet from the public parking lot down to the Russian River beach plus the moderate to steeply sloping Hulbert Creek bank, retaining walls in certain locations will be constructed.

Drainage and Storm Water:

A Preliminary Storm Water Mitigation Plan (SUSMP) was prepared for the Project site (BKF Engineers February 5, 2020). The purpose of the plan is to incorporate sustainable LID (low impact development) strategies that encourage infiltration and minimize the introduction of pollutants into downstream receiving waters. The main measures incorporated include the stenciling of inlets to increase public awareness, sediment removal and erosion repair, creation of numerous bio-retention areas throughout the site and the use of flow-through planters (Figure 13).

Finished grades throughout the site will direct storm water to vegetated swales and bio-retention areas as outlined in the Preliminary Storm Water Management Plan. The purpose of these LID features is to retain and allow filtration of the water into the ground when the soil is not saturated. Excess storm water will runoff into a storm drain system which includes a series of sediment and hydrocarbon filter tanks before it is discharged into the Russian River.

The finished grade of the site and the design of the buildings will take flooding into account. No net fill will be brought on the site and all of the structures will be located outside the floodway. All finished floor elevations of project structures will be 1 ft. above 100-year flood elevations, that is, an elevation of approximately 54 ft. (NGVD.29) or 57 ft. (NAVD.88). The driveway and the parking lots are designed to route flood water along its existing route through the site along the western property line. The main hotel buildings stand on a pier foundation system that use flood vents along the perimeter wall to permit flood water to pass under the building.

Regarding the 100-year flood elevation, there is a 3-foot discrepancy between the NGVD 29 and NAVD 88 datums. According to the project engineer, BKF Engineers, they converted the project topo to NAVD 88 datum so F1 goes up to the 57-foot elevation. Therefore, it should be clarified that F1 Floodway is the 54-foot elevation contour with NGVD 29 vertical datum and 57-foot contour with the NAVD 88 vertical datum.

Figure 14: Permeable vs. Non Permeable Surfaces



Vegetation, Habitats, and Biological Resources:

An updated assessment of construction impact of trees growing on the Guernewood Park Resort project site was conducted by McNair & Associates (project arborist) and report prepared, dated February 10, 2018, updated February 10, 2020. This report documents probable tree impacts occurring as the result of the current project design. Per the Tree Inventory and Construction Impact Assessment matrix, up to 76 coast redwood trees could be removed. There are 6 clusters that will be completely removed (41 trees) and 5 clusters where partial removal will occur (portion of 35 trees). Partial removal involves removing a portion of the trunks comprising the cluster. The 76 tree removal number is based upon an assumption that full removal could happen at each cluster designated for partial removal due to their close proximity to proposed buildings (adjacent) and the inability to preserve the remaining trees in the clusters. A copy of the Tree Preservation Plan is provided in the Initial Study, under Attachment 23.

Per the Sonoma County Municipal Code, timberland conversion means timberland conversion as defined in Section 1100 of the Forest Practice Rules, except that timberland conversion shall not include the conversion of less than three (3) acres of timberland for the purpose of constructing a structure in accordance with a valid building permit where the conversion is limited to the cutting and removal of the minimum number of trees necessary to accommodate the structure and related improvements. A condition of approval requires prior to grading and building permit issuance that the applicant submit a tree cutting and removal plan completed by a certified arborist that demonstrates the minimum number of trees necessary will be trimmed and/or removed to accommodate resort structures and related improvements. Therefore, a Zoning permit for a Minor Timberland Conversion will not be required when this condition is satisfied.

Construction of improvements within the redwood grove areas include soil excavation, compaction, utility

trenching, foundations, walkways and landscaping. This work will be subject to arborist and geotechnical review to minimize root loss and/or disturbance. In particular, the tree protection plan (James MacNair and Associates) and the geotechnical investigation (PJC Geotechnical Engineering) recommend the use of geotextiles and structural soils in areas to reduce soil excavation and compaction within the root zones. The underground utilities are also routed to avoid tree impacts. The building foundations will be designed to minimize the impacts to the roots of trees by using pier or piles, which penetrate a very small surface area, and are then tied together by above grade beams.

Tree protection measures will be implemented to ensure tree preservation and long-term viability. The tree protection measures are intended to protect root zones, while allowing construction close to the tree clusters. Construction methods will include pier and beam foundation construction, cantilevered structures, and above grade driveways and pathways using geotextile fabric, reinforced concrete, and elevated walkways to avoid grading cuts within the primary tree protection zone. Implementation of the tree protection measures is a condition of approval.

Riparian Corridor

The County has enacted General Plan policies that designate Riparian Corridors throughout the County and provides for the protection and conservation of the riparian corridors, which includes both the stream or river and land alongside the stream or river. The project application was originally submitted in 2008. When the project was re-activated in 2014/2015, the building footprint had to comply with the 50 ft. riparian setback, which was adopted in 2014. It was determined that encroachment would be possible if a Streamside Conservation Plan, as allowed by the Zoning Code, was prepared and submitted.

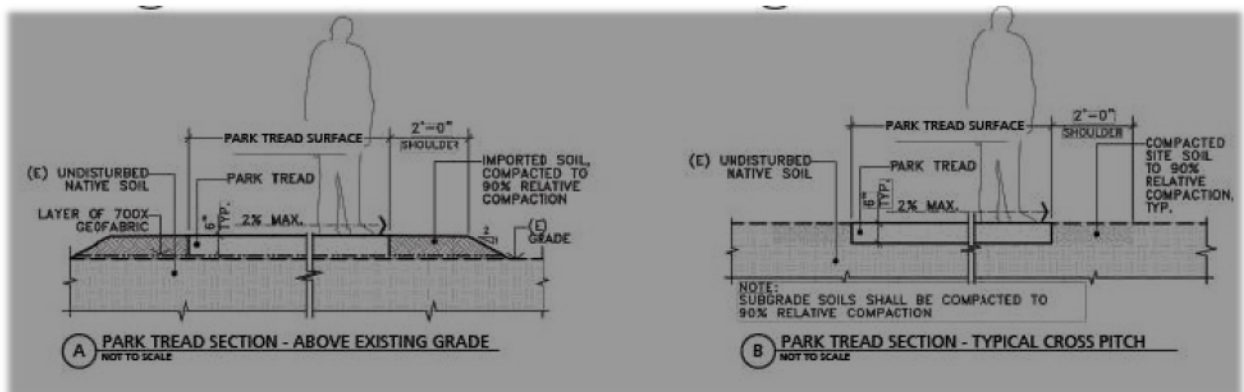
A Streamside Conservation Plan was prepared to mitigate for impacts to riparian habitat resulting from small areas of the Project encroaching into the Riparian Corridor along the Russian River and Hulbert Creek. The area where the buildings and parking areas of the Project will be constructed on relatively flat ground northeast of the physical top of bank of the Russian River (See Attachment 13).

Figure 15: Riparian Corridor



The Riparian Corridor covers approximately 1.065 acres (46,426 sq. ft.) along the banks of the Russian River and Hulbert Creek. The Project will affect approximately 0.10 acre (4,490 sq. ft.) of the Riparian Corridor, not including the square footage of impact from the proposed public access trail and pathway from the hotel down to the river. Approximately 0.063 acre (2,740.5 sq. ft.) of the Riparian Corridor will be impacted by buildings and approximately 0.04 acre (1,746 sq. ft.) of the Riparian Corridor will be impacted by walkways, decks and patios. The public access trail square footage is not included or mitigated in the current Streamside Conservation Plan since the trail alignment is conceptual. The public access trail sections (Figure 19) show the width of the impact within the Riparian Corridor. The width includes the 5-foot width of the finished trail plus the 2+ feet on each side for a total of 9 feet. The length of the trail is approximately 1,200 feet long so the square footage of impact is approximately 0.25 acre (10,800 sq. ft.). There is additional grading that is required in certain locations where steep slopes need to be graded back. This additional grading (approximately 1590 sq. ft.) increases the public access trail impact to approximately 0.28 acre. The trail surface will be permeable and the graded areas adjacent to the trail will be planted with native riparian species. The project also includes an 8-foot wide pathway with steps from the hotel buildings down to the Russian River. This pathway is approximately 185 feet in length which adds another 0.03 acre (1480 sq. ft.) for a total of approximately 0.32 acre for the public access trail and pathway. The total impact in the Riparian Corridor created by hotel buildings, walkways, decks and patios plus the public access trail and pathway to the river is 0.42 acre (18,425.5 sq. ft.). The remaining 0.644 acre (28,000.5 sq. ft.) of the Riparian Corridor will not be directly affected by the Project. No removal of trees is required with the currently proposed public access trail alignment. It is anticipated that the final alignment of the public access trail will be close to the conceptual alignment and will not require any tree removal. The design of the trail will be such that at no time will it extend beyond the ordinary high water mark.

Figure 26: Public Access Trail Sections



The mitigation ratio for “new construction” affecting a Riparian Corridor is normally 2:1. However, the applicant agreed to a 3:1 mitigation ratio (three acres for each impacted acre) to provide a greater project benefit to the public. The Project will affect 0.10- acre (4,490 sq. ft.) of the Riparian Corridor (Figure 4) which, at a 3:1 mitigation ratio, will require restoration of a 0.30-acre (13,470 sq. ft.) area. The minor impact of the Project on the Riparian Corridor will be offset by removing non-native invasive plants, such as English ivy, Himalayan blackberry, and French broom, from the unaffected 0.965 acre (41,936 sq. ft.) of the Riparian Corridor. The removal of non-native vegetation from the understory of the forested areas of the Riparian Corridor and establishment of native vegetation in the understory will have an overall beneficial effect on the habitat value in the mitigation area for those species that traditionally utilize the understory areas in forested areas dominated by redwoods and bay. Removing invasive species from the unaffected area of the Riparian Corridor and planting this area with native plants will satisfy the mitigation requirement based on the 3:1 mitigation ratio (Streamside Conservation Plan, by Ted Winfield & Associates and Resource-Design, December 11, 2017, updated February 17, 2020).

The conservation planting plan (See Attachment 24) will consist of planting of species of shrubs, vines, ferns and grasses. Given the presence of redwood and other native trees, much of the understory area that will be replanted is shaded and the plants that will be planted at the mitigation site can grow in shady or partial shady conditions. All of the shrubs, vines and ferns will be grown in the nursery and planted from liners, deep-root tree tubes, and one-gallon containers. Grasses will be grown in the nursery and planted as plugs between three and six inches in diameter.

The California State Lands Commission surveyor reviewed the project and determined that The Lodge on Russian River project will not extend onto sovereign land in the Russian River under the Commission's jurisdiction. It appears no portion extends below the ordinary high-water mark.

Cultural Resources:

The Tavern at Ginger's Rancho prepared an archaeological/historical investigation (Archaeological Resource Service, October 2008) that indicated "No prehistoric artifacts, features or sites were observed" based on site investigation, as well as literature review. A referral on the project was sent to the Northwest Information Center who did not request a site study. The Lytton Band of Pomo Indians responded to the original project referral, indicating that accidental discovery conditions should be added to the project in the event that archaeological/historical resources or human remains are found at the site. The study found one historic feature at that time, the fireplace and foundation remains of the former Guerneville Hotel Resort. However, the study concluded "the remains do not retain integrity to convey the former use of the property. In order to ensure that no cultural or archaeological resources are unearthed during ground disturbing activities, standard project conditions of approval require the following cultural resources note be printed on plan sheets."

"During construction activities, if archaeological remains are uncovered, work at the place of discovery should be halted immediately until a qualified archaeologist can evaluate the finds pursuant to Government Code Section 15064.5. If archaeological materials such as pottery, arrowheads or midden are found, all work shall cease and PRMD staff shall be notified so that the find can be evaluated by a qualified archaeologist (i.e., an archaeologist registered with the Society of Professional Archaeologists). Artifacts associated with prehistoric sites include humanly modified stone, shell, bone or other cultural materials such as charcoal, ash and burned rock indicative of food procurement or processing activities. Prehistoric domestic features include hearths, fire pits, or house floor depressions whereas typical mortuary features are represented by human skeletal remains. Historic artifacts potentially include all by-products of human land use greater than 50 years of age including trash pits older than fifty years of age. The developer shall designate a Project Manager with authority to implement the mitigation prior to issuance of a building/grading permit. When contacted, a member of PRMD Project Review staff and the archaeologist shall visit the site to determine the extent of the resources and to develop proper procedures required for the discovery. No work shall commence until a protection plan is completed and implemented subject to the review and approval of the archaeologist and Project Review staff. Mitigation may include avoidance, removal, preservation and/or recordation in accordance with accepted professional archaeological practice."

There are no known archaeological resources on the site, but the project could uncover such materials during construction. In the event that human remains are unearthed during construction, state law requires that the County Coroner be contacted in accordance with Section 7050.5 of the State Health and Safety Code to investigate the nature and circumstances of the discovery. If the remains were determined to be Native American interment, the Coroner will follow the procedure outlined in CEQA Guidelines Section 15065.5(e).

Air Pollutant and Greenhouse Gas (GHG) Emissions

The California Emissions Estimator Model, Version 2016.3.2 (CalEEMod) was used to predict emissions from the construction period, area sources, energy consumption, solid waste generation, water usage, and hotel occupancy (Air Pollutant and GHG Emissions Modeling, Illingworth & Rodkin, July 23, 2021). Construction period emissions would be below the lowest thresholds adopted by the Bay Area Air Quality Management District (BAAQMD). Project operational emissions of air pollutants from area, energy consumption, mobile, solid waste generation, and water usage sources would not exceed the annual or average daily emission thresholds.

Noise:

The project proposes two outdoor use areas adjacent to the hotel east wing: the spa pool area and the gazebo picnic area. Per the Environmental Noise and Vibration Assessment (Illingworth & Rodkin, August 12, 2016), the future exterior noise levels at outdoor use areas would be at or below the County's 60 dBA Ldn threshold for exterior noise environments at noise-sensitive land uses. The future noise environment at the project site would continue to result primarily from traffic along Highway 116 and the surrounding roadways. Interior standards would also be met.

An Addendum to the 2016 Noise Assessment (Illingworth and Rodkin, September 8, 2022) evaluates changes made to the project plans. The Addendum concludes that all of the noise impacts identified in the 2016 report would continue to be significant impacts unless mitigated, and that the mitigation measures identified for these impacts would remain the same. The assessment of daytime and nighttime recreation and water play noise associated with the natural outdoor pool and deck area concluded that recreation and water play noise would not exceed daytime or nighttime NE-2 noise standards at the property lines of the surrounding residential uses. Therefore, this would not be a significant impact and not require mitigation.

Per the conditions of approval, amplified speech and amplified music shall be confined to indoors only. This condition applies to indoor special events, such as corporate events or meetings, receptions and other indoor special events. Amplified sound and the very loud musical instruments (such as horns, drums and cymbals) are not permitted outdoors. The quieter, non-amplified musical instruments (such as piano, stringed instruments, woodwinds, flute, etc.) are allowed outdoors when in compliance with the Noise Element of the Sonoma County General Plan.

The proposed project is expected to generate noise levels in excess of the standards established in Table NE-2 of the County's General Plan at nearby sensitive receptors. At the multi-family residential development (Dubrava), amplified music, amplified speech, and non-amplified music would exceed the nighttime threshold. Mitigation for nighttime parking lot noise plus amplified speech and music is proposed via construction of a noise barrier (solid wall or fence) varying in height from six to eight feet. The Addendum states that the six-foot tall property line noise barrier shown in their 2016 report would provide noise reduction to ground based receivers at the property line shared with the Dubrava Village residences, however, no property line wall of any reasonable or feasible height is capable of attenuating project generated special events and activities to upper floor private decks or patios at the Dubrava Village residences. Per the Addendum, it should further be noted that the County standards apply General Plan NE-2 noise standards at the shared property line of the project site, and that these standards are only applied "to the outdoor area of the receptor if an exception to the standard has been approved."

Scenic Corridors and Landscapes:

The existing aerial power line over the development site will be routed underground along the west side of the property to a new pole and river crossing. The aerial power and telephone lines along the highway frontage will be placed underground and the existing power pole will be removed and replaced by another pole next to the highway near the northwest corner of the site.

Prior to the original 2008 submittal, a number of informal outreach meetings were held with the surrounding property owners and members of the Guerneville community. It was the overwhelming position of the neighbors to locate the resort away from the scenic corridor roadway and hidden within the trees. The decision to place the buildings away from the main road was strongly influenced by this input received from many of the neighboring residents. The hotel resort buildings will border the south and east sides of the development site, which places the buildings away from the highway.

The following additional public outreach meetings have occurred. Some concerns were expressed at these meetings regarding the size, height and scope of the development plus scenic corridor protection.

Outreach Conducted by Applicant:

05/02/2018	Russian River Chamber of Commerce Mixer
06/04/2018	Stakeholder Meeting with Guerneville Area Organizations & Community Leaders
07/21/2018	Meeting with Guerneville Neighborhoods Association
08/25/2018	Meeting with Dubrava Homeowners Association
09/08/2018	Guerneville Park Picnic with Neighbors
2/6/2019 & 4/5/2019	Meetings with Russian Riverkeeper
Mid-April 2019	Communication with Mike Nicholls, Lower Russian River MAC Chair
07/21/2020	Land-use Sub-committee Meeting of the Lower Russian River MAC
05/04/2021	Russian River Chamber of Commerce
05/22/2021	Dubrava Village Homeowner's Association
06/17/2021	Lower Russian River MAC presentation
Aug-Sept 2021	Chamber Newsletter - Russian River Chamber of Commerce

The project was presented during a public meeting before the Design Review Committee (DRC) on November 7, 2018. Recommendations were made by the DRC regarding the site plan, architecture, parking design, landscaping, colors/materials, lighting and other considerations. DRC has required that the applicant respond to each comment as to how the project plans have been revised to address underlying design concerns and/or recommendations. An explanation of any recommendations not incorporated into the project design is also required. The DRC supported the overall design concept provided that the final design plans reduced building massing and accommodate additional landscaping. The DRC may support the request for height limit exception from 35 to 53 feet provided that the façade elevations undergo revision to reduce appearance of bulk and massing as seen from the Russian River to the south and from the hotel frontage approach to the north. In July 2022, the project was revised to lower the building height from 53 feet to 35 feet, and therefore an exception to the maximum building height limit is no longer required. Standard project conditions of approval require DRC approval over final project design plans.

Pursuant to the County's Visual Assessment Guidelines, the project ranked "High" in Site Sensitivity due to the Scenic Resources designation and location within the Highway 116 Scenic Corridor and Russian River Corridor. The Visual Dominance of the project is "Co-Dominant" although the project is set back into the property from Highway 116 due to its prominence within the setting when viewed from the Russian River. The Site Sensitivity and Visual Dominance Tables 2 and 3 from the County's Visual Assessment Guidelines are provided below for reference.

Sensitivity	Characteristics
Low	<p>The site is within an urban land use designation and has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by urban development or the site is surrounded by urban zoning designations and has no historic character and is not a gateway to a community.</p> <p>The project site terrain has visible slopes less than 20 percent and is not on a prominent ridgeline and has no significant natural vegetation of aesthetic value to the surrounding community.</p>

Moderate	<p>The site or portion thereof is within a rural land use designation or an urban designation that does not meet the criteria above for low sensitivity, but the site has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by rural or urban development but may include historic resources or be considered a gateway to a community. This category includes building or construction sites with visible slopes less than 30 percent or where there is significant natural features of aesthetic value that is visible from public roads or public use areas (i.e. parks, trails etc.).</p>
High	<p>The site or any portion thereof is within a land use or zoning designation protecting scenic or natural resources, such as General Plan designated scenic landscape units, coastal zone, community separators, or scenic corridors. The site vicinity is generally characterized by the natural setting and forms a scenic backdrop for the community or scenic corridor. This category includes building and construction areas within the SR designation located on prominent hilltops, visible slopes less than 40 percent or where there are significant natural features of aesthetic value that are visible from public roads or public use areas (i.e. parks, trails etc.). This category also includes building or construction sites on prominent ridgelines that may not be designated as scenic resources but are visible from a designated scenic corridor.</p>
Maximum	<p>The site or any portion thereof is within a land use or zoning designation protecting scenic resources, such as General Plan designated scenic landscape units, coastal zone, community separators, or scenic corridors. The site vicinity is generally characterized by the natural setting and forms a scenic backdrop for a designated scenic corridor. This category includes building or construction sites within the scenic resource designation on or near prominent ridgelines, visible slopes greater than 40 percent or where there are significant natural features of aesthetic value that are visible from a designated scenic corridor.</p>

Table 3: Visual Dominance

Dominance	Characteristics
Dominant	Project elements are strong – they stand out against the setting and attract attention away from the surrounding landscape. Form, line, color, texture, and night lighting contrast with existing elements in the surrounding landscape.
Co-Dominant	Project elements are moderate – they can be prominent within the setting, but attract attention equally with other landscape features. Form, line, color, texture, and night lighting are compatible with their surroundings.
Subordinate	Project is minimally visible from public view. Element contrasts are weak – they can be seen but do not attract attention. Project generally repeats the form, line, color, texture, and night lighting of its surroundings.
Inevident	Project is generally not visible from public view because of intervening natural land forms or vegetation.

Water, Wastewater, and Waste Disposal:

The Project will connect to the Sweetwater Springs Water District and the Russian River Sanitation District service lines within the Highway 116 right-of-way. Trash enclosures are proposed on the site. A condition of approval requires that all garbage and refuse on this site shall accumulate or be stored for no more than seven calendar days, and shall be properly disposed of at a County Transfer Station or County Landfill before the end of the seventh day. Solid waste will be picked up and processed by a local waste hauler.

IV. ISSUES RAISED BY THE PUBLIC OR AGENCIES

A referral packet was drafted and circulated on May 22, 2018 to inform and solicit comments from selected relevant local, state and federal agencies, local Tribes; and to special interest groups that were anticipated to take interest in the project. Comments were received from the State of California Department of Transportation District 4, Sonoma County Department of Transportation and Public Works, Sonoma County Department of Health Services, Permit Sonoma Project Review Section - Health, Permit Sonoma Fire Prevention Section, Permit Sonoma Grading and Storm Water Section, Permit Sonoma Sanitation Section, Permit Sonoma Natural Resources Section, Sonoma County Department of Agriculture/Weights & Measures, Northern Sonoma County Air Pollution Control Board, and Sonoma County Regional Parks. Their comments included recommended conditions of approval.

Assembly Bill 52 Project Notifications were sent to the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Torres Martinez Desert Cahuilla Indians, Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria Band of Pomo Indians, Lytton Rancheria of California, Kashia Pomos Stewarts Point Rancheria and Federated Indians of Graton Rancheria. Only the Lytton Rancheria responded requesting that a Phase 1 archaeological survey be performed for the project. A copy of the cultural resources report (Archaeological Resource Service, October 2008) was provided. After review of the report, the Lytton Rancheria requested that the standard cultural resources conditions be applied for the project.

The original circulation dates for the Initial Study/Mitigated Negative Declaration (IS/MND) were August 27, 2021 through September 27, 2021. Due to project changes made by the applicant, Permit Sonoma recirculated the IS/MND November 2, 2022 through December 2, 2022. Due to new mitigation measures required by the California Department of Fish and Wildlife, Permit Sonoma is now recirculating this IS/MND for a third time, February 3, 2023 through March 6, 2023.

The following issues were raised in the previous ci:

- Potential traffic impacts
- Potential noise impacts
- Potential visual impacts
- Potential tree removal
- Potential impacts to the Riparian Corridor
- Potential biological impacts
- Storm water management

Mitigation measures and standard County conditions of approval shall be incorporated into the project as presented in the Initial Study and will substantially reduce potential impacts to a level of less than significant.

V. EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts of this project based on the criteria set forth in the State CEQA Guidelines and the County's implementing ordinances and guidelines. For each item, one of four responses is given:

No Impact: The project would not have the impact described. The project may have a beneficial effect, but there is no potential for the project to create or add increment to the impact described.

Less Than Significant Impact: The project would have the impact described, but the impact would not be significant. Mitigation is not required, although the project applicant may choose to modify the project to avoid the impacts.

Less Than Significant with Mitigation Incorporated: The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.

Potentially Significant Impact: The project would have the impact described, and the impact could be significant. The impact cannot be reduced to less than significant by incorporating mitigation measures. An environmental impact report must be prepared for this project.

Each question was answered by evaluating the project as proposed, that is, without considering the effect of any added mitigation measures. The Initial Study includes a discussion of the potential impacts and identifies mitigation measures to substantially reduce those impacts to a level of insignificance where feasible. All references and sources used in this Initial Study are listed in the Reference section at the end of this report and are incorporated herein by reference.

The owner, Lok GuerneWood Park Development Company, LLC, has agreed to accept all mitigation measures listed in this Initial Study as conditions of approval for the proposed project, and to obtain all necessary permits, notify all contractors, agents and employees involved in project implementation and any new owners should the property be transferred to ensure compliance with the mitigation measures.

1. AESTHETICS:

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

a) Have a substantial adverse effect on a scenic vista?

Comment: The project site is within the Sonoma County's General Plan Scenic Corridor designation for State Route 116 and is subject to the Russian River Corridor Design Guidelines. Additionally, the project is visible from the Russian River.

Design of the buildings utilizes a modern design theme, and includes:

- Two main hotel buildings with building heights up to approximately 35 feet; and
- Twenty-eight guest suites and rooms located in four "Tree House" (TH) buildings (formerly called bungalow buildings) three stories in height.

All structures located within scenic corridors established outside of the urban service area boundaries are subject to the setbacks of thirty percent (30%) of the depth of the lot to a maximum of two hundred feet (200 feet) from the centerline of the road (Sec. 26-64-030(a)). The resort buildings would be set back at least 30 percent of the depth of the lots and outside of the Highway 116 Scenic Corridor. The buildings would be set within the coast redwood trees to help achieve compatibility with the surrounding residential area. The existing vegetation would be used to screen the buildings from view from Highway 116.

Mature clusters, or small groves of coast redwoods dominate the site. The redwood groves are typically multiple trunk clusters originating as sprouts from the below ground root collar or stump of the original tree. The coast redwood trees range in height from 90-120± feet and their crown diameter ranges from 50'-60'± feet. Building height limits under zoning are 35 feet, unless a taller height is permitted by Design Review use permit approval. The proposed project would be approximately 35 feet high (tallest structure) with three stories. However the heights of trees would be approximately double the heights of the buildings. The coast redwood tree clusters would provide screening from both Highway 116 and the Russian River to minimize impacts on views since the buildings will be visible from both the highway and the river. The Russian River is not visible from Highway 116. New landscaping would be installed throughout the development site to integrate the project with the existing visual setting and to enhance the quality of the existing riparian habitat. The low stone wall and landscaping between the highway and the parking areas would visually separate the resort from the highway and the adjoining residential uses.

The project complies with the maximum building height of 35 feet. The total square footage of building footprint is approximately 38,315 square feet or .88 acre. Zoning standards also provide for a 50% maximum lot (building) coverage; the project will comply with this standard with an approximately 9 percent lot coverage. The project would also meet zoning setback standards, including a minimum 45-foot setback from the centerline of SR 116 pursuant to the base zoning (Recreation and Visitor Serving Commercial District) standards. Trails and sidewalks would be constructed as part of the project, including a public access parking lot at the front of the property by Highway 116, and detached accessory structures, including terrace improvements by outdoor use areas. These structures would utilize similar design themes as the main structures of the project.

The project requires noise mitigation to ensure noise levels at the adjoining multi-family residential units (Dubrava) do not exceed County noise standards. The recommended mitigation measure requires construction of a noise barrier (sound wall). The sound wall and landscaped areas will be located at the western (Dubrava Village) property boundary (8-foot high sound wall around the perimeter of the hotel's parking lot along the southwestern boundary, and continues until the main access driveway plus 6-foot high sound wall where the eight-foot barrier ends and continues along the main access driveway property line until just passed the last parking space). The sound wall would be visible from the highway, primarily to westbound traffic. Since the sound wall would be lower (six feet) towards the front portion of the property, similar in height to a typical side yard property line fence, visual impact to motorists is expected to be minimal. Final design plans will need to include sound wall details, ensuring they are consistent with the design themes presented for the remainder of the project.

The project received Design Review by the Russian River Corridor Design Review Committee in 2008, and the general direction to the applicant was to ensure appropriate building siting, minimizing development impact to the site, and ensuring adequate parking on the site. The project site is subject to the subsequently adopted 2010 Russian River Corridor Design Guidelines. The Guidelines were developed in order to preserve and enhance the built environment of the Russian River area and to promote new development that respects the context of its unique setting.

The Russian River Corridor Design Guidelines address a wide range of objectives and issues, including those listed below. The manner in which the project complies with these guidelines is provided after each guideline.

- *Ensure buildings are sited and designed to create a welcoming frontage that provides visual interest and encourages street vitality and safety.*

Comment: The resort buildings are set back in the site within the coast redwood trees to help achieve compatibility with the surrounding residential area. A low stone wall and landscaping between Highway 116 and the parking areas would visually separate the resort from the highway and adjoining residential uses;

- *Preserve existing views of the Russian River from the scenic corridor.*

Comment: The project preserves existing views of the Russian River from the scenic corridor.

- *Preserve and incorporate natural features, such as mature trees and creeks, into the site design as a valuable project asset.*

Comment: The project is using the existing coast redwoods as a valuable project asset for screening and reducing visual impacts. New landscaping would be installed throughout the development site to integrate the project with the existing visual setting and to enhance the quality of the existing riparian habitat.

- *Design riverfront development to capitalize on its unique location by providing riverside amenities such as viewing areas, decks, balconies, large windows, and river access.*

Comment: Project design includes a large deck that connects the resort hotel buildings with the pool plus balconies off the guest rooms, all with views of the river.

- *Design new development proposed to be located between the Russian River and the Scenic Corridor to preserve existing views of the river, to the extent feasible.*

Comment: The hotel buildings are not impacting any views of the Russian River from Highway 116.

- *Maintain as much of the existing vegetation as possible during site preparation to minimize soil erosion.*

Comment: Adding landscaping and enhancing the riparian habitat will help minimize soil erosion.

- *Ensure that building scale and massing reflect the existing character of the surrounding area.*

Comment: Final DRC will help ensure the project complies this guideline.

- *Ensure that scale and proportions of architectural elements and detailing are appropriate for the building's architectural style.*

Comment: Final DRC will help ensure the project complies this guideline.

On November 7, 2018, preliminary design review on the project was completed during a public meeting

before the Design Review Committee (DRC). The DRC generally supported the project proposal, identifying several design and site planning aspects that needed to be addressed by the applicant, with a requirement to return to the DRC for a Final Design Review. DRC comments focused on the following:

General - DRC supports overall design concept provided that requested plan revisions to reduce building massing and accommodate additional landscaping come back for further consideration after BZA decision.

Site Plan - Consider incorporating corridor breaks between bungalow buildings to break up horizontal massing and provide for improved circulation. DRC supports building encroachment within riparian corridor with riverfront access improvements working to benefit the greater community as proposed

Architecture - DRC may support the request for height limit exception from 35 to 53 feet provided that façade elevations undergo revision to reduce appearance of bulk and massing as seen from the Russian River to south and from the hotel frontage approach to the north. Consider stepping western hotel building back upper floors from west exterior to reduce massing. Consider adding more articulation to north and south facades to break up continuous vertical planes.

Parking Design - DRC supports request for reduction of five (5) required on-site parking spaces if traffic study clearly upholds findings and site plan is appropriately revised to accommodate more landscaping as recommended.

Landscaping - Provide additional trees throughout parking lot landscape area. Increase planter island widths at opportune locations throughout the parking interior and along the site frontage to accommodate more landscaping. Develop a more effective screening solution between the highway and parking area. Reconsider use of big leaf maple trees for parking lot shading.

Colors / Materials - Confirm use of low reflectivity window schedule for façade exteriors with southern exposure.

Lighting - Minimize use of exterior lighting that could result in off-site light spillage, such as with light bollards and shielded light fixtures, especially closer to the Du Brava property line. No tall light poles should be used.

The applicant has indicated their intent to address the DRC comments as part of their final design action, subsequent to Board of Zoning Adjustments action on the project Use Permit. In July 2022, the applicant revised the project to lower the building height from 53 feet to 35 feet. The revised project also includes a reduction in rooms, from 120 to 108, a 5,230 square foot increase in total building footprint, and a reduction in parking spaces, from 201 to 175. Pending the future final Design Review action, staff finds that the proposed design is generally consistent with the applicable Design Guidelines and design provisions within County Code, provided final project design plans address preliminary DRC comments. The following mitigation measures require the project reduce potentially significant aesthetic impacts to less than significant:

Significance Level: Potentially Significant Unless Mitigated.

Mitigation Measure VIS-1:

The applicant shall obtain Final Design Review Committee review and approval to ensure Committee concerns from the November 18, 2018 meeting are addressed regarding building scale and articulation, horizontal massing, circulation, need for additional trees and landscaping, landscape screening between highway and parking area, and minimization of exterior lighting.

Mitigation Monitoring VIS-1: Permit Sonoma will ensure Final Design Review approval is obtained prior to issuance of grading and building permits.

b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Comment: Highway 116 in the vicinity of the project site is a designated state scenic highway. Per the Tree Inventory and Construction Impact Assessment matrix, up to 76 coast redwood trees could be removed. The 76 tree removal number is based upon an assumption that full removal could happen at each cluster designated for partial removal due to their close proximity to proposed buildings (adjacent) and the inability to preserve the remaining trees in the clusters. All of these proposed tree removals would occur in the back portion of the site (approximately 300 feet or more from the edge of SR 116, and in the area of the proposed building footprints, pathways, outdoor use and driveway areas), with most of the tree removals being in one of seven clusters, away from the property frontage along River Road. This, combined with new tree plantings as part of the project landscape plan, will reduce potential visual impacts of the tree removals from the Scenic Resource roadway corridor. The project arborist's report, discussed in more detail in Section 4 (Biological Resources) of this study, demonstrates compliance with the County Tree Ordinance and provides for proportionate replanting and tree protection measures. The site contains no rock outcroppings. See comments above under item 1.a) regarding visual impacts as seen from the Highway 116 corridor.

Significance Level: Less Than Significant Impact.

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 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?

Comment: See discussion above under item 1.a. and 1.b. Mitigation and a standard condition of approval will be required, stating that the site plan, building elevations, walls and fences, signage, lighting plan, landscaping and irrigation plans shall require final design review by the Design Review Committee and compliance with Russian River Corridor and Highway 116 Scenic Corridor local area guidelines prior to issuance of building permits. See mitigation required under item 1.a, above. With final Design Review, the project will not cause a significant visual impact.

Significance Level: Less Than Significant Impact.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Comment: The project will add new structures to the site and thus introduce new sources of light and glare. The County's standard development regulations, combined with provisions for commercial lighting under the Russian River Corridor Design Guidelines, minimizes the impact of new development by ensuring that exterior lighting is designed to prevent glare, and preclude the trespass of light on to adjoining properties and into the night sky.

A standard condition of approval will be required: "Prior to issuance of the Building Permit, an exterior lighting plan shall be submitted to the Design Review Committee for review and approval. Exterior lighting is required to be fully shielded, and directed downward to prevent "wash out" onto adjacent properties. Generally fixtures should accept sodium vapor lamps and not be located at the periphery of the property. Flood lights are not allowed. The lighting shall be installed in accordance with the approved lighting plan during the construction phase."

The project will require exterior lighting as necessary to comply with the California Building Code. A standard condition of approval requires "All new exterior lighting to be dark sky compliant, low mounted, downward casting and fully shielded to prevent glare. Lighting shall not wash out structures or any portions of the site. Light fixtures shall not be located at the periphery of the property and shall not spill over onto adjacent properties or into the night sky. Flood lights are not permitted. Lighting shall shut off automatically after closing and security lighting shall be motion sensor activated. Prior to final occupancy of the cave portal, the applicant is required to demonstrate compliance with exterior lighting requirements by providing PRMD photograph documentation of all exterior light fixtures installed". By incorporating

standard conditions of approval, the project will not result in a new source of substantial light or glare with would adversely affect day or nighttime view in the area.

Significance Level: Less Than Significant Impact.

2. AGRICULTURE AND FOREST RESOURCES:

Would the project:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

Comment: The site is designated for Recreational and Visitor Serving Commercial Use and is within the Guerneville urban services area. It does not contain farmland of Prime, Unique or of Statewide importance, and therefore will not convert Prime, Unique or Farmland of Statewide Importance.

Significance Level: No Impact.

- b) **Conflict with existing zoning for agricultural use, or Williamson Act Contract?**

Comment: The project site is zoned for Recreation and Visitor Serving Commercial uses. Sonoma County Zoning Code Section 26-42-020.q allows for the proposed resort use, subject to approval of a use permit. The project site is not under a Williamson Act contract.

Significance Level: No Impact.

- c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

Comment: The project site is not under the TP (Timberland Production) zoning district, nor will the project conflict with or cause a change to lands under TP zoning.

Significance Level: No Impact.

- d) **Result in the loss of forest land or conversion of forest land to non-forest use?**

Comment: The project site is currently vacant and contains 2.35 acres of coast redwood forest land (timberland) with coast redwood trees being the primary timber species growing onsite. Using the Redwood Tree Inventory and Construction Impact Assessment matrix in the Arborist Construction Impact report (February 10, 2020), 2375.83 square feet (0.6 acre) of timberland will be converted to a non-forest use per cluster. The crown diameter for each cluster averages 55 feet (50 - 60 feet in diameter). Using the formula for area of a circle, $A = \pi r^2$, the area of each crown is 2375.83 square feet. For the 43 clusters of coast redwood trees, the total is 102,160.69 square feet (2.35 acres).

Sonoma County Code Section 26-02-140 defines timberland conversion as “defined in Section 1100 of the Forest Practice Rules, except that timberland conversion shall not include the conversion of less than three (3) acres of timberland for the purpose of constructing a structure in accordance with a valid building permit where the conversion is limited to the cutting and removal of the minimum number of trees necessary to accommodate the structure and related improvements.” County code requires a zoning permit for conversion of less than 3-acres of timberland. Surrounding lands to the project site do not contain forest-related land uses.

Preliminary grading and tree removal plans for the project show selective tree removal is necessary to accommodate the resort structures and related improvements (parking, walkways, decks and patios). Specifically, potentially 76 coast redwood trees consisting of 6 clusters to be completely removed and 5 clusters to be partially removed could be totally removed. Using the, 2375.83 square feet (0.6 acre) of timberland to be converted to a non-forest use per cluster, for 11 clusters, there is a total of 0.6 acre being converted to non-timberland use. Additional information is also provided in the matrix. The crown height of almost all of clusters is 90-120 feet. The diameter of the trunks at 4.5 feet range from 10 inches to 40 inches. The Arborist Construction Impact report is based on a conceptual resort design as the exact details on location of "related improvements", e.g. sewer, water lines, parking, landscaping areas, walkways, decks, patios, public access trail alignment, will be determined during a public meeting before the Design Review Committee.

Significance Level: Potentially Significant unless Mitigated

Mitigation Measure Agriculture and Forest Resources AG1: Prior to grading and building permit issuance, the applicant shall provide a tree cutting and removal plan completed by a certified arborist that demonstrates the minimum number of trees necessary will be trimmed and/or removed to accommodate resort structures and related improvements.

Mitigation Monitoring Agriculture and Forest Resources AG1: Permit Sonoma staff shall not issue any grading or building permits for the project until the final tree cutting/removal plan completed by a certified arborist demonstrates the minimum number of trees necessary will be removed to accommodate resort structure and related improvements. The final tree cutting/removal plan shall be reviewed and approved by the Design Review Committee.

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?

Comment: The project proposes development of the site with a hotel and restaurant use, and would not result in conversion of farmland to non-agricultural uses. There would be a 0.6-acre conversion of forest lands to non-forest use. The site is bordered by a residential condominium development and other residential use. Site development would not encourage off-site conversion of nearby or adjacent farmland or forest land, because none exists in the vicinity of the project.

Significance Level: Less Than Significant Impact.

3. AIR QUALITY:

Where applicable, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Comment: The main purpose of an air quality plan is to bring an area into compliance with the requirements of federal and State air quality standards. Air quality plans describe air pollution control strategies to be implemented by a city, county, or region. The project site is under the jurisdiction of the Northern Sonoma County Air Pollution Control District (NSCAPCD). The NSCAPCD is in attainment for all criteria pollutants and does not have an adopted air quality plan. Therefore, the proposed project would not conflict or obstruct an applicable plan.

The Sonoma County General Plan Resource Conservation Element addresses pollutants from mobile

sources (e.g., transportation sources). The project will create traffic, therefore the following goal would be relevant to the proposed project:

Goal RC-13: Preserve and maintain good air quality and provide for an air quality standard that will protect human health and preclude crop, plant, and property damage in accordance with requirements of the federal and State CAA's (Clean Air Act).

State and Federal standards have been established for the "criteria pollutants": ozone, carbon monoxide, nitrogen dioxide, sulphur dioxide, and particulate (PM10 and PM2.5). To determine whether standards for any of these pollutants would be violated, the emissions from both stationary and mobile sources must be considered. The NSCAPCD does not have any adopted CEQA thresholds of significance for criteria air pollutants. The NSCAPCD recommends using the Bay Area Air Quality Management District (BAAQMD) adopted CEQA thresholds of significance to evaluate the significance of criteria air pollutants.

Illingworth & Rodkin (Air Pollutant and GHG Emissions Modeling, July 23, 2021) used the California Emissions Estimator Model, Version 2020.4.0 (CalEEMod) to predict construction emissions in the form of CO₂e. CalEEMod is a computer model developed by the South Coast Air Quality Management District (SCAQMD) with cooperation of other California Air Districts to estimate air pollutant and GHG emissions from land use development projects. This model also predicts emissions associated with construction activities from land use projects. The model is recommended by the Bay Area Air Quality Management District (BAAQMD) for use in estimating emissions from land use development projects. Note that NSCAPCD relies on guidance provided in the BAAQMD CEQA Air Quality Guidelines.

Air pollutant emissions are based on the CalEEMod modeling that predicts air pollutant emissions in the form of ozone precursors (i.e., reactive organic gases [ROG] and nitrogen oxides [NO_x]) along with respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM10) and fine particulate matter that has an aerodynamic diameter of 2.5 micrometers or less (PM2.5). The results of the CalEEMod modeling are provided in section 3.b below, which demonstrates the project will comply with General Plan policy. As noted the project would not conflict or obstruct an applicable air quality plan.

Significance Level: Less Than Significant Impact.

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

Comment: State and Federal governments have established standards for six criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide, sulfur dioxide, and particulates with a diameter of less than 10 and 2.5 microns (PM₁₀ and PM_{2.5}, respectively). In addition to criteria air pollutants, there are other, secondary pollutants that can lead to the formation of criteria air pollutants. For example, nitrogen oxides (NO_x) and volatile organic compounds (VOC) react with sunlight and can lead to the formation of ground level ozone.

Since the geographic area under the Northern Sonoma County Air Pollution Control District's (NSCAPCD) jurisdiction is in attainment for all criteria air pollutants, meaning there have been no violations of State or Federal air quality standards, no CEQA thresholds of significance have been set for the NSCAPCD. NSCAPCD does, however, suggest the use of the Bay Area Air Quality Management District (BAAQMD) CEQA thresholds and mitigation measures.

During grading and construction activities, dust would be generated. The amount of dust generated would be highly variable and is dependent on the size of the area disturbed, amount of activity, soil conditions and meteorological conditions. Typical winds during late spring through summer are from the west-northwest. PM10 is the pollutant of greatest concern associated with dust. Project construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod, v. 2020.4.0). Criteria air pollutant emissions were estimated for all project components.

A construction build-out scenario, including equipment list and schedule by phase, was based primarily on the default assumptions assigned by CalEEMod for the project. The model bases these assumptions on the project size and type. The schedule was extended since 16 months of construction is anticipated with about 5 months of site preparation. Equipment usage was provided by phase that included the type and quantity of each piece of equipment along with the number of days during the phase it would operate and the average hours per operating day. Traffic generated by construction, which included worker trips, vendor deliveries and material hauling were computed separately using the CARB EMFAC2021 model. All other construction inputs were based on the CalEEMod model.

Standard dust control requirements are included in the conditions of approval for the proposed project, as follows:

The Permit Holder shall be responsible for controlling dust and debris during all construction phases. The following measures shall be implemented by the permit holder on the project site during the construction period:

- Water all active construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- Sweep daily (preferably with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
- Sweep streets daily (preferably with water sweepers) if visible soil material is carried onto adjacent public streets.
- Hydro-seed or apply (non-toxic) soil stabilizers to inactive construction areas.
- Enclose, cover, water twice daily or apply (non-toxic) soil binders to exposed stockpiles dirt, sand, etc.
- Limit traffic speeds on unpaved access roads to 15 mph.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
- Replant vegetation and ground cover in disturbed areas as quickly as possible.

Construction Emissions

The CalEEMod model used default construction assumptions built into the model, which are based on project type, size of new development, and site acreage to predict construction emissions. An approximate 16-month construction schedule was generated by CalEEMod. Construction phases included site preparation and grading, building construction, architectural coating, and paving. Project emissions from construction are reported in Table 1. Emissions of criteria air pollutants (or their precursors) do not exceed any of the thresholds. Under this scenario, construction of the project would emit 627 MT of CO₂e. Neither the County nor the BAAQMD have quantified thresholds for construction activities. However, the emissions would be below the lowest threshold adopted by BAAQMD and could be considered less than significant .

Table 1. Construction Period Emissions

Scenario		ROG	NOx	PM ₁₀ Exhaust	PM _{2.5} Exhaust	CO ₂ e
Uncontrolled	Total	1.2 tons	2.7 tons	0.1 tons	0.1 tons	627 Mtons
	Average Daily ¹	7 lbs.	15 lbs.	1 lbs.	1 lbs.	--
<i>BAAQMD Thresholds (pounds per day)</i>		<i>54 lbs.</i>	<i>54 lbs.</i>	<i>82 lbs.</i>	<i>54 lbs.</i>	<i>--</i>
Exceed Threshold?		No	No	No	No	--
Notes: ¹ Assumes 1.5 years or 366 workdays. Mtons = metric tons						

Significance Level: Less Than Significant Impact

Operational Emissions

The CalEEMod model uses mobile emission factors from the CARB's EMFAC2021 model. Forecasted project trip generation rates of 6.24 trips per room provided by W-Trans were input to the model. Trip generation data for hotels is based on travel data collected at typical hotels that include meeting rooms (such as for corporate events) and on-site amenities such as hotel restaurants and hotel bars. The parking lot serves the trips generated by the project and public parking. Parking lots are typically not considered to generate traffic trips but rather serve traffic that is already on the roadway network. CalEEMod does not generate traffic emissions for parking lot land uses. Given the nature of the project, the default CalEEMod setting of "Urban" was changed to "Rural," which lengthens the traffic trips. The "Rural" model default trip lengths and traffic mix for Sonoma County in CalEEMod were also used.

Emissions associated with vehicle travel depend on the year of analysis. The earlier the year, the higher the emission rates, as CalEEMod uses the CARB's EMFAC2021 motor vehicle emissions model. This model assumes reduced emission rates as newer vehicles with lower emission rates replace older, more polluting vehicles through attrition of the overall vehicle fleet. The earliest year the project could be possibly constructed and fully operated for one year would be 2025. Full build out occurring later than 2025 would result in lower emissions.

CalEEMod default inputs for the project were used to model area sources. Area sources include reactive organic gas (an ozone precursor pollutant) emissions from paints and other consumer products, wood smoke from fireplaces, and exhaust emissions from landscape equipment. The project proposes a two-sided fireplace in the hotel lobby plus generous decks with outdoor fireplaces. Only non-wood burning fireplaces are allowed as a condition of approval of the project.

Energy usage emissions include those from natural gas combustion and electricity usage. CalEEMod model default energy usage inputs were used in the modeling. CalEEMod uses a default CO₂ emission rate of 119.98 pounds of CO₂ per megawatt of electricity produced, which is based on Sonoma Clean Power emissions rate. Emissions from solid waste generation are also based on CalEEMod model defaults for the project type and size. These are emissions associated with transporting and landfilling of solid waste generated by the project. No adjustments were made for recycling.

Emissions from water usage are based on CalEEMod model defaults that are based on the project type and size. Indirect emissions from water usage are associated with electricity usage associated with conveyance and treatment of water and wastewater associated with the project. No adjustments to reflect project-specific water usage were made in the modeling.

Sonoma County had a total supply of over 6,100 hotel rooms in 2015 (HVS, In Focus: Sonoma County California Hotel Market, July 2015). The total supply increased to over 6,300 rooms by 2018, despite a loss of approximately 400 hotel rooms that were lost to fires in 2017. Additional other lodging options within the County include more than 750 Airbnb rentals, and an estimated 3,700 campground and recreational vehicle spaces (First Carbon Solutions, August 24, 2021).

Low occupancy rates from 2010-12 reflected the lingering effects of the 2007-09 worldwide recession. The high occupancy rate in 2018 occurred during a time when a large share of hotel guests were local residents that had been displaced from their homes due to fires, as well as first responders and construction workers (Sonoma County Economic Development Board, Sonoma County Annual Tourism Report, 2019). In 2019, the occupancy rate decreased to 71 percent. With the pandemic limiting worldwide travel beginning in early 2020, the subsequent years should show a decrease for 2020-21, but most likely trend back to the average of about 72 percent by 2022 (First Carbon Solutions, August 24, 2021).

GHG emissions are based on annual operations. The hotel is anticipated to have an occupancy rate of 71.6% annually. Therefore, CalEEMod modeled emissions for mobile, water usage, and solid waste

generations were reduced by 20% to account for annual occupancy. Energy usage emissions were assumed to be reduced by 15%, since there would be energy necessary to sustain some unoccupied portions of the project.

Operational emissions of criteria air pollutants (or their precursors) on an annual and daily basis are provided in Table 2. Emissions of air pollutants would not exceed the annual or average daily emission thresholds.

Emissions of CO₂e are reported based on annual conditions only. Annual operational CO₂e emissions computed using CalEEMod were adjusted for the annual occupancy conditions and also shown in Table 2. The proposed project would have total direct and indirect emissions that are below the GHG operational threshold (1,100 MT of CO₂e per year) recommended by BAAQMD for new projects.

BAAQMD has not published a new threshold since the State passed Senate Bill 32, which sets statewide GHG reduction targets of at least 40 percent below 1990 levels by 2030. In 2018, California met the goals of Assembly Bill 32 to reduce statewide GHG emission to 1990 levels by 2020. The BAAQMD recommended thresholds were originally intended to address the AB32 goals for 2020. The BAAQMD recommended 2020 threshold is adjusted downward by 20 percent to identify a 2025 threshold (project opening year), which is in line with a 40 percent reduction for year 2030. These thresholds are also shown in Table 2.

Table 2. Operational Emissions

Scenario	ROG	NO _x	PM ₁₀ Total	PM _{2.5} Total	CO ₂ e
Area	0.46	0.00	0.00	0.00	0.00
Energy Consumption	0.02	0.19	0.02	0.01	210 ¹
Mobile	0.75	0.39	0.49	0.13	420 ²
Solid Waste Generation	--	--	--	--	26 ²
Water Usage	--	--	--	--	4 ²
Total in Year 2025 (in tons/year)	1.23	0.58	0.51	0.14	660 Mtons
2025 Project Average Daily Emissions (lbs/day)	7	3	3	1	--
<i>2020 BAAQMD Thresholds (tons/year)</i>	<i>10</i>	<i>10</i>	<i>15</i>	<i>10</i>	<i>1,100Mtons</i>
<i>Threshold adjusted for 2025</i>					<i>880 Mtons</i>
<i>Threshold adjusted for 2030</i>					<i>660 Mtons</i>
<i>BAAQMD Thresholds (lbs/day)</i>	<i>54</i>	<i>54</i>	<i>82</i>	<i>54</i>	<i>--</i>
<i>Exceed Threshold?</i>	No	No	No	No	No

¹ The CalEEMod annual GHG energy emissions were reduced by 15 percent to account for an annual occupancy rate of 72 percent.

² The CalEEMod annual GHG mobile, solid waste and water emissions were reduced by 20 percent to account for an annual occupancy rate of 72 percent.

Significance Level: Less Than Significant Impact

c) Expose sensitive receptors to substantial pollutant concentrations?

Comment: The project is located more than 30 feet from the nearest off-site residence and is not located near any other sensitive receptor or population (school, hospital, nursing facility, etc.). The project will not emit a substantial pollutant concentration based on the analysis under Section 3 b. above.

Significance Level: No Impact.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Comment: The project is not expected to result in other emissions, including odors.

Significance Level: No Impact.

4. BIOLOGICAL RESOURCES:

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?

Comment: A Biological Assessment (Kjeldsen Biological Consulting, July 16, 2008) was prepared for the project. The project site consists of an open grassy area near the center of the property, with individual trees and tree clusters closer to Hulbert Creek and the Russian River. Trees, addressed below under Section 4.e, below, include multiple stands of coast redwoods. Other native tree species occurring on the site include bay laurel (*Umbellularia californica*), box elder (*Acer negundo*), Oregon ash (*Fraxinus oregana*), Pacific big-leaf maple (*Acer macrophyllum*), tan oak (*Lithocarpus densiflorus*), white alder (*Alnus rhombifolia*), and willow (*Salix spp.*). Additionally, the non-native tree species black locust (*Robinia pseudoacacia*) occurs in significant numbers in the southwest slope above the Russian River. The number of these trees is limited within the proposed grading limits for the primary resort structures, walkways and outdoor use areas. Tree removals would be potentially 76 total if partial cluster removal is not possible. A Streamside Conservation Plan has been prepared for impacts within the Riparian Corridor due to slight encroachment of the hotel buildings and decks. Impacts due to the construction of the public access trail will also be mitigated. Tree removals and tree planting are addressed under Section 4.e, below.

The Biological Assessment lists the following special-status animals as known to occur within five miles of the property: Bank swallow, California freshwater shrimp, California red-legged frog, Foothill yellow-legged frog, Giuliani's Dubiraphaian riffle beetle, Gualala roach, Hoary bat, Northwestern pond turtle, Osprey (nesting), Russian River tule perch, and Sonoma tree vole. None of these species were found to be present on the Project Site. In Table III of the Biological Assessment, "Potential Habitat present along Russian River" was stated for the Northwestern pond turtle, Giuliani's Dubiraphaian riffle beetle, Russian River tule perch, Osprey (nesting), Foothill yellow-legged frog, and the Bank swallow. Hulbert Creek was also stated as Potential Habitat for the Foothill yellow-legged frog. Requisite habitat is absent for Gualala roach and the project site does not contain associated habitat for California red-legged frog. California freshwater shrimp are not known for Hulbert Creek or this area of the Russian River.

The Biological Assessment concludes: "The project footprint does not contain habitat, which would support special-status species. The site conditions, historical land use, lack of any findings during our studies, soils present, site topography, lack of any historical records for the site, and the habitat and plant associates present would reasonably preclude the presence of special-status species. Special-status aquatic organisms are known for the Russian River and its tributaries." Since there is potential habitat along the Russian River and Hulbert Creek for certain special-status species, mitigation measures are proposed.

California Red-legged Frog

As frogs search for new breeding habitat, they can migrate long distances and occupy riparian habitat and any area with persistent summer moisture. If California red-legged frogs do occur on-site, removal of riparian habitat adjacent to Hubert Creek and the Russian River could result in injury or direct mortality. If

riparian habitat adjacent to Hubert Creek and the Russian River could result in injury or direct mortality. If California red-legged frog is present in the Project area and impacted, Project impacts to California red-legged frog would be potentially significant.

Significance Level: Potentially Significant unless Mitigated

Based on the Agency Review comments received during the IS/MND public comment period November 2, 2022 through December 2, 2022, the California Department of Fish and Wildlife (CDFW) stated in their letter, dated November 29 2022, that for an adequate environmental setting and to reduce impacts to California Red-legged Frog to less-than-significant, CDFW recommends including the following mitigation measure:

Mitigation Measure BIO-1: California Red-legged Frog Habitat Assessment and Surveys. At least two weeks prior to the commencement of ground-disturbing activities, the Project area and nearby vicinity, including a minimum 500-foot radius surrounding the Project activity area, shall be assessed by a Qualified Biologist for the presence of California red-legged frog individuals and habitat features. Habitat features include both aquatic habitat such as plunge pools and ponds and terrestrial habitat such as burrows or other refugia. If habitat occurs, then no more than 48 hours prior to ground-disturbing activities the area shall be surveyed by a Qualified Biologist. The results of the habitat feature assessment and survey shall be submitted to CDFW for written acceptance prior to starting Project activities. Burrows and refugia sites shall be flagged or otherwise marked for avoidance; Project activities shall avoid habitat features to the extent feasible. If California red-legged frogs are encountered during the assessment or Project activities, the Project shall not proceed or all work shall cease, and CDFW shall immediately be notified. Work shall not proceed until the frog, through its own volition, moves out of harm's way and CDFW has provided permission in writing to proceed with the Project. If California red-legged frog is encountered or the Qualified Biologist determines that impacts to the species are likely to occur, the Project shall consult with USFWS pursuant to the federal Endangered Species Act and receive written approval from CDFW prior to the impact. In this case, CDFW may require additional protection measures which shall be implemented by the Project.

Mitigation Monitoring BIO-1: Permit Sonoma shall include this mitigation measure in the conditions of approval for any planning, grading and building permits. Permit Sonoma staff shall ensure the results of the habitat feature assessment and survey have been submitted to CDFW for written acceptance prior to starting Project activities.

Foothill Yellow-Legged Frog

Removal of riparian habitat adjacent to Hubert Creek and the Russian River could result in direct mortality of foothill yellow-legged frog. Juvenile frogs can migrate long distances after breeding occurs in the spring and occupy riparian habitat, moist grassland habitat, and any area with persistent summer moisture as they search for new breeding habitat.

Foothill yellow-legged frog North Coast distinctive population segment (DPS) is as a Species of Special Concern (SSC). The SSC designation is given to species native to California satisfying one or more of the following criteria: 1) is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role; 2) is listed as Federally-, but not State threatened or endangered; 3) meets the State definition of threatened or endangered but has not formally been listed; 4) is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; or 5) has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State threatened or endangered status. If Foothill yellow-legged frog is present in the Project area and impacted, Project impacts to foothill yellow-legged frog would be potentially significant.

Significance Level: Potentially Significant unless Mitigated

Based on the Agency Review comments received during the IS/MND public comment period November 2, 2022 through December 2, 2022, the California Department of Fish and Wildlife (CDFW) stated in their letter, dated November 29 2022, that for an adequate environmental setting and to reduce impacts to Foothill Yellow-Legged Frog to less-than-significant, CDFW recommends including the following

mitigation measure:

Mitigation Measure BIO-2: Foothill Yellow-Legged Frog - Survey Methodology: A CDFW-approved Qualified Biologist shall provide a foothill yellow-legged frog (FYLF) survey methodology for CDFW review and written approval at least 30 days prior to conducting project activities, unless otherwise approved in writing by CDFW. Project activities shall not begin until FYLF surveys have been completed using a methodology approved by CDFW. Survey methodology is not required if the stream is dry and there are no areas of persistent summer moisture present in or within 500 feet upstream and downstream of the project area. Survey methodology shall target all life stages and shall include carefully searching under rocks, within vegetation such as sedges and other clumped vegetation, and under undercut banks, no less than 50 feet from the streambed, where appropriate, and at least 500 feet upstream and downstream of the project area. Surveys should be conducted at different times of day and under variable weather conditions, if possible. Surveys should avoid windy days (15 miles per hour or greater), as ripples in the water make it more challenging to detect frogs.

Foothill Yellow-Legged Frog Surveys: Prior to starting project activities, a CDFW-approved Qualified Biologist shall conduct surveys for FYLF using a CDFW-approved methodology. The results of the surveys shall be emailed to a CDFW representative, and the project shall receive written acceptance of the survey results from CDFW prior to starting project activities. The project shall install exclusionary fencing and prepare and implement a FYLF Relocation and Habitat Improvement Plan if FYLF or their eggs are found, if required and approved by CDFW.

If documentation is provided to CDFW that the stream has been completely dry for greater than 30 days prior to starting Project activities, and no water or moist areas within the streambed exist within 500 feet upstream and downstream of the Project site, then surveys for foothill yellow-legged frogs are not necessary.

Mitigation Monitoring BIO-2: Permit Sonoma shall include this mitigation measure in the conditions of approval for any planning, grading and building permits. Permit Sonoma staff shall ensure the results of the surveys have been submitted to CDFW for written acceptance prior to starting Project activities.

Townsend's Big-Eared Bat

The Biological Assessment did not evaluate potential impacts to Townsend's big-eared bat (*Corynorhinus townsendii*). Removal of trees may significantly reduce suitable roosting habitat for Townsend's big-eared bat and without proper habitat assessments and surveys being conducted prior to removal, could result in the direct mortality of Townsend's big-eared bat individuals. Townsend's big-eared bat is an SSC and also has a State Ranking of S2, meaning it is at high risk of extirpation in the state due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors. If Townsend's big-eared bats are roosting within the trees that would be removed, project impacts to Townsend's big-eared bat would be potentially significant.

Significance Level: Potentially Significant unless Mitigated

Based on the Agency Review comments received during the IS/MND public comment period November 2, 2022 through December 2, 2022, the California Department of Fish and Wildlife (CDFW) stated in their letter, dated November 29 2022, that for an adequate environmental setting and to reduce impacts to Townsend's Big-Eared Bat to less-than-significant, CDFW recommends including the following mitigation measure:

Mitigation Measure BIO-3: Bat Protection: Prior to any tree removal, a qualified bat biologist shall conduct a habitat assessment for bats. The habitat assessment shall be conducted a minimum of 30 days prior to tree removal and shall include a visual inspection of potential roosting features (e.g., cavities, crevices in wood and bark, or exfoliating bark for colonial species, and suitable canopy for foliage-roosting species). If suitable habitat trees are found, they shall be flagged or otherwise clearly marked, CDFW shall be notified immediately, and tree trimming or removal shall not proceed without approval in writing from CDFW. Trees may be removed only if: a) presence of bats is presumed, or documented during the surveys described below, in trees with suitable bat habitat, and removal using the two-step removal process detailed below occurs only during seasonal periods of bat activity from approximately

March 1 through April 15 and September 1 through October 15, or b) after a qualified bat biologist, under prior written approval of the proposed survey methods by CDFW, conducts night emergence surveys or complete visual examination of roost features that establish absence of roosting bats. Two-step tree removal shall be conducted over two consecutive days, as follows: 1) the first day (in the afternoon), under direct supervision and instruction by a qualified bat biologist with experience conducting two-step tree removal limbs and branches shall be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices or deep bark fissures shall be avoided, and 2) the second day the entire tree shall be removed.

Mitigation Monitoring BIO-3: Permit Sonoma shall include this mitigation measure in the conditions of approval for any planning, grading and building permits. Permit Sonoma staff shall ensure the results of the bat habitat assessment have been submitted to CDFW for written acceptance prior to starting Project activities.

Western Pond Turtle

Removal of riparian habitat adjacent to Hubert Creek and the Russian River could result in direct mortality of western pond turtle. Western pond turtle is as an SSC. If western pond turtle is present in the Project area and impacted, Project impacts to western pond turtle would be potentially significant.

Significance Level: Potentially Significant unless Mitigated

Based on the Agency Review comments received during the IS/MND public comment period November 2, 2022 through December 2, 2022, the California Department of Fish and Wildlife (CDFW) stated in their letter, dated November 29 2022, that for an adequate environmental setting and to reduce impacts to Western Pond Turtle to less-than-significant, CDFW recommends including the following mitigation measure:

Mitigation Measure BIO-4: Western Pond Turtle Surveys. A Qualified Biologist shall conduct a pre-construction survey for the western pond turtle and their nests within 48 hours of the commencement of project activities. If western pond turtle or their nests are detected at any time CDFW shall be notified immediately, and the Qualified Biologist shall relocate the turtle to appropriate habitat within the stream it was found. The project shall prepare and implement a Western Pond Turtle Habitat Improvement Plan, if western pond turtle or their nests are found, if required and approved by CDFW.

Mitigation Monitoring BIO-4: Permit Sonoma shall include this mitigation measure in the conditions of approval for any planning, grading and building permits. Permit Sonoma staff shall ensure the western pond turtle surveys have been completed and, if any western pond turtles are found, CDFW has been notified and a Western Pond Turtle Habitat Improvement Plan has been prepared and implemented prior to starting Project activities.

Sonoma Tree Vole

Removal of up to 76 redwood (*Sequoia sempervirens*), Douglas-fir (*Pseudotsuga menziesii*), and other conifer trees could result in direct mortality of Sonoma tree vole and destruction of active nests. Sonoma tree vole is as an SSC. If Sonoma tree vole is present in the Project area and impacted, Project impacts to Sonoma tree vole would be potentially significant.

Significance Level: Potentially Significant unless Mitigated

Based on the Agency Review comments received during the IS/MND public comment period November 2, 2022 through December 2, 2022, the California Department of Fish and Wildlife (CDFW) stated in their letter, dated November 29 2022, that for an adequate environmental setting and to reduce impacts to Sonoma Tree Vole to less-than-significant, CDFW recommends including the following mitigation measure:

Mitigation Measure BIO-5: Sonoma Tree Vole Surveys: A Qualified Biologist shall conduct a pre-construction survey for the Sonoma tree vole and their nests within 48 hours of the removal of trees on-site. If Sonoma tree vole or their nests are detected at any time CDFW shall be notified immediately. The project shall prepare and implement a Sonoma tree vole relocation plan, if Sonoma tree vole or their

nests are found, if required and approved by CDFW.

Mitigation Monitoring BIO-5: Permit Sonoma shall include this mitigation measure in the conditions of approval for any planning, grading and building permits. Permit Sonoma staff shall ensure pre-construction surveys have been completed and, if any Sonoma tree voles are found, CDFW has been notified and a relocation plan has been prepared and implemented prior to starting Project activities.

Northern Spotted Owl

The project could result in impacts to nesting northern spotted owl (NSO) including mortality of young and a violation of CESA, and loss of nesting habitat. The project is within and near potential nesting habitat for NSO. The closest NSO occurrences documented in the California Natural Diversity Database (CNDDDB) are less than 0.7 miles south of the project, and there are additional documented NSO occurrences within the project vicinity. NSO can utilize a wide variety of habitat types even though typically NSO are associated with old-growth or mature forests. NSO exhibit flexibility in their use of different forested areas for nesting, roosting, and feeding requirements. Typical NSO habitat characteristics include a multi-storied structure and high canopy cover. The project may cause adverse impacts to NSO, such as disturbance from elevated sound levels or human presence near nest sites. Removal of 76 trees which are potential NSO nesting habitat may result in direct removal of a nesting site and loss of NSO eggs or young.

NSO qualifies as a threatened animal under CEQA because it is listed as threatened under California Endangered species Act (CESA) and the Federal Endangered Species Act (ESA) (CEQA Guidelines, § 15380). If NSO are nesting on or near the project site during construction, the project could result in take of the species and a substantial reduction in its population, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Significance Level: Potentially Significant unless Mitigated.

Based on the Agency Review comments received during the IS/MND public comment period November 2, 2022 through December 2, 2022, the California Department of Fish and Wildlife (CDFW) stated in their letter, dated November 29 2022, that for an adequate environmental setting and to reduce impacts to Northern Spotted Owl to less-than-significant, CDFW recommends including the following mitigation measure:

Mitigation Measure BIO-6: Northern Spotted Owl Habitat Assessment: At least 30 days prior to commencement of Project Activities, an NSO habitat assessment shall be conducted to determine the type of NSO habitat present on-site. The habitat assessment shall identify potential habitat as described on page 31 of the USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls. If no suitable habitat exists within 0.25 miles of the project, then no surveys or avoidance measures would be required. If the habitat assessment does identify suitable NSO habitat within 0.25 miles of the project, then the type of habitat within that 0.25-mile area would need to be identified. Results shall be submitted to CDFW for review and approval prior to commencement of project activities. If nesting habitat is identified on-site and will be impacted, two years of protocol surveys shall be conducted and compensatory mitigation for loss or downgraded quality of nesting habitat shall be provided at a minimum 3:1 mitigation to impacts ratio including permanent protection of nesting habitat through a conservation easement and providing funding for, preparing, and implementing a long-term management plan in perpetuity, unless otherwise approved in writing by CDFW.

Northern Spotted Owl Surveys: No project activities within 0.25 miles of NSO nesting habitat shall occur from March 15 to August 31, unless NSO surveys have been completed by a qualified biologist following the U.S. Fish and Wildlife Service (USFWS) Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls, dated (revised) January 9, 2012, and the survey report is accepted by CDFW in writing. If breeding NSOs are detected during surveys, a 0.25-mile no-disturbance buffer zone shall be implemented around the nest. NSO surveys shall be conducted for each year project construction occurs. No Project activities shall occur within the buffer zone until the end of breeding season, or a qualified biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. Alternate buffer zones may be proposed by a qualified biologist after conducting an auditory and

visual disturbance analysis following the USFWS guidance, Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW. Survey results shall be provided to the Spotted Owl Observations Database at <https://wildlife.ca.gov/Data/CNDDDB/Spotted-Owl-Info>). If NSO are detected, CDFW and the USFWS shall be immediately notified. If Project activities may impact NSO, or NSO nesting habitat, the project shall apply for and obtain an Incidental Take Permit (ITP) from CDFW, as well as authorization from the USFWS, before starting project activities.

Alternate buffer zones may be proposed by a Qualified Biologist after conducting an auditory and visual disturbance analysis following the USFWS guidance, Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW.

Mitigation Monitoring BIO-6: Permit Sonoma shall include this mitigation measure in the conditions of approval for any planning, grading and building permits. Permit Sonoma staff shall ensure the NSO habitat assessment and required surveys has been completed and, if any NSO are found, the requirements in the mitigation measure have been implemented prior to starting Project activities.

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

Comment: Policy OSRC-8a classifies “Riparian Corridors” designated in the Open Space and Resource Conservation Element. The “Russian River Riparian Corridor” is the corridor adjacent to the main stem of the Russian River, excluding lands located within the Urban Residential, Commercial, Industrial, or Public-Quasi Public land use categories or within the jurisdiction of a city. General Plan policy OSRC-8b establishes a 200-foot Riparian Corridor streamside conservation area along both sides of the Russian River. However, since the Project will be located in an unincorporated area of Guerneville, the County Zoning Code reduces the Riparian Corridor to 50 feet per Policy OSRC-8a.

Section 26-65-005 of the Sonoma County Zoning Code allows for an exception to the prohibitions of encroaching into the 50-foot Riparian Corridor as follows: An exception to this prohibition may be approved with a use permit if a streamside conservation plan is approved that provides for the appropriate protection of the biotic resources, water quality, floodplain management, bank stability, groundwater recharge, and other applicable riparian functions. Off-site mitigation will be considered only where on-site mitigation is infeasible or would provide superior ecological benefits, as determined by the director.

The project application was originally submitted in 2008. When the project was re-activated in 2014/2015 the need for the building footprint to comply with the 50 ft. riparian setback, which was adopted in 2014, was raised. After an extensive number of meetings, it was determined that encroachment would be possible if a Streamside Conservation Plan, as allowed by the Zoning Code, was submitted and approved. A Streamside Conservation Plan was prepared to mitigate for impacts to riparian habitat resulting from small areas of the Project encroaching into the Riparian Corridor along the Russian River and Hulbert Creek.

The mitigation ratio for “new construction” affecting a Riparian Corridor is normally 2:1. However, the applicant agreed to a 3:1 mitigation ratio (three acres for each impacted acre) to provide a greater project benefit to the public. The Project will affect 0.10- acre (4,490 sq. ft.) of the Riparian Corridor, not including the public access trail impacts, (Figure 18) which, at a 3:1 mitigation ratio, will require restoration of a 0.30-acre (13,470 sq. ft.) area. The limited impact of the Project on the Riparian Corridor will be offset by removing non-native invasive plants, such as English ivy, Himalayan blackberry, and French broom, from the unaffected 0.965 acre (41,936 sq. ft.) of the Riparian Corridor. The removal of non-native vegetation from the understory of the forested areas of the Riparian Corridor and establishment of native vegetation in the understory will have an overall beneficial effect on the habitat value in the mitigation area for those species that traditionally utilize the understory areas in forested areas dominated by redwoods and bay. Removing invasive species from the unaffected area of the Riparian Corridor and planting this area with native plants will satisfy the mitigation requirement based on the 3:1 mitigation ratio (Streamside

Conservation Plan, by Ted Winfield & Associates and Resource- Design, December 11, 2017, Updated February 17, 2020). The Streamside Conservation Plan prepared by Ted Winfield & Associates and Resource-Design (updated in February 17, 2020) estimates approximately 0.25 acres (10,800 sq. ft.) of the Riparian Corridor will be impacted due to the public access trail. After the final alignment of the public access trail is determined and the acreage of impacts of that trail on the Riparian Corridor are determined, then a final Streamside Conservation Plan that includes the additional mitigation acreage for the public access trail will be submitted to Permit Sonoma. This is a condition of approval prior to issuance of grading and building permits.

Riparian habitat is of critical importance to protecting and conserving the biotic and abiotic integrity of an entire watershed. Riparian functions become impaired when riparian habitat is substantially altered, thereby likely substantially adversely impacting aquatic and terrestrial species. Removal of trees and other vegetation may significantly reduce suitable nesting and roosting habitat for many bird and bat species, such as Townsend's big-eared bat, an SSC. It also causes the loss of important refugia for small mammals such as the Sonoma tree vole, also an SSC. Mature riparian trees and mid canopy vegetation would take considerable time to reestablish and grow to function. The project may substantially adversely affect riparian habitat by permanently removing riparian habitat resulting in the loss or degradation of this vulnerable habitat type. If the above impacts to riparian habitat occur, project impacts to riparian habitat would be potentially significant.

Significance Level: Potentially Significant Unless Mitigated.

Based on the Agency Review comments received during the IS/MND public comment period November 2, 2022 through December 2, 2022, the California Department of Fish and Wildlife (CDFW) stated in their letter, dated November 29 2022, that to reduce impacts to riparian habitat to less-than-significant, CDFW recommends that a Lake and Streambed Alteration (LSA) Notification be submitted to CDFW and the following mitigation measure that will most likely be required if the LSA Agreement is issued:

Mitigation Measure BIO-7: A LSA Notification shall be submitted to CDFW and the LSA Agreement complied with, if issued.

Mitigation Monitoring BIO-7: Permit Sonoma shall not issue any grading or building permits for the project until the applicant submits a LSA notification to CDFW and a LSA Agreement has been issued.

The LSA Agreement would most likely require the following mitigation measure:

Mitigation Measure BIO-8: To mitigate for the removal of riparian trees, replacement trees shall be planted at the below minimum replacement to removal, unless otherwise approved in writing by CDFW:

- 1:1 for removal of non-native trees;
- 1:1 for removal of native trees other than oak (*Quercus* sp.) up to 3 inches DBH (diameter at breast height);
- 3:1 for removal of native trees other than oak 4 to 6 inches DBH;
- 6:1 for removal of native trees other than oak greater than 6 inches DBH;
- 4:1 for removal of oak trees up to 6 inches DBH;
- 5:1 for removal of oak trees greater than 6 inches to 15 inches DBH; and
- 10:1 for removal of oak trees greater than 15 inches in diameter

Replacement tree plantings shall consist of 5-gallon or greater saplings and locally-collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three acorns planted at an approximately two-inch depth to minimize predation risk. Large acorns shall be selected for plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, from the same watershed in which they are planted.

The project shall monitor and maintain, as necessary, all plants for five years to ensure successful revegetation. Planted trees and other vegetation shall each have a minimum of 80 percent survival at the

end of five years. If revegetation survival and/or cover requirements do not meet established goals as determined by CDFW, the project is responsible for replacement planting, additional watering, weeding, invasive exotic eradication, or any other practice, to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for five years after planting.

Mitigation Monitoring BIO-8: Permit Sonoma shall include this mitigation measure in the conditions of approval for any planning, grading and building permits. Permit Sonoma staff shall ensure the applicant implements the required replacement tree plantings and monitors the plantings as required by the LSA Agreement.

Mitigation Measure BIO-9: The applicant shall comply with all recommendations, mitigation measures and monitoring plan of the February 17, 2020 Ted Winfield & Associates and Resource- Design, Final Streamside Conservation Plan. The performance criterion for the plants at the mitigation site will focus on the survival of the plants.

- a. Survival for the trees, shrubs and ferns will be 80% at the end of five years.
- b. Survival for the planted grasses will be 60% at the end of three years.

Mitigation Monitoring BIO-9: The applicant shall submit a detailed Final Streamside Conservation Plan to Permit Sonoma staff prior to the issuance of the grading and building permits per a condition of approval. The Final Streamside Conservation Plan specifications shall be incorporated into the plans. The applicant shall ensure that implementation of the Final Streamside Conservation Plan mitigation measures will be in compliance with the planting plan, planting specifications, recommendations for maintenance of the plants, evaluations of the status of the plants, removal of non-native vegetation, maintenance of the irrigation system and irrigation need plus the survival rates for the monitoring time periods.

Per the Final Streamside Conservation Plan, the survival of the plants will be assessed during (May-June) and toward the end of the growing season (August-September) during the first five years following planting. Dead planted material will be replaced prior to the rainy season during the first three years. Photos will be taken of the planted areas during each site visit to document development of plants in the mitigation area from set photo points. Additional monitoring of the plants will occur during the first three growing seasons to evaluate the need for supplemental irrigation, removal of weeds and repair of protective fencing to protect seedlings from browsers. A report, including photos, shall be provided to Permit Sonoma staff upon completion and annually for review and approval after the second assessment site visit in September and by the end of each year.

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?

Comment: Kjeldsen Biological Consulting, project biologist, determined that there are no wetlands or vernal pools associated with the project footprint. The project will not have an adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act (Biological Assessment, July 16, 2008).

Significance Level: No Impact.

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?

Comment: The Russian River and Hulbert Creek are corridors for fish and wildlife movement. Per the Biological Assessment (Kjeldsen, July 16, 2008), the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species. A public access trail would be constructed within the Hulbert Creek and Russian River Riparian Corridors. Figures 14, 15 and 20 show the conceptual alignment of the public access trail and cross-sections. The impact of constructing the public access trail within the riparian corridors will be mitigated as described in the Streamside

Conservation Plan and Mitigation Measures BIO-8 and BIO-9 above. Non-native plants and debris will be removed and replaced with native plants improving the riparian habitat. After construction, the public access trail would not interfere substantially with the movement of any native resident or wildlife species.

Application of standard County Grading Ordinance provisions would further protect potential impacts to Hulbert Creek and the Russian River. Best management practices (BMPs) are included as standard conditions of approval addressing project grading and erosion control, and would further protect native and migratory fish within Hulbert Creek and the Russian River. A condition of approval requires as part of the grading plans, the applicant must include an erosion prevention/sediment control plan which clearly shows best management practices to be implemented, limits of disturbed areas/total work, vegetated areas to be preserved, pertinent details, notes, and specifications to prevent damages or minimize adverse impacts to the surrounding properties and the environment.

Kjeldsen Biological Consulting, project biologist, determined the project will not substantially interfere with native resident, migratory fish or wildlife species, wildlife corridors, and or native wildlife nursery sites (Biological Assessment, July 16, 2008).

Kjeldsen did not observe any rookeries, nesting sites or breeding habitat for wildlife of the area associated with the project. Raptor (Osprey) nesting is common along the Russian River but no nests were observed on the property or near vicinity. However, there is a possibility that a native bird may nest in some of the trees located in or near the area where construction is going to occur. A standard condition of approval is included that if construction is going to occur during nesting season, a pre-construction survey for nesting birds will be performed.

Significance Level; Less than significant impact.

e) Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

Comment: The project is subject to the Tree Protection Ordinance. Potentially 76 trees, consisting of tree clusters of coast redwoods (*Sequoia sempervirens*) will be removed if partial removal of tree clusters is not possible for project grading and construction. Most of the trees proposed to be removed are located in clusters on the east and south portions of the site, 300 feet or more from the SR 116 frontage, along with one additional tree closer to the western property boundary.

The applicant prepared an Arborist's Report and Construction Impact Assessment (MacNair & Associates, July 2008, updated November 2017, updated October 2018, updated February 2020) for the project. The report found mature clusters, or small groves, of coast redwoods, dominate the site. The redwood groves are typically multiple trunk clusters originating as sprouts from the below ground root collar or stump of the original tree. The trees appear to be second growth trees based upon the size and uniformity of the stumps. The clusters range in number from 2 to 18 trunks with the multiple trunk trees often having fused and/or co-dominant trunks structures. Extensive replanting is proposed to meet requirements of the Tree Protection Ordinance and compliance will be a condition of project approval, also addressed below as a project mitigation measure. There are no known Heritage or Landmark Trees on the project site that would be impacted by development, and no oak trees are proposed to be removed.

A Tree Preservation Plan (See Attachment 11) from the Arborist Construction Impact Review (MacNair, February 10, 2018, updated February 10, 2020) highlights the locations of the 43 coast redwood clusters, the assigned tree cluster number, and the color-coded construction impact category. The construction impact categories are:

- No grading or construction impact expected (dark green). The clusters are located at a sufficient distance where no root or crown impacts are expected.
- Grading or construction is shown within the primary tree protection zone (light green). These trees will require specialized tree protection procedures and construction techniques to protect the trees.
- Partial cluster removal (yellow). Redwood clusters where a portion of the stems/trees are shown for removal due to locations adjacent to buildings and other site improvements. This cluster

category will require further evaluation to determine the feasibility of retaining some of the trees. Removal (red). Clusters are designated for removal due to locations within the grading limits or building footprints.

Of the 43-coast redwood (*Sequoia sempervirens*) clusters within the development envelope, there will be no impact to four (4) of the clusters; twenty-eight (28) of the clusters will require special tree protection measures so as to not damage the root zones; five (5) of the clusters will require partial removal and six (6) of the clusters will be removed.

The following tree protection measures will be implemented to ensure tree preservation and long-term viability. These are general tree protection concepts with detailed specifications to be prepared in conjunction with the completion of the site improvement plans. The tree protection measures are intended to protect root zones, while allowing construction close to the tree clusters. Construction methods will include pier and beam foundation construction, cantilevered structures, and above grade driveways and pathways using geotextile fabric, reinforced concrete, and elevated walkways to avoid grading cuts within the primary tree protection zone.

Tree Protection Measures:

1. Establish tree protection zones (TPZs) (primary and secondary)
 - 1.1. Primary TPZ: Goal: No root loss or damage within 20'± of face of trunk.
 - 1.2. Secondary TPZ: Limited root loss may occur with root pruning procedures implemented and pre and post-construction cultural procedures applied.
2. Tree protection fencing plan
3. Building design- Pier and grade beam foundations with cantilevered structures to protect primary root zones. The tree protection goal is to avoid grading or soil disturbance within primary tree protection zones.
4. Underground Utilities: Establish underground utility corridors outside TPZs where possible. Use directional boring or airspade excavation techniques within primary tree protection zones.
5. Site preparation: Brush clearing, tree removals with approved equipment and soil protection procedures.
6. Determine root distribution patterns for locating appropriate foundation pier locations using airspade or hand digging and probing.
7. Driveways and walkways designed to avoid grading cuts using geotextile fabrics or reinforced concrete at existing or fill grades, as well as elevated walkways.
8. Pruning to provide building clearances and remove weak or shade suppressed branches. Branches can be thinned or shortened as required.
9. Cultural Procedures-
 - 9.1. Irrigation to improve vigor and to compensate for root loss.
 - 9.2. Pest and disease control procedures as required.
 - 9.3. Tree risk assessments and risk abatement procedures.

The Streamside Conservation Plan for Guernewood Park Resort, December 11, 2017; updated February 12, 2020, was prepared by Ted Winfield, Ph.D., biologist and Mark Bowers of Resource – Design, landscape architect. The report found that the impact of the loss of North Coast Redwood Forest habitat was off-set by the beneficial effect of eradicating non-native invasive species and replanting the area at 3:1 ratio with native riparian vegetation. The health and longevity of the mitigation area is assured by an extensive maintenance plan, which is included in the Streamside Conservation Plan.

The use of an air spade (high pressure pneumatic spade) to locate significant roots prior to excavation or grading will be used. The air spade uses high-pressure air to excavate soil while leaving roots intact and undamaged. The use of thick layers of mulch and geotextile fabric will prevent soil compaction by equipment and construction personnel requiring access near protected trees and roots during construction. Additional tree protection procedures include fencing and trunk fender boards to protect trees from accidental impact from equipment. All grading and excavation work will be field staked and reviewed by the project arborist, or designated owner representative, prior to implementation.

The tree protection measures above are addressed through the following mitigation measures, which, along with tree replacement plantings as required by County Ordinance, would reduce the tree removal impact to less than significant.

Significance Level: Potentially Significant Unless Mitigated.

Mitigation Measure BIO-10: The applicant shall implement all recommendations of the Arborist's Report and Construction Impact Assessment (MacNair & Associates, July 2008, updated November 2017, updated October 2018, updated February 2020), including use of tree protection measures. The applicant shall submit an updated report from a qualified arborist that addresses compliance of the final grading and building plans with the tree protection measures. The report shall be provided to PRMD staff for review and approval prior to grading permit and building permit issuance.

Mitigation Monitoring BIO- 10: Permit Sonoma will verify that site grading and building plans provide for compliance with the 2020 Arborists report and recommendations. Permit Sonoma will verify that on-site protection measures are installed and maintained by the applicant during grading and building construction, and subject to Permit Sonoma inspections.

Mitigation Measure BIO- 11: The applicant shall provide a final landscape plan demonstrating compliance with the County's Tree Protection Ordinance including tree replacements consistent with Ordinance requirements.

Mitigation Monitoring BIO-11: The applicant shall provide the final landscape plan prior to issuance of a grading permit, with tree plantings confirmed by Permit Sonoma site inspection prior to issuance of an occupancy permit.

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?

Comment: Habitat conservation plans and natural community conservation plans are site-specific plans to address effects on sensitive species of plants and animals. The project site is not located in an area subject to a habitat conservation plan or natural community conservation plan.

Significance Level: No Impact.

5. CULTURAL RESOURCES:

Assembly Bill 52 Project Notifications were sent to the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Torres Martinez Desert Cahuilla Indians, Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria Band of Pomo Indians, Lytton Rancheria of California, Kashia Pomos Stewarts Point Rancheria and Federated Indians of Graton Rancheria. These Native American tribes were invited to consult on the project pursuant to Public Resources Code sections 21080.3.1 and 21080.3.2.

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Comment: The location of The Lodge on Russian River (formerly GuerneWood Park Resort) is the site of a former summer hotel that offered accommodations to seasonal visitors. The hotel appears to have been founded in the late 1920s. Several pictures of the resort exist from the 1930s. By the 1960s the resort became Ginger's GuerneWood Park Rancho. Ginger's Rancho consisted of 54 cabins and 32 campsites and retained the old tavern building from the GuerneWood Hotel Resort. The Tavern at Ginger's Rancho prepared an archaeological/historical investigation (Archaeological Resource Service, October 2008). The study found one historic feature at that time, the fireplace and foundation remains of the former GuerneWood Hotel Resort. However, the study concluded "the remains do not retain integrity to convey the former use of the property. They have lost integrity of design, setting, materials, workmanship, feeling and association." and concluded these are not considered a significant historic resource under CEQA. Therefore the proposed project will not to have a negative effect upon local significant historic resources.

See Section 5.(b) below for protection of any submerged historic resources.

Significance Level: Less Than Significant Impact.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Comment: The Tavern at Ginger's Rancho's archaeological investigation (Archaeological Resource Service, October 2008) indicated "No prehistoric artifacts, features or sites were observed" based on site investigation, as well as literature review. See section 18.a. below for standard condition of approval to ensure that cultural or archaeological resources are protected if unearthed during ground disturbing activities.

In response to State Lands Commission comment on the original publication of the IS/MND for the project, the following information and mitigation measure has been added:

Any submerged archaeological site or submerged historic resource that has remained in state waters for more than 50 years is presumed to be significant. The title to all archaeological sites, and historic or cultural resources on or in the tide and submerged lands of California is vested in the state and under the jurisdiction of the Commission (Pub. Resources Code, § 6313).

Significance Level: Potentially Significant Unless Mitigated.

Mitigation Measure CUL-1: The following NOTE shall be printed on all grading and building permit plan sheets:

"In the event historic or cultural resources are discovered during construction activities, Project personnel shall halt all activities in the immediate area and notify a qualified archaeologist to determine the appropriate course of action "

"The final disposition of archaeological, historical, and paleontological resources recovered on State lands under the jurisdiction of the California State Lands Commission must be approved by the Commission."

Mitigation Monitoring CUL-1: Prior to issuance of grading and building permits, the Project Planner will verify the note is printed on all grading and building permit plan sheets.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Comment: There are no known archaeological resources on the site, but the project could uncover such materials during construction. In the event that human remains are unearthed during construction, state law requires that the County Coroner be contacted in accordance with Section 7050.5 of the State Health and Safety Code to investigate the nature and circumstances of the discovery. If the remains were determined to be Native American interment, the Coroner will follow the procedure outlined in CEQA Guidelines Section 15065.5(e).

A standard condition of approval requires the following language be printed on the grading and building plans:

NOTES ON PLANS: If human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and PRMD staff, County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" can be designated."

Significance Level: Less Than Significant Impact.

6. ENERGY

Would the project:

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

Comment: The project will not result in significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Standard construction practices will be used. The project includes efficient use of land within urban service areas, orienting buildings to capture solar energy to the extent feasible, use of renewable and energy efficient building materials and systems, and reduced reliance on non-renewable resources.

Significance Level: No impact.

- b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

Comment: There is no state or local plan for renewable energy or energy efficiency. However, the new buildings will use renewable and energy efficient building materials and systems, and will have reduced reliance on non-renewable resources.

Significance Level: No Impact.

7. GEOLOGY AND SOILS

Would the project:

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Comment: The site is not located in an Alquist-Priolo fault zone or on a known fault based on the Safety Maps in the Sonoma County General Plan. The closest known active fault is eight miles away (San Andreas Fault). The Uniform Building Code has been developed to address seismic events in California and development which complies with the Code will result in buildings which should withstand the most severe reasonably anticipated seismic event.

Significance Level: Less Than Significant Impact.

- ii. **Strong seismic ground shaking?**

Comment: All of Sonoma County is subject to seismic shaking that would result from earthquakes along the San Andreas, Healdsburg-Rodgers Creek, and other faults. Predicting seismic events is not possible, nor is providing mitigation that can entirely reduce the potential for injury and damage that can occur during a seismic event. However, using accepted geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake.

The applicant prepared a preliminary geotechnical investigation (PJC & Associates, April 2008). The analysis included site investigations, soil borings and laboratory testing, and review of geotechnical literature. The analysis determined the primary geotechnical considerations in design and construction of the project are as follows:

- a. The presence of weak and compressible artificial fill.
- b. The potential of seismically induced settlement from liquefaction and soil densification.
- c. The potential of seismically induced earth slumps and lateral spreading of creek and river banks.
- d. The high potential of creek and river bank erosion.

Based on the results of this investigation, which included field investigations and use of boreholes to evaluate soils conditions, the report concluded that the project is feasible from a geotechnical engineering standpoint, provided the recommendations of the report are incorporated in the design and carried out during construction. The recommendations, incorporated herein as project mitigation measures, address soil compaction, foundation design, and related construction issues.

The design and construction of the new hotel structures are subject to load and strength standards of the California Building Code as adopted and amended by the County of Sonoma (CBC), which take seismic shaking into account. Project conditions of approval require that building permits be obtained for all construction and that the project meet all standard seismic and soil test/compaction requirements. The project would therefore meet seismic standards in the CBC and would not expose people to substantial risk of injury from seismic shaking.

Significance Level: Potentially Significant Unless Mitigated.

Mitigation Measure GEO-1: Grading and building design shall comply with the recommendations of the preliminary geotechnical investigation (PJC & Associates, April 2008), which shall be specified on the construction drawings.

Mitigation Monitoring GEO-1: Prior to grading or building permit issuance, Permit Sonoma will verify that grading and building design plans comply with the recommendations of the preliminary geotechnical investigation (PJC & Associates, April 2008). Field inspections by Permit Sonoma staff will verify the use of the required grading and construction measures.

iii. Seismic-related ground failure, including liquefaction?

Comment: The California Building Code (CBC) and the codes and policies of Sonoma County have been developed to address seismic hazards to the most reasonable extent possible. The development will have to comply with the design and construction is in compliance with the seismic design requirements of the CBC. Compliance with the project's preliminary geotechnical analysis is also required, as discussed above.

Significance Level: Less Than Significant Impact.

iv. Landslides?

Comment: The project site is not located in a landslide prone area as shown on Geology for Planning in Sonoma County Special Report 120 Slope Stability or per the California Landslides Inventory map at <https://www.conservation.ca.gov/cgs/maps-data>. Slope stability along the banks of Hulbert Creek and the Russian River are addressed above, and per the recommendations of the project preliminary geotechnical report.

Significance Level: Less Than Significant Impact.

b) Result in substantial soil erosion or the loss of topsoil?

Comment: The project includes grading, cuts and fills which require the issuance of a grading permit. Unregulated grading, both during and post construction, has the potential to increase the volume of runoff from a site which could have adverse downstream flooding and further erosion impacts, and increase soil erosion on and off site which could adversely impact downstream water quality.

County grading ordinance design requirements, adopted County grading standards and best management practices (such as silt fencing, straw wattles, construction entrances to control soil discharges, primary and secondary containment areas for petroleum products, paints, lime and other materials of concern, etc.), mandated limitations on work in wet weather, and standard grading inspection requirements, will be applied to the project, and are specifically designed to prevent soil erosion and loss of topsoil.

The County adopted grading ordinances and standards and related conditions of approval which enforce them are specific, and also require compliance with all standards and regulations adopted by the State and Regional Water Quality Control Board, such as the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, Low Impact Development (LID) and any other adopted best management practices. Therefore, no significant adverse soil erosion or related soil erosion water quality impacts are expected given the mandated conditions and standards that need to be met.

Significance Level: Less Than Significant Impact.

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?

Comment: The project's Preliminary Geotechnical Investigation identified potential for soil instability on portions of the site as a result of liquefaction. Requirements to obtain grading permits will ensure that any potential instability related to the construction of driveways, parking lots, trails, and structures will be reviewed and methods implemented so that no on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse occurs. Soil and slope stability are further addressed in the project preliminary geotechnical study, and addressed in section 7 above as a project mitigation measure.

Significance Level: Less Than Significant Impact.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Comment: Potential impacts will be addressed through appropriate structural design and construction standards. Soil stability is further addressed in the project preliminary geotechnical study, which found that, based on subsurface borings and soils testing, that soils on the project site are relatively granular and not considered expansion. The project will also be conditioned to require building permits to be approved in compliance with Building Code standards.

Significance Level: Less Than Significant Impact.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Comment: The project proposes connection to the Russian River Sanitation District. There will be no septic tanks or alternative methods of waste water disposal.

Significance Level: No Impact.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic

feature?

Comment: The location of The Lodge on Russian River is the site of a former summer hotel that offered accommodations to seasonal visitors. No unique geological features exist on the property to be impacted by the proposed project. The geology of the site and the nature of the project make it extremely unlikely that paleontological resources would be encountered or destroyed.

Significance Level: No Impact.

8. GREENHOUSE GAS EMISSIONS:

Regulatory Setting

Executive Order S-3-05

The Governor announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

California Global Warming Solutions Act of 2006 (AB 32)

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines GHGs as CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆ and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

A specific requirement of AB 32 was to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020. CARB developed and approved the initial Scoping Plan in 2008, outlining the regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs that would be needed to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives.

The First Update to the Scoping Plan was approved by CARB in May 2014 and built upon the initial Scoping Plan with new strategies and recommendations. In 2014, CARB revised the target using the GWP values from the IPCC AR4 and determined that the 1990 GHG emissions inventory and 2020 GHG emissions limit is 431 MMTCO₂e. CARB also updated the State's BAU 2020 emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were adopted for motor vehicles and renewable

energy.

Senate Bill 97

SB 97, enacted in 2007, directed OPR to develop California Environmental Quality Act (CEQA) Guidelines (*CEQA Guidelines*) “for the mitigation of GHG emissions or the effects of GHG emissions.” In December 2009, OPR adopted amendments to the *CEQA Guidelines*, Appendix G Environmental Checklist, which created a new resource section for GHG emissions and indicated criteria that may be used to establish significance of GHG emissions. Appendix F of the *CEQA Guidelines* states that, in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Appendix F of the *CEQA Guidelines* further states that a project’s energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting, and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives.

Senate Bill 32 and Assembly Bill 197

In 2016, Senate Bill (SB) 32 and its companion bill AB 197, amended HSC Division 25.5 and established a new climate pollution reduction target of 40 percent below 1990 levels by 2030, while including provisions to ensure the benefits of state climate policies reach into disadvantaged communities.

2017 Climate Change Scoping Plan Update

In response to SB 32 and the 2030 GHG reduction target, CARB approved the 2017 Climate Change Scoping Plan Update (2017 Scoping Plan Update) in December 2017. The 2017 Scoping Plan Update outlines the proposed framework of action for achieving the 2030 GHG target of 40 percent reduction in GHG emissions relative to 1990 levels (CARB, 2017). CARB determined that the target Statewide 2030 emissions limit is 260 MMTCO_{2e}, and that further commitments will need to be made to achieve an additional reduction of 50 MMTCO_{2e} beyond current policies and programs. The cornerstone of the 2017 Scoping Plan Update is an expansion of the Cap-and-Trade program to meet the aggressive 2030 GHG emissions goal and ensure achievement of the 2030 limit set forth by Executive Order B-30-15.

In the Update, CARB recommends statewide targets of no more than six metric tons CO_{2e} per capita by 2030 and no more than two metric tons CO_{2e} per capita by 2050. CARB acknowledges that since the statewide per capita targets are based on the statewide GHG emissions inventory that includes all emissions sectors in the State, it is appropriate for local jurisdictions to derive evidence-based local per-capita goals based on local emissions sectors and growth projections. To demonstrate how a local jurisdiction can achieve their long-term GHG goals at the community plan level, CARB recommends developing a geographically-specific GHG reduction plan (i.e., climate action plan) consistent with the requirements of CEQA Section 15183.5(b). A so-called “CEQA qualified” GHG reduction plan, once adopted, can provide local governments with a streamlining tool for project-level environmental review of GHG emissions, provided there are adequate performance metrics for determining project consistency with the plan.

Sonoma County Regional Climate Action Plan

Climate Action 2020 and Beyond (CA2020) was the regional climate action plan for Sonoma County, adopted by the Sonoma County Regional Climate Protection Authority (RCPA) on July 11, 2016. CA2020 was not adopted as a qualified GHG reduction plan due to legal challenges and subsequent court decision. However, the underlying GHG emissions analysis and GHG inventory provides the basis for deriving a GHG threshold of significance.

California CEQA Guidelines

State CEQA Guidelines section 15064.4 specifically addresses the significance of GHG emissions, requiring a lead agency to make a “good faith effort” to “describe, calculate or estimate” GHG emissions in CEQA environmental documents. Section 15064.4 further states that the analysis of GHG impacts should include consideration of (1) the extent to which the project may increase or reduce GHG emissions, (2) whether the project emissions would exceed a locally applicable threshold of significance, and (3) the extent to which the project would comply with “regulations or requirements adopted to

implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.”

The CEQA Guidelines do not require or recommend a specific analytical methodology or provide quantitative criteria for determining the significance of GHG emissions, nor do they set a numerical threshold of significance for GHG emissions. The 2009 amendments also include a new Subdivision 15064.7(c) which clarifies that in developing thresholds of significance, a lead agency may appropriately review thresholds developed by other public agencies, or recommended by other experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

The California Natural Resources Agency has also clarified that the amended CEQA Guidelines focus on the effects of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA’s requirements for cumulative impact analysis (see Section 15064(h)(3)).

CEQA Guidelines section 15126.4(c) includes the following direction on measures to mitigate GHG emissions, when such emissions are found to be significant:

Consistent with Section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. Measures to mitigate the significant effects of greenhouse gas emissions may include, among others:

- (1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of a lead agency’s decision;*
- (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures;*
- (3) Off-site measures, including offsets that are not otherwise required to mitigate a project’ emissions;*
- (4) Measures that sequester greenhouse gases;*

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Comment: The Climate Action 2020 Plan developed by the Sonoma County Regional Climate Plan Authority (RCPA) in 2016 was unable to be formally adopted due to litigation. The Sonoma County Board of Supervisors-adopted May 8, 2018 Climate Change Action Resolution acknowledged the Climate Action 2020 Plan and resolved to “...work towards the RCPA’s countywide target to reduce GHG emissions by 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050”, consistent with SB32 and AB197 climate pollution reduction targets, as well as adopting twenty goals for reducing GHG emissions including increasing carbon sequestration, increasing renewable energy use, and reducing emissions from the consumption of goods and services. The Bay Area Air Quality Management District (BAAQMD) has published greenhouse gas significance thresholds for use by local governments in the report titled *California Environmental Quality Act Air Quality Guidelines May 2017*. For projects other than stationary sources, the greenhouse gas significance threshold is 1,100 metric tons per year of CO₂e or 4.6 metric tons of CO₂e per service population (residents and employees) per year.

To assess potential greenhouse gas emissions related to the project, air quality modeling was performed using the CalEEMod Version. The applicant provided an analysis of projected greenhouse gas (GHG) emissions (Illingworth & Rodkin, Inc., Air Pollutant and GHG Emissions Modeling, July 23, 2021). The analysis determined that GHG emissions would be emitted directly and indirectly by the project. Sources of these emissions would include traffic, direct emissions from natural gas usage, and indirect emissions from electricity usage. Included in the indirect emissions are those associated with the conveyance of water and wastewater, and handling and storage of solid waste. The majority of emissions for the project are expected to come from traffic and energy usage.

The analysis evaluated the GHG emissions of the proposed project through computer modeling following guidance provided by BAAQMD. The results presented in Table 2 of Section 3.b above show that the proposed project would have total direct and indirect emissions of 660 MT CO₂e/year, below the GHG operational threshold of 1,100 MT of CO₂e per year as recommended by BAAQMD for new projects. Table 2 in Section 3.b above also adjusts the BAAQMD recommended 2020 threshold downward by 20 percent to identify a 2025 threshold (project opening year) of 880 Mtons of CO₂e per year, and by 40 percent to identify a 2030 threshold of 660 Mtons of CO₂e per year. Therefore, the project's GHG emissions would not significantly contribute to a cumulative impact on global climate change.

In July 2022, the project was reduced in size by removing 12 rooms, lowering building height from 53 feet to 35 feet, and reducing the number of parking spaces from 201 to 175. The reduced project size is not expected to result in a higher GHG emission than the original 120-room project proposal.

Significance Level: Less than Significant Impact.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Comment: The County's adopted goals and policies include GP Policy OSRCI 4.4 to reduce greenhouse gas emissions 25% below 1990 levels by 2015. Sonoma County emissions in 2015 were 9% below 1990 levels, while the countywide population grew 4%. In May 2018, the Board of Supervisors adopted a Resolution of Intent to Reduce Greenhouse Gas Emissions that included adoption of the Regional Climate Protection Agency's goal to further reduce greenhouse gas emissions by 40% below 1990 levels by 2030 and by 80% below 1990 levels by 2050, consistent with SB32 and AB197 climate pollution reduction targets. The Resolution of Intent included specific measures that can further reduce greenhouse gas emissions.

All new development is required to evaluate all reasonably feasible measures to reduce greenhouse gas emissions and enhance carbon sequestration. The following greenhouse gas emission reduction measures were incorporated into the project by the applicant and are included as a condition of approval:

- Secure bicycle parking
- Bicycle to rent for hotel guests
- Electric vehicle charging stations for hotel guests and visitors
- Possible shuttle service for guests to visit Sonoma County wineries; coastal areas etc.
- Employee incentive program to use alternative modes of transportation such as ride share, bicycles and buses.
- Improved bus stop and shelter
- Priority hiring from local employee workforce
- Priority hiring from local contractors and subcontractors
- Construction to CalGreen Standards or higher

Significance Level: Less Than Significant Impact.

9. HAZARDS AND HAZARDOUS MATERIALS:

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Comment: The project uses do not involve the routine transport, use, or disposal of hazardous materials. However, it is possible that improper handling or storage could result in minor spills or drips of hazardous materials such as oil, fuel or paint during or after construction. To address this possibility, the project is

required to comply with all applicable hazardous materials handling and storage requirements and would use qualified contractors for construction.

Significance Level: No Impact.

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?

Comment: There are no aspects of the proposed hotel use which would not generate or produce substantial quantities of hazardous materials or unsafe conditions. However, it is possible that improper handling or storage could result in minor spills or drips of hazardous materials such as oil, fuel or paint during or after construction. To address this possibility, the project is required to comply with all applicable hazardous materials handling and storage requirements and would use qualified contractors for construction.

Significance Level: No Impact.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Comment: There is not an existing or proposed school within one-quarter mile of the project. The project uses do not involve the routine transport, use, or disposal of hazardous materials.

Significance Level: No Impact.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Comment: The project is not located on any list of sites containing hazardous materials.

Significance Level: No 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?

Comment: The project is not located within an airport land use plan or within two miles of a public airport or public use airport, Therefore the project would not result in a safety hazard or excessive noise for people residing or working in the project area.

Significance Level: No Impact.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Comment: There is no separate emergency evacuation plan for the County. Furthermore, the project would not cause an interference with emergency evacuations. The Fire Marshall will review the building plans to insure that the hotel and restaurant will have adequate fire protection. The primary entrance off of SR 116 includes a looped driveway system to provide for emergency vehicle ingress and egress.

Significance Level: No Impact.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Comment: According to the Safety Element of the General Plan, the project site is not located in a high wildland fire hazard area. The construction of new structures in accordance with current building standards would decrease the fire risk to structures on the project parcel. The County Fire Marshal's fire safe requirements require that new structures be installed with fire sprinklers with the intent to contain or prevent fires from spreading. In addition, standard conditions of approval include that the facility operator shall develop an emergency response plan consistent with Chapter 4 of the 2013 California Fire Code with safety plans, emergency procedures, and employee training programs; shall provide for safe access for emergency fire apparatus and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during an emergency; shall provide emergency water supply for fire protection available and accessible in locations, quantities and delivery rates as specified in the California Fire Code; and establish defensible space. All of the fire safe conditions of approval will ensure that the resort project would reduce the exposure of people and property to fire hazards to a degree the risk of injury or damage is less than significant. The project would not expose people to significant risk from wildland fires.

Significance Level: Less Than Significant Impact.

10. HYDROLOGY AND WATER QUALITY:

Would the project:

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

Comment: The project proposes connection to the Russian River Sanitation District, and therefore no on-site sewage disposal systems are proposed, reducing potential for violation of any applicable water quality standards.

In addition, the County's grading ordinance and adopted best management practices require that storm water facilities be engineered to treat storm events and associated runoff to the 85 percentile storm event. Adopted flow control best management practices must be designed to treat storm events and associated runoff to the channel forming discharge storm event, which is commonly referred to at the two-year storm event. Required County inspection ensures that all work is constructed according to the approved plans. These ordinance requirements and adopted best management practices are specifically designed to maintain potential project water quantity impacts at a less than significant level during and post construction.

Drainage improvements to the site as well as erosion/sediment control measures will be required during construction to handle any increases in storm runoff. The project plans include proposed use of bio-swales as part of the filtration storm drainage system. Final drainage improvements will be designed so that the post-development flows do not exceed the pre-development flows. Therefore, with the application of the Low Impact Development (LID) and other adopted best management practices to the project, no significant adverse soil erosion or related soil erosion water quality impacts are expected given the mandated conditions and standards that need to be met.

Significance Level: Less Than Significant Impact.

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

Comment: The project would be served by a public water system connection to the Sweetwater Springs Water District, and as such would not deplete groundwater supplies or affect nearby wells, if any. The project site contains areas for groundwater recharge, and is also adjacent to both the Russian River and

Hulbert Creek, with no significant impact to groundwater table levels anticipated.

Significance Level: Less Than Significant Impact.

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

i. would result in substantial erosion or siltation on- or off-site?

Comment: With the incorporation of BMP's into the overall project's design, the project will not significantly alter drainage patterns on-site or in the general area, nor will it result in on- or off-site flooding. The project does not include any work or alteration of a course of a stream or river.

Project development will require a grading permit, as well as the appropriate building and sewer permits. A portion of the public access trail would be constructed below the top of bank of Hulbert Creek and the Russian River and require environmental permitting from the environmental regulatory agencies. The trail would not alter the course of the creek or river. The surface of the trail, Park Tread, would be permeable. A condition of approval requires the applicant to submit an erosion prevention/sediment control plan which clearly shows best management practices to be implemented, limits of disturbed areas, vegetated areas to be preserved, pertinent details, notes, and specifications to prevent damages and minimize adverse impacts to the environment in the grading and improvement plans. Tracking of soil or construction debris into the public right-of-way, including SR 116, shall be prohibited. Runoff containing concrete waste or by-products shall not be allowed to drain to the storm drain system, waterways, or adjacent lands. The erosion prevention/sediment control plan shall abide by and contain all applicable items in the Grading Permit.

The applicant has submitted a Preliminary Storm Water Mitigation Plan for the project. Use of bio-swales is proposed to provide additional filtration treatment. A final drainage study is required to be submitted with the grading permit application or with improvement plans, and is subject to review and approval by Permit Sonoma prior to the issuance of any grading or building permits. Post construction storm water measures must be installed per approved plans and specifications, and working properly prior to finaling the grading permit and associated building permits. Overall, based on the large project site, and requirements under the Grading Ordinance and permit process, the project would not result in substantial erosion or siltation on- or off-site.

Significance Level: Less Than Significant Impact.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Comment: As discussed in subparagraph (a) and above, the project will not increase the rate and amount of surface runoff on- or off-site.

Significance Level: No Impact.

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

Comment: As discussed in subparagraph (a) above, the project will not create or contribute additional runoff water.

Significance Level: No Impact.

iv. impede or redirect flood flows?

Comment: The project site is classified as being within a 100-year flood hazard on the General Plan's Public Safety Element Figure PS-1e. The 100-year flood zone or Special Flood Hazard Area (SFHA) is defined as the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. These areas are depicted on County zoning maps with the F1- Flood Zone and F2 - Flood Plain Combining Zones. County zoning regulations apply for the F1 and F2 Combining Zones:

F-1, Section 26-56.030: Except as specifically allowed in this article, no building or structure shall be constructed, erected, moved, converted, altered or enlarged in the floodway, nor shall any other condition be allowed which would tend to cause significant stream channel alteration or adversely affect the carrying or storage capacity of a floodway, or otherwise constitute a threat to life and property. Ordinary maintenance and repair of existing nonconforming structures shall be permitted subject to the provisions.

F-2, Section 26-58.010: The F2 district shall be applied to properties which lie within the one hundred (100) year flood hazard area as shown on the most recent FEMA maps and accompanying report. The boundaries of the one hundred (100) year floodplain as indicated on the zoning maps should be considered approximate. The provisions of this article may be waived by the decision making body where it is demonstrated through engineering analysis, field determinations or other appropriate data, that the precise one hundred (100) year floodplain boundary differs from that shown on the FEMA maps, and provided further, that FEMA approval and sign-off is first secured.

The most-current FEMA map for the area (Community Panel No. 06097C0657E, effective on 12/02/2008), indicates that the entire project site is located in Flood Zone AE, which is defined as an area where the base flood elevation has been determined. The FIRM map indicates the base flood elevation at the site to be approximately 57 feet (NAVO 88). The FIRM map indicates that areas within the AE zone "must be kept free of encroachment so that the 1% annual flood chance can be carried without substantial increases in flood height."

The applicant prepared a site-specific floodway determination (Green Valley Consulting Engineers, 2007). The 100-year flow was determined from the FIRM maps available at that time, and with hydraulic modeling conducted in 2005. The study determined that a base flood elevation (BFE) for the project would be approximately 54.2 feet (NGVD 29). NGVD 29 vertical datum would be approximately 3 feet higher in NAVO 88 vertical datum, therefore, the elevations are consistent. The applicant's study also determined that Hulbert Creek would not be a factor in flooding, but that "there could be some overbank flows from Hulbert Creek as the Russian River rises to its BFE elevation of around 54.3 feet." Again, this is in NGVD vertical datum and would be approximately 57.3 feet (NAVO 88).

Project plans for the Tree House buildings and hotel structures indicate finished first floor elevations of 55.25 feet (NGVD 29), approximately 1 foot above the study's indicated estimated flood elevation of 54.3 feet (NGVD 29), but below the estimated approximate 57-foot elevation flood level in the 2008 FIRM study which is in NAVO 88 vertical datum. The applicant's design also utilizes raised finished floors with open, perimeter foundations to reduce any disruption to possible flood flows. The public access trail design will not impede Hulbert Creek and Russian River flood flows and the trail surface, Park Tread, is permeable. The project's drainage design is subject to compliance with the Sonoma County Water Agency's Flood Control Design criteria. To ensure consistency with County flood protection regulations, the below mitigation measure would require preparation of a final flood elevation study to certify flood elevations across the project site to ensure finished floor elevations of project structures are at least one foot above 100-year flood elevations.

Significance Level: Potentially Significant Unless Mitigated.

Mitigation Measure HYDR0-1: The applicant shall prepare a final flood elevation study to certify that first floor elevations of the project structures, including hotel and bungalows, are constructed at least one foot above 100-year flood elevations related to Hulbert Creek and the Russian River. The applicant shall

submit the required flood elevation study to the Permit Sonoma Engineering Division for review and approval prior to issuance of a grading permit for the project.

Mitigation Monitoring HYDRO-1: Permit Sonoma will not release the grading permit for issuance until the flood elevation study has been approved. Permit Sonoma will not sign off building occupancy until final elevation certifications are provided by the applicant and inspected by the County.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Comment: The project site is located more than 10 miles from the Pacific Ocean and not susceptible to tsunami, mudflow or seiche.

Significance Level: No Impact.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Comment: The project is not located in a priority basin for the Sustainable Groundwater Management Act.

Significance Level: No Impact.

11. LAND USE AND PLANNING:

Would the project:

a) Physically divide an established community?

Comment: The project site is located within a rural, unincorporated area northwest of the community of Guerneville along Highway 116 (River Road). It would not block or otherwise physically divide Guerneville or areas adjacent to it. The project includes connections to public transit, bikeways and trails.

Significance Level: No impact.

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?

Comment: The Sonoma County General Plan designates the project site as Recreation and Visitor Serving Commercial; Scenic Corridor.

This category provides sites for both outdoor recreation uses and the commercial service needs of visitors and travelers. Its purpose is to limit this type of development to those appropriate sites.

Structures and parking generally are restricted to cover not more than 50 percent of the site or exceed thirty-five feet in height. Additional height may be considered if a reduction in site coverage is provided that results in no overall increase in building intensity. Lodging facilities may not exceed 50 rooms per site in rural areas and 200 rooms per site in Urban Service Areas (the project site is in the Guerneville Urban Service Area).

Applicable General Plan policies include:

Objective LU-15.2: Limit new uses within the floodway of the Russian River, as designated on the Federal Flood Insurance Rate Maps (FIRM), to recreation and visitor serving commercial uses without permanent structures.

Objective LU-15.3: Maintain a balance of commercial development between local serving and visitor oriented uses. Guerneville shall remain the primary commercial center of the area.

The project meets the criteria allowing for construction and operation of visitor serving commercial establishments in the General Plan while limiting construction in the floodway to pedestrian access to the river and otherwise complying with flood design criteria. The site was historically developed with a resort before being destroyed by fire. The proposed use would reestablish a resort use (hotel and restaurant), subject to approval of a use permit.

The project site is zoned (K) Recreation and Visitor-Serving Commercial. Sonoma County Zoning Code Section 26-42-020.q allows for the proposed resort use, subject to approval of a use permit: Hotels, motels and similar lodging facilities, subject, at a minimum, to a limit of two hundred (200) rooms in designated urban service areas

The proposed ancillary restaurant use is permitted by the K zoning designation.

The proposed 35-foot building height and lot coverage of 9 percent will comply with the development standards required in the K Zoning District. The project would also meet zoning setback standards, including a minimum 45-foot setback from the centerline of SR 116.

Significance Level: Less Than Significant Impact.

12. MINERAL RESOURCES:

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?**

Comment: There is no known mineral resource of value to the region and the residents of the state located on the property. The site is not zoned MR (Mineral Resources). The project will not result in the loss of a known mineral resource.

Significance Level: No Impact.

- 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?**

Comment: There is no locally-important mineral resource recovery site located on the property that is delineated on a local general plan, specific plan or other land use plan.

Significance Level: No impact.

13. NOISE:

Would the project:

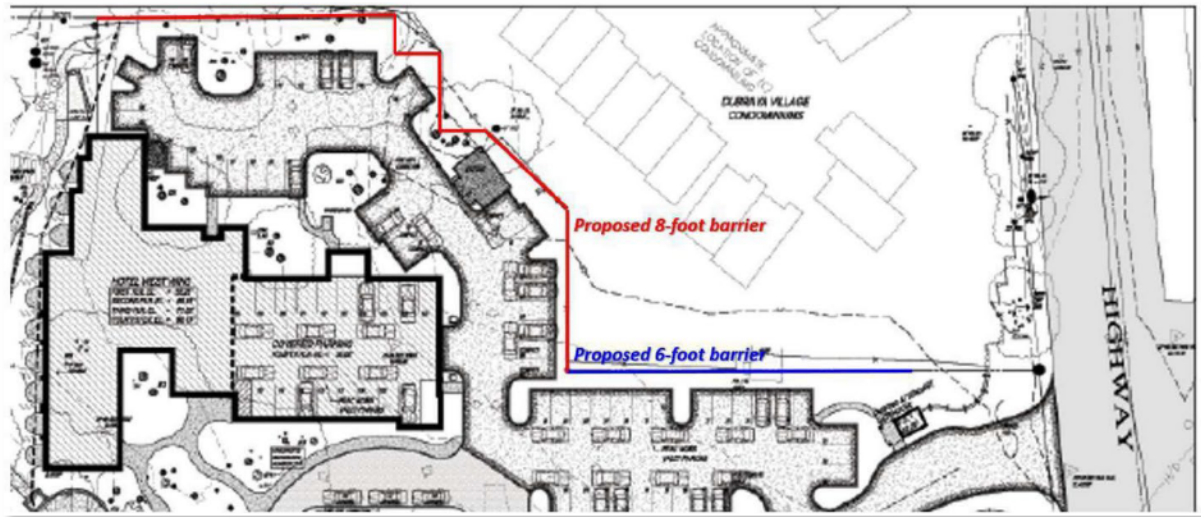
- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Comment: A noise monitoring survey was performed at the site in July 2016, conducted for the applicant by Illingworth and Rodkin. The study included on-site noise monitoring and modeling for projected noise conditions based on the proposed project. The study found that the existing noise environment at the site results primarily from vehicular traffic along SR 116. Local traffic along the other nearby roadways also contributes to the ambient noise environment. The future noise environment at the project site would continue to result primarily from traffic along SR 116 and the surrounding roadways.

Key findings of the noise study in consideration of the proposed project follow:

- Projected traffic increases, including the project, would result in a noise level increase of 1 dBA by the year 2040 as measured near the project frontage.
- The project proposes two outdoor use areas: the spa pool area and the gazebo picnic area located on the east wing terrace, overlooking the river. Noise levels at these areas would not be expected to exceed 60dBA during peak highway travel periods, in compliance with County noise standards. Interior standards would also be met.
- For interior noise at the main resort buildings, future exterior noise levels ranging from 53 to 58 dBA Ldn would be expected facing the highway, while the remaining building façades of the west wing would be exposed to future exterior noise levels at or below these levels.
- All of the bungalow units were replaced with 5 Tree House buildings (currently reduced to 4 buildings in the same location as the previous 5) and all of the Tree House buildings are farther away from Highway 116 than the former first and second bungalow units closest to the highway. Therefore, mitigation for reducing the interior noise of these two former bungalows no longer applies. However, the mitigation for the “remaining former bungalows” applies to all of the Tree House buildings.
- The proposed project would include mechanical equipment, such as heating and air conditioning systems, and noise mitigation is included, below, to reduce this impact to less than significant.
- Noise related to parking lot and driveway use varied based on location on the property. Noise associated with driveway/parking lot noise would not exceed the County’s daytime NE-2 noise standard at the nearby residences. However, parking lot noise southwest of the hotel west wing would exceed the nighttime NE-2 standard at the adjacent multi-family residences. Mitigation, consisting of a noise barrier is therefore required as noted below.
- Indoor special events were evaluated, such as corporate events or meetings and potentially receptions. These ground-floor rooms (previously 1,600 sq ft total and currently 3500 s. ft. total) would open to a terrace overlooking the river from the hotel east wing building. While amplified speech and amplified music could potentially be included at these events, it would be confined to indoors only. Events occurring within the hotel buildings would receive noise shielding from the building structures estimated at 12 dBA (assuming open windows and/or doors). Daytime indoor events with amplified music, amplified speech, non-amplified music, films, or raised conversations would not exceed the County NE-2 standards at the property lines of the nearest residential land uses. At the multi-family residential development (Dubrava), however, amplified music, amplified speech, and non-amplified music would exceed the nighttime threshold. This would be a significant impact and would require mitigation. Mitigation is proposed via construction of a noise barrier (solid wall or fence) varying in height from six to eight feet, placed as shown on the below diagram.

Figure 17: Specially-designed Noise Barrier



An Addendum to the 2016 Report (Illingworth & Rodkin, dated October 26, 2022) was prepared to analyze the current site plan presented in this Revised MND. These changes include the removal of the two story “Bungalows” along the north-eastern project frontage and their replacement with a parking area to the north and two “Treehouse Suites” attached to the east wing of the hotel; modification to the footprints of the east and west wings of the Hotel and the reduction of the heights of these buildings from four stories to three (a 35-foot maximum building height); the location of the meeting rooms, where all events will be held, have been clearly defined as being located opposite the lobby in the east wing of the hotel; the removal of the parking structure previously attached to the west wing of the hotel; an allowance for ground level tandem parking in the western and northern portions of the site; and the inclusion of a ‘natural’ outdoor pool and deck on the project’s southwest riverfront. The Addendum states that “the reduction in the height of the hotel buildings from four stories to three would result in a lower level of both construction and guest related operational activities at surrounding noise sensitive uses. Thus, this change will result in lower levels of offsite noise.” The Addendum concludes that all of the noise impacts identified in the 2016 report, with exception of the indoor events, would continue to be significant impacts unless mitigated and that the mitigation measures previously identified for these impacts would remain the same.

The Addendum finds that placement of the meeting rooms, where indoor events would be held, opposite the lobby in the east wing of the hotel with pre-function (outdoor) use areas facing the river, would provide significant building shielding for the Dubrava Village residential development. “The noise associated with indoor events would not exceed the County NE-2 standards at the property lines of the identified adjacent residents, including the facades of the second and third levels of the Dubrava Village residences.” The facades of the Dubrava Village residences are setback further from the shared property line and would also be shielded from events by the intervening building structure held in the Meeting Rooms. However, the updated Addendum recommends retaining the proposed 6-foot sound barrier shown in Figure 7 above to reduce driveway and parking lot noise at the adjacent multi-family residences. Table 3 below presents and summarizes the assessment of daytime and nighttime event noise versus County Noise Standards.

Table 3: Indoor Special Events L₅₀ Noise Levels

	L ₅₀ (Noise Level Exceeded 30 minutes in Any Hour), dBA		
	Multi-Family Res.	Res. Opposite Highway 116	Res. Opposite Russian River
Unadjusted Table NE-2 Daytime Limit	50	50	50
Daytime Ambient Noise Levels	46	61	46
Daytime Ambient Exceeds NE-2 Limit?	No	Yes	No
Daytime NE-2 Adjustment	+0	+5	+0
Unadjusted Table NE-2 Nighttime Limit	45	45	45
Nighttime Ambient Noise Levels	35	50	35
Nighttime Ambient Exceeds NE-2 Limit?	No	Yes	No
Nighttime NE-2 Adjustment	+0	+5	+0
Indoor Special Event Noise at Receptor	Multi-Family Res.	Res. Opposite Highway 116	Res. Opposite Russian River
Indoor Amplified Music	36	41	40
Indoor Amplified Speech	35	40	39
Indoor Non-Amplified Music	31	36	35
Indoor Films – Voices/Music	28	33	32
Indoor Raised Conversation	29	34	33
Adjusted NE-2 Limits and Compliance	Multi-Family Res.	Res. Opposite Highway 116	Res. Opposite Russian River
Event Exceed Ambient by 10 dBA?	No (day) Yes (night)	No (day & night)	No (day & night)
NE-2 Adjustment	+0 (day) -5 (night)	+0 (day & night)	No (day & night)
Adjusted Table NE-2 Daytime Limit	50	55	50
Adjusted Table NE-2 Nighttime Limit	40	50	45
Amplified Music Noise Exceeds NE-2?	No (day & night)	No (day & night)	No (day & night)
Amplified Speech Noise Exceeds NE-2?	No (day & night)	No (day & night)	No (day & night)
Non-Amplified Music Exceeds NE-2?	No (day & night)	No (day & night)	No (day & night)
Films – Voices/Music Exceeds NE-2?	No (day & night)	No (day & night)	No (day & night)
Raised Conversation Exceeds NE-2?	No (day & night)	No (day & night)	No (day & night)

As stated above under key findings from the 2016 noise monitoring study, the ground-floor meeting rooms would open to a terrace overlooking the river from the hotel east wing building. While amplified speech and amplified music could potentially be included at these events, it would be confined to indoors only. To ensure that potential noise impacts are reduced to less than significant, the project has been conditioned to require the following:

- Amplified speech and amplified music shall be confined to indoors only and the doors to the terrace shall remain closed. This condition applies to indoor special events, such as corporate events or meetings, receptions and other indoor special events.
- Amplified sound and the very loud musical instruments (such as horns, drums and cymbals) are not permitted outdoors. The quieter, non-amplified musical instruments (such as piano, stringed instruments, woodwinds, flute, etc.) are allowed outdoors when in compliance with the Noise Element of the Sonoma County General Plan.
- If noise complaints are received from nearby residents, and they appear to be valid complaints in PRMD's opinion, then the applicant shall conduct a Noise Study to determine if the current operations meet noise standards and identify any additional noise Mitigation Measures if necessary. A copy of the Noise Study shall be submitted to the Project Review Health Specialist within sixty days of notification from Permit Sonoma that a noise complaint has been received.

The owner/operator shall implement any additional Mitigation Measures needed to meet noise standards.

Table 4 presents and summarizes the assessment of daytime and nighttime recreation and water play noise associated with the natural outdoor pool and deck area versus County Noise Standards. As Table 3 indicates, recreation and water play noise would not exceed daytime or nighttime NE-2 noise standards at the property lines of the surrounding residential uses. Therefore, this would not be a significant impact and not require mitigation.

Table 4: Outdoor Pool Activity Noise L₀₂ and L₅₀ Noise Levels

	Multi-Family Res.		Res. Opposite Highway 116		Res. Opposite Russian River	
	L ₅₀ , dBA	L ₀₂ , dBA	L ₅₀ , dBA	L ₀₂ , dBA	L ₅₀ , dBA	L ₀₂ , dBA
Unadjusted Table NE-2 Daytime Limit	50	65	50	65	50	65
Daytime Ambient Noise Levels	46	57	61	69	46	57
Daytime Ambient Exceeds NE-2 Limit?	No	No	Yes	Yes	No	No
Daytime NE-2 Adjustment	+0	+0	+5	+4	+0	+0
Unadjusted Table NE-2 Nighttime Limit	45	60	45	60	45	60
Nighttime Ambient Noise Levels	35	51	50	66	35	51
Nighttime Ambient Exceeds NE-2 Limit?	No	No	Yes	Yes	No	No
Nighttime NE-2 Adjustment	+0	+0	+5	+5	+0	+0
Active recreation and water play	42	57	<30	35	<30	<30
Active recreation and water play noise Exceeds Ambient by 10 dBA?	No, day or Night		No, day or Night		No, day or Night	
NE-2 Adjustment	+0	+0	+0	+0	+0	+0
Adjusted Table NE-2 Daytime Limit	50	65	55	69	50	65
Adjusted Table NE-2 Nighttime Limit	45	60	50	65	45	60
Active recreation and water play Exceeds NE-2?	No, day or Night		No, day or Night		No, day or Night	

In addition, there will be short-term noise impacts from the construction activities.

Therefore, reasonable regulation of the hours of construction, as well as regulation of the arrival and operation of heavy equipment and the delivery of construction material, are necessary as Best Management standard Conditions of Approval to protect the health and safety of persons, promote the general welfare of the community, and maintain the quality of life.

The County shall require that the construction crew adhere to the following, but not limited to, best management practices as a standard condition to reduce construction noise levels emanating from the site and minimize disruption and annoyance of existing sensitive-noise receptors in the project vicinity.

- Noise-generating construction activities should be restricted to between the hours of 8:00 a.m. to 6:00 p.m. Monday through Friday. No construction activities should occur on weekends or holidays. If work is necessary outside of these hours, the County should require the contractor to implement a construction noise monitoring program and, if feasible, provide additional mitigation as necessary (in the form of noise control blankets or other temporary noise barriers, etc.) for affected receptors. A sign(s) shall be posted on the site regarding allowable hours of construction.

- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment when located within 200 feet of adjoining sensitive land uses. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. Equipment shall be properly maintained and turned off when not in use.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used. Any enclosure openings or venting shall face away from sensitive receptors.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Pile driving activities shall be limited to 8:00 a.m. to 6:00 p.m. week days only.
- Construction maintenance, storage and staging areas for construction equipment shall avoid proximity to residential areas to the maximum extent practicable. Stationary construction equipment, such as compressors, mixers, etc., shall be placed away from residential areas and/or provided with acoustical shielding. Quiet construction equipment shall be used when possible.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Control noise from the construction workers' radios to a point where they are audible at existing residences bordering the project site.
- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise and take prompt action to correct the problem. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

The implementation of the reasonable and feasible standard Best Management controls outlined above would reduce construction noise levels emanating from the site by 5 to 10 dBA in order to minimize disruption and annoyance. With the implementation of these controls, and considering that construction is temporary, the impact would be reduced to a less-than-significant level.

Since the noise sources relating to project construction are temporary, limited in frequency and limited to daytime hours, they are not considered significant due to the implementation of standard Best Management Practices. Conditions of approval limit hours for site grading and construction to reduce any potentially significant impacts to less than significant.

Additionally, by implementing the mitigation measures outlined below, noise impacts would be reduced to less than significant.

Significance Level: Potentially Significant Unless Mitigated.

Mitigation Measure NOISE-1: The Tree House suite buildings require forced-air mechanical ventilation with industry standard construction materials to meet the 45 dBA Ldn threshold. The applicant shall provide building plans to Permit Sonoma for review and approval demonstrating compliance with this mitigation measure.

Mitigation Monitoring NOISE-1: Permit Sonoma will verify that the construction plans provide a suitable form of forced-air mechanical ventilation, as determined by the Permit Sonoma building official, for all Tree House units on the project site, so that windows can be kept closed at the occupant's discretion to control interior noise and achieve the interior noise standards. Field inspection by Permit Sonoma will verify installation.

Mitigation Measure NOISE-2: Provide a suitable form of forced-air mechanical ventilation, as determined by the Permit Sonoma building official, for all Tree House suite buildings on the project site, so that windows can be kept closed at the occupant's discretion to control interior noise and achieve the interior noise standards. The applicant shall provide building plans to Permit Sonoma for review and approval demonstrating compliance with this mitigation measure

Mitigation Monitoring NOISE-2: Permit Sonoma will verify that the construction plans provide a suitable form of forced-air mechanical ventilation, as determined by the Permit Sonoma building official, for all Tree House units on the project site, so that windows can be kept closed at the occupant's discretion to control interior noise and achieve the interior noise standards. Field inspection by Permit Sonoma staff will verify installation.

Mitigation Measure NOISE-3: Mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the County's noise level requirements. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected by the applicant to determine specific noise reduction measures necessary to reduce noise to comply with the County's noise level requirements. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/installation of noise barriers such as enclosures and parapet walls to block the line-of-sight between the noise source and the nearest receptors. Alternate measures may include locating equipment in less noise-sensitive areas, such as the rooftop of the hotel buildings away from the building's edge nearest the multi-family residences, where feasible. The applicant shall provide building plans to PRMD for review and approval demonstrating compliance with this mitigation measure.

Mitigation Monitoring NOISE-3: Permit Sonoma will verify that the noise reduction measures necessary to reduce noise to comply with the County's noise level requirements have been implemented. Field inspection by PRMD staff and the qualified acoustical consultant shall verify that this mitigation measure has been met.

Mitigation Measure NOISE-4: Mitigation methods for reducing driveway/parking lot noise levels at nearby sensitive land uses are limited for the proposed project. Mitigation requires the construction of a sound wall or specially-designed barrier capable of reducing parking lot and driveway noise levels at the westerly property line, adjacent to the Dubrava multi-family residences by up to 9 dBA. The barrier shall be located around the perimeter of the hotel's parking lot along the southwestern boundary, and continue until the main access driveway. The total length of the proposed barrier would be approximately 400 feet. The proposed barrier would be continuous from grade to top, with no cracks or gaps, and have a minimum surface density of three lbs/ft² (e.g., one-inch thick marine-grade plywood, 1/2-inch laminated glass, concrete masonry units (CMU)). A barrier height of approximately eight feet would be sufficient for reducing noise levels by at least 9 dBA. This height shall be measured relative to the pad elevation of the parking lot.

This mitigation measure also applies for required noise reduction related to indoor special events at the resort. The noise barrier would provide the required 6 dBA noise reduction at the property line of the multi-family residential land uses to meet the County's nighttime threshold of 40 dBA L50 for all indoor special events. This barrier would start where the eight-foot barrier ends and continue along the main access driveway property line until just passed the last parking space. The total distance would be approximately 180 feet.

Mitigation Monitoring NOISE-4: The applicant shall provide building plans to Permit Sonoma for review and approval demonstrating that all of the requirements for the specially-designed noise barrier are included in the construction plans. Field inspection by PRMD staff shall verify installation of the noise barrier.

b) Generation of excessive ground borne vibration or ground borne noise levels?

Comment: The project includes construction activities that may generate ground-borne vibration and noise. These noise levels would not be significant because they would be short-term and temporary, and would be limited to daytime hours. Per the Environmental Noise and Vibration Assessment, construction activities would include site preparation work, foundation work, and new building framing and finishing. Typically, these types of projects do not require pile driving and pile driving is not expected for this project. Therefore, construction-related vibration levels resulting from activities at the project site would not exceed 0.3 in/sec PPV at the nearest residential and commercial land uses. This is a less-than-significant impact.

The Assessment states: "The nearest multi-family residential land uses, which are southwest of the project site, would be approximately 35 to 50 feet from the shared property line. At these distances, vibration levels would be at or below 0.15 in/sec PPV. The nearest single-family residences northwest of the project site, opposite Highway 116 would be 85 to 95 feet from the project's property line. At these distances, vibration levels would be expected to be 0.06 in/sec PPV or less. Opposite Hubert Creek to the northeast are commercial land uses, and the nearest building to the project site would be 375 feet from property line. At this distance, vibration levels would be at or below 0.01 in/sec PPV. All vibration levels expected at nearby commercial and residential buildings would, therefore, be below the 0.3 in/sec PPV significance threshold. This is a less-than significant impact."

As stated above, the updated Addendum, dated October 26, 2022, states that "the reduction in the height of the hotel buildings from four stories to three would result in a lower level of both construction and guest related operational activities at surrounding noise sensitive uses. Thus, this change will result in lower levels of offsite noise."

Construction activities are regulated by County Codes and conditions of the project would also limit construction hours.

Significance Level: 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?

Comment: The project is not located within the vicinity of a private airstrip, an airport land use plan or within two miles of a public airport or public use airport. Therefore, the project would not expose people residing or working in the project area to excessive noise levels.

Significance Level: No Impact.

14. POPULATION AND HOUSING:

Would the project:

- a) **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)?**

Comment: The project does not include construction of homes. The project would create jobs, potentially attracting new residents to the area. However, the number of new jobs (approximately 37) is relatively low, and therefore would not be expected to induce substantial unplanned population growth.

Significance Level: Less Than Significant Impact.

- b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

Comment: The project site does not contain any housing units. The project would not displace a substantial number of people necessitating the construction of replacement housing elsewhere in the County.

Significance Level: No Impact.

15. PUBLIC SERVICES:

Would the project:

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police, schools, parks, other public facilities**

Comment: Generally, any potential impact the project may have on the provision of public services and or expansion of governmental facilities will be offset by development fees. Specifically:

Fire Protection: The County Fire Marshal requires that the Project comply with Fire Safe Standards, including fire protection methods such as sprinklers in buildings, alarm systems, extinguishers, vegetation management, hazardous materials management and management of flammable or combustible liquids and gases. Fire protection services are provided by the Russian River Fire Protection District.

Police: The Sonoma County Sheriff provides police protection services.

Schools, parks, or other public facilities:

Schools: The project is not expected to generate a significant impact to schools as it does not include residential units.

Parks: The project would include recreational amenities for hotel guests, including walking trails and beach access. The project also includes provision of a 25-space public parking lot off the project driveway near the SR 116 frontage. A small public restroom facility would be located by the parking lot, with a public pedestrian trail provided from the parking lot near the east property

line down to the Russian River. Therefore, an increase in the use of the public beaches below the hotel will occur. However, the applicant is required to submit a maintenance plan for the public access trail and the public restroom facility and public parking will be maintained by the hotel. The maintenance of all the recreational facilities will reduce the impact of increased use. The resort setting, including the Riparian Corridor, will provide the feeling of being in a park plus all of the recreational amenities will reduce the need to use the local parks.

Other public facilities: The project includes a pool, a restaurant and bar, terraces overlooking the Russian River, the public beach, and private decks for guests. Guests will not have to leave the resort to use other facilities. If some guests chose to do so, the other public facilities will not be significantly impacted.

Significance Level: Less than significant impact.

16. RECREATION:

Would the project:

- 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?**

Comment: As stated above in 15.a, there may be some increase in the use of existing local and regional parks but the increase would not result in substantial physical deterioration of the facility. The project would include recreational amenities for hotel guests, including walking trails and beach access. The project also includes provision of a 25-space public parking lot off the project driveway near the SR 116 frontage. A small public restroom facility would be located by the parking lot, with a public pedestrian trail provided from the parking lot near the east property line down to the Russian River. The beach has accommodated guests for many years during and since the time period of the previous resort. The improved access trail to the River will protect the surrounding riparian vegetation and habitat. Maintenance of the new facilities will prevent substantial physical deterioration. The resort setting, including the Riparian Corridor, will provide the feeling of being in a park plus all of the recreational amenities will reduce the need to use the local parks. The project includes a pool, a restaurant and bar, terraces overlooking the Russian River, the public beach, and private decks for guests. Guests will not have to leave the resort to use other facilities. If some guests chose to do so, the other public facilities will not be significantly impacted.

Sonoma County Regional Parks has identified several recreation-related improvements it recommended as part of project implementation, including:

- Placement of information signage including presence of public parking and access to trail leading to the Russian River.
- Provision of a public access parking lot.
- Provision of ADA-accessible trail, and River access.
- Installation of a sidewalk or Class I bicycle lane along the property frontage.
- Public restroom access.

These improvements are included as conditions of project approval. They will be permanent and maintained by the hotel. The public restroom facility will be permanent and connected to domestic water and sewer service lines.

Significance Level: 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?

Comment The proposed project would not involve activities that would cause or accelerate substantial physical deterioration of parks or recreational facilities. The project includes provision of a 25-space public parking lot off the project driveway near the SR 116 frontage. A small public restroom facility would be located by the parking lot, with a public pedestrian trail provided from the parking lot near the east property line down to the Russian River. The impacts of the parking lot and trail construction are evaluated within this Initial Study, including within the Aesthetics and Biological sections.

Significance Level: Less Than Significant Impact.

17. TRANSPORTATION:

Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

Comment: Three transportation-related plans have been adopted in Sonoma County: the Sonoma County General Plan 2020 Circulation Element, the Sonoma County Transportation Authority Comprehensive Transportation Plan (2009), and the Sonoma County Bikeways Plan. The project will not conflict with any of these plans.

Primary vehicular access to the project site would be provided by a central driveway encroachment from Highway 116. The driveway would lead to parking areas on either side of the driveway, and continue to the hotel buildings via a looped driveway. The driveway length would be approximately 360 feet. The parking lots, including the 25 public spaces, provide 175 parking spaces overall, which includes a zone for 22 stacked parking spaces.

In February 2016, in response to County peer and staff review of a previous traffic study for the project prepared by W-Trans traffic engineers, an updated traffic analysis for the project was submitted by W-Trans on behalf of the applicant in 2018, and was subject to TPW peer review. The project analysis included the following traffic and circulation findings:

- The project is expected to generate an average of 59 weekday p.m. peak hour and 148 weekend midday peak hour trips. Daily weekday trips would total 749 and weekend trips would total 1,612.
- The analysis considered six intersections in the project area:
 - 1) SR 116/River Road
 - 2) SR 116/Armstrong Woods Road
 - 3) SR 116/Old Cazadero Road (southbound approach)
 - 4) SR 116/Lovers Lane (southbound approach)
 - 5) SR 116/Old Monte Rio Road (southbound approach)
 - 6) SR 116/Guernewood Lane
- Under both Existing plus Project and Future plus Project conditions, all of the study intersections are anticipated to operate acceptably at LOS D or better during both peak periods, though vehicle speeds through downtown Guerneville will likely be slow during peak periods due to congestion associated with downtown activities. The Study indicated that "This type of congestion is typical of downtown areas, particularly in smaller communities with seasonal resort activity like Guerneville." Note: The project would, when added to Existing + Future conditions, result in LOS D at the intersection of Armstrong Woods Road/SR 116 in Guerneville, representing an increase during weekend midday peak periods, with the project contributing to an expected 1.7 second increase in vehicle travel through the intersection. The LOS D measurement would remain

consistent with County standards.)

- Sight distances along SR 116 from the proposed driveway are adequate in both directions.
- Peak hour queues in the northbound left-turn pocket of SR 116 at River Road and westbound right-turn pocket at SR 116/Armstrong Woods Road can exceed available storage capacity during one or both peak hours, and under future conditions may occasionally exceed queue length by one to four car lengths, which can result in short-term queuing on SR 116.
- Left-turn queues at SR 116 into the project site driveway are projected to remain within the available two-way left turn lane storage.

Based on the findings, the traffic analysis did not include any traffic recommendations, finding that the proposed project would be expected to have a less-than-significant impact on transportation and traffic. The W-Trans traffic analysis was reviewed and accepted by the Sonoma County Public Works and Transportation Department (project conditions of approval have been required) and by Caltrans, who identified the need to obtain an encroachment permit for driveway access onto SR 116; requested the provision of bike lanes and multi-use trails to facilitate walking and biking to nearby jobs; services and transit; asked for information on number and size of events and associated impact on on-site parking demand; and encouraged use of Transportation Demand Management policies to promote mobility and reduce traffic impacts.

The W-Trans traffic analysis also provided an analysis of special events addressing trip generation and parking demand, and found that additional parking demand could be generated for use of the 3,500 sq. ft. meeting space within the resort buildings "if the meetings or events are attended by a large proportion of non-guests." Additionally, the applicant, in response to Caltrans' comments on events, has indicated that they have no specific event plans *per se* but believe the hosting of events "is endemic (accessory) to the nature of a resort/lodging facility." This Initial Study (including the noise and traffic analysis) assume events will be held at the facility (all indoors). Parking demand is addressed below (see Section 17 f), including the applicant's proposed shared parking plan and use of valet parking. Staff is also proposing a condition of approval on this issue to ensure adequate on-site parking. Other Caltrans' items are addressed as conditions of the project.

The project would be required to install frontage improvements, including a pedestrian sidewalk between the project site and the adjacent transit stop. An on-site pedestrian trail would lead from a public parking lot near the project frontage down to the Russian River. Sonoma County Regional Parks has also indicated their support of, in-lieu of a sidewalk on the entire property frontage, installation of an eight-foot wide Class I bicycle path on the property frontage, installed consistent with Caltrans standards. This is addressed in the mitigation measure below.

Required parking is one bicycle parking space be provided for every 5 spaces required for automobiles, equating to at least 35 required bicycle parking spaces if utilizing 175 vehicle parking spaces. The project site plan does identify provision of bicycle parking spaces or storage lockers. The project will provide 35 on-site bicycle parking spaces. This is addressed in the mitigation measures below, which would reduce this impact to less-than significant.

Significance Level: Potentially Significant Unless Mitigated.

Mitigation Measure TRAF -1: The project shall install a Class I bicycle pathway along the entire frontage.

Mitigation Monitoring TRAF -1: The applicant shall provide final design plans for installation of the Class I bicycle lane to Permit Sonoma and County Regional Parks for review and approval prior to issuance of a grading permit.

Mitigation Measure TRAF -2: The project shall include a minimum 35 on-site bicycle parking spaces.

Eighteen (18) bicycle parking spaces shall be located near the main hotel and restaurant building and 14 bicycle parking spaces shall be located near the Tree House buildings. An additional 6 bicycle parking spaces shall be located at the public parking lot.

Mitigation Monitoring TRAF -2: The applicant shall include the required bicycle parking spaces on the updated project site plan as part of the first building permit for the project and shall ensure the bicycle parking spaces are installed prior to building occupancy.

The project is, therefore, not expected to result in significant impacts related to transportation plans or policies, or to circulation systems in the area.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) (evaluation of transportation impacts of land use projects using vehicle miles traveled)?

Comment: Based upon the recommendations in the Office of Planning and Research (OPR) Technical Advisory for Evaluation VMT and confirmation with Sonoma County staff, FirstCarbon Solutions, in conjunction with their traffic partner TJKM, analyzed the potential impacts due to vehicle miles travelled (VMT) attributable to the project (FirstCarbon Solutions, VMT Impact Assessment, August 24, 2021) . VMT impacts attributable to the proposed hotel may be considered potentially significant if:

- Home based work VMT per Employee exceeds 85 percent of the average rate for Sonoma County; or
- VMT attributable to hotel guests results in a net increase in total VMT.

The VMT per Employee (Countywide average) is 22.8 miles (round trip). Therefore, the Impact Threshold (85% of Countywide average) is 19.4 miles round trip).

The VMT assessment determined the forecasted net change in daily home-based work VMT to jobs in the project area resulting from the proposed hotel, based on the Sonoma County Travel Demand Model estimates for baseline conditions (per 2015) with and without the hotel. Based on the Sonoma County Travel Demand Model estimates for baseline conditions (year 2015) with and without the hotel, the forecasted net change in daily home-based work VMT to jobs in the project area resulting from the proposed hotel is a net increase of 894 round-trip daily home-based work miles generated by 120 daily trips (60 inbound and 60 outbound) attributable to the hotel employees. Based on 60 employees as presumed by the model forecast: the forecasted net increase in employment VMT would equate to 14.9 miles per employee (round-trip) based on the model, thus below the impact threshold of 19.4 miles per employee (round-trip) or 85% of Countywide average. Therefore, VMT impacts attributable to hotel employees would be less than significant.

Consistent with the recommended method of evaluating VMT for customer-serving retail uses, VMT attributable to hotel guests would be considered significant if it resulted in a net increase in total countywide VMT.

The VMT assessment of net VMT takes into account that guests already visiting Sonoma County would otherwise stay at another hotel if the proposed hotel did not exist. In addition, “day trippers” already visiting the area would otherwise not stay in the area overnight. Based upon the annual average hotel room occupancy rates over a 10-year period, the number of hotel guests in Sonoma County increases or decrease each year, independently of the number of hotel rooms. Due to the pandemic, there should be a decrease for 2020-21, but most likely the annual average hotel room occupancy rate will trend back to the average of about 70 percent by 2022. The VMT assessment states that based on these trends: the proposed hotel is unlikely to result in an increase in the number of visitors to Sonoma County. Therefore, VMT attributable to hotel guests is unlikely to result in a net increase in total countywide VMT. The VMT assessment concludes that VMT attributable to hotel guests is unlikely to result in a net increase in total countywide VMT so VMT impacts generated by hotel guests are anticipated to be less than significant.

Significance Level: Less Than Significant Impact.

c) Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Comment: As discussed in subparagraph (a) above, a condition of approval will ensure that the proposed project would not increase hazards due to design features or incompatible uses.

Significance Level: Less Than Significant Impact.

d) Result in inadequate emergency access?

Comment: The traffic study concluded that no improvements related to traffic are required. The proposed site plan would accommodate the expected parking demand. Emergency access and site distances are adequate. Therefore, the proposed project would not result in inadequate emergency access.

Significance Level: No impact.

f) Result in inadequate parking capacity?

Comment: The required parking was determined based on the requirements set forth in Section 26-86-010 of the Sonoma County Zoning Code and the Urban Land Institute Manual for shared parking. All hotel guest parking will be valet parking. The 25 public parking spaces will be available for hotel use after the close of the public access trail, that is, after sunset and before sunrise. The parking lots, including the 25 public spaces, provide 175 parking spaces overall, which includes a zone for 22 stacked, in a line front to back, parking spaces. The proposed on-site parking would not meet County requirements based on application of County parking standards individually for the hotel and restaurant uses, plus river access spaces. However, the applicant seeks approval of a shared parking concept (where joint uses on a site may utilize the same parking areas) as part of the project. County Code Section 26-86-010.i indicates that:

"Parking standards may be reduced when it has been satisfactorily demonstrated (to the BZA) that fewer spaces will adequately serve the specific use or that the applicant has encouraged transit opportunities through one or more of the following:

(1) Participation in a comprehensive travel demand management (TOM) program including, but not limited to, provision of flex-time, carpooling, and transit passes such that VMT generated by the project is reduced;

(2) Provision of transit stops and/or turnouts developed in cooperation with and approved by Sonoma County Transit;

(3) Provision of amenities for bicyclists, bus riders, carpoolers and pedestrians beyond (Code requirements).

The W-Trans traffic analysis addressed this issue, and the analysis was reviewed and accepted by the County's Transportation and Public Works Department. An Addendum to the Final Traffic Impact Study with an updated parking analysis was submitted that supersedes the parking analysis in the Final Traffic Impact Study to reflect an updated use permit proposal statement. Per Article 86 of the Sonoma County Zoning Code, one parking space is required per hotel room plus one space for an on-site manager. Thus, the hotel component of the project requires 109 parking spaces. Dining areas require an additional one space per 60 square feet, thus, 56 parking spaces are required for the restaurant. The proposed meeting rooms required one space per 100 square feet, thus, 35 parking spaces are required for the meeting rooms. In addition, the County is requiring 25 public parking spaces for public access to the Russian River. The total required onsite supply parking ratios based upon these standalone uses, would be 225 parking spaces.

Methodologies contained in the updated Urban Land Institute (ULI) publication, Shared Parking, Third Edition, 2020, were utilized to determine parking demand for the resort and its affiliated uses during different time periods. The Second Edition of Shared Parking from 2005 was previously used in the Final

Traffic Impact Study and methodologies have undergone significant refinement. The ULI shared parking methodology ties recommended parking supply to the maximum demand period.

Shared Parking for the Leisure Hotel land use includes the total number of rooms, restaurant square footage and meeting room space. The shared parking analysis projects a peak season weekday parking demand of 182 spaces and a peak season weekend demand of 190 spaces. The parking demand projections include that generated by the river access public parking lot. Both weekday and weekend parking demand would peak in the evenings near 9:00 p.m. Peak season demand would be somewhat lower in the morning and afternoon. Overall parking demand is projected to be approximately 30 percent lower during the off-peak winter months.

The river access lot is projected to serve 16 users on weekdays and 18 users on weekends during the afternoon between 1:00 p.m. and 2:00 p.m. This corresponds to a period when the hotel's parking demand is relatively low. Conversely, in the evenings when the hotel's parking demand peaks, the river access parking lot would have no public parking demands. These patterns demonstrate the efficiencies that can be gained through the use of shared parking arrangements. Even if river access related parking demand reaches 25 vehicles, sufficient parking supply would be available for these users during the daytime.

Based on application of ULI shared parking demand methodologies, analysis concludes the resort's proposed 175-space parking supply would be expected to accommodate the projected peak-season demand for 174 spaces. The Board of Zoning Adjustments must determine if the shared parking concept is acceptable when acting on the project Use Permit.

Additionally, the proposed project anticipates some indoor special events may be held at the site, accessory to the resort use, though no specific schedule or details on events was provided. The W-Trans study concluded that if a large number of non-hotel guests attends events, additional parking demand could be generated, particularly during the peak season for the hotel. The use of valet parking is proposed as part of the W-Trans study. Using the industry standard of 2.5 persons per car for special events, use of valet parking in the lots west of the main driveway could increase the total parking supply by at least 44 spaces accommodating up to approximately 110 outside guests during the peak season. Implementation of valet parking throughout the site would further increase capacity. Valet parking would be unnecessary for events occurring during the resort's off-peak season since the available parking supply is projected to average 30 spaces between December and April. Consequently, events attracting up to 75 outside guests may be accommodated without the use of valet parking during the off-peak season. This is further addressed in the following mitigation measure, which would reduce the potential impact for parking to a less-than significant level.

Significance Level: Potentially Significant Unless Mitigated.

Mitigation Measure TRAF-3: The applicant shall submit a final parking management plan to Permit Sonoma and the Department of Transportation and Public Works (DTPW) addressing plans for use of valet parking during special events subject to final review and approval. The parking management plan shall address both peak- and non-peak season uses. In no instance shall the number of permitted outside guests exceed 145 during the non-peak season (December to April) and 275 during the peak season (June to October), with "shoulder" periods between the peak and non-peak seasons being the average of the two.

Mitigation Monitoring TRAF-3: Permit Sonoma will not release the first building permit until the parking plan has been submitted and approved in final form by Permit Sonoma and DTPW.

18. TRIBAL CULTURAL RESOURCES:

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site feature, place, 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 i) 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 5030.1(k), or ii) 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Comment: A referral on the project was sent to the Northwest Information Center who did not request a site study. The Lytton Band of Pomo Indians responded to the original project referral, indicating that accidental discovery conditions should be added to the project in the event that archaeological/historical resources or human remains are found at the site.

In order to ensure that no cultural or archaeological resources are unearthed during ground disturbing activities, a standard condition would be required for the project as follows:

A standard condition of approval requires the following language be printed on building or grading plans for ground disturbing activities:

NOTE ON PLANS: “During construction activities, if archaeological remains are uncovered, work at the place of discovery should be halted immediately until a qualified archaeologist can evaluate the finds pursuant to Government Code Section 15064.5. If archaeological materials such as pottery, arrowheads or midden are found, all work shall cease and PRMD staff shall be notified so that the find can be evaluated by a qualified archaeologist (i.e., an archaeologist registered with the Society of Professional Archaeologists). Artifacts associated with prehistoric sites include humanly modified stone, shell, bone or other cultural materials such as charcoal, ash and burned rock indicative of food procurement or processing activities. Prehistoric domestic features include hearths, fire pits, or house floor depressions whereas typical mortuary features are represented by human skeletal remains. Historic artifacts potentially include all by-products of human land use greater than 50 years of age including trash pits older than fifty years of age. The developer shall designate a Project Manager with authority to implement the mitigation prior to issuance of a building/grading permit. When contacted, a member of PRMD Project Review staff and the archaeologist shall visit the site to determine the extent of the resources and to develop proper procedures required for the discovery. No work shall commence until a protection plan is completed and implemented subject to the review and approval of the archaeologist and Project Review staff. Mitigation may include avoidance, removal, preservation and/or recordation in accordance with accepted professional archaeological practice.”

The Lytton Band of Pomo Indians responded to the original project referral, indicating that accidental discovery conditions should be added to the project in the event that archaeological/historical resources or human remains are found at the site. Standard conditions of approval will ensure that a substantial adverse change in the significance of a tribal cultural resource will not occur. See section 5.c above.

Significance Level: Less Than Significant Impact.

19. UTILITIES AND SERVICE SYSTEMS:

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?**

Comment: The project is not expected to result in the construction of new water or wastewater treatment facilities, beyond connection to the existing facility lines in SR 116 (Russian River County Sanitation District for sewer, Sweetwater Springs Water District for water). The project proposes connection to the Russian River County Sanitation District, which provides sewage disposal services in the area. A condition of project approval requires submittal of a Will Serve Letter from the District. There are no known aspects of the project which would violate applicable Regional Water Quality Control Board wastewater treatment requirements. The project proposes a connection to the Sweetwater Springs Water District for provision of water supplies. The required Will Serve Letter from the District has been submitted.

The project will require the construction of new storm water drainage facilities. The project has been conditioned so that the final grading/improvement plans prevent and/or minimize the discharge of pollutants and waste after the project is constructed (post-construction). There are numerous post-construction storm water best management practices that can be utilized to accomplish this goal. These include project design features and best management practices that minimize new impervious surfaces, disperse development over larger areas, and/or that create areas that allow storm water to be detained, infiltrated, or retained for later use. Other post-construction storm water best management practices include storm water treatment devices based on filtering, settling or removing pollutants. County permitting will ensure no impact to storm drain systems.

The project will require the construction of a new wastewater treatment system, however, this facility will not result in a significant environmental impact.

Significance Level: Less Than Significant Impact.

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

Comment: The project proposes a connection to the Sweetwater Springs Water District for provision of water supplies. The required Will Serve Letter from the Water District has been submitted. The letter is conditioned on the applicant using construction building Types IA, IB, IIA and/or IIIA. If the type of construction is not Type IA, IB, IIA or IIIA, then the applicant will have to construct additional water storage at the applicant's expense.

Significance Level: Less Than Significant Impact.

- 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?**

Comment: The project proposes connection to the Russian River County Sanitation District, which provides sewage disposal services in the area. No capacity issues or concerns were raised by the District. A condition of project approval requires submittal of a Will Serve Letter from the District prior to building permit issuance.

Significance Level: Less Than Significant Impact.

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?

Comment: The project will not generate excess solid waste.

Significance Level: No impact.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Comment: The project has been conditioned to comply with the County's solid waste requirements. Trash enclosures and recycling areas will be reviewed and approved by PRMD's Environmental Health Specialist and the Building Plan Check Section. Trash trucks must have at least a 32-foot turning radius at the trash enclosure and the dumpster must have 16 feet of overhead clearance. The outside perimeter of the trash enclosure shall be graded to prevent storm water from draining into the sanitary sewer system. The trash enclosure shall be covered with a roof or awning. A condition of approval requires that all garbage and refuse on this site shall accumulate or be stored for no more than seven calendar days, and shall be properly disposed of at a County Transfer Station or County Landfill before the end of the seventh day. The project will comply with applicable solid waste management and reduction requirements.

Significance Level: Less Than Significant Impact.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project: 1) Substantially impair an adopted emergency response plan or emergency evacuation plan; 2) 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; 3) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk of that may result in temporary or ongoing impacts to the environment; 4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Comment: According to the Safety Element of the General Plan, the project site is not located in a high wildland fire hazard area.

The project is located in a State Responsibility Area and is outside of the wildland high and very high fire hazard zones mapped by Wildland Fire Hazard Areas Figure PS 1-g of the Sonoma County General Plan 2020. The project is located in a relatively flat area and surrounded by redwood groves, riparian corridors and rural residential uses. The resort would add population to the site in the form of guests and employees. However, the site is roughly one mile from the Russian River Fire Station #1, ensuring rapid response times in the event of an emergency. To facilitate locating an emergency and to avoid delays in emergency response, the project has been conditioned to require the resort provides for safe access for emergency fire apparatus and civilian evacuation concurrently, and unobstructed traffic circulation during an emergency. Additionally, project conditions of approval require the resort connects to the Sweetwater Springs Water District, installs fire hydrants for fire suppression, and develop fire safety and emergency plans, as well as employee training programs consistent with the requirements of the 2013 California Fire Code and Sonoma County Code. New construction on the site must conform to County Fire Safe Standards building requirements. Fire Safe Standards include building requirements related to fire sprinklers, stairways to roofs, fire apparatus access roads, door panic hardware, fire resistant stairway

enclosures, emergency water supply, and defensible space. The construction of new structures in accordance with current building standards should decrease the risk to structures on the project parcel and ensure that the resort project would reduce the exposure of people and property to fire hazards. See section 9.g above for additional conditions of approval to reduce the risk of injury or damage from wildfire.

There is no separate emergency evacuation plan for the County. Furthermore, the project would not cause an interference with emergency evacuations. The Fire Marshall will review the building plans to insure that the hotel and restaurant will have adequate fire protection. The primary entrance off of SR 116 includes a looped driveway system to provide for emergency vehicle ingress and egress.

Significance Level: Less Than Significant Impact.

21. MANDATORY FINDINGS OF SIGNIFICANCE

- 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?**

Comment: Potential project impacts on special status plant and fish/wildlife species and habitat are addressed in Section 4. Implementation of the required mitigation measures (Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4) would reduce these potential impacts to a less-than-significant level. Potential adverse project impacts to cultural resources are addressed in Section 5. A standard condition of approval to ensure that cultural or archaeological resources are protected if unearthed during ground disturbing activities is provided in Section 18a. Implementation of this standard condition of approval would reduce any potential impacts to a less-than-significant level.

Significance Level: Less than Significant Impact

- 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)?**

Comment: No project impacts have been identified in this Initial Study that are individually limited but cumulatively considerable. The project would contribute to impacts related to aesthetics, agriculture and forest resources, biological resources, geology and soils, hydrology and water quality, noise and traffic, which may be cumulative off-site, but mitigations would reduce project impacts to less-than-significant levels.

Significance Level: Less than Significant Impact

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

Comment: Proposed project operations have the potential to cause substantial adverse impacts on human beings, both directly and indirectly. However, all potential impact and adverse effects on human beings (resulting from aesthetics, geology and soils, hydrology and water quality, noise, traffic) were analyzed, and would be less than significant with the mitigations identified in the Initial Study incorporated into the project.

Significance Level: Less than Significant Impact

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7. Alquist-Priolo Special Studies Zones; State of California; 1983. http://www.conservation.ca.gov/cgs/rghm/ap/Pages/official_release.aspx
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24. Sonoma County Permit and Resource Management Department Noise Guidelines, 2017
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Technical Reports & Plans (Attached)

- Att. 1: BKF, Preliminary Storm Water Mitigation Plan for Guerneville Park Resort, February 5, 2020.
- Att. 2: BKF, Guerneville Park Resort – 100 yr Flood Elevation, September 28, 2017.
- Att. 3: Coastland Engineers, Guerneville Park Resort Project Impact Analysis, July 12, 2018 (for Guerneville water system)
- Att. 4: Illingworth & Rodkin, Guerneville Park Resort Environmental Noise and Vibration Assessment, August 12, 2016, Addendum October 26, 2022.
- Att. 5: Illingworth & Rodkin, Guerneville Park Resort, Guerneville, CA - Air Pollutant and GHG Emissions Modeling, April 23, 2020, Revised July 23, 2021
- Att. 6: Kapolchok & Associates, Greenhouse Gas Reduction Plan, February 20, 2020.
- Att. 7: Kjeldsen Biological Consulting, Biological Assessment, Guerneville Park Resort, July 16, 2008.
- Att. 8: Kjeldsen Biological Consulting, Riparian Delineation, July 9, 2017.
- Att. 9: MacNair & Associates, Guerneville Park Resort - Arborist Report Update, November 18, 2017.
- Att. 10: MacNair & Associates, Guerneville Park Resort- Arborist Report Update (Driveway Alignment per Fire Access Requirements), October 29, 2018.

- Att. 11: MacNair & Associates, GuerneWood Park Resort- Arborist Construction Impact Review, February 10, 2018, updated February 10, 2020.
- Att. 12: PJC & Associates, Geotechnical Investigation, Proposed GuerneWood Park Resort, April 30, 2008.
- Att. 13: Ted Winfield & Associates and Resource-Design, Streamside Conservation Plan, GuerneWood Park Resort, Updated: February 17, 2020.
- Att. 14: W-Trans, Final Traffic Impact Study for the GuerneWood Resort Project, December 11, 2018.
- Att. 15: W-Trans, Addendum to the Final Traffic Impact Study for the GuerneWood Park Resort Project, September 8, 2020.
- Att. 16: First Carbon Solutions, Vehicles Miles Traveled (VMT) Impact Assessment for the GuerneWood Park Resort Project, March 4, 2021, Revised August 24, 2021
- Att. 17: Sweetwater Springs Water District, Signed Will Serve Letter, March 22, 2021
- Att. 18: W-Trans, Updated Parking Assessment, June 1, 2022
- Att. 19: Resource Design, updated Conceptual Landscape Master Plan, August 11, 2022
- Att. 20: B+H, updated Parking Plan, August 11, 2022
- Att. 21: B+H, Conceptual Public Trail Plan, August 11, 2022
- Att. 22: BKF, preliminary Grading Plan, February 20, 2020
- Att. 23: B+H, Tree Preservation Plan, August 11, 2022
- Att. 24: B+H, Conservation Planting Plan, August 11, 2022