DRAFT
Initial Study and Mitigated Negative Declaration
h3hotel Project
City of Healdsburg, Sonoma County, California

Prepared for:

City of Healdsburg
Building & Planning Department
401 Grove Street
Healdsburg, CA 95448
707.431.3346

Contact: Jesse Brown, Project Planner

Prepared by:

FirstCarbon Solutions
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597
Phone: 925.357.2562
Fax: 916.357.2572

Contact: Mary Bean, Project Director
Janna Waligorski, Project Manager

October 9, 2014

Table of Contents

Section 1: Introduction 1
1.1 - Purpose 1
1.2 - Background 1
1.3 - Project Location 1
1.4 - Environmental Setting 1
1.5 - Project Description 2
1.5.1 - Guest Amenities 2
1.5.2 - Architectural Characteristics 17
1.5.3 - Landscaping 17
1.5.4 - Employment 17
1.5.5 - Site Access and Parking 17
1.5.6 - Deliveries and Solid Waste Removal 18
1.5.7 - Sustainability 18
1.5.8 - Creekside Park and Riparian Setback 18
1.5.9 - Utilities 19
1.5.10 - Construction 27
1.6 - Required Discretionary Approvals 27
1.7 - Intended Uses of this Document 27

Section 2: Environmental Checklist and Environmental Evaluation 29
1. Aesthetics 30
2. Agriculture and Forestry Resources 34
3. Air Quality 36
4. Biological Resources 44
5. Cultural Resources 54
6. Geology and Soils 63
7. Greenhouse Gas Emissions 66
8. Hazards and Hazardous Materials 70
9. Hydrology and Water Quality 74
10. Land Use and Planning 78
11. Mineral Resources 80
12. Noise 81
13. Population and Housing 89
14. Public Services 91
15. Recreation 93
16. Transportation/Traffic 95
17. Utilities and Service Systems 100
18. Mandatory Findings of Significance 103

Section 3: References 105

Section 4: List of Preparers 109
4.1 - Lead Agency's Environmental Consultant 109
4.2 - Applicant's Technical Consultants 109

Appendix A: Air Quality/Greenhouse Gas Assessment

Appendix B: Biological Resource Reports

B.1 - Biological Resources Evaluation
B.2 - Wetlands Delineation

Appendix C: Phase I Environmental Site Assessment

Appendix D: Hydrology Calculations and Standards Urban Stormwater Mitigation Plan

Appendix E: Noise and Vibration Impact Technical Memorandum

Appendix F: Traffic Memorandum

List of Tables

Table 1: Construction Criteria Air Pollutants and Precursors Screening Level 40
Table 2: Operational Criteria Air Pollutants and Precursors Level 40
Table 3: Plant Community Acreages within the Project Site 45
Table 4: Known Cultural Resources Located within 0.5 mile of the Project Area 55
Table 5: Historic Structures within a 0.5-Mile Radius 56
Table 6: Cultural Resources Reports within 0.5 Mile of the Candidate Area 60
Table 7: NR Listed or Eligible Historic Structures within 500 Feet 60
Table 8: Operational Greenhouse Gases Screening Level 67
Table 9: Typical Construction Equipment Maximum Noise Levels, L_{max}.....82
Table 10: Trip Generation Comparison 96

List of Exhibits

Exhibit 1: Regional Location Map.....3
Exhibit 2: Local Vicinity Map, Aerial Base 5
Exhibit 3: Site Photographs 7
Exhibit 4a: Site Plan.....9
Exhibit 4b: Ground Level Floor Plan.....11
Exhibit 4c: Second and Third Level Floor Plans.....13
Exhibit 4d: Fourth Level Floor Plan 15
Exhibit 5a: Street Elevations – East 21
Exhibit 5b: Street Elevations – West 23
Exhibit 5b: Street Elevations – South 25

SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Draft Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from implementation of the h3hotel project (project) in Healdsburg, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Healdsburg (City) is the Lead Agency in the preparation of this Draft IS/MND and any additional environmental documentation required for the project. The City has discretionary authority over the proposed project. The intended use of this document is to disclose the potential environmental impacts resulting from development of the project and to provide the basis for input from public agencies, organizations, and interested members of the public. This Draft ISMND will be circulated for 30 days during which time comments can be made by the public on the analyses contained herein. Although not required by CEQA, a Final IS/MND will be prepared to provide responses to comments received during the 30-day review period.

The remainder of this section provides a brief description of the project location and the characteristics of the project. Section 2 includes an environmental checklist giving an overview of the potential impacts that may result from project implementation and elaborates on the information contained in the environmental checklist.

1.2 - Background

The project applicant, Paolo Petrone (applicant), currently operates two hotels in the Downtown Healdsburg area: Hotel Healdsburg, located one-half block north of the project site at 25 Matheson Street; and h2hotel, located one building south of the project site at 219 Healdsburg Avenue. The two existing hotels are managed jointly, and deliveries (food, linens, etc.) are often coordinated between them.

1.3 - Project Location

The 0.59-acre project site is located at 227 Healdsburg Avenue in the downtown area of the City of Healdsburg, Sonoma County, California (Exhibit 1). The project site is bordered by Healdsburg Avenue (east), commercial development (north and south), and Grove/Vine Street and the Sonoma Marin Area Rail Transit (SMART) railroad (west).

The project site is located on the Healdsburg 7.5 minute topographic quadrangle map, Range 9 West, Township 9 North, Section 21 (Latitude 38°36’34” North; Longitude 122°52’15” West).

1.4 - Environmental Setting

The project site consists of a gravel parking lot and a portion of the Foss Creek riparian corridor (Exhibit 2). The parking lot is currently utilized by guests and employees of the h2hotel. A sidewalk is located along Healdsburg Avenue in front of the project site and includes a Sonoma County Transit bus stop shelter, waste receptacle, and bike parking. Two street trees are also located within the

sidewalk area along the project frontage. Habitat types within the project site include Foss Creek, non-native grassland, oak riparian, and urban/disturbed. Exhibit 3 provides photographs of the existing site conditions.

The site is relatively level at approximately 100 feet above sea level. Foss Creek bisects the site north to south, with relatively steep banks that separate a 4,000-square-foot area on the western side of the creek and the remainder of the site (approximately 20,000 square feet) along Healdsburg Avenue.

Existing water, sewer, stormwater, electricity, and natural gas services are located in Healdsburg Avenue directly adjacent to the site.

The City of Healdsburg General Plan designates the site as DC – Downtown Commercial. The Healdsburg Zoning Map designates the site as CD – Downtown Commercial, which allows hotels, extended stay hotels, and motels. The neighboring commercial developments are also designated as DC – Downtown Commercial, and are also zoned as CD – Downtown Commercial.

1.5 - Project Description

The project applicant is proposing to develop a 39-room boutique hotel with a gross floor area of 36,827 square feet. Building site coverage would be 11,097 square feet, with a floor area ratio (FAR) of 1.56 (Exhibit 4a through Exhibit 4d).

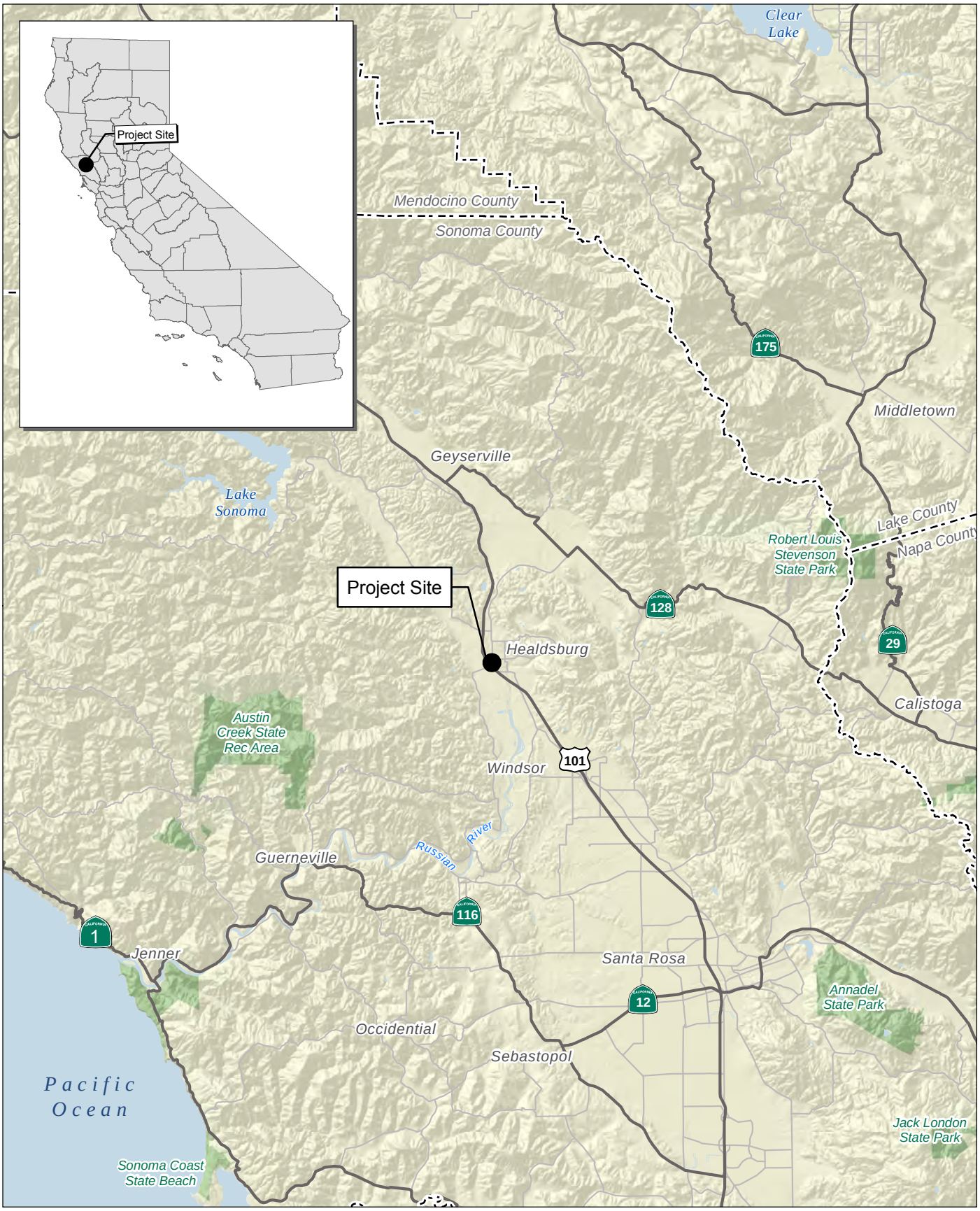
The h3hotel would operate 24 hours a day, 7 days a week, year-round, and would include a lobby and reception area, indoor/outdoor rooftop lounge, meeting room, pool, and creekside park. The ground floor would accommodate 50 parking spaces. Specific project components are discussed below.

1.5.1 - Guest Amenities

Guest amenities would include a meeting room located on the fourth floor to be used for meetings and social events for hotel guests or guests of the existing Hotel Healdsburg and h2hotel. The adjacent rooftop lounge would be available for guest use only for meeting breakouts, breakfast service, and wine and cheese hour, etc.

A small prep kitchen and dishwashing facility would be provided to service the meeting space and rooftop lounge, with the majority of food prep occurring at Spoonbar located within h2hotel. Room service options would be available from Spoonbar and Pizzando (located within Hotel Healdsburg), thereby minimizing on-site food preparation.

A pool with concrete decking and small lawn area would be located behind the hotel along the eastern bank of Foss creek. The pool and surrounding concrete decking would be fenced to restrict access.



Source: Census 2000 Data, The CaSIL, FCS GIS 2013.

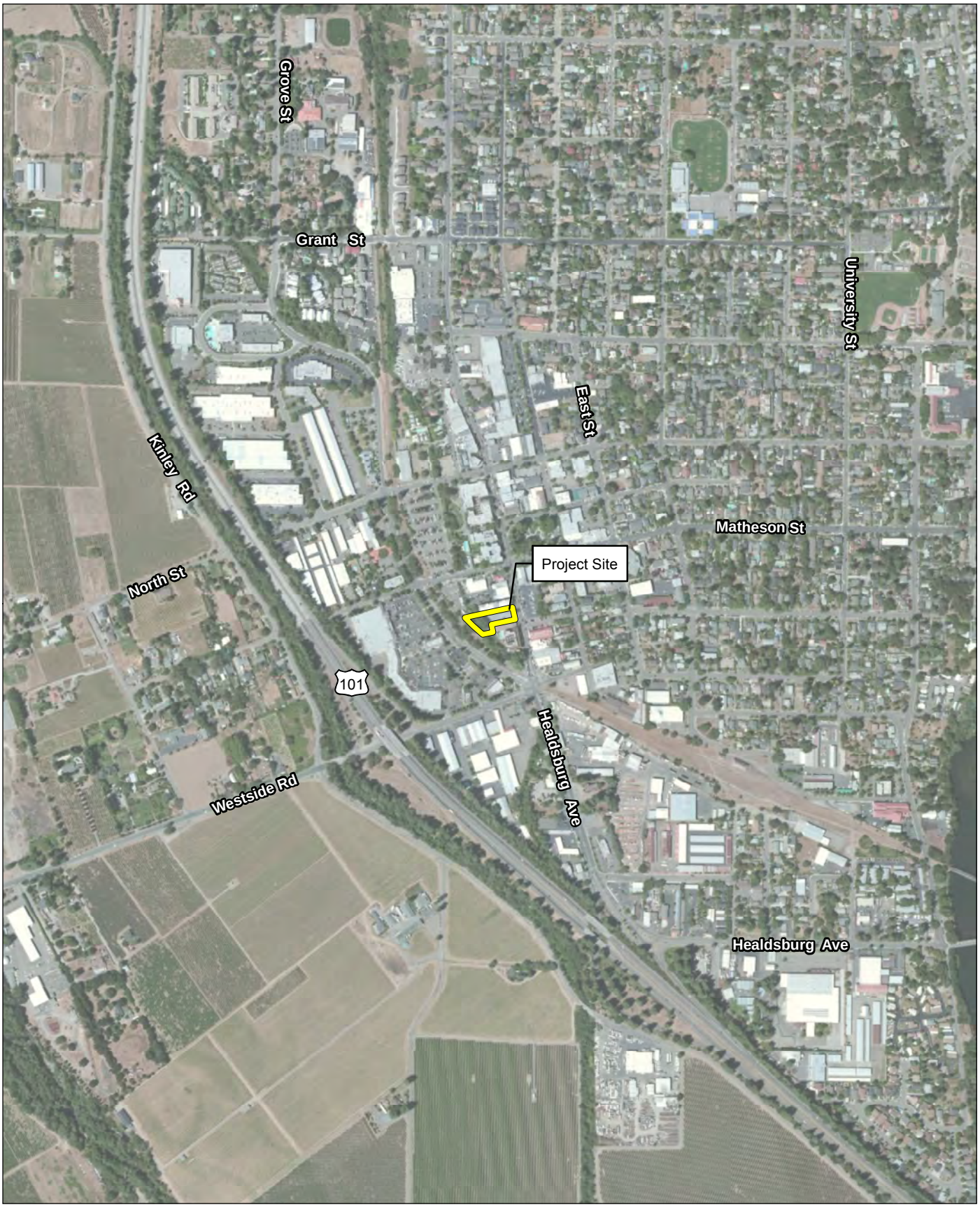
FirstCarbon SOLUTIONS

5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

32570006 • 06/2014 | 1_regional.mxd

City of Healdsburg • h3hotel Project
Draft Initial Study/Mitigated Negative Declaration



Source: ESRI Imagery, 2013

FirstCarbon SOLUTIONS

900 450 0 900 Feet

Exhibit 2
Local Vicinity Map
Aerial Base

A

B

C

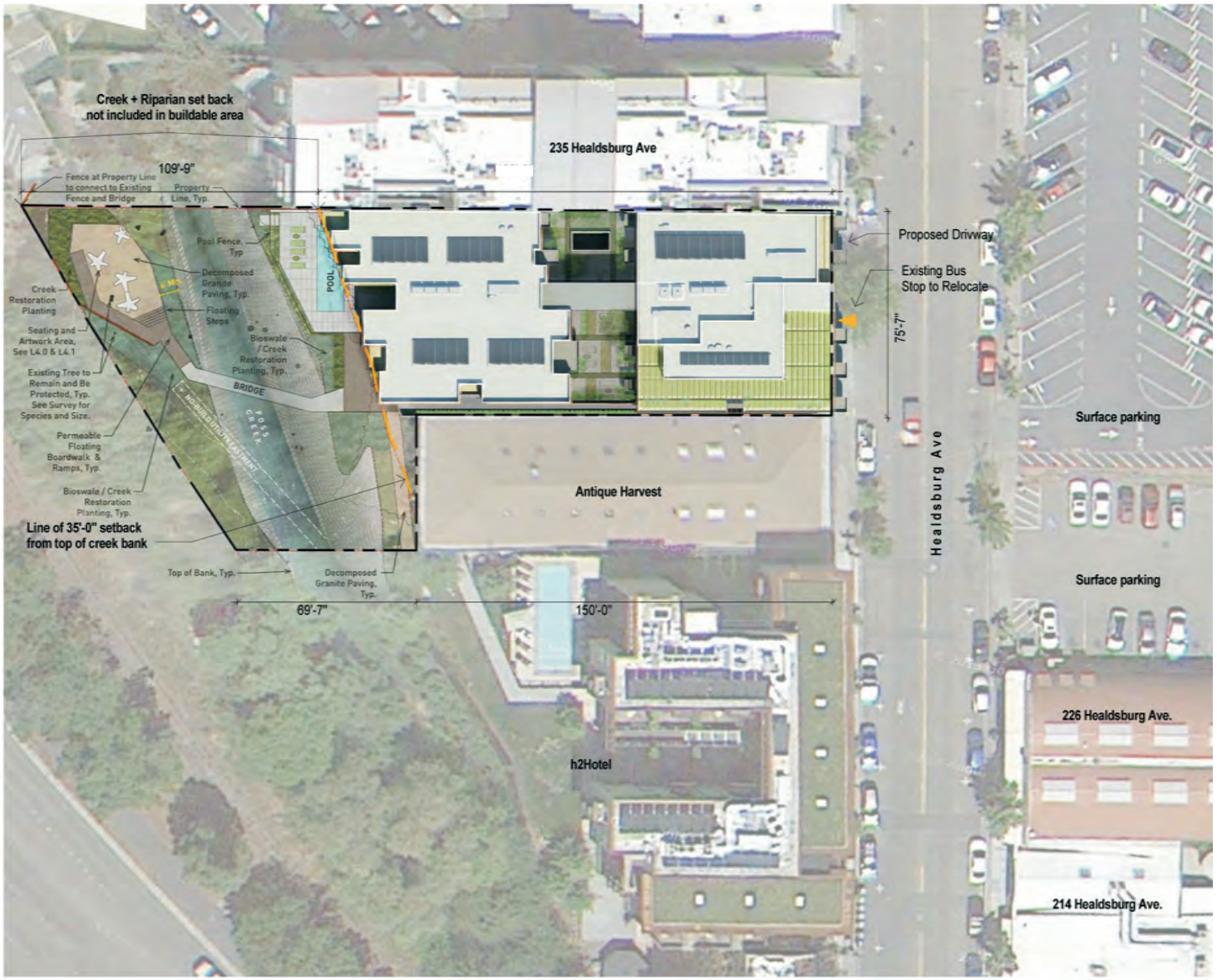
D

E

Source: David Baker Architects, 2014

FirstCarbon® SOLUTIONS

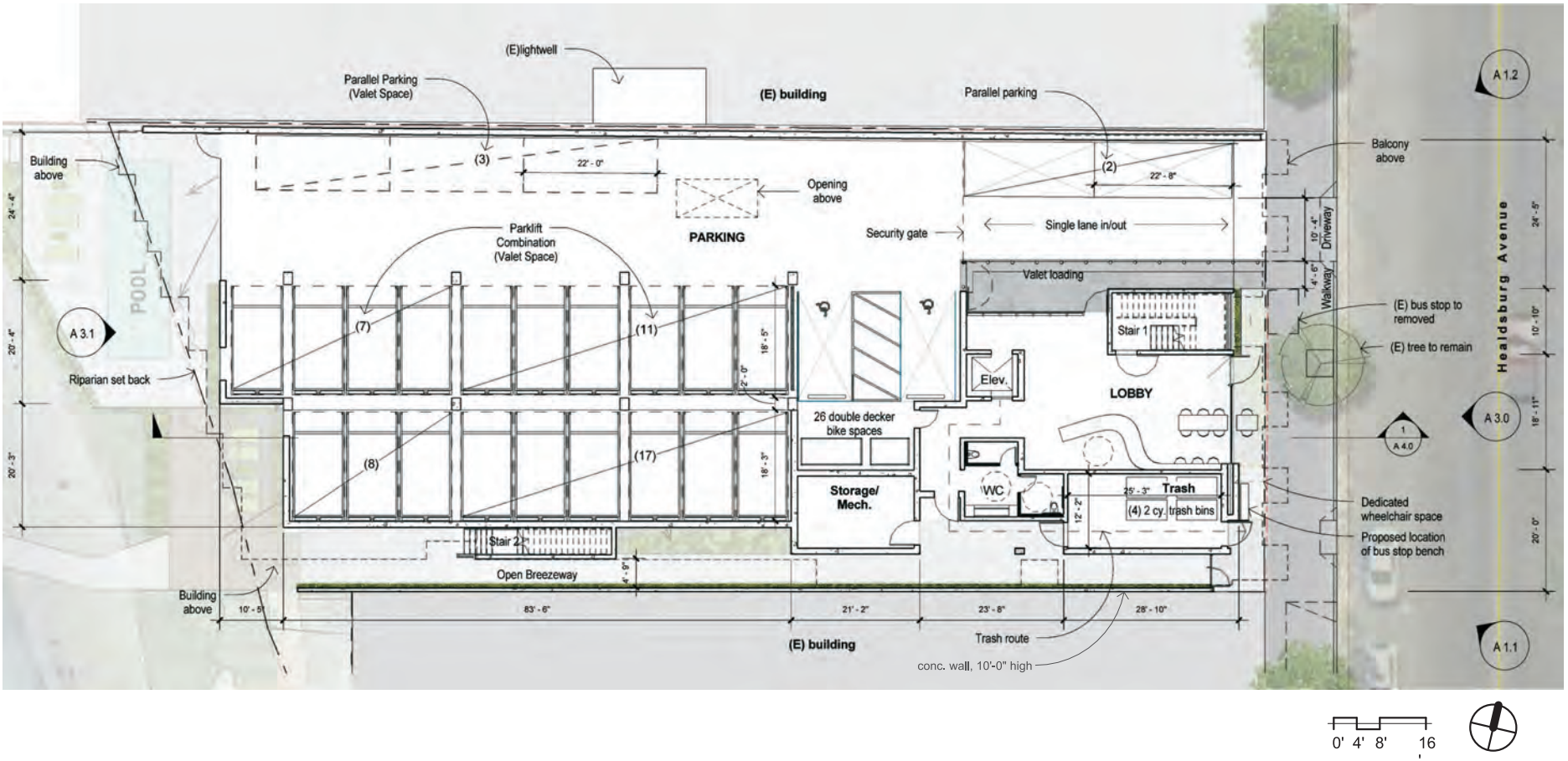
Exhibit 3
Site Photographs



Source: David Baker Architects, 2014

FirstCarbon® SOLUTIONS

Exhibit 4a
Site Plan



Source: David Baker Architects, 2014

FirstCarbon® SOLUTIONS

Exhibit 4b
Ground Level Floor Plan

0' 4' 8' 16

Source: David Baker Architects, 2014

FirstCarbon® SOLUTIONS

Exhibit 4c
Second and Third Level Floor Plans

Source: David Baker Architects, 2014

FirstCarbon® SOLUTIONS

Exhibit 4d
Fourth Level Floor Plan

1.5.2 - Architectural Characteristics

The hotel would employ modern architecture dominated by exterior slatted Forest Stewardship Council (FSC) certified redwood in horizontal and vertical patterns, and corten steel (Exhibits 5a,5b and 5c). Both the redwood and corten steel would not require painting or coating and would weather naturally with exposure to the elements. The massing of the building is consistent with surrounding buildings in the downtown area, including the h2hotel to the south and the commercial building to the north. At ground level, the hotel would be fronted with clear glass windows and doors would be flanked by vertical vine plantings.

1.5.3 - Landscaping

The project would include 5,374 square feet of green/open space, of which 4,000 square feet are located on the west side of Foss Creek. The green/open space would include a creekside park (discussed separately below). Other areas of landscaping would include vertical vine plantings, ferns, groundcover, small trees, and decorative planters located along the hotel's front and rear façades. Courtyards on the second and third floors, as well as the rooftop lounge would include landscaped planters and small trees. All existing trees in the Foss Creek riparian corridor would be retained and protected during construction. The smaller of the two existing street trees along Healdsburg Avenue would be removed for a new driveway entrance.

1.5.4 - Employment

The project would employ five day-shift employees and one night-shift employee. Staff at the management level would be shared between Hotel Healdsburg and h2hotel; no additional management positions would be required.

1.5.5 - Site Access and Parking

Vehicular access to the site would be via a single lane in/out driveway from Healdsburg Avenue, to 50 enclosed parking spaces located on the ground floor. Valet service would be provided to hotel guests.

Parking at the ground floor level would consist of five parallel spaces, two Americans with Disability Act (ADA) accessible spaces, and 43 spaces located within a partially belowground mechanical lift system that would allow cars to be double-parked both vertically and horizontally. Employee parking would be accommodated within the 50 parking spaces but employees would be encouraged to cycle to work. In addition, adequate bicycle storage would be provided to both employees and guests.

Pedestrian access to the project would be provided from Healdsburg Avenue. A decomposed granite path would provide access to h2hotel along the hotel's back façade, and a footbridge would provide pedestrian access to the park on the west bank of Foss Creek. The existing Sonoma County Transit bus stop shelter would be incorporated into the hotel's street-front façade.

1.5.6 - Deliveries and Solid Waste Removal

Minimal vendor deliveries would be required, due to minimal on-site food and beverage operations. Because the h3hotel would be managed jointly along with the applicant's other properties, deliveries would be made on foot from the Hotel Healdsburg and h2hotel via hand carts.

Solid waste storage would be accommodated in four receptacles located in a completely enclosed street level room with door access to Healdsburg Avenue. These receptacles would receive solid waste from the proposed hotel as well as h2hotel. Pickup would occur as needed with a minimum of three times per week (Monday, Wednesday, and Friday) between 7 a.m. and 8 a.m.

1.5.7 - Sustainability

The proposed hotel would take a sustainable green approach to construction and operations with the goal of obtaining Leadership in Energy & Environmental Design (LEED) certification. Included in the plan are solar roof panels for water heating to conserve electricity, stormwater management to control potential pollutants, and a continued focus on the restoration of Foss Creek.

1.5.8 - Creekside Park and Riparian Setback

A private creekside park consisting of approximately 4,000 square feet would be constructed on the western side of Foss Creek, west of the hotel. A footbridge would provide access for hotel guests. No construction or disturbance would take place within the top of bank lines or within the utility easement located within the southwestern corner of the project site. The park would consist of permeable floating boardwalks, decomposed granite paving, and seating areas containing artwork. A bioswale/creek restoration area would separate the boardwalk and decomposed granite areas from the top of bank and would be planted with western columbine (*Aquilegia formosa*), California fescue (*Festuca californica*), Douglas iris (*Iris douglasiana*), California grey rush (*Juncus patens*), white monkeyflower (Mimulus 'Jelly Bean White' PP11,969), and golden eyed grass (*Sisyrinchium californicum*). Bioswale/creek restoration areas would also be created along the park's southwestern edge, and on the eastern side of Foss Creek.

Restoration plantings would be located along the park's northwestern boundary and would consist of snowball ceanothus (*Ceanothus rigidus*), evergreen currant (*ribes viburnifolium*), Dara's choice sage (salvia 'Dara's choice'), and hummingbird sage (*Salvia Spathacea*). Existing creekside trees would be maintained; vegetation along the west bank would be maintained to the extent possible.

The hotel building would maintain the required riparian setback of 35 feet with the exception of guest room balconies on the hotel's west façade, which would overhang the riparian setback area by no more than 1 foot, 9 inches.

A portion of the pool and surrounding deck, as well as the footbridge and improvements west of Foss Creek would be constructed within the 35-foot riparian setback, but would remain outside the creek's top of bank (Exhibit 4a).

1.5.9 - Utilities

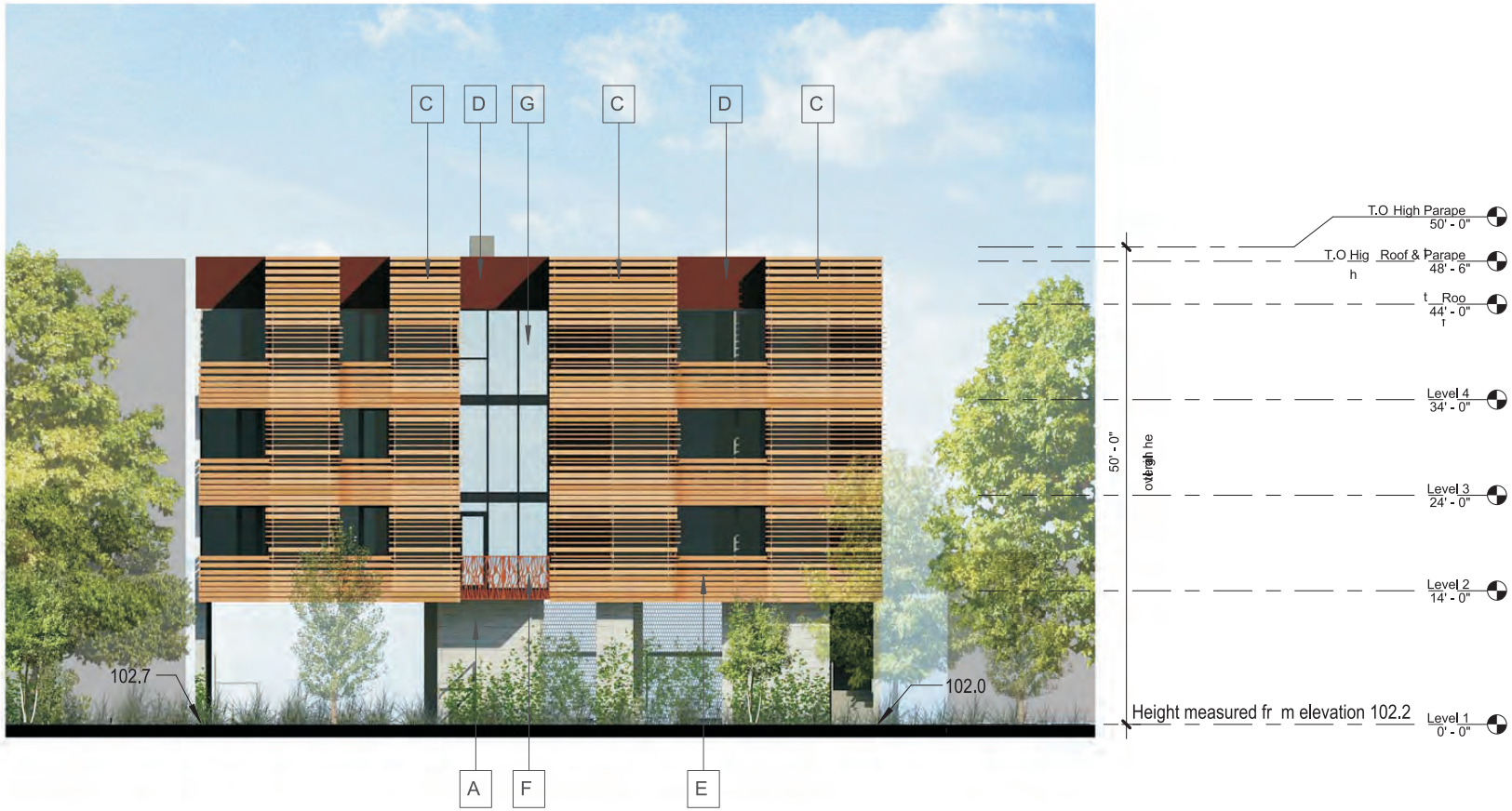
Utilities such as water, sewer, electricity, natural gas, telephone, and cable television would be extended onto the site to serve the development; all on-site utilities would be private. The project would connect to the existing public water and sewer lines in Healdsburg Avenue.

Stormwater runoff from the hotel's rooftop would be conveyed via a pipe network that would cross Foss Creek under the proposed pedestrian bridge and would outlet into vegetated bioswales.

Source: David Baker Architects, 2014

FirstCarbon® SOLUTIONS

Exhibit 5a
Street Elevations - East



Source: David Baker Architects, 2014

FirstCarbon® SOLUTIONS

Exhibit 5b
Street Elevations - West

Source: David Baker Architects, 2014

FirstCarbon® SOLUTIONS

Exhibit 5c
Street Elevations - South

The swales have been designed to mitigate the 85th percentile, 24-hour storm event. Larger storm events would overtop the bioswales via rock protected level spreaders, and would sheet flow into Foss Creek. Stormwater from the project's sidewalk would sheet flow into the Healdsburg Avenue gutter consistent with existing conditions.

1.5.10 - Construction

Project construction is expected to last 18 months and could begin as early as April 1, 2015. The majority of staging activities would occur on-site. Should off-site staging be required, it would occur at the Nu Forest Products yard located at 164 Healdsburg Avenue, less than one block south of the project site. In addition, the parking lot located to the northwest, behind 235 Healdsburg Avenue, would be used for the staging and installation of the bridge as well as for the site work required for the creekside park development. Approximately 487 cubic yards of soil would be cut from the site to allow for the mechanical lift parking system. Cut soil would be disposed of at Tubbs Island, approximately 50 miles south of the project site.

During construction, valet parking for guests of the h2hotel would be provided at a vacant lot owned by the applicant, located at the northeast corner of Healdsburg Avenue and North Street. Construction employees would be requested to park on Grove/Vine Street, outside of the main downtown area. Alternatively, efforts will be made to provide some temporary parking in the parking lot across Healdsburg Avenue from the project site.

1.6 - Required Discretionary Approvals

The proposed project would require the following discretionary approvals from the City of Healdsburg:

- Major Design Review
- Variance- Foss Creek Riparian Setback

In addition, the proposed project would require ministerial approvals including issuance of grading, and building permits from the City of Healdsburg.

1.7 - Intended Uses of this Document

This Draft IS/MND has been prepared to disclose the potential environmental impacts resulting from development of the project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project. The Draft IS/MND will be circulated for a minimum of 30 days, during which period comments concerning the analysis contained in the Draft IS/MND should be sent to:

Mr. Jesse Brown, Project Planner
City of Healdsburg
Building & Planning Department
401 Grove Street
Healdsburg, CA 95448
Phone: 707.431.3346
Fax: 707.431.3321
Email: jbrown@ci.healdsburg.ca.us

SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

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" as indicated by the checklist on the following pages.					
☐	Aesthetics	☐	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Geology / Soils
☐	Greenhouse Gas Emissions	☒	Hazards / Hazardous Materials	☐	Hydrology / Water Quality
☐	Land Use / Planning	☐	Mineral Resources	☒	Noise
☐	Population / Housing	☐	Public Services	☒	Recreation
☒	Transportation / Traffic	☐	Utilities / Services Systems	☒	Mandatory Findings of Significance
Environmental Determination					

On the basis of this initial evaluation:

☐ I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Date: 10/7/14 Signed: _____

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. Aesthetics *Would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Analysis

This section provides a description of existing visual conditions in the vicinity of the project site and an assessment of changes to those conditions that would occur from implementation of the proposed project. Effects of the proposed project on the visual environment are generally defined as follows:

- A project's physical characteristics and potential visibility,
- The extent to which the project's presence would change the perceived visual character and quality of the environment where it would be located, and
- The expected level of sensitivity that the viewing public may have in areas where project facilities would alter existing views.

The aesthetic quality of a community is composed of visual resources, which are those physical features that make up the visible landscape, including land, water, vegetation, and the built environment (e.g., buildings, roadways, and structures). Exhibit 3 provides photographs of the project site's existing conditions. Exhibit 4a through Exhibit 4d provide site and floor plans of the project. Exhibit 5a through Exhibit 5c provide project elevations.

Regional Setting

The project is located in the City of Healdsburg in Sonoma County, California. The City of Healdsburg is located in a small, flat valley that runs roughly north to south. The valley is surrounded by gently rolling hills covered with swaths of oak trees, grassland, and other vegetation. Views of the surrounding foothills and open space areas such as agricultural lands, creeks, and woodlands are scenic values experienced from a number of public vantage points throughout the City.

Visual Setting

The project site consists of a gravel parking lot and a portion of the Foss Creek riparian corridor (Exhibit 2). The L-shaped project site is located along Healdsburg Avenue between two developed parcels. The building to the north contains commercial uses, such as wine tasting rooms, is four stories in height, and employs modern architectural styles. The building to the south contains an antique mall, is one story in height, and does not employ a distinctive architectural style.

The adjoining SMART railroad right-of-way forms the western boundary of the site.

The parking lot is currently utilized by guests and employees of the h2hotel. A sidewalk is located along Healdsburg Avenue and includes a Sonoma County Transit bus stop shelter, waste receptacle, and bike parking. Two street trees are also located within the sidewalk. Other on-site vegetation is limited to the riparian area adjacent to Foss Creek in the western portion of the project site and consists primarily of non-native grassland and oak riparian habitat types.

As provided in City of Healdsburg Municipal Code Section 20.24.045, none of the tree species meet City of Healdsburg criteria for heritage trees. The project site would be viewable by motorists traveling along Healdsburg Avenue, and from the surrounding commercial land uses.

For this analysis, the visual study area includes Healdsburg Avenue, the adjacent sidewalks, and the nearby commercial land uses from which the site is visible.

Buildings directly adjacent to the project site have minimal visibility of the site due to lack of windows on the project facing façades. Other nearby commercial land uses on Healdsburg Avenue have oblique views of the project site. Views of the project site are most unobstructed from Healdsburg Avenue and the parking lot directly across Healdsburg Avenue. However, views of Foss Creek as seen from Healdsburg Avenue are obscured by existing vegetation and the lower elevation of the creek. Views of the project site from Grove/Vine Street and the nearby parking lot along the railroad right-of-way are also obscured by existing trees and vegetation. The project site cannot be seen from Healdsburg Plaza or the Foss Creek Parkway.

a) Scenic Vistas

Less than significant impact. Primary scenic vistas that exist within the City of Healdsburg are of wooded ridges and hillsides and the Russian River. The City's General Plan designates several ridgelines as scenic resources. Specifically, Fitch Mountain, to the east of the project site, is a known scenic resource. The Russian River is more than 0.5 mile west of the project site and is not visible. The proposed project's building height, mass, and landscaping are consistent with the Land Use Code as well as surrounding commercial development. Given the project's similar building scale and height with that of the surrounding commercial uses, and the lack of sensitive viewers or sensitive view locations in the project vicinity, existing views of ridgelines would not be obstructed. As such, impacts would be considered less than significant.

b) State Scenic Highway

No impact. According to California Department of Transportation's California Scenic Highway Mapping System, the project site is not located near a designated State Scenic Highway. The only officially designed Scenic Highways in Sonoma County are State Routes 116 (SR-116) and 12 (SR-12). The City of Healdsburg General Plan designates Highway 101 and various segments of Healdsburg Avenue outside of the downtown area as scenic roads within the city limits. However, the segment of Healdsburg Avenue adjacent to the project site is not designated as a scenic road.

The project would not be visible from Highway 101; thus, there would not be an impact to a scenic highway. Additionally, the project site is barren of significant rock outcroppings or historic buildings. Therefore, the project would be consistent with the City's General Plan policies regarding scenic roads and would have no impact on scenic resources such as rock outcroppings, trees, or historic buildings within view from a scenic highway.

c) Visual Character

Less than significant impact. The project is surrounded by commercial uses to the north, east, and south, and Foss Creek and the SMART railroad right-of-way to the west.

Pursuant to Municipal Code Section 20.28.105(B), the proposed hotel is required to undergo design review for compliance with the design guidelines contained in the City's Design Review Manual. This review will ensure compliance with the surrounding visual character and the character encouraged by the Design Review Manual.

The hotel would complete the existing street façade along Healdsburg Avenue, changing the existing visual character from that of a gravel parking lot to that of a modern hotel complete with landscaping. The hotel would employ contemporary architecture, similar to that of the nearby h2hotel, and consistent with that of surrounding buildings and downtown area. The building would be of similar height (50 feet above finished grade) to existing surrounding buildings and therefore would be consistent with the existing visual character in the project vicinity.

Changes within the riparian area, including the creekside park and pool area, would be minimally visible from surrounding properties. Furthermore, these changes would be consistent with the existing character of the nearby h2hotel pool and would focus on restoration of the riparian area across the creek. As such, the proposed project would not degrade the visual character of the project site or its surroundings. Impacts would be less than significant.

d) Light/Glare

Less than significant impact. The project would include new sources of light and glare. However, the project site is located in an area that is already developed with commercial uses and the proposed nighttime lighting would be consistent with the established urban character of street lighting and exterior lighting on adjacent buildings.

The proposed hotel would include various sources of outside lighting, consistent with that of existing, surrounding nighttime lighting. Path lights would be added along the south side of the hotel, footbridge, and the landscaped path within the creekside park. Landscape lighting and illuminated furniture would be included in the second- and third-level courtyards as well as the rooftop lounge. Building mounted lights would be included in the front entry, guest room balconies, courtyards, and the roof deck. In addition, lighting would be added within the creekside seating and artwork area. Creek lighting would be designed to limit the amount of light entering the creek bed, with the goal of minimizing disturbance to existing wildlife.

Consistent with Municipal Code Section 20.24.15, lighting would be indirect or diffused and would be directed away and/or shielded to minimize spillage onto adjacent properties. In summary, lighting would be consistent with surrounding areas, minimized to the extent practicable, and would not result in a significant overall increase in nighttime lighting.

Glass and construction materials have the potential to impact daytime views in the area if significant sources of glare are produced. However, the project's exterior of FSC redwood and corten steel have low reflection rates and would not be expected to produce glare. The hotel's guest room and street façade windows could produce a minimal amount of glare depending on the location of the sun, however such glare would be brief and dependent on the time of day and year. Furthermore, typical commercial glass surfaces have a minimized reflectivity rate. Therefore, the project would not produce a substantial amount of light or glare and impacts would be less than significant.

Mitigation Measures

No mitigation is necessary.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. Agriculture and Forestry Resources *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Analysis

a) Conversion of Farmland

No impact. The project site is currently used as a parking lot. The California Department of Conservation Farmland Mapping and Monitoring Program designates the project as "Urban Built-Up" land, which is a non-agricultural designation. Therefore, development of the proposed project would not convert Important Farmland to non-agricultural use. No impacts would occur.

b) Agricultural Zoning/Williamson Act Contract

No impact. The project site is zoned "CD – Downtown Commercial," which is a non-agricultural zoning designation. The site is not encumbered by a Williamson Act contract. Therefore, the proposed project would not conflict with existing agricultural zoning or with a Williamson Act contract. No impacts would occur.

c) Conflict with Forest Existing Zoning

No impact. The project site is zoned "CD – Downtown Commercial," which is a non-forest zoning designation. No impacts would occur.

d) Loss or Conversion of Forest Land

No impact. The project site contains a gravel parking lot and undeveloped riparian land. There are scattered trees in the riparian area of the property; however, most trees will remain and the area would not be classified as forest land. This condition precludes the possibility of the loss of forest land. No impacts would occur.

e) Other Changes That Result In Conversion of Agricultural Land

No impact. The project site is surrounded by urban land uses and infrastructure. No agricultural land uses are located in the vicinity of the project. Therefore, the proposed project does not possess any characteristics that would lead to the conversion of farmland to non-agricultural uses. No impacts would occur.

Mitigation Measures

No mitigation is necessary.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. Air Quality *Where available, the significance criteria established by the applicable air quality management 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?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Analysis

The project is located in the North Coast Air Basin, where air quality is regulated by the Northern Sonoma County Air Pollution Control District (NSCAPCD). The NSCAPCD is in attainment for all state and federal ambient air quality standards. Therefore, the NSCAPCD is not required to prepare or implement an air quality plan. In addition, the NSCAPCD has not established explicit thresholds of significance for construction or operational activities. As such, the NSCAPCD recommends that CEQA analysis follow the CEQA guidance and thresholds of significance used in the neighboring San Francisco Bay Area Air Basin, which is regulated by the BAAQMD.

The BAAQMD updated its air quality assessment guidelines (Air Quality Guidelines) in June 2010 to include new to thresholds of significance (2010 Thresholds). The 2010 Air Quality Guidelines were updated with minor edits in May 2011; however, for the purposes of clarity, the updated 2011 Air Quality Guidelines are referred to in this document by the 2010 adoption date (2010 Air Quality Guidelines). The 2010 Thresholds included new thresholds of significance for construction emissions, cumulative toxic air contaminant impacts, fine particulate matter concentration increases, and greenhouse gas emissions.

The analysis in this section is based on the findings of the Air Quality and Greenhouse Gas Assessment completed by FirstCarbon Solutions. The Assessment is provided in its entirety in Appendix A.

a) Air Quality Plan

No impact. The North Coast Air Basin, where the project is located, is in attainment for all state and federal ambient air quality standards. Therefore, the NSCAPCD is not required to prepare or implement an air quality plan. There is no applicable air quality plan. Because there is no applicable air quality plan, there would be no impact.

b) Air Quality Standard

Less than significant with mitigation incorporated. This impact relates to localized criteria pollutant impacts. Potential localized impacts would be exceedances of state or federal standards for particulate matter (PM_{10}), or carbon monoxide (CO). PM_{10} are of concern during construction because of the potential to emit fugitive dust during earth-disturbing activities (construction fugitive dust). CO emissions are of concern during project operation because operational CO hotspots are related to increases in on-road vehicle congestion. Each area of impact is discussed separately below.

Construction Fugitive Dust

During construction (grading), fugitive dust (PM_{10}) would be generated from site grading and other earth-moving activities. The majority of this fugitive dust will remain localized and will be deposited near the project site.

The BAAQMD does not have a quantitative threshold for fugitive dust. The BAAQMD's Air Quality Guidelines recommend that projects determine the significance for fugitive dust through application of Best Management Practices (BMPs). The project does not currently include any dust control measures, resulting in the potential for a significant impact. Therefore, it is recommended that the fugitive dust control measures identified in the BAAQMD's Air Quality Guidelines be included to reduce localized dust impacts to less than significant. Mitigation Measure (MM) AIR-1 requires the application of BMPs for fugitive dust control. Implementation of MM AIR-1 reduces the project's construction-generated fugitive dust impact to less than significant.

Operational CO Hotspot

Localized high levels of CO (CO hotspot) are associated with traffic congestion and idling or slow-moving vehicles. The BAAQMD recommends a screening analysis to determine if a project has the potential to contribute to a CO hotspot. The screening criteria identify when site-specific CO dispersion modeling is necessary. The project would result in a less than significant impact to air quality for local CO if the following screening criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans; or

- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

According to the Traffic Memo prepared for this project (Appendix F), the project is consistent with the applicable congestion management plan. Based on 2004 data collected by California Environmental Health Tracking Program, the segment of Healdsburg Avenue adjacent to the project site carries 12,800 vehicles per day. More recently, traffic counts conducted in 2010 indicates that the segment of Healdsburg Avenue south of Mill Street (one block south of the project) carries an average of 18,853 vehicles per day. When accounting for turning movements at the Healdsburg Avenue/Mill Street/Vine Street intersection, counts on Healdsburg Avenue north of this intersection (adjacent to the project site) would likely be reduced from the reported 2010 count number. Both traffic counts are well below the hourly screening criteria identified above. According to the Traffic Memo, the project is estimated to generate 319 total daily trips, which would not substantially increase traffic volumes on Healdsburg Avenue. Furthermore, the adjacent roadways are not located in an area where vertical and/or horizontal mixing, or the free movement of the air mass, is substantially limited by physical barriers such as bridge overpasses or urban or natural canyon walls. While the project would include an enclosed ground-level parking area, its limited size (50 spaces) and the limited trip generation of the hotel, in combination with the limited potential for extended vehicle idling durations and parking area ventilation, would ensure a substantial accumulation of CO would not occur. Therefore, the project would not result in any impacts related to these criteria.

Conclusion

The project would not generate a significant amount of fugitive dust during construction after implementation of MM AIR-1. The project operations would not generate or substantially contribute to a CO hotspot. Therefore, the project would not violate an air quality standard or substantially contribute to an existing or projected air quality violation after implementation of MM AIR-1.

c) Cumulative Criteria Pollutants

Less than significant with mitigation incorporated. This impact is related to regional criteria pollutant impacts. The project is located within the NSCAPCD, which is designated as attainment for all state and federal ambient air quality standards.

The non-attainment regional pollutants of concern for the adjacent Bay Area Air Basin (under the BAAQMD's jurisdiction) are ozone, PM_{10}, and $PM_{2.5}$. Ozone is not emitted directly into the air, but is a regional pollutant formed by a photochemical reaction in the atmosphere. Ozone precursors—ROG and NO_X—react in the atmosphere in the presence of sunlight to form ozone. Therefore, the BAAQMD does not have a recommended ozone threshold, but it does have regional thresholds of significance for ROG and NO_X. Construction and operational regional emissions are discussed separately below.

Construction Emissions

Project construction would result in regional air pollutant emissions from equipment exhaust and worker trips to the project site. The BAAQMD's Air Quality Guidelines provides guidance and screening criteria for determining if a project could potentially result in significant air quality impacts. The screening method is used to indicate whether a project's construction-related air pollutants or precursors could potentially exceed the BAAQMD's thresholds of significance. The construction of the project would result in a less than significant impact to air quality if the following screening criteria are met because:

1. The project is below the applicable screening size shown in Table 1, below.
2. All Basic Construction Mitigation Measures would be included in the project design and implemented during construction.
3. Construction-related activities would not include any of the following:
    a) Demolition activities inconsistent with BAAQMD Regulation 11, Rule 2: Asbestos Demolition, Renovation and Manufacturing;
    b) Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would occur simultaneously);
    c) Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high density infill development);
    d) Extensive site preparation (i.e., greater than default assumptions used by the Urban Land Use Emissions Model [URBEMIS] for grading, cut/fill, or earth movement); or
    e) Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity.

The construction criteria pollutant screening size relevant to the project is provided Table 1, below. As shown in Table 1, the project would be less than the BAAQMD's construction criteria pollutant screening size. The project would construct a 39-room boutique hotel, and the BAAQMD's construction screening size is 554 rooms for the comparable land use.

In addition, the project would implement the BAAQMD-identified basic construction mitigation measures through implementation of MM AIR-1. The project would not include demolition activities. Furthermore, it is not anticipated that the project would involve the simultaneous occurrence of more than two construction phases, or of more than one land-use type. Although the project would include some amount of soils excavation and export, the project is not anticipated to involve extensive site preparation or material transport (e.g., greater than 10,000 cubic yards of soil import/export). Therefore, impacts from construction related regional emissions would be less than significant with implementation of MM AIR-1.

Table 1: Construction Criteria Air Pollutants and Precursors Screening Level

Land Use Type	Construction Criteria Pollutant Screening Size	Project Size	Project Percent of Screening Size
Hotel	554 rooms (ROG)	39 rooms	7%

Note:
ROG = reactive organic gases
Source: BAAQMD 2010 Air Quality Guidelines.

Operational Emissions

Long-term regional air pollutant emissions would result from the vehicle emissions and stationary sources (such as heating and cooling devices and generators). The BAAQMD's Air Quality Guidelines provides guidance and screening criteria for determining if a project could potentially result in significant air quality impacts. The operational criteria pollutant screening size relevant to the project is provided in Table 2. As shown in Table 2, the project would be less than the BAAQMD's operational criteria pollutant screening size. The project would construct a 39-room boutique hotel, and the BAAQMD's operational screening size is 489 rooms for the comparable land use. As such, additional emissions analysis for operational regional criteria pollutants is not warranted, and project operations would generate a less than significant impact.

Table 2: Operational Criteria Air Pollutants and Precursors Level

Land Use Type	Operational Criteria Pollutant Screening Size	Project Size	Project Percent of Screening Size
Hotel	489 rooms (ROG)	39 rooms	8%

Note:
ROG = reactive organic gases
Source: BAAQMD 2010 Air Quality Guidelines.

Conclusion

Project construction would be less than the screening criteria provided by the BAAQMD after implementation of MM AIR-1. In addition, project operation would be less than the screening criteria provided by the BAAQMD. As such, additional emissions analysis for construction or operational regional criteria pollutants is not warranted, and the project would generate a less than significant impact with implementation of MM AIR-1.

d) Sensitive Receptors

Less than significant with mitigation incorporated. This discussion addresses whether the project would expose sensitive receptors to significant concentrations of construction-generated fugitive dust (PM_{10}), construction-generated diesel particulate matter (DPM), operational related toxic air contaminants, or operational CO hotspots.

A sensitive receptor is defined as the following (from BAAQMD 2010): "Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals and

residential areas." Hotels are not considered a sensitive receptor land use. The BAAQMD guidance identifies the area within 1,000 feet of the project site as the zone of influence for toxic air contaminates. The project's zone of influence was reviewed to identify locations of sensitive receptors. The nearest sensitive receptors are existing residences located directly north of the project site at 235 Healdsburg Avenue.

Construction Fugitive Dust

During construction (grading), fugitive dust (PM_{10}) is generated. As detailed in Section 3, question b), the project would result in a less than significant impact dust impact after incorporation of MM AIR-1. Therefore, the project would not expose adjacent receptors to significant amounts of construction dust with the implementation of MM AIR-1.

Construction Diesel Particulate Matter

As discussed in the BAAQMD Air Quality Guidelines, construction activity using diesel-powered equipment emits diesel particulate matter (DPM), a known carcinogen. A 10-year research program (ARB 1998) demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health risk. Moreover, the current methodological protocols required by the California Air Resources Board (ARB) when studying the health risk posed by DPM assume the following: (1) 24-hour constant exposure; (2) 350 days a year; (3) for a continuous period lasting 70 years.

The majority of heavy diesel equipment usage would occur during the grading phase of construction, which would occur over a brief duration. Nearby residences adjacent to the project site would be exposed to construction contaminants only for the duration of construction. This brief exposure period would substantially limit exposure to hazardous emissions. In addition, construction-emitted pollutants would rapidly disperse from the project site. The brief exposure period presented by the project is substantially less than the exposure period typically assumed for health risk analysis, as provided above. Therefore, the project would result in a less than significant impact from exposure to construction-generated DPM.

Operational Toxic Air Contaminants

The ARB's Air Quality and Land Use Handbook contains recommendations that will "help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution" including recommendations for distances between sensitive receptors and certain land uses. The project would not be a location of sensitive receptors. However, the project would be located near existing sensitive receptors. Therefore, ARB's recommended screening distances are assessed as follows:

- Heavily traveled roads. ARB recommends avoiding new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. Epidemiological studies indicate that the distance from the roadway and truck traffic densities were key factors in the correlation of health effects, particularly in children. The project is not a heavily traveled road, nor would project operations substantially contribute to

traffic on an existing heavily traveled road. Therefore, the project would not expose sensitive receptors to substantial risk from heavily traveled roads.

- Distribution centers. ARB also recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center. The project is not a distribution center. Therefore, the project would not expose sensitive receptors to substantial risk from distribution centers.
- Fueling stations. ARB recommends avoiding new sensitive land uses within 300 feet of a large fueling station (a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas dispensing facilities. The project does not include a fueling station. Therefore, the project would not expose sensitive receptors to substantial risk from fueling stations.
- Dry cleaning operations. ARB recommends avoiding siting new sensitive land uses within 300 feet of any dry cleaning operation that uses perchloroethylene. For operations with two or more machines, ARB recommends a buffer of 500 feet. For operations with three or more machines, ARB recommends consultation with the local air district. The project would not include a dry cleaning operation. Therefore, the project would not expose sensitive receptors to substantial risk from dry cleaning operations.

The proposed project does not include a source of toxic air contaminants identified in the Land Use Handbook. As such, the project would not result in a significant health risk to sensitive receptors. Impacts would be less than significant.

Conclusion

The project would not expose receptors to a significant quantity of construction dust after incorporation of MM AIR-1. The project would not expose adjacent receptors to significant risks from construction-generated diesel particulate matter or to significant risks from operational toxic air contaminants. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations after incorporation of MM AIR-1.

e) Objectionable Odors

Less than significant impact. The BAAQMD recommends the use of screening criteria to determine when a detailed odor impacts is warranted. The screening criteria is based on distance between types of sources known to generate odor and the receptor. For projects within the screening distances, the BAAQMD uses the following threshold for project operations:

> An odor source with five (5) or more confirmed complaints per year averaged over three years is considered to have a significant impact on receptors within the screening distance shown in the Bay Area Air Quality Management District's guidance, Table 3-3.

A review of the BAAQMD's screening guidance shows the project site is not located within the recommended screening distances of any typical sources of objectionable odors, which typically include agricultural operations (dairies, feedlots, etc.), landfills, wastewater treatment plants,

refineries, and other types of industrial land uses. In addition, the project does not contain land uses typically associated with emitting objectionable odors.

Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and should not reach an objectionable level at the nearest sensitive receptors. Therefore, the project would generate a less than significant odor impact during project construction and operations.

Mitigation Measures

MM AIR-1 The following measures are recommended throughout all phases of construction:

- Water or cover stockpiles of debris, soil, sand or other materials that can be blown by the wind.
- Water all active construction areas with non-potable water 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 non-potable water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- Sweep streets daily (preferably with water sweepers using non-potable water) if visible soil material is carried onto adjacent public streets.
- Enclose, cover, water twice daily with non-potable water, hydroseed or apply non-toxic soil stabilizers to inactive construction areas and exposed stockpiles (dirt, sand, etc.).
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
- Replant vegetation in disturbed areas as quickly as possible.
- Post on the construction site, in a conspicuous location, the name and phone number of a designated dust control coordinator who can respond to complaints by suspending dust-producing activities or providing additional personnel or equipment for dust control.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	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?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or result in substantial loss of any other types of habitat identified as biologically unique and of the limited distribution, such as serpentine chaparral, serpentine grassland, and native grassland?	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
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 wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
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?	☐	☐	☐	☒

Analysis

Special-status species are commonly characterized as species that are at potential risk or actual risk to their persistence in a given area or across their native habitat (locally, regionally, or nationally) and are identified by a state and/or federal resource agency as such. These agencies include governmental agencies such as California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS), or private organizations such as California Native Plant Society

(CNPS). The degree to which a species is at risk of extinction is the limiting factor on a species' status designation. Risk factors to a species' persistence or population's persistence include habitat loss, increased mortality factors (take, electrocution, etc.), invasive species, and environmental toxins.

Special-status plant and wildlife species were determined from a U.S. Geological Survey (USGS) quadrangle search (CDFW 2014a), California Natural Diversity Database (CNDDB) QuickViewer search of unprocessed data (CDFW 2014b), CNPS search (CNPS 2014), and a USFWS quadrangle search (USFWS 2014a) for the Healdsburg 7.5-minute quadrangle. The results of the database search are included in the standalone Biological Resources Evaluation (Appendix B) prepared for this project. The potential for each special-status species to occur within the project site was assessed by known occurrences of the species within a 1-mile radius of the project site, suitability of habitat within the project site, and professional expertise.

When the USFWS lists a species as threatened or endangered under FESA, areas of habitat considered essential to its conservation and survival may be designated as critical habitat. These areas may require special consideration and/or protection because of their ecological importance. Potential critical habitat designations within the general vicinity of the project site were checked using the USFWS Critical Habitat Portal (USFWS 2014b).

Following the literature search, a pedestrian reconnaissance-level survey was conducted on June 26, 2014. Vegetation communities and other biological resources were noted on an aerial photograph of the project site and were digitized using ArcGIS software. Current site conditions and habitat types were correlated to the wildlife habitat types in A Guide to Wildlife Habitats of California (Mayer and Laudenslayer 1988). Photographs were taken along the project site boundaries. Where access was permitted, all species observed within and adjacent to the project site were noted and are included in in the Biological Resources Evaluation (Appendix B).

A review of the USFWS's Critical Habitat designations for Threatened & Endangered Species Across the United States indicated that the project site is located within an area designated as critical habitat for steelhead (*Oncorhynchus mykiss*) by the USFWS.

Four distinct habitat types and natural communities exist within the project site: (1) Foss Creek, (2) non-native grasslands, (3) oak riparian, and (4) urban developed. Table 3 provides a summary of the plant community acreages.

Table 3: Plant Community Acreages within the Project Site

Plant Community	Approximate Area (acres)
Foss Creek	0.05
Non-native Grasslands	0.01
Oak Riparian	0.16
Urban/Disturbed	0.37
Total	0.59

The analysis in this section is based on the Biological Resources Evaluation (FCS 2014) completed by biologist Jeannette Owen, which included a reconnaissance-level habitat assessment on the project site on June 26, 2013. In addition, a Delineation of Wetland and Other Waters was prepared. The reports are provided in their entirety in Appendix B.

As of January 1, 2013, the agency formerly known as the California Department of Fish and Game (CDFG) changed its name to the California Department of Fish and Wildlife (CDFW). Some publications written prior to the change refer to the CDFG; therefore, this document refers to CDFG and the CDFW, as appropriate, referring to the same state agency.

a) Candidate, Sensitive, or Special Status Species

Less than significant impact with mitigation incorporated. Habitats that support special-status plants that occur within the project site include oak riparian and grasslands (including non-native). Each of the 12 plant species identified as potentially occurring within the region have been ruled out from further analysis because of the lack of suitable habitat, the project site occurs outside of the species known range, or the site survey was conducted during the blooming period of the species, which resulted in a negative detection for these species.

A total of 16 special-status wildlife species were identified during the database search as potentially occurring within the project region. Species identified having the potential to occur within the project site include California freshwater shrimp (*Syncaris pacifica*), steelhead, chinook salmon (*Oncorhynchus tshawytscha*), coho salmon (*Oncorhynchus kisutch*), Russian River tule perch (*Hysterocarpus traski pomo*), Navarro roach (*Lavinia symmetricus navarroensis*), white-tailed kite (*Elanus leucurus*), Townsend's big-eared bat (*Corynorhinus townsendii*), pallid bat (*Antrozous pallidus*), western pond turtle (*Actinemys marmorata*) , and white-tailed kite (*Elanus leucurus)*. Other species not identified within the database search but having suitable habitat within the project site include Cooper's hawk (*Accipiter cooperii*); sharp-shinned hawk (*Accipiter striatus*), ferruginous hawk (*Buteo regalis*), loggerhead shrike (*Lanius ludovicianus*), California yellow warbler (*Dendorica petechia brewster*i), oak titmouse (*Baeolophus inornatus*), black phoebe (*Sayornis nigricans*), and other migratory birds.

Special-Status Plant Species

Based upon the evaluation of the few habitats present within and adjacent to the project site, the absence of unaltered natural areas, and reconfiguration of the land for development, no federally or State-listed or other special-status plant species are expected to occur because of the lack of suitable habitat. Therefore, construction and implementation of the project would not result in impacts to special-status plants.

Special-Status Wildlife Species

Based upon an evaluation of habitats present within and adjacent to the project site, federally listed special-status species that were identified as having potential to occur within the project site include California freshwater shrimp, steelhead, chinook salmon, and coho salmon. Other special-status species that could occur within or adjacent to the project site include Russian River tule perch, Navarro roach, western pond turtle, white-tailed kite, Townsend's big-eared bat, pallid bat, and a

variety of bird species protected by the Migratory Bird Treaty Act. The invertebrate (California freshwater shrimp), fish, and reptile species could occur in habitat associated with Foss Creek; and white-tailed kite, raptors, and migratory passerines could nest in the trees and vegetation throughout and adjacent to the project site. Bats could roost in trees, tree hollows and buildings within or adjacent to the project site. As discussed below, with mitigation incorporated, impacts to these species would be less than significant.

Invertebrates

The California freshwater shrimp is a small, 10-legged crustacean that inhabits perennially flowing streams with slow moving water and flat gradients. Listed as federally endangered since 1988, the species is endemic to Marin, Sonoma and Napa Counties. It is only found in portions of 16 coastal streams within this range, including Foss Creek in Sonoma County. Existing populations of the species are threatened by introduced fish, and deterioration or loss of habitat from water diversion, impoundments, livestock and dairy activities, agricultural activities and developments, flood control activities, gravel mining, timber harvesting, migration barriers and water pollution.

California freshwater shrimp is a federally listed species, and, according the USFWS Recovery Plan for California freshwater shrimp, the only populations in the Russian River are in Austin Creek, Green Valley Creek and Laguna de Santa Rosa (USFWS 1998). There have been no documented reports of presence of this species in any CDFW Stream Assessment reports conducted in 1960 or in 2007. Based on this information and the fact that Foss Creek presents extremely marginal habitat that is spatially distant to existing populations, the project would have no impacts on the California freshwater shrimp or its habitat; therefore, no mitigation is required.

Fish

Foss Creek is designated as critical habitat for steelhead although the creek does not provide optimal spawning habitat, due to poor water quality and sediment laden substrate. Foss Creek also provides potential habitat for coho salmon, chinook salmon, Russian River tule perch, and Navarro roach, although the habitat is considered poor because of water quality and sediment.

Implementation of the project could result in impacts to special-status fish habitat in Foss Creek (estimated to be 83.2 square feet of new shading impacts). Construction of the project could impact riparian vegetation (1,610.7 square feet associated with Foss Creek), which could affect fish, if present. Impacts to special-status fish and fish habitat in Foss Creek could be significant during construction in and near the channel.

Reptiles

Foss Creek and the riparian vegetation along the channel provides habitat for the western pond turtle which is listed by the State as a species of special concern. Implementation of the project could result in impacts to this species in Foss Creek (estimated to be 83.2 square feet of new shading impacts) and adjacent to Foss Creek (1,610.7 square feet of oak riparian). For example, construction of the project could remove existing riparian shrubs that provide habitat along the channel. Construction of the pedestrian bridge over Foss Creek could temporarily impact riparian vegetation and riverine habitat and temporarily disturb the bed and banks of Foss Creek, which could affect the western pond turtle, if present. Potential impacts to western pond turtle would be significant.

Implementation of Mitigation Measures BIO-1 and BIO-2 would mitigate potential impacts on aquatic resources (fish) and reptiles (western pond turtle) to less than significant levels. The reduction in impact would be achieved by requiring work-windows, and by conducting pre-construction surveys by a qualified biologist prior to work in Foss Creek to determine whether special-status species are present at or near the project site, and if present, implementing related protection measures. If the surveys completed as part of Mitigation Measure BIO-1 conclude that federally listed or fully protected species are present, a Section 10 permit (requiring the preparation of Habitat Conservation Plan) and/or a Section 2081 (Incidental Take) permit would be required.

Bats

Trees, buildings, and bridges within and adjacent to the project site provide potential habitat for special-status bat species, including Townsend's big-eared bat and pallid bat. Impacts on special-status bat species could result from an increase in noise during project construction. Impacts to special-status bat species would be significant.

Implementation of Mitigation Measure BIO-3 would reduce impacts on special-status bat species to less than significant by requiring pre-construction surveys and the avoidance of disturbance to roosting bats.

Special-Status Birds and Migratory Passerines and Raptors

Trees within and adjacent to the project site provide potential habitat for special-status bird species, including white-tailed kite as well as migratory raptors and passerine bird species. Implementation of the project could result in tree trimming, which would result in impacts to special-status and migratory birds if present in trees. Construction activities adjacent to Foss Creek could disturb nesting and breeding birds in trees and shrubs near the construction site. Potential impacts on special-status and migratory birds that could result from implementation of the project include the destruction of eggs or occupied nests, mortality of young, and the abandonment of nests with eggs or young birds prior to fledging. Such potential impacts to special-status and migratory birds would be significant.

Implementation of Mitigation Measure BIO-4 would mitigate potential impacts on special-status and migratory birds to less than significant levels by requiring pre-construction surveys by a qualified biologist to determine whether special-status or migratory bird nests are present at or near the project.

b) Riparian Habitat or Other Habitat

Less than significant impact with mitigation incorporated. Development and construction activities along Foss Creek could result in temporary impacts to the sparse riparian habitat along the channel where the riparian corridor consists of native tree and shrub species. The Healdsburg 2030 General Plan identifies several policies to protect riparian trees, such as Policy NR-B-2, which requires the protection of large mature trees that provide important wildlife habitat, and Policy NR-B-3, which requires the siting of new development to maximize protection of native tree species, riparian vegetation, and important wildlife habitat. Additionally, city regulations require a 35-foot setback from the top of bank of Foss Creek that would minimize riparian vegetation loss. However, the City's

Municipal Code Section 20.24.095 provides for issuance of a variance where the provision of the required setback is infeasible and requires a detailed riparian mitigation plan to be prepared by a licensed landscape architect or qualified field biologist to ensure no net loss of acreage or functional value of riparian habitat. Furthermore, restoration plantings would be located along the creekside park. Existing creekside trees would be maintained; vegetation along the west bank would be restored and maintained to the extent possible.

Although the riparian vegetation may be sparse along Foss Creek, the loss of riparian vegetation (1,610.7 square feet) would be significant.

Implementation of Mitigation Measure BIO-5, which requires the implementation of a Streambed Alteration Agreement in compliance with Section 1600 of the California Fish and Game Code would mitigate potential impacts to riparian vegetation and habitat from construction activities within the riparian setback along Foss Creek by requiring riparian vegetation planting and monitoring to ensure no loss of acreage of riparian habitat.

c) Federally Protected Wetlands

Less than significant impact. A Preliminary Wetland Delineation (FCS 2014) was prepared for the project site. Foss Creek, a perennial creek, was identified as a potentially federal and state jurisdictional feature. Approximately 132.1 linear feet and 0.05 acre of Foss Creek occur within the project site. Current design of the pedestrian bridge illustrates that the bridge abutments and footings are outside of the ordinary high water mark and therefore are not subject to Section 404 Clean Water Act.

Changes to the construction approach that necessitate work within the ordinary high water mark (the channel of Foss Creek within the project site measures approximately 10 to 15 feet wide at the ordinary high water mark) would require subsequent CEQA review to determine the level of impact as well as appropriate avoidance or minimization measures.

d) Species, Wildlife Corridors, or Wildlife Nursery Sites

Less than significant impact with mitigation incorporated. The majority of uplands in the project site is in urban habitat and typically supports wildlife species habituated to urbanized environments. They do not provide substantive patches of habitat and there is no connectivity to habitat patches that is necessary to facilitate migration.

The project would not impede movement of native resident or migratory species along the upland areas adjacent to the creek, because the upland areas adjacent to the creek are surrounded by urban development and typically support wildlife species habituated to urbanized environment. The uplands do not provide substantive patches of habitat and there is no connectivity to habitat patches that are necessary to facilitate migration.

Foss Creek provides a migration corridor for a variety of aquatic species, including fish and reptiles. Construction and placement of the pedestrian bridge over Foss Creek would likely require work in and adjacent to the channel that could temporarily impede movement of native resident or

migratory species. Implementation of the project would not permanently affect migration, but the temporary impact could be significant.

Implementation of Mitigation Measures BIO-1 through BIO-5 would reduce impacts to native resident or migratory fish or wildlife species through selection of work timeframes to avoid migration periods and by providing bypass and/or relocation of special-status species during construction activities. The impacts would be less than significant.

e) Local Policies or Ordinances

Less than significant impact with mitigation incorporated.

The project would be subject to the Heritage Tree Protection Requirements from the City's Municipal Code Chapter 20.24 (City of Healdsburg 2012a). However, no trees with a diameter of 30 inches measured 2 feet above ground level occur within the project site. As such, implementation of the project would have no impact relative to the protection of heritage trees.

Part of project approval would be the provision of a variance from the City to allow the project to encroach within the 35-foot setback associated with Foss Creek. As part of the variance, the project would be required to comply with the City's Municipal Code Section 20.24.095 regarding preparation of a detailed riparian mitigation plan to ensure no net loss of acreage or functional value of riparian habitat. In addition, implementation of Mitigation Measures BIO-1 through BIO-5 would ensure that the project would not conflict with city policies and ordinances protecting biological resources.

f) Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan

No Impact. The project would not conflict with applicable city policies, ordinances, or adopted conservation plans. There are no adopted habitat conservation plans covering the area. Therefore, the project would result in no impact related to conservation plans.

Mitigation Measures

MM BIO-1 The following measures will be implemented if the project would result in the loss of individuals of steelhead, coho salmon, chinook salmon, and special-status fish species, or occupied habitat for these species.

1. Avoidance: The project proponent shall conduct all in-water (within wetted portions of Foss Creek) construction activities between June 15 and October 15 to avoid the primary migration seasons of adult and juvenile salmonids.
2. Minimization: Project areas (Foss Creek) that are known to be occupied or that provide habitat suitable for steelhead, coho salmon, chinook salmon, or other special-status fish species shall be surveyed by a qualified biologist acceptable to the National Marine Fisheries Service (NMFS) and the California Department of Fish and Wildlife (CDFW) prior to project activities (within 21 days of earthmoving activities, including removal of streamside

vegetation) to insure that these species are not present within the project area or downstream of the project area (300 feet). If any of the above mentioned species are identified in the project area, the following measures shall be implemented:

a. An erosion control plan and emergency response and clean-up plans shall be prepared prior to beginning work adjacent to Foss Creek occupied by steelhead, coho salmon, chinook salmon, or other special-status fish species. The plan shall detail the methods to contain sediment runoff into creek and to contain and clean-up spills of petroleum products or other hazardous materials in the work area.
b. Riparian vegetation that extends over or into the water or that has roots extending into the water shall not be removed or cut from Foss Creek within the project area (occupied by steelhead, coho salmon, chinook salmon, or other special-status fish species). Riparian vegetation that does not provide shade or shelter for these species may be trimmed or removed, subject to measures stipulated in the Section 10 permit for these species. The amount disturbed shall be the minimum necessary to complete the project. Severely trimmed (more than ¼ of the crown) or removed vegetation shall be replaced at a 2:1 ratio on-site.
c. The project applicant shall implement measures stipulated in a Section 10 permit, and/or Section 2081 permit to minimize the impacts of incidental take and avoid jeopardizing the continued existence of steelhead, coho salmon, and/or chinook salmon ,(i.e., reduce appreciably the likelihood of both the survival and recovery of the species in the wild by reducing the reproduction, numbers, or distribution of that species).

3. Equipment maintenance and fueling areas will be located at least 100 feet away from the creek bank. Fueling must be behind a containment barrier that will prevent any spilled or leaked fuel from running into the creek. All equipment servicing must occur within designated areas away from sensitive habitats. All motorized equipment used during construction or demolition activities will be checked for oil, fuel, and coolant leaks prior to initiating work. Any equipment found to be leaking fluids will not be used in or within 100 feet of aquatic habitat features in order to minimize the chances of contaminating the habitat.

4. For work sites located adjacent to Foss Creek, a biological resource education program for construction personnel shall be provided by a qualified biologist addressing all special-status species that may occur within or adjacent to the project site.

MM BIO-2 Western Pond Turtle Mitigation Measures

1. Minimization: The project proponent shall ensure that preconstruction surveys for the western pond turtle are conducted by a qualified biologist. If western pond turtles are found during preconstruction surveys, CDFW shall be notified and individuals shall be captured by a qualified biologist and relocated to suitable areas within or adjacent to the project site. If preconstruction surveys identify active nests, a qualified biologist shall establish a no disturbance buffer zone around the nest using temporary orange exclusion fencing. The radius of the buffer zone and the duration of the exclusion shall be determined in consultation with CDFW. The buffer zone and fencing shall remain in place until the young have left the nest, as determined by the biologist.
2. When working within 200 feet of stream crossings, all construction personnel shall receive awareness training relating to the protection of western pond turtles. Additionally, to minimize the likelihood of encountering turtles in upland areas near Foss Creek, construction footprints shall be minimized to the greatest extent feasible.

MM BIO-3 Special-status Bats Avoidance and Minimization Measures

1. To reduce construction related impacts to special-status bat species, a bat survey shall be conducted between March 1 to July 31 by a qualified wildlife biologist in the year prior ground disturbance. If no bat roosts are detected, then no further action is required.
2. If a colony of bats is found roosting on-site, then the following mitigation will be implemented to reduce the potential disturbance:.
    a. If a female or maternity colony of bats are found on the project site, a wildlife biologist through coordination with CDFW shall determine what physical and timed buffer zones shall be employed to ensure the continued success of the colony. Such buffer zones may include a construction-free barrier of 200 feet from the roost and/or the timing of the construction activities outside of the maternity roost season (after July 31 and before March 1).

MM BIO-4 Raptors and Bird Surveys Protected by the Migratory Bird Treaty Act Mitigation Measures

1. If construction or tree removal is proposed during the breeding/nesting season for local avian species (typically March 1st through August 31st), a focused survey for active nests of raptors and migratory birds within and in the vicinity of (no less than 76 meters [250 feet] outside the project boundaries, where possible) the project site shall be conducted by a

qualified biologist. Two surveys will be conducted, at least 1 week apart, with the second survey occurring no more than 2 days prior to tree removal. If no active nests are found, tree removal or construction activities may proceed.

2. If an active nest is located during pre-construction surveys, United States Fish and Wildlife Service and/or California Department of Fish and Wildlife (as appropriate) shall be notified regarding the status of the nest. Furthermore, construction activities shall be restricted as necessary to avoid disturbance of the nest until it is abandoned or the biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum radius of 30 meters [100 feet] around an active raptor nest and a 15-meter [50-foot] radius around an active migratory bird nest) or alteration of the construction schedule.

MM BIO-5 Protect or Compensate for Loss of Riparian Vegetation

To protect the long-term habitat of the Foss Creek, the Applicant shall ensure that the creek is not obstructed and human intrusion into the riparian area is minimized. In compliance with Section 1600 of the California Fish and Game Code, the Applicant will enter into a Streambed Alteration Agreement prior to conducting any construction activities within the creek corridor (defined by CDFW as the top of bank plus the outer edge of the dripline of riparian vegetation and by the City as 35 feet from the top of bank) which will identify conditions the Applicant will implement. Conditions shall include but not be limited to the implementation of bank stabilization measures, and/or restoration and revegetation of the stream corridor habitat that has been damaged by project construction.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Analysis

Cultural resources are classified by the State Office of Historic Preservation (OHP) as sites, buildings, structures, objects and districts, each of which is described below.

Site. A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.

Building. A building, such as a house, barn, church, hotel or similar construction, is created principally to shelter any form of human activity. "Building" may also refer to a historically and functionally related unit, such as a courthouse and jail, or a house and barn.

Structure. The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.

Object. The term "object" is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.

District. A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

The analysis in this section is based on the Records Searches conducted by FirstCarbon Solutions (FCS) at the Northwest Information Center (NWIC).

a) Historical Resource

Background

Prior to 1923, the project area was rural and contained a tree orchard that is believed to date back to the late 1800s. Based on a review of the 1923 Sanborn Map for Healdsburg, the project area appears to have been first developed with a "Blacksmith & Wagon Shop", which appears to partially occupy the northern portion of the project area. From approximately 1934 until 1953, Signal Oil and Gas Company of California (Signal Oil & Gas) operated a gasoline service station within the project area; in 1953, the underground storage tanks (USTs) were apparently filled with sand and abandoned in place. The structures associated with the former gas station appear to have been removed sometime between 1953 and 1965. From 1956 until 1966, a used car lot operated within the project area. From 1966 to the present, no buildings, structures, or aboveground improvements are noted within the project area, except for its current use as an informal parking lot.

Record Search

A record search was conducted by FCS at the NWIC on July 2, 2014. To identify any historic properties or resources, the current inventories of the National Register of Historic Places (NR), the California Register of Historic Resources (CR), the California Historical Landmarks (CHL) list, the California Points of Historical Interest (CPHI) list, and the California State Historic Resources Inventory (HRI) were reviewed to determine the existence of previously documented local historical resources. The results of the records search indicated that 55 known cultural resources (see Tables 3 and 4) have been recorded within the search radius of 0.5 mile of the project site. In addition, 15 area-specific survey reports are on file with the NWIC for the search radius (Table 5). None of the reports addressed the project site, suggesting the project area has not been surveyed for cultural resources.

Table 4: Known Cultural Resources Located within 0.5 mile of the Project Area

Site Number	Distance from Project	Resource Description
P-49-001299	350 feet north	CA-SON-001391 Prehistoric Site
P-49-001352	2500 feet northwest	CA-SON-001449 Prehistoric Site
P-49-002823	2030 feet southeast	CA-SON-002823; A.F. Stevens Mill & Lumber Co. Shed/Healdsburg Lumber Company Mill Building 359 Hudson Street 2D2 - Eligible for NR Listing/Contributor to a Historic District
P-49-002834	180 feet west	CA-SON-002322H; Northwestern Pacific Railroad Not currently included in HRI Listings
P-49-002968	170 feet northeast	Odd Fellows Hall, 1906 102 Matheson Street 7N – Needs to be re-evaluated
P-49-003918	1190 feet northeast	John M. and Georgia McClish House, 1903 325 Fitch Street 7N – Needs to be re-evaluated
Source: NWIC, 2014.		

Table 5: Historic Structures within a 0.5-Mile Radius

Address	Distance from Project	Resource Description
204 Center Street	570 feet southeast	Pimm House, 1875 3S – Eligible for NR Listing
214 Center Street	500 feet southeast	Seventh-Day Adventist Church, 1865 3S – Eligible for NR Listing
218 Center Street	460 feet east	Seventh-Day Adventist Cook House, 1865 3S – Eligible for NR Listing
219 Center Street	310 feet east-southeast	Dr. Coustol Home, 1858 3S – Eligible for NR Listing
239 Center Street	275 feet northeast	Historic Building, 1853 3S – Eligible for NR Listing
322 Center Street	750 feet northeast	Masonic Temple and Building, 1914 3S – Eligible for NR Listing
321 East Street	800 feet northeast	First Baptist Church, 1892 3S – Eligible for NR Listing
340 East Street	1080 feet northeast	Hall House, Rosenberg House, 1880 1D – Listed on NR/Contributor to Historic District
430 East Street	1140 feet northeast	Ellis Property, 1901 3S – Eligible for NR Listing
434 East Street	1470 feet northeast	Ellis Property, 1901 3S – Eligible for NR Listing
150 Fitch Street	1180 feet southeast	Mrs. P.E. Rose House, 1865 3S – Eligible for NR Listing
315 Fitch Street	1110 feet northeast	Foreman House, 1920 3S – Eligible for NR Listing
431 Fitch Street	1560 feet northeast	Healdsburg First Baptist Church, 1868 3S – Eligible for NR Listing
538 Fitch Street	2370 feet northeast	Dr. Merritt Kellogg House, 1871 3S – Eligible for NR Listing
423 Foss Street	1175 feet north	HGB Oil Company Office, 1870 3S – Eligible for NR Listing
237 Grant Street	2295 feet northeast	Cuneo Barn and Gerolamo Cagliardo Home, 1880-1890 3D – Eligible for NR Listing/Contributor to an Historic District
321 Haydon Street	1140 feet southeast	A.D. Passalacqua House, 1912 3S – Eligible for NR Listing
401 Haydon Street	1615 feet southeast	Historic Building, 1900 3S – Eligible for NR Listing

Table 5 (cont.): Historic Structures within a 0.5-Mile Radius

Address	Distance from Project	Resource Description
417 Haydon Street	1790 feet southeast	Historic Building, 1900 3S – Eligible for NR Listing
217 Healdsburg Avenue	200 feet south	Healdsburg Chamber of Commerce, 1936 3S – Eligible for NR Listing
245 Healdsburg Avenue	145 feet north	Historic Building, 1920 3D – Eligible for NR Listing/Contributor to an Historic District
320 Healdsburg Avenue	575 feet northeast	Bank of America, 1920 3S – Eligible for NR Listing
467 Healdsburg Avenue	1400 feet north	Ottmer House, 1893 3S – Eligible for NR Listing
316 Hudson Street	2550 feet southeast	Northwestern Pacific Railroad Depot, 1928 3S – Eligible for NR Listing
359 Hudson Street (P-49-002823)	2030 feet southeast	A.F. Stevens Mill and Lumber Co., 1910 2D2 - Eligible for NR Listing/Contributor to an Historic District
607 Johnson Street	2400 feet north	J.S. Stone House, 1892 3S – Eligible for NR Listing
619 Johnson Street	2540 feet north	John King House, 1885 3S – Eligible for NR Listing
327 Mason Street	1700 feet southeast	James A. Mead House, 1860 3S – Eligible for NR Listing
209 Matheson Street	880 feet northeast	St. Paul's Episcopal Church, 1888 3D – Eligible for NR Listing/Contributor to an Historic District
221 Matheson Street	1050 feet northeast	Healdsburg Carnegie Library, 1911 1S – Listed on NR
326 Matheson Street	1385 feet northeast	Eli Bush House, Nalley House, 1903 3D – Eligible for NR Listing/Contributor to an Historic District
403 Matheson Street	1685 feet northeast	A.W. Garrett House. 1895 3S – Eligible for NR Listing
423 Matheson Street	1910 feet northeast	George Alexander House, 1906 3S – Eligible for NR Listing
504 Matheson Street	2120 feet east-northeast	Crocker Sanitarium, The Palms, 1904 3S – Eligible for NR Listing
141 North Street	1105 feet northeast	Skinner Apartments, 1910 3D – Eligible for NR Listing/Contributor to an Historic District

Table 5 (cont.): Historic Structures within a 0.5-Mile Radius

Address	Distance from Project	Resource Description
201 North Street	1165 feet northeast	Schaffer Home, Are House, 1874 3D – Eligible for NR Listing/Contributor to an Historic District
207 North Street	1210 feet northeast	Henry Brown House, 1882 3D – Eligible for NR Listing/Contributor to an Historic District
211 North Street	1260 feet northeast	Powell Mansion, Dr. Seawell's House, 1871 3D – Eligible for NR Listing/Contributor to an Historic District
212 North Street	1115 feet northeast	Historic Building, 1890 3D – Eligible for NR Listing/Contributor to an Historic District
216 North Street	1165 feet northeast	Historic Building, 1890 3D – Eligible for NR Listing/Contributor to an Historic District
219 North Street	1310 feet northeast	Samuel Meyer House, 1876 3D – Eligible for NR Listing/Contributor to an Historic District
220 North Street	1200 feet northeast	Historic Building, 1908 3D – Eligible for NR Listing/Contributor to an Historic District
226 North Street	1250 feet northeast	Condit House, Sohler House, 1890 3D – Eligible for NR Listing/Contributor to an Historic District
227 North Street	1350 feet northeast	John Marshall House, Provine House, 1871 Historic Building, 1890 3B – Eligible for NR Listing
330 North Street	1590 feet northeast	Historic Building, 1870 3D – Eligible for NR Listing/Contributor to an Historic District
420 North Street	1890 feet northeast	Historic Building, 1880 3D – Eligible for NR Listing/Contributor to an Historic District
152 Piper Street	1575 feet northeast	John Grater House, 1890 3S – Eligible for NR Listing
216 Piper Street	1625 feet northeast	J. B. Beeson Home, 1869 3S – Eligible for NR Listing
241 Piper Street	1895 feet northeast	Northern Methodist Church, 1870 3S – Eligible for NR Listing
407 Piper Street	2240 feet northeast	Ames Home, 1890 2S2 – Eligible for NR Listing

Table 5 (cont.): Historic Structures within a 0.5-Mile Radius

Address	Distance from Project	Resource Description
119 Plaza Street	780 feet northeast	Farmers and Mechanics Bank, 1908 3S – Eligible for NR Listing
511 Prince Avenue	1875 feet northeast	Historic Building, 1885 3S – Eligible for NR Listing
308 Tucker Street	1225 feet east	Samuel Meyer House, Healdsburg Mansion, 1868 3S – Eligible for NR Listing
313 Tucker Street	1285 feet east	Historic Building, 1900 2S2 – Eligible for NR Listing
317 Tucker Street	1410 feet east	Morris Express Stop, 1860 3S – Eligible for NR Listing
411 Tucker Street	1730 feet east	J.S. Tucker House, 1895 3S – Eligible for NR Listing
415 Tucker Street	1775 feet east	Historic Building, 1880 3D – Eligible for NR Listing/Contributor to an Historic District
418 Tucker Street	1765 feet east	Historic Building, 1890 3D – Eligible for NR Listing/Contributor to an Historic District
502 Tucker Street	2090 feet east	George Ferguson House, 1901 3S – Eligible for NR Listing
515 Tucker Street	2255 feet east	Dr. M.C. Farrar House, Foreman House, 1889 3D – Eligible for NR Listing/Contributor to an Historic District
532 Tucker Street	2525 feet east	Historic Building, 1890 3D – Eligible for NR Listing/Contributor to an Historic District
14 University Street	2220 feet southeast	Walter E. Bowles House, 1880 3S – Eligible for NR Listing
307 W. North Street	2530 feet west	Historic Building, 1890 3S – Eligible for NR Listing

Note:
Table includes historic Structures within a 0.5-mile radius of project listed on the Sonoma County HRI, NR, CR, CHL, and/or CHPI inventories that are eligible or listed for the National Register.
Source NWIC, 2014.

Table 6: Cultural Resources Reports within 0.5 Mile of the Candidate Area

Site Number	Additional Details
S-002894	Chavez, 1982 – Did not assess project area, but assessed an area approximately 350 feet north adjacent to Healdsburg Avenue
S-006087	Chavez, 1980 – Did not assess project area
S-006183	Garaventa and Anastasio, 1983 – Assessed Healdsburg Avenue located adjacent to the project area as a general cultural resource survey for proposed plan alignment
S-006810	Banks, 1984 – Did not assess project area
S-006820	Busby et al., 1984 – Did not assess project area
S-009926	Villemaire, 1988 – Did not assess project area
S-010496	Waechter, 1989 – Did not assess project area
S-010820	Waechter, 1989 – Did not assess project area
S-016018	Patterson, Roberts, Orlins, and Whitney, no year provided – Did not assess project area
S-016048	Psota, 1994 – Did not assess project area
S-022086	Newland, 1999 – Did not assess project area
S-022483	Gerike and Gillies, 2000 – Did not assess project area
S-022736	Jones & Stokes Associates, Inc., 2000 – Did not assess project area
S-023775	Bakic, Baker, and Dougherty, 2001 – Did not assess project area
S-023988	Billat, 2001 – Did not assess project area
Source: NWIC 2014.	

The record search indicated that no historic resources have been previously recorded within the project site. In addition, there are no existing structures within the project site; therefore, impacts to known historical resources would be less than significant.

Field Survey

A field survey was conducted on July 9, 2014, which indicated that there are six NR listed or eligible historic structures located within 500 feet of the project site (Table 7).

Table 7: NR Listed or Eligible Historic Structures within 500 Feet

Address	Distance from Project	Resource Description
217 Healdsburg Avenue	200 feet south	Healdsburg Chamber of Commerce, 1936 3S – Eligible for NR Listing
245 Healdsburg Avenue	145 feet north	Historic Building, 1920 3D – Eligible for NR Listing/Contributor to an Historic District

Table 7 (cont.): NR Listed or Eligible Historic Structures within 500 Feet

Address	Distance from Project	Resource Description
214 Center Street	500 feet southeast	Seventh-Day Adventist Church, 1865 3S – Eligible for NR Listing
218 Center Street	460 feet east	Seventh-Day Adventist Cook House, 1865 3S – Eligible for NR Listing
219 Center Street	310 feet east-southeast	Dr. Coustol Home, 1858 3S – Eligible for NR Listing
239 Center Street	275 feet northeast	Historic Building, 1853 3S – Eligible for NR Listing

Although the proposed hotel would be visible from some of these structures, the design of the proposed structure reflects the adjacent buildings in scale and style and would not add a radically different appearance to the street view. In addition, the hotel's main façade facing Healdsburg Avenue would be partially obscured by the existing street trees lining the sidewalks and the other adjacent buildings. Therefore, the proposed project would not present a significant viewshed impact.

b) Archaeological Resource

Less than significant with mitigation incorporated. The record search at the NWIC indicated that there are two prehistoric resources located within 0.50 mile of the project area; the closest of which is approximately 350 feet to the north. No known prehistoric resources exist within the project site. Therefore, no archaeological resources would be expected to be encountered during construction activities associated with the proposed project. However, it is possible that subsurface excavation activities may encounter previously undiscovered archaeological resources, particularly because of their proximity to Foss Creek. The implementation of MM CUL-1 which requires standard cultural resource construction mitigation would ensure that impacts to archeological resources would be less than significant.

c) Unique Paleontological Resource or Site or Unique Geologic Feature

Less than significant with mitigation incorporated. No known paleontological resources or unique geologic features exist within the project area. However, it is possible that subsurface excavation activities could encounter previously undiscovered paleontological resources. The implementation of MM CUL-1 would ensure that impacts to unique paleontological resources or unique geologic features would be less than significant.

d) Human Remains

Less than significant with mitigation incorporated. No known human remains are interred within the project area. However, it is possible that subsurface excavation activities may encounter previously undiscovered human remains or burial sites. The implementation of MM CUL-2, which

requires standard human remains construction mitigation would reduce this potential impact to a less than significant level.

Mitigation Measures

MM CUL-1 If a potentially significant historic, prehistoric, or paleontological resource is encountered during subsurface earthwork activities, all construction activities within a 50-foot radius of the find will cease and the City of Healdsburg Planning and Building Director shall be notified immediately. The project Applicant will then obtain a qualified archaeological consultant to examine the finds and make recommendations concerning appropriate measures to be implemented to protect the resources, including but not limited to excavation and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Any previously undiscovered resources found within the project area shall be evaluated for significance in terms of CEQA criteria and recorded on appropriate Department of Parks and Recreation (DPR) 523 forms.

MM CUL-2 If human remains are encountered during excavations associated with this project, all work will halt, and the Sonoma County Coroner and City of Healdsburg Planning and Building Director will be notified immediately. If the coroner determines that the remains are of Native American origin, he or she will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Public Resources Code Section 5097.98. The MLD will make his or her recommendations within 48 hours of being notified by the NAHC (CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Sections 5097.94 and 5097.98).

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6. Geology and Soils *Would the project:*				
a) Expose people or structures to 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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil??	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Analysis

The City of Healdsburg is located within the central portion of the Coast Ranges geomorphic province of California, a region characterized by northwest-trending valleys and mountain ranges. This alignment of valleys and ridges has developed in response to uplift, folding, and faulting along the San Andreas system of active faults.

a) i) and ii) Fault Rupture or Strong Seismic Ground Shaking

Less than significant impact. The closest active faults to the project site are Rodgers Creek Fault Zone, located approximately 3.5 miles to the southeast; the Maacama Fault Zone (southern extension), located approximately 6 miles to the northeast; and the San Andreas Fault Zone, located approximately 20 miles to the southwest. There are no known faults on the project site, precluding the potential for fault rupture. However, strong ground shaking would likely occur at the project site during an earthquake because of the proximity of active faults in the region. The project would be required to comply with the latest adopted edition of the California Building Standards Code, which includes measures that reduce potential impact from ground shaking.

Furthermore, as required by Municipal Code 15.04.030 and the 2013 California Building Code Section 1803.1, prior to the issuance of a grading permit, a geotechnical investigation would be required and would provide site-specific soil and construction recommendations. These recommendations would be approved by the City and incorporated into site plans such that the risk of impacts related to ground shaking would be reduced to less than significant.

a) iii) Seismic-related Ground Failure, Including Liquefaction

Less than significant impact. Liquefaction is a phenomenon associated with loose, cohesionless, sands and gravels subjected to ground shaking during earthquakes, and can result in unacceptable total and/or differential settlements. According to the Healdsburg 2030 General Plan Background Report, the project site is located in an area identified as having potential liquefaction hazards. However, compliance with the latest adopted edition of the California Building Standards Code and completion of a geotechnical investigation as required would provide site-specific building practices that would be approved by the City and incorporated into the site plans to reduce any potential on-site liquefaction risks. As such, impacts would be less than significant.

a) iv) Landslides

No impact. The Healdsburg 2030 General Plan Background Report identifies the project site as being located within Slope Hazard Zone A, defined as the most stable zone and having little or no landside risk. The project site is located in area of generally flat relief and the site is relatively flat with the exception of the Foss Creek depression. Construction of the project, including the creekside park and footbridge, would occur outside the top of bank lines, thereby avoiding the slopes along the creek and minimizing soil disturbance in sloped areas. As such, no impacts would occur.

b) Soil Erosion or the Loss of Topsoil

Less than significant impact. Soil exposed by construction activities during the development of the proposed project could be subject to erosion if exposed to heavy rain, winds, or other storm events. Implementation of BMPs as required by the National Pollutant Discharge Elimination System (NPDES) permit C.3 requirements would minimize construction related erosion. In addition, through a combination of capture and treatment (percolation and settlement), the projects stormwater design (bioswales) would ensure substantial erosion or siltation would not occur on- or off-site. Impacts would be less than significant.

c) Unstable Soil

Less than significant impact. As previously indicated, the project site is located in area of generally flat relief and the site is relatively flat with the exception of the Foss Creek depression. Construction of the project, including the creekside park and footbridge, would occur outside the top of bank lines, thereby avoiding the slopes along the creek and minimizing soil disturbance in sloped areas. As such, no impacts would occur on- or off-site related to landslides and lateral spreading.

Also previously indicated, the project site is located in an area identified as having potential liquefaction hazards. However, compliance with the latest adopted edition of the California Building Standards Code and completion of a geotechnical investigation as required would provide site-specific building practices that would be approved by the City and incorporated into the site plans to reduce any potential on-site liquefaction risks. As such, impacts related to liquefaction would be less than significant.

No known subsidence or collapse hazards are located onsite. If any are identified, compliance with the California Building Standards Code and completion of a geotechnical investigation as required would provide site-specific building practices that would reduce any potential impacts to less than significant.

d) Expansive Soil

Less than significant impact. As indicated by the Healdsburg 2030 General Plan Background Report, portions of Healdsburg are underlain by expansive soils, although the extent of such soils is not well known. Expansive soils undergo a significant volume change as a result of wetting or drying, which can cause damage to improperly designed structures. However, as required by Municipal Code 15.04.030 and the 2013 California Building Code Section 1803.1, prior to the issuance of a grading permit, a geotechnical investigation would be required and would identify if expansive soils are present on-site. Recommendations regarding site-specific building practices to reduce potential on-site expansive soils risks would be approved by the City and incorporated into project plans. As such, impacts would be less than significant.

e) Septic Systems

No Impact. The project site's wastewater disposal needs would be served by the City of Healdsburg's wastewater system. No alternative waste water disposal or septic systems would be implemented. This condition precludes the possibility of related impacts. No impacts would occur.

Mitigation Measures

No mitigation is necessary.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. Greenhouse Gas Emissions *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Analysis

The analysis in this section is based on the findings of the Air Quality and Greenhouse Gas Assessment completed by FirstCarbon Solutions. The Assessment is provided in its entirety in Appendix A.

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

Less than significant impact. Both construction and operational activities have the potential to generate greenhouse gas emissions. The project would generate greenhouse gas emissions during temporary (short-term) construction activities such as site grading, construction equipment engine use, on-site heavy-duty construction vehicle use, vehicles hauling materials to and from the project site, asphalt paving, and motor vehicles used by the construction workers. Long-term, operational greenhouse gas emissions would result from project generated vehicular traffic, on-site combustion of natural gas, operation of any landscaping equipment, off-site generation of electrical power over the life of the project, the energy required to convey water to and wastewater from the project site, the emissions associated with the hauling and disposal of solid waste from the project site, and any fugitive refrigerants from air conditioning or refrigerators.

BAAQMD does not have a threshold for construction-generated greenhouse gas emissions; however, the BAAQMD recommends that construction-generated greenhouse gas emissions be addressed in CEQA analysis. Therefore, construction-generated emissions are addressed with the project's operational emission analysis, below.

BAAQMD's 2010 Air Quality Guidelines provides guidance and screening criteria for determining if a project could potentially result in significant greenhouse gas impacts. The operational greenhouse gas screening size relevant to the project is provided in Table 8. As shown in Table 8, the project would be less than half of the BAAQMD's operational greenhouse gas pollutant screening size. The project would construct 39 rooms, and the BAAQMD's operational greenhouse gas screening level is

83 rooms for the comparable land use. As such, additional emissions analysis for operational greenhouse gas pollutants is not warranted. Project operations would generate a less than significant impact. Because the project size is such that the project's operational emissions would be less than the BAAQMD's threshold of significance, and the project's construction activities would be limited in duration and scope, construction-generated greenhouse gas emissions would be minimal and result in a less than significant impact.

Table 8: Operational Greenhouse Gases Screening Level

Land Use Type	Operational Criteria Pollutant Screening Size	Project Size	Project Percent of Screening Size
Hotel	83 rooms	39 rooms	47%
Source: BAAQMD 2010 Air Quality Guidelines.			

b) Applicable Plan, Policy or Regulation

Less than significant impact. NSCAPCD's adopted Rule 221 (Federal Permitting for Greenhouse Gas Emissions) applies only to stationary sources with a potential to emit gases above the applicability threshold of 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year. Stationary sources are large fixed-location sources of air pollution such as power plants, refineries, and factories. The project is not a stationary source and not subject to NSCAPCD's Rule 221.

In 2008, the City of Healdsburg adopted a plan for greenhouse gas reductions for city operations. In 2011, a memorandum was released indicating that the City was in the process of drafting a Climate Action Plan and with the help of a "Green City Committee". The Committee is a group consisting of a minimum of seven members appointed by the City Council, including two Planning Commissioners. (Healdsburg 2011). In addition, the City is one of the nine Sonoma County cities participating in the Climate Action 2020 Plan to develop a regional Greenhouse Gas Reduction Plan to comply with AB 32. However, as of the time of this project's analysis, the City has not adopted a greenhouse gas reduction plan applicable to the project. Since a Climate Action Plan has not been adopted by the City of Healdsburg, ARB's adopted Scoping Plan and the Assembly Bill (AB) 32 emission reduction goal were used to analyze the project's consistency with an applicable greenhouse gas reduction plan, policy, or regulation.

The adopted Scoping Plan states, "The 2020 goal was established to be an aggressive, but achievable, mid-term target, and the 2050 GHG [greenhouse gas] emissions reduction goal represents the level scientists believe is necessary to reach levels that would stabilize climate" (ARB 2008). The year 2020 greenhouse gas emission reduction goal of AB 32 corresponds with the mid-term target established by Executive Order S-3-05, which aims to reduce California's fair-share contribution of greenhouse gases in 2050 to levels that would stabilize the climate.

Construction of the project is estimated to generate greenhouse gases. AB 32 requires that greenhouse gas emissions generated in California in year 2020 be equal to or less than California's statewide inventory from 1990. Construction emissions would occur before the year 2020; the

project's construction would not contribute to year 2020 emissions. Therefore, construction emissions would not conflict with the AB 32 Scoping Plan.

As provided by the BAAQMD:

> BAAQMD's approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move us towards climate stabilization. If a project would generate GHG emissions above the threshold level, it would be considered to contribute substantially to a cumulative impact, and would be considered significant.

Therefore, if a project is less than the BAAQMD's threshold of significance for greenhouse gases, it stands to follow that the project would not substantially conflict with existing California legislation adopted to reduce statewide greenhouse gas emissions. As shown in analysis a) of this section, the project is less than the BAAQMD's screening level for greenhouse gas emissions and would result in a less than significant impact. Therefore, the project would not substantially conflict with the emission reduction requirements of AB 32. The ARB's Scoping Plan was adopted to implement the emission reduction requirements of AB 32. Therefore, the project would not conflict with the Scoping Plan.

The Scoping Plan identifies recommended measures for multiple greenhouse gas emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors. As stated in the Scoping Plan, the key elements of the strategy for achieving the 2020 greenhouse gas target include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards.
- Achieving a statewide renewable energy mix of 33 percent.
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system.
- Establishing targets for transportation-related greenhouse gas emissions for regions throughout California and pursuing policies and incentives to achieve those targets.
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard.
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation.

Implementation of certain Scoping Plan measures may obliquely affect the project, such as the low carbon fuel standard and enactment of the Pavley standards, as part of California AB 1493. AB 1493

(Pavley) required the ARB to develop and adopt regulations that reduce greenhouse gases emitted by passenger vehicles and light duty trucks.

As stated above, the project would not conflict with the emission reduction requirements of AB 32 and, by extension, ARB's Scoping Plan adopted to achieve the emission reduction requirements of AB 32. Therefore, the project would not conflict with an applicable plan, policy, or regulation and would have a less than significant impact.

Mitigation Measures

No mitigation is necessary.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☒	☐	☐
e) Be located within two miles of the Healdsburg Municipal Airport and result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Analysis

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous materials are grouped into the following four categories, based on their properties:

- Toxic - causes human health effects
- Ignitable - has the ability to burn

- Corrosive - causes severe burns or damage to materials
- Reactive - causes explosions or generates toxic gases

A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. If improperly handled, hazardous materials and waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. California Code of Regulations, Title 22, Sections 66261.20-24 contain technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

a) Transport, Use, or Disposal of Hazardous Materials

Less than significant impact. The project would not involve the regular use, storage, transport, or disposal of significant amounts of hazardous materials. Construction and operation of the project would involve the minor routine transport and handling of hazardous substances such as diesel fuels, lubricants, solvents, asphalt, pesticides, and fertilizers. Improper handling and transportation of these materials could result in the exposure of workers to hazardous materials. However, the project would not create a significant hazard to the public or the environment, because project construction and operation would be in compliance with applicable federal, state, and local laws pertaining to the safe handling and transport of hazardous materials. Impacts would be less than significant.

b) Risk of Upset and Accident Conditions

Less than significant impact. As previously indicated, construction and operation of the project would involve the minor routine transport and handling of hazardous substances such as diesel fuels, lubricants, solvents, asphalt, pesticides and fertilizers. Use of these substances would be in accordance with applicable regulations and is not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset or accident. Impacts would be less than significant.

c) Hazard within One-Quarter Mile of an Existing or Proposed School

Less than significant impact. The project site is located approximately 0.13 mile west of St. John the Baptist Catholic School, and 0.13 mile southeast of Live Oak Pre-School. As explained in impacts 7a and 7b, the proposed project would not involve the use of significant quantities of hazardous materials and therefore would not have the potential to expose the school to such substances. Impacts would be less than significant.

d) Hazardous Materials Sites

Less than significant with mitigation incorporated. Pursuant to CEQA, the California Department of Toxic Substances Control (DTSC) maintains a Hazardous Waste and Substances Sites List (Cortese List). Before placing a site on the backlog, DTSC ensures that all necessary actions have been taken to protect the public and environment from any immediate hazard posed by the site. The project is not included in the DTSC Cortese List, and—according to State Water Resources Control Board

"GeoTracker", an online hazardous materials database—the project site is not listed as a hazardous materials site.

As indicated in the Phase I Environmental Site Assessment (ESA) prepared by Edd Clark and Associates (Appendix C), while the subject site is not listed on any of the regulatory databases searched by Environmental Data Resources (EDR), it was formerly developed with a gasoline fueling service station from approximately 1934 to 1953. According to a review of available data at the Healdsburg Fire Department, two 550-gallon gasoline underground storage tanks (USTs) were removed under permit in March 1990. Soil samples collected from beneath the USTs did not identify detectable levels of total petroleum hydrocarbons such as gasoline (TPHg) and benzene, toluene, etheylbenzene and exylenes (BTEX). The case was subsequently closed, indicating that this former use does not present a hazard to future development.

However, EDR did indicate that there are 27 leaking underground storage tank (LUST) facilities located within an approximate 0.5-mile radius of the project site. Of the 27 LUST sites, 24 are closed, indicating that they have been properly addressed; two are eligible for closure; and one remains open (located at 230 Healdsburg Avenue across the street from the project site).

A review of information for each of the closed LUST sites and the sites that are eligible for closure indicates that fuel hydrocarbon (FHC)-impacted soils were removed to the extent feasible, and that either FHC-impacted soils did not impact groundwater or FHC-impacted groundwater is stable and/or decreasing and generally limited to the approximate boundaries of each of the listed LUST sites.

The open LUST facility located at 230 Healdsburg Avenue, across the street from the project site, has recently been added to the LUST list as a result of unauthorized releases of FHCs from underground storage tanks (USTs) formerly located at this property. A Phase II Environmental Site Assessment, dated October 2013, indicated soil and groundwater FHC levels substantially above regulatory screening levels within the listed site. Five USTs and an associated reservoir tank were removed from the listed site in April 2014.

As indicated by a June 2014 letter report prepared by Harris & Lee Environmental Sciences, approximately 100 cubic yards (150 tons) of contaminated soil were removed from the UST pits and properly disposed. According to RWQCB correspondence dated May 7, 2014, additional excavation of soils in the vicinity of the former tanks is not warranted. Groundwater was not encountered during excavations, however, as previously indicated sampling results from the Phase II Environmental Site Assessment indicate groundwater has been impacted by FHC. The extent of the FHCs in groundwater has not yet been delineated and additional investigation is recommended to evaluate the lateral extent of FHC constituents in groundwater.

The LUST site at 230 Healdsburg Avenue has the potential to have impacted groundwater beneath the subject site, because the USTs at 230 Healdsburg Avenue were in the general up-gradient groundwater flow direction from, and located within approximately 65 feet of the project site. A representative of the North Coast Regional Water Quality Control Board indicates that the installation of groundwater monitoring wells to evaluate the degree and extent of the groundwater impact from the removed USTs will likely be required. The unauthorized FHC release represents a

vapor encroachment concern at the project site. As such, this condition is a recognized environmental condition.

Edd Clark and Associates indicated that soil and possible groundwater containing hazardous substances may be encountered during future development of the site, and therefore recommends the preparation of a Soil and Groundwater Management Plan as well as a Site Safety Plan prior to implementation of site disturbance. As such, MM HAZ-1 would incorporate these recommendations into the project to ensure impacts related to hazardous materials would be reduced to less than significant.

e) Healdsburg Municipal Airport

No impact. The Healdsburg Municipal Airport is approximately 3 miles northwest of the project site. The project site is not located within the airport safety zones identified in the Comprehensive Airport Land Use Plan for Sonoma County. These conditions preclude the potential for aviation safety hazards for persons residing or working in the project area. No impacts would occur.

f) Emergency Response Plan or Emergency Evacuation Plan

Less than significant impact. Healdsburg maintains an Emergency Operations Plan, which specifies roles and responsibilities during an evacuation. Healdsburg Avenue is the primary north-south roadway in the City of Healdsburg; thus, it is used for emergency response and could be used for evacuation purposes. The proposed project does not propose any modifications to Healdsburg Avenue that would impair or interfere with emergency response or evacuation (permanent road closures, lane narrowing, etc.). The project site does not serve as an evacuation route for adjacent land uses. Impacts would be less than significant.

g) Wildland Fires

No impact. The proposed project is located in an urban area and is surrounded by urban development and infrastructure. These land use types are not associated with wildland fires and preclude the possibility of exposure thereof. No impacts would occur.

Mitigation Measures

MM HAZ-1: Prior to any site disturbance, a qualified hazardous material specialist shall prepare a Soil and Groundwater Management Plan and Site Safety Plan to address the potential for on-site contaminated soils and groundwater. The Plans shall include procedures for soil and groundwater screening, stockpile locations, sampling and disposal procedures, and security of open pits. The Plans shall be submitted to the Healdsburg Fire Department and the North Coast Regional Water Quality Control Board for review. In addition, soil conditions should be monitored during grading and excavation activities for the presence of petroleum hydrocarbons and volatile organic compounds. If impacted soil and or groundwater is encountered, it should be segregated and sampled, the samples should be analyzed, and identified contaminated soils should be disposed of appropriately.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. Hydrology and Water Quality *Would the project:*				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

Analysis

a) Water Quality Standards or Waste Discharge Requirements

Less than significant impact. Construction of the proposed project would require grading and construction activities, which could allow surface water to carry sediment from on-site erosion and small quantities of pollutants (e.g., oil or fuel used in construction equipment) off-site, thereby potentially affecting local waterways by degrading water quality. Implementation of BMPs as

required by NPDES permit C.3 requirements would ensure such impacts would be less than significant.

Once constructed, stormwater runoff from the hotel's rooftop and exterior facilities would be conveyed via a pipe network to vegetated bioswales located on both sides of Foss Creek. The swales have been designed to mitigate the 85th percentile, 24-hour storm event. Larger storm events would overtop the bioswales via rock protected level spreaders that would dissipate energy and sheet flow into Foss Creek. As indicated in the Hydrology Calculations and Standard Urban Stormwater Mitigation Plan, (Appendix D), the project would meet the required Low Impact Development (LID) standards through a combination of treatment and capture in the bioswales. As such, the project would not result in significant impacts to water quality standards.

Wastewater from the project site would be directed to the City's wastewater treatment plant. Through compliance with the City's waste discharge permit program, which is administered subject to the requirements and limitations of the NPDES program, as enforced by the RWQCB, the project would not result in an exceedance of wastewater discharge requirements. As such, impacts would be less than significant.

b) Groundwater

Less than significant impact. The City of Healdsburg would serve the proposed project with potable water service, which it obtains from well fields located along the Russian River and Dry Creek. The City has the rights to 3,376 acre-feet of water,. The City's most recently completed 2005 Urban Water Management Plan (UWMP) indicates that the City's total demand for water in 2005 was 2,863 acre-feet, resulting in a surplus of 513 acre-feet. Development of the project site was included in the UWMP's consideration of future water demands. The UWMP indicates that sufficient water supplies are available to serve buildout of the General Plan (including the project site) through 2025.

More recent water usage rates from 2013 indicate that the City's total water demand was 2,180 acre-feet prior to accounting for losses and unmetered water use (pers. com. Brown). According to the 2005 UWMP, projected losses and unmetered water use for 2010 is 296 acre-feet and for 2015 is 312 acre-feet. The average of these numbers (304 afy), was used to account for losses and umetered water use for 2013 resulting in an estimated water use of 2,484 acre-feet. Using this adjusted 2013 water usage rate, the city's resulting surplus was 892 acre-feet, which is greater than the surplus reflected for 2005 in the UWMP.

The proposed project is conservatively estimated to require approximately 4.06 acre-feet of water per year, which is well within the City's surpluses of 513 acre-feet in 2005 and 891 acre-feet in 2013. As such, the project site's use of groundwater has been considered and sufficient supplies are available. No additional groundwater supplies would be needed such that overdraft would occur.

Because the project site currently consists of pervious surfaces, stormwater percolation currently occurs on-site. However, the site is not of such a size that its development would significantly impact groundwater recharge rates. Furthermore, stormwater from the hotel's rooftop and exterior

facilities would be directed to bioswales within the creekside park area that would continue to allow water to percolate. As such, impacts would be less than significant.

c) Erosion or Siltation

Less than significant impact. The project would not alter the existing course of Foss Creek. As previously noted, stormwater runoff from the hotel's rooftop and exterior facilities would be conveyed via a pipe network to vegetated bioswales located on both sides of Foss Creek. The swales have been designed to mitigate the 85th percentile, 24-hour storm event. Through a combination of capture and treatment (percolation and settlement), the projects stormwater design would ensure substantial erosion or siltation would not occur on- or off-site. Impacts would be less than significant.

d) Flooding

Less than significant impact. The project would not alter the existing course of Foss Creek. Stormwater runoff from the hotel's rooftop and exterior facilities would be conveyed via a pipe network to vegetated bioswales located on both sides of Foss Creek. The swales have been designed to mitigate the 85th percentile, 24-hour storm event. As such, the bioswales would substantially reduce the potential for surface runoff to contribute to on- or off-site flooding. While the creekside park and the western footing of the connecting footbridge would be located within the 100-year flood zone of Foss Creek, the hotel building, pool area, footbridge deck, and eastern bridge footing would be raised above or located outside the 100-year flood zone and therefore would not displace flood waters. The western bridge footing would be located within the 100-year flood zone but would be minimal in size, likely consisting of a concrete piling, and would not displace flood waters so that flooding would occur on- or off-site. As such, impacts would be less than significant.

e) Stormwater Drainage

Less than significant impact. As previously indicated, stormwater runoff from the hotel's rooftop and exterior facilities would be conveyed via a pipe network to vegetated bioswales located on both sides of Foss Creek. The swales have been designed to mitigate the 85th percentile, 24-hour storm event. As indicated in the Hydrology Calculations and Standard Urban Stormwater Mitigation Plan, (Appendix D), the project would meet the required LID standards through a combination of treatment and capture in the bioswales. The project would not contribute stormwater to the existing stormwater system in Healdsburg Avenue with the exception of stormwater from the sidewalks, which is a pre-existing condition. In summary, the existing and proposed stormwater drainage systems would be capable of handling surface runoff flows and impacts would be less than significant.

f) Housing within a 100-year Flood Hazard Area

No impact. Flood Insurance Rate Map Community Parcel No. 06097C0551E indicates that the majority of the project is located in Zone A, an area subject to inundation by 100-year storm events, but where no base flood elevations have been determined. However, a Letter of Map Revision Determination Document indicates that because of upstream improvements, the 100-year flood

plain is limited to the western portion of the project site near Foss Creek. As previously indicated, the primary project components, including the hotel and pool area would be constructed outside the 100-year flood plain and no guest rooms would be located on the first floor. Therefore, the project would not place housing (hotel rooms) within a 100-year flood hazard area. No impact would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. Land Use and Planning *Would the project:*				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?	☐	☐	☐	☒

Analysis

The City of Healdsburg General Plan designates the site as DC - Downtown Commercial, provides for a broad range of commercial and offices uses, including hotels. The Healdsburg Zoning Map designates the site as CD – Downtown Commercial, which allows hotels, extended stay hotels and motels. The neighboring commercial developments are also designated as DC – Downtown Commercial and zoned as CD – Downtown Commercial.

a) Division of an Established Community

No impact. The project is directly surrounded by commercial uses to the north, east, and south and the SMART railroad the west. The proposed hotel is consistent with surrounding land uses. In addition, the project site does not serve as a public linkage between surrounding land uses and, upon completion, would provide a pedestrian path linkage to h2hotel. Therefore, the development of the project would not physically divide an established community. No impacts would occur.

b) Land Use Plan, Policy, or Regulation

Less than significant impact. The proposed project consists of the development of a hotel and outdoor seating area. The Healdsburg General Plan and the Healdsburg Zoning Ordinance designates the project site as "Downtown Commercial", which permits the construction of hotels. Development on-site would be required to comply with all applicable General Plan policies and Municipal Code regulations, and would be reviewed by the City prior to approval of the necessary permits. In addition, the applicant is requesting a variance to the 35-foot Foss Creek riparian setback requirements as outlined in Municipal Code Section 20.24.090. As indicated by Municipal Code Section 20.24.095, variances to the 35-foot setback may be granted where the provision of the required setback is infeasible. Section 20.24.095 also states that, where a variance is granted, and

where creeks or other riparian habitats are impacted by proposed activities subject to CEQA, detailed riparian mitigation plans shall be prepared by a licensed landscape architect or qualified field biologist and shall be based on guidelines maintained by the City's Planning and Building Director. The goal of such a mitigation plan is to ensure no net loss of acreages or of function value of riparian habitat. Because the project applicant is required to abide by Section 20.24.095, impacts would be less than significant.

c) Habitat Conservation Plan or Natural Communities Conservation Plan

No impact. The project site is not located within an existing habitat conservation plan or natural community conservation plan. This condition precludes the possibility of the project conflicting with the provisions of such a plan. No impacts would occur.

Mitigation Measures

No mitigation is necessary.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
11. 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Analysis

The primary mineral resources of the area are aggregate, sand, and gravel. The State Mines and Geology Board designates sand and gravel deposits that are of regional significance pursuant to the California Surface Mining and Reclamation Act of 1975. The State has designated the terrace mining pits along Russian River, including those of Kaiser Sand and Gravel of Syar, as regionally significant because of their commercial value to Sonoma County.

a) Regional or Statewide Mineral Resources

No impact. The project site does not support any mineral extraction activities, nor do any known mineral deposits exist on site. Therefore, implementation of the proposed project would not 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. No impacts would occur.

b) Locally Important Mineral Resource Recovery Site

No impact. The proposed project site is not designated for mineral resources by the City of Healdsburg General Plan. Therefore, the implementation of the proposed project would not result in the loss of availability of a locally important mineral resource. No impacts would occur.

Mitigation Measures

No mitigation is necessary.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. Noise *Would the project result in:*				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Analysis

The analysis in this section is based on the Noise and Vibration Impact Technical Memorandum prepared for the project by FCS (Appendix E). The memorandum is based in part on a report prepared for the project by Wilson, Ihrig & Associates (2014), which is included in its entirety in Attachment C of the Noise and Vibration Impact Technical Memorandum.

a) Excessive Noise Levels

Less than significant with mitigation incorporated. The City of Healdsburg addresses noise in the General Plan and Municipal Code. The General Plan addresses noise in the Safety Element. The Safety Element contains the City's land use compatibility standards for community noise environments. For example, environments with ambient noise levels of up to 65 dBA L_{dn} are considered normally acceptable for new hotel land use development. Environments with ambient noise levels between 65 dBA and 70 dBA L_{dn} are considered "conditionally acceptable" for new hotel land use development. New construction or development proposed in "conditionally acceptable" noise environments should be undertaken only after a detailed analysis of the noise reduction requirements is made and after needed noise insulation features are included in the project's design.

Construction Noise Impacts

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the site would incrementally increase noise levels on access roads leading to the site. The projected construction traffic would be short-term, consisting of construction worker commutes and delivery/ removal of construction equipment, causing intermittent noise nuisance (passing trucks at 50 feet would generate up to a maximum of 86 dBA L_{max}). The associated short-term noise increase along Healdsburg Avenue and at the nearest sensitive receptors would be perceptible; however, such a noise increase would be instantaneous and short-term as a truck passes by. This type of short-term noise would not generate a substantial temporary or periodic increase in the ambient noise level in the project area. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during site-preparation and building construction. Construction would be performed in discrete steps; each step of construction has its own mix of equipment and, consequently, its own noise characteristics. These various construction operations would change the character of the noise generated at the project site and, therefore, the ambient noise level as construction progresses. The loudest phase of construction is the excavation and site preparation phase since the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery such as backhoes, bulldozers, and front loaders, and compacting equipment such as rollers, scrapers, graders, and water trucks. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings. As shown in Table 9, the maximum noise level generated by scrapers, bulldozers, roller compactors, and graders is approximately 85 dBA L_{max} at 50 feet. The maximum noise level generated by tractors and dump trucks is approximately 84 dBA L_{max} at 50 feet from this source. Assuming construction equipment operates at a reasonable distance apart from one another, the worst-case combined noise level during this phase of construction would be 90 dBA L_{max} at a distance of 50 feet when multiple pieces of equipment operate simultaneously at full power.

Table 9: Typical Construction Equipment Maximum Noise Levels, L_{max}

Type of Equipment	Impact Device?	Specification Maximum Sound Levels for Analysis (dBA at 50 feet)
Impact Pile Driver	Yes	95
Auger Drill Rig	—	85
Vibratory Pile Driver	—	95
Jackhammers	Yes	85
Pneumatic Tools	—	85
Pumps	—	77
Scrapers	—	85

Table 9 (cont.): Typical Construction Equipment Maximum Noise Levels, L_{max}

Type of Equipment	Impact Device?	Specification Maximum Sound Levels for Analysis (dBA at 50 feet)
Cranes	—	85
Portable Generators	—	82
Roller Compactors	—	85
Bulldozers	—	85
Tractors	—	84
Front-End Loaders	—	80
Backhoe	—	80
Excavators	—	85
Graders	—	85
Air Compressors	—	80
Dump Truck	—	84
Concrete Mixer Truck	—	85
Pickup Truck	—	55
Source: FHWA, 2006.		

The closest noise sensitive receptors to the project site are the adjacent apartments and hotel land use, Two Thirty-Five Luxury Suites, located immediately north of the project site. At the southern façade of this building, the worst-case maximum noise levels could range up to 100 dBA L_{max} if multiple pieces of heavy construction equipment all operate simultaneously within 15 feet of the building. Based on the United States Environmental Protection Agency's Protective Noise Levels (EPA 1978), a combination of wall, door, and window standard construction measures for northern California residential-type buildings would provide more than 25 dBA in exterior to interior noise reduction with windows closed. Therefore, these construction activities would result in noise levels up to 75 dBA L_{max} in interior spaces of this hotel/residential land use when windows are closed, which could result in sleep disturbance of nearby sensitive receptors unless activities are restricted to daytime hours.

According to the City's Noise Ordinance, noise from construction activity is exempt from the City's noise performance standards provided that all noise-producing construction activities are limited to the daytime hours between 7:30 a.m. and 6:00 p.m., Monday through Saturday, and at no time on Sundays or legal holidays. Significant construction noise is not expected to occur outside these times. In addition, for construction activities that could result in potentially significant impacts on noise sensitive uses, Policy S-25 of the General Plan indicates the project applicant should incorporate additional construction noise-reducing measures, and provides a suggested list of such measures. Therefore, to ensure the following best management practice, construction noise-

reducing measures are implemented to reduce all temporary noise impacts from construction on nearby sensitive receptors to the maximum extent feasible, MM NOI-1 is required.

Because construction noise is temporary and the applicant would be required to implement all portions of MM NOI-1, construction noise resulting from implementation of the proposed project would be reduced to the maximum extent feasible and would not expose persons in the project vicinity to substantial temporary increases in ambient noise levels.

On-Site Operational Noise Impacts

Noise sources in the project vicinity include traffic noise, retail commercial stationary noise (such as delivery activities), and railroad noise sources. The existing ambient noise environment was documented through the long-term ambient noise measurement effort. Existing ambient noise conditions were then compared for compliance with the City's land use compatibility standards and to the State's Title 24 interior noise level standards for hotel land use development.

As documented in the noise monitoring effort, traffic on local roadways is the dominant noise source on the project site, other than mechanical ventilation equipment on adjacent buildings. Based on the long-term noise measurement, ambient noise levels on the project site range up to 57 dBA L_{dn}. According to the City's land use compatibility standards, environments with ambient noise levels of up to 65 dBA L_{dn} are considered normally acceptable for new hotel land use development.

According to the traffic impact analysis prepared for this project, the project is expected to generate an average of 319 trips per day, including 14 trips during the AM peak hour and 19 trips during the PM peak hour. These project trips would result in less than a 1-dBA increase in traffic noise levels in the project vicinity as measured at the peak hour or daily average (L_{dn}) noise metric. Therefore, resulting traffic noise levels with implementation of the project would remain below the City's normally acceptable standard for new hotel land use development.

However, future railroad activity could result in noise levels that could cause the interior noise levels at the hotel to exceed acceptable interior noise level standards. Based on a report prepared for the project by Wilson, Ihrig & Associates (2014), future railroad noise levels due to train horns could result in noise levels ranging up to 70 dBA L_{dn} at the western façade of the proposed project. The report concludes that window and sliding door assemblies must be upgraded on the front (east facing) and rear (west facing) façades of the proposed project to a minimum sound isolation rating of 27 Outdoor-Indoor Transmission Class (OITC). This is roughly equivalent to a sound isolation rating of a 35 Standard Transmission Class (STC) rating. Therefore, implementation of MM NOI-2, which requires the use of the aforementioned noise attenuating window and sliding door assemblies, would ensure that noise from future railroad activity would not result in exceedance of acceptable interior noise levels.

b) Excessive Groundborne Vibration or Groundborne Noise Levels

Less than significant with mitigation incorporated. The project would result in a significant impact if it would result in the exposure of persons to or generation of excessive groundborne vibration or

groundborne noise levels. The construction and operational vibration impacts are analyzed separately below.

Operational Vibration Impacts

The project does not include any permanent noise sources that would expose persons to excessive groundborne vibration or noise levels. Existing sources of groundborne vibration in the project vicinity include vibration from railroad activity along the SMART railroad line, located over 150 feet west of the proposed building footprint. According to the Federal Transit Administration (FTA) (FTA 2006), the screening distance for potential groundborne vibration impacts from intermediate capacity rail activity for residential type land uses, such as hotels, is 100 feet. Because the SMART railroad line is located more than 100 feet away from the proposed hotel, groundborne vibration impacts from railroad activity on the proposed project would be less than significant.

Construction Vibration Impacts

Another common source of groundborne vibration is the operation of heavy construction equipment. During development of the proposed project, construction equipment such as cranes, excavators, graders, loaders backhoes, and bulldozers may be used adjacent to off-site buildings to the north and south of the project site. Of the types of equipment expected to be used on the project site, a vibratory roller would generate the highest groundborne vibration levels; resulting in vibration levels of 0.101 PPV as measured at a distance of 25 feet from the operating machinery. The closest sensitive receptor to heavy equipment construction areas are the hotel/apartment/commercial retail land use north of the project site and the commercial retail land uses located south of the project site. When a vibratory roller operates at the edge of the construction limits, these closest structures may be exposed to groundborne vibration levels ranging up to 0.399 PPV. This vibration level is above the FTA construction vibration damage criteria of 0.2 PPV for buildings of non-engineered timber or masonry construction (the structure type of the building south of the project); and even exceeds FTA's construction vibration damage criteria of 0.3 PPV for buildings of engineered concrete and masonry construction (the structure type of the building north of the project).

To reduce this impact to a less than significant level, MM NOI-3 requires that the project applicant shall retain a structural engineer or other appropriate professional to design means and methods of construction that would not exceed the FTA's groundborne vibration impact criteria for the adjacent impacted land uses. Methodologies for reducing construction related vibration can be found in, but are not limited to, Caltran's Transportation- and Construction-Induced Vibration Guidance Manual (2004) and the Federal Transit Administration's Transit Noise and Vibration Impact Assessment (2006) which provide varied measures to reduce potential impacts. Implementation of MM NOI-3 would ensure that groundborne vibration impacts on adjacent structures from project-related construction activities would be reduced to below vibration impact criteria, and would not expose persons to or generation of excessive groundborne vibration levels.

c) Permanent Increase in Ambient Noise Levels

Less than significant impact. Significant noise impacts to off-site receptors would occur if the project would result in a substantial increase in ambient noise levels compared to noise levels existing without the project. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments, while a change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. Therefore, for purposes of this analysis, a substantial increase is considered 5 dBA or greater in ambient noise levels in the project vicinity above levels existing without the project.

According to the traffic impact analysis prepared for this project, the project is expected to generate an average of 319 trips per day, including 14 trips during the AM peak hour and 19 trips during the PM peak hour. A characteristic of noise is that a doubling of sound sources with equal strength is required to result in a perceptible increase (defined to be a 3-dBA increase) in noise level. Implementation of the project would not result in a doubling of traffic volumes along any roadway segment in the project vicinity. This number of project trips would result in less than a 1-dBA increase in traffic noise levels in the project vicinity as measured at the peak hour or daily average (L_{dn}) noise metric. Therefore, project-related traffic would not result in a perceptible permanent increase in existing ambient noise levels along any roadway segment in the project vicinity, and project-related traffic noise impacts on off-site sensitive land uses would be less than significant.

The proposed project would also include stationary noise sources such as parking lot noise, delivery activities, and mechanical equipment (such as heating, ventilation, and air conditioning system) noise. However, parking and delivery activities would primarily occur within the enclosed ground floor parking area and therefore would not result in a substantial increase in ambient noise levels compared with noise levels existing without the project. At the time of preparation of this analysis, details of mechanical ventilation systems were not available; therefore, a reference noise level for typical rooftop mechanical ventilation systems was used. Noise levels from typical rooftop mechanical ventilation equipment are anticipated to range up to approximately 60 dBA L_{eq} at a distance of 25 feet. The proposed mechanical ventilation system would be located on the rooftop behind a solid parapet wall. The height of the roof and the parapet wall would provide a minimum reduction of 5 dBA in mechanical noise at the closest off-site sensitive receptor façade. Therefore, noise generated by rooftop mechanical ventilation equipment would attenuate to less than 55 dBA L_{eq} as measured at the nearest off-site sensitive receptor. Existing ambient noise levels are documented to range from 58.1 dBA to 63.9 dBA L_{eq} throughout the project site. Therefore, noise generated by rooftop mechanical ventilation equipment would not exceed existing ambient noise levels nor result in a substantial permanent increase in ambient noise levels compared with conditions existing without the project. Impacts would be less than significant.

d) Temporary or Periodic Increase In Ambient Noise Levels

Less than significant with mitigation incorporated. Refer to analysis 12. a) of this section. Project-related construction activities could result in high intermittent noise levels of up to 100 dBA L_{max} at the façade of the closest noise sensitive receptor, with resulting interior noise levels ranging up to 75 dBA L_{max}. This noise would result from the temporary use of heavy construction equipment.

However, because construction noise is temporary and the applicant would be required to implement all portions of MM NOI-1 listed below, construction noise resulting from implementation of the proposed project would be reduced to the maximum extent feasible and would not expose persons in the project vicinity to substantial temporary increases in ambient noise levels. Impacts would be less than significant after the implementation of mitigation.

e) Aviation Noise

No impact. The Healdsburg Municipal Airport is located approximately 3 miles northwest of the project site. The project site is not located within the airport safety zones identified in the Comprehensive Airport Land Use Plan for Sonoma County. As such, the proposed project would not expose persons residing or working in the project vicinity to excessive aviation noise. No impacts would occur.

Mitigation Measures

MM NOI-1: In addition to compliance with the permissible hours of construction described in Municipal Code Section 9.32.070, and in accordance with General Plan Policy S-25, the construction contractor shall implement the following construction noise reduction measures:

- The construction contractor shall equip internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and are appropriate for the equipment.
- The construction contractor shall locate stationary noise-generating equipment as far as possible from sensitive receptors in the vicinity.
- The construction contractor shall utilize “quiet” air compressors and other stationary noise sources where technology exists.
- The construction contractor shall erect temporary noise control blanket barriers in a manner to shield noise sensitive uses.
- No amplified music shall be allowed on-site during construction activities.
- The construction contractor shall designate a “disturbance coordinator” responsible for responding to complaints about project construction noise and taking reasonable measures to correct the problem. The construction contractor shall conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in any notice sent to neighbors regarding the construction schedule.
- The construction contractor shall prohibit unnecessary idling of internal combustion engines.
- Where feasible, the project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site.
- The construction contractor shall locate, to the maximum extent practical, on-site equipment staging areas to maximize the distance between construction-related

noise sources and noise-sensitive receptors nearest the project site during all project construction.

MM NOI-2: Exterior glazing (window and sliding glass door assemblies) on façades facing Healdsburg Avenue and facing Foss Creek shall have a minimum sound isolation rating of 27 Outdoor-Indoor Transmission Class or 35 Standard Transmission Class.

MM NOI-3: The project applicant shall retain a structural engineer or other appropriate professional to design means and methods of construction to be implemented during project construction to ensure the Federal Transit Administration's groundborne vibration impact criteria for adjacent land uses is not exceeded. Such methods may include restrictions on the number or types of construction equipment that may operate at a time within 50 feet of adjacent structures, restrictions on equipment hours of operation, or requirements to use alternative construction techniques such as auger cast or screw piles in lieu of driven piles. The vibration impact assessment shall be submitted to the City's Planning and Building Department staff for review and approval prior to issuance of grading permits.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. Population and Housing *Would the project:*				
a) Induce substantial 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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Analysis

The population of the City of Healdsburg as of January 2014 was estimated at 11,541 (California Department of Finance 2014).

a) Population Growth

Less than significant impact. The project would result in the creation of approximately 6 new jobs. The amount of population growth potentially associated with the creation of these jobs would be negligible. Furthermore, according to the State of California Employment Development Department, there are 13,100 unemployed people in Sonoma County, and 300 unemployed people in Healdsburg. As such, new employment may be filled by the existing unemployed population. Impacts related to direct population growth would be less than significant.

The proposed project would be an infill hotel development and would not extend roads or infrastructure. Therefore, no impacts would occur related to indirect population growth.

b) Displacement of Housing

No impact. The project site contains an existing parking lot and riparian area. No dwelling units would be displaced; therefore, no impact would occur.

c) Displacement of People

No impact. The project site contains an existing parking lot and riparian area. No people would be displaced; therefore, no impact would occur.

Mitigation Measures

No mitigation is necessary.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. Public Services *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:*				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Analysis

a) Fire Protection

Less than significant impact. The project site is located within the service area of the Healdsburg Fire Department. The Fire Department has reviewed the site plan and has not identified any issues associated with the project. The proposed hotel would not significantly increase demand for fire protection services because the project site is located within an urban, built-up area with adequate response times and infrastructure. Furthermore, the project applicant would be required to pay a Fire Impact Fee of 15 cents per square foot to offset the minimal increase in fire protection demand. The project would not substantially increase demand on the Fire Department such that new or expanded fire facilities would be required. Therefore, impacts would be less than significant.

b) Police Protection

Less than significant impact. The project site is located within the service area of the Healdsburg Police Department. The Police Department has reviewed the site plan and indicated concern regarding unauthorized access to the creekside park. Fencing has been incorporated into the project to discourage unauthorized access to both the creekside park and adjacent SMART right-of-way. The proposed hotel would not significantly increase demand for police protection services because the project site is located within an urban, built-up area with adequate response times. The project would not substantially increase demand on the Police Department such that new or expanded police facilities would be required. Therefore, impacts would be less than significant.

c) Schools

Less than significant impact. The project does not include new housing units and would not result in significant population growth due to employment opportunities. Therefore, substantial increases in school-age children would not occur. The project would not substantially increase demand on the

school services such that new or expanded facilities would be required. Impacts would be less than significant.

d) Parks

Less than significant impact. The project does not include new housing units and would not result in significant population growth due to employment opportunities. The project would not substantially increase demand on park and park services such that new or expanded facilities would be required. Furthermore, the project includes the creation of park amenities that would be available to hotel guests and employees. Impacts would be less than significant.

e) Other Public Facilities

Less than significant impact. The project does not include new housing units and would not result in significant population growth due to employment opportunities. The project would not substantially increase demand on the library services such that new or expanded facilities would be required. Impacts would be less than significant.

Mitigation Measures

No mitigation is necessary.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. Recreation				
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?	☐	☐	☒	☐
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?	☐	☒	☐	☐

Analysis

The City of Healdsburg's Community Services Department (CSD) operates and maintains a variety of parks and recreational facilities throughout the regional area. The CSD's service area is coterminous with that of the Healdsburg Unified School District (HUSD). In addition to the Healdsburg Plaza and West Plaza Parks, Villa Chanticleer, Tayman Park Golf Course, Municipal Pool, and Senior Center, there are seven neighborhood and community parks within the City, with a total park acreage of 43.32 acres. A joint use agreement with HUSD provides another 25 acres of school athletic fields available for community use. Dog parks are also provided at Badger Park and Villa Chanticleer. In addition, Sonoma County operates and maintains the Veterans Memorial Beach Park, located on the east side of the Russian River just south of Healdsburg Avenue.

The City's goal is to provide 5 acres of developed neighborhood and community parkland per 1,000 residents. The City's 2030 General Plan indicated that the City is currently deficient by almost 16 acres in meeting its goal in terms of developed neighborhood and community park acreage relative to population. In addition to a deficiency of regional park acreage, all playing fields and park buildings are regularly used to maximum capacity. However, the City has approved a 36.15-acre community park that will be constructed as part of the Saggio Hills project. The park will provide two lighted soccer fields, a multi-use field, picnic areas, basketball courts, playgrounds, a volleyball court, and a trail network that will link to off-site recreation areas and scenic overlooks.

a) Deterioration of Parks or Other Recreational Facilities

Less than significant impact. The project does not include new housing units and would not result in significant population growth due to employment opportunities. The project would not substantially increase demand on parks or other recreational facilities such that substantial physical deterioration of existing parks or other recreational facilities would occur or be accelerated. Furthermore, the project includes the creation of park amenities that would be available to hotel guests and

employees, thereby offsetting potential additional public park use. Impacts would be less than significant.

b) Expansion of Recreational Facilities

Less than significant with mitigation incorporated. The project includes the construction of a private creekside park consisting of approximately 4,000 square feet located along Foss Creek, west of the hotel. The park would be accessed by hotel guests via a footbridge. No construction or disturbance would take place within the top of bank lines. Park amenities on the west bank of Foss Creek would consist of permeable floating boardwalks, decomposed granite paving and seating areas containing artwork. A bioswales/creek restoration area would separate the boardwalk and decomposed granite areas from the top of bank line. Construction of the park has been considered throughout this document. Implementation of Mitigation Measures AIR-1, BIO 1 through BIO 6, CUL-1 through CUL-2, HAZ-1, NOI-1 and NOI-3 as provided in this document would apply to the park and its construction, as appropriate, and would ensure potential physical adverse impacts on the environment would not occur. As such, impacts would be less than significant with the implementation of mitigation indicated in this document.

Mitigation Measures

Implement Mitigation Measures AIR-1, BIO-1 through BIO-6, CUL-1 through CUL-2, HAZ-1, NOI-1, and NOI-3.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. Transportation/Traffic *Would the project:*				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

Analysis

a) Level of Service

Less Than Significant Impact.

Background

Analysis of impacts at intersections is based on the concept of Level of Service (LOS). LOS is used to rank traffic operation on various types of facilities based on traffic volumes and roadway capacity

using a series of letter designations ranging from A to F. Generally, LOS A represents free flow conditions and LOS F represents forced flow or breakdown conditions. A unit of measure that indicates a level of delay generally accompanies the LOS designation.

Goal T-A of the City of Healdsburg General Plan is for "a circulation system that is correlated with existing and proposed land use and provides for the efficient movement of people, goods, and services within and through Healdsburg." Under Policy T-A-1, the City of Healdsburg strives to maintain operation at LOS D or better during periods of peak traffic flow, and LOS C or better at off-peak times.

Project Trip Generation

The potential traffic impacts of the hotel were evaluated based on the project's trip generating potential. Using the standard rates for a Resort Hotel (LU #330) published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 9th Edition, 2012, the 39-room hotel would be expected to generate an average of 14 trips during the morning peak hour and 19 trips during the evening peak hour. Daily trip generation rates are not available for this land use, but based on the daily trip generation rate for a Hotel (LU #310), an average of 319 daily trips would be anticipated. Note that the Hotel land use assumes that there are little to no amenities on-site or within walking distance, and, therefore, the daily trips rates are likely higher than what would be anticipated for a Resort Hotel land use, which typically has on-site services or is located within walking distance of such services, as is the case with the project.

During the preparation of the City's current General Plan, this parcel was assumed to be developed with 15,246 square feet of retail space. Using rates for a Specialty Retail Center (except for the AM peak period, for which Shopping Center rates were used), the site was assumed to generate 676 new trips on a daily basis, including 15 during the AM peak hour and 41 during the PM peak hour. As shown in Table 10, the currently proposed project would generate substantially fewer trips than were assumed under General Plan buildout. Therefore, the impacts of the proposed project are adequately captured in the General Plan analysis, and, in fact, the project site would have a lesser traffic impact than was previously assumed.

Table 10: Trip Generation Comparison

Land Use	Units	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Proposed Project											
Resort Hotel	39 rms	8.17	319	0.37	14	10	4	0.49	19	8	11
As Previously Evaluated											
Retail	15.27 ksf	44.32	676	0.96	15	9	6	2.71	41	18	23
Change from Assumed		**—**	**-357**	**—**	**-1**	**1**	**-2**	**—**	**-22**	**-10**	**-12**

Notes:
rms = rooms; ksf = 1,000 square feet
Source: W-Trans 2014.

The Environmental Impact Report prepared for the 2030 General Plan Update identified future infrastructure improvements needed to maintain acceptable LOS D traffic operation with the addition of traffic associated with lands that were vacant or under-developed at the time of the analysis, including the project site. General Plan Implementation Measure T-6, which is to improve operation at the five-way intersection of Healdsburg Avenue/Mill Street/Vine Street, is currently underway with design efforts recently initiated. In accordance with General Plan Policy T-A-9, the applicant would be required to pay street and traffic control development fees to fund system-wide capacity improvements such as the Healdsburg Avenue/Mill Street/Vine Street intersection improvements.

In summary, the project is expected to generate substantially fewer trips than the use envisioned and planned for in the General Plan. The project would not exceed the City's thresholds as documented in the City Standards cited above, and would pay required street and traffic control development fees; as a result, impacts on traffic operation would be less than significant.

b) Congestion Management Program

Less than significant impact. The County of Sonoma's Congestion Management Program is contained within the 2009 Comprehensive Transportation Plan for Sonoma County. Goal 2, "Relieve Traffic Congestion", establishes the objective of reducing person-hours of delay 20 percent below 2005 levels by 2035 through strategic improvements, technology, and changes in driving habits. The project is consistent with this goal in that it locates tourists near Healdsburg Plaza, allowing access to shopping, recreation, and dining within walking distance of the hotel. Further, the trip generation associated with the project as proposed is less than what was assumed in the Healdsburg General Plan for long-range planning purposes. The project therefore contributes to reduced congestion by generating fewer trips than were assumed for purposes of establishing the infrastructure improvements needed to accommodate the traffic demand of future development. Therefore, impacts would be less than significant.

c) Air Traffic Patterns

No impact. The Healdsburg Municipal Airport is located approximately 3 miles northwest of the project site; as such, the project site is located outside of the most commonly used take-off and landing patterns of the airport. In addition, the hotel would be consistent with the height of surrounding structures and, thus, would not have the potential to interfere with aviation activities. The project would not generate or impede any air traffic patterns. Therefore, no impact would occur.

d) Design Feature or Incompatible Use

Less than significant with mitigation incorporated. Access to the project site is proposed via one driveway on Healdsburg Avenue. Sight lines along Healdsburg Avenue are generally good, which is due to the straight, flat alignment. Along the project frontage, site lines are clear due to the location of a bus stop, as well as a driveway to an adjacent property and a fire hydrant all of which prohibit parking.

The proposed driveway is designed for single-lane service and would meet all applicable codes and standards. To avoid conflicts and queuing into the street, MM TRANS-1 requires right-of-way to be assigned to inbound vehicles. Drivers exiting the parking garage would have limited visibility prior to crossing the sidewalk onto Healdsburg Avenue. To avoid vehicle/pedestrian conflicts, MM TRANS-2 requires placement of signage advising drivers to watch for pedestrians. With the incorporation of this mitigation, impacts relative to increased hazards due to site design would be less than significant.

e) Emergency Access

Less than significant impact. Under Policy T-A-12 of the City of Healdsburg General Plan, the City strives "to complete links in the existing street system to improve continuity and provide emergency vehicle access, consistent with existing neighborhood character, pedestrian safety, and subject to fiscal and physical limitations."

The project is in-fill development and, therefore, does not include or require new streets. Emergency access to the project site would be from Healdsburg Avenue. Fire suppression would likely take place from the parking lane on the street, and on-site access would therefore be unnecessary. As such, the impact on emergency access would be less than significant.

f) Public Transit, Bicycle, or Pedestrian Facilities

Less than significant impact. Goal T-D of the City of Healdsburg General plan is for "Bicycle and pedestrian routes and facilities that provide safe and convenient access and an alternative to the use of motor vehicles." Policy T-D-1 states that "The use of alternative transportation modes shall be encouraged by establishing a safe and convenient bicycle and pedestrian network interconnecting residential areas with recreation, shopping and employment areas." Goal T-E of the City of Healdsburg General plan is for "A coordinated transportation system, including efficient bus service and rail transit that provides an effective alternative to private automobile use."

Within Healdsburg, the network of bicycle facilities is growing and includes a Class I bike path along Vine and Grove Streets just west of the project site. Sidewalk facilities are complete and continuous within the downtown area. A Sonoma County Transit bus stop with a shelter is located along the project's street frontage, which contributes to the current condition wherein the sidewalk is somewhat cluttered. As proposed, the bus shelter would be incorporated into the building façade, increasing the space available for pedestrian traffic and improving conditions.

Employees of the proposed hotel would be encouraged to walk or cycle to work, and adequate bicycle storage would be provided for both employees and guests. Pedestrian access to the project would be from connections to the sidewalk located along Healdsburg Avenue, decomposed granite paths to the nearby h2hotel along the hotel's back façade, and a foot bridge connecting to the creekside park. Access to transit is available on Healdsburg Avenue directly in front of the project site.

While the project would be expected to generate pedestrian, bicycle, and transit trips, the incorporation of the bust stop into the building façade together with existing facilities for

pedestrians, bicyclists, and transit users ensures sufficient capacity is available to accommodate project-generated trips. As such, impacts to alternative transportation would be less than significant.

Mitigation Measures

MM TRANS-1 Yield signage shall be posted at the western end of the parking garage's one-way driveway to assign right-of-way to incoming traffic.

MM TRANS-2 Signage shall be posted at the eastern end of the one-way driveway warning drivers to watch for pedestrians when exiting the parking garage.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Utilities and Service Systems *Would the project:*				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) 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?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

Analysis

a) Wastewater Treatment Requirements

Less than significant impact. The sewage collection, treatment, and disposal facilities that serve the City are owned and operated by the City of Healdsburg. The City's wastewater treatment plant (WWTP) is located approximately one mile southwest of the city limits, on Foreman Lane just south of the confluence of Dry Creek and the Russian River. Through compliance with the City's waste discharge permit program, which is administered subject to the requirements and limitations of the NPDES program, as enforced by the RWQCB, the project would not result in an exceedance of wastewater treatment requirements.

According to the Healdsburg 2030 General Plan Update EIR, the WWTP has a permitted dry-weather capacity of 1.4 million gallons per day (mgd). Taking the highest dry weather flow between 2000 and 2008 (0.98 mgd) as the base year, the unused capacity available to accommodate development and growth under General Plan buildout is a minimum of 0.42 mgd. Buildout of the General Plan (inclusive of the project site) is anticipated to generate an estimated wastewater flow of 428,015 gpd (0.428 mgd). When added to the highest dry weather flow (0.98 mgd) the total sewage average flow would increase to approximately 1.41 mgd, which is less than 1 percent above the WWTP's permitted capacity. Furthermore, as indicated in the 2030 General Plan Update EIR, actual expected average dry weather flow generation would reasonably be expected to be at least 15 percent of lower (0.36 mgd), resulting in a flow of 1.34 mgd at General Plan buildout, leaving an unused WWTP capacity of 0.06 mgd. As such, sufficient treatment capacity is available and impacts would be less than significant.

b) Construction or Expansion of Water or Wastewater Treatment Facilities

Less than significant impact. As discussed in analysis a) and d) of this section, the proposed project could be readily served by the City's existing water and wastewater utilities, without the need for construction of new facilities or expansion of existing treatment facilities. Impacts would be less than significant.

c) Construction or Expansion of Stormwater Drainage Facilities

Less than significant impact. Stormwater runoff from the hotel's rooftop and exterior facilities would be conveyed via a pipe network to vegetated bioswales located on both sides of Foss Creek. The swales have been designed to mitigate the 85th percentile, 24-hour storm event. As indicated in the Hydrology Calculations and Standard Urban Stormwater Mitigation Plan (Appendix D), the project would meet the required LID standards through a combination of treatment and capture in the bioswales. The project would not contribute stormwater to the existing stormwater system in Healdsburg Avenue with the exception of stormwater from the sidewalks, which is a pre-existing condition. In summary, the existing and proposed stormwater drainage systems would be capable of accommodating stormwater runoff flows and impacts would be less than significant.

d) Water Supplies

Less than significant impact. The City of Healdsburg would serve the proposed project with potable water service, which it obtains from well fields located along the Russian River and Dry Creek. The City has the rights to 3,376 acre-feet of water per year,. The City's most recently completed 2005 UWMP indicates that the City's total demand for water in 2005 was 2,863 acre-feet, resulting in a surplus of 513 acre-feet. Development of the project site was included in the UWMP's consideration of future water demands. The UWMP indicates that sufficient water supplies are available to serve buildout of the General Plan (including the project site) through 2025.

More recent water usage rates from 2013 indicate that the City's total water demand was 2,180 acre-feet prior to accounting for losses and unmetered water use (pers. com. Brown). According to the 2005 UWMP, projected losses and unmetered water use for 2010 is 296 acre-feet and for 2015 is

312 acre-feet. The average of these numbers (304 acre-feet), was used to account for losses and umetered water use for 2013 resulting in an estimated water use of 2,484 acre-feet. Using this adjusted 2013 water usage rate, the city's resulting surplus was 892 acre-feet, which is greater than the surplus reflected for 2005 in the UWMP.

The proposed project is conservatively estimated to require approximately 4.06 acre-feet of water per year, which is well within the City's surpluses of 513 acre-feet in 2005 and 891 acre-feet in 2013. As such, no new entitlements would be needed and impacts would be less than significant.

e) Wastewater Treatment Capacity

Less than significant impact. As indicated in impact 16 a), the Healdsburg Wastewater Treatment Plant has adequate capacity to serve the proposed project. Impacts would be less than significant

f) Solid Waste Disposal Capacity

Less than significant impact. According to CalRecycle, hotels generate between 2 and 4 pounds of waste per room per day (CalRecycle 2014). Using the more conservative figure of 4 pounds, the proposed 39-room hotel would generate an estimated 156 pounds of trash per day or 28.47 tons annually. Solid waste from Healdsburg is currently transferred first to the North County Transfer Station and then transported to landfill sites located outside of Sonoma County where adequate capacity exists. Landfills outside of Sonoma County include Redwood Sanitary Landfill near Novato, Potrero Hills Sanitary Landfill near Suisun City, and Altamont Landfill near Livermore. Collectively, these disposal facilities have more than 100 million cubic yards of remaining capacity. According to the United States Environmental Protection Agency, which referenced Sonoma County's Solid Waste Management Plan, compacted mixed municipal solid waste weighs approximately 785 pounds per cubic yard. Using this multiplier, the disposal facilities can accommodate more than 39.25 million tons of waste. Impacts would be less than significant.

g) Solid Waste Statutes and Regulations

Less than significant impact. The proposed project would be served with curbside solid waste, recycling, and green waste collection service, which are standard services for commercial uses in Healdsburg. Solid waste disposal must follow the requirements of the contracted waste hauler and receiving landfill, which follow federal, state, and local regulations related to the collection and disposal of solid waste. The project would comply with all construction and operational regulations regarding waste diversion and recycling. In addition, the project would include waste reduction measures during construction and operation in support of its goal of obtaining LEED certification. Therefore, the proposed project would comply with federal, state, and local statutes and regulations related to solid waste. Impacts would be less than significant.

Mitigation Measures

No mitigation is necessary.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. Mandatory Findings of Significance				
a) Does the project have the potential to 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, 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?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Analysis

a) Does the project have the potential to 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, 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?

Less than significant with mitigation incorporated. As discussed in the preceding environmental checklist, the project may result in several impacts associated with biological resources and cultural resources that would be significant if left unmitigated. MMs BIO-1 through BIO-5, CUL-1, and CUL-2 would fully mitigate all potential impacts to levels of less than significant. With the implementation of these mitigation measures, the project would have less than significant impacts.

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)?

Less than significant with mitigation incorporated. All impacts related to air quality, biological resources, cultural resources, hazards, noise, and traffic would be reduced to less than significant after the implementation of mitigation. The General Plan EIR, which considered development of the project site, concluded that cumulative impacts of General Plan buildout would include greenhouse gas emission impacts on global climate change, traffic-related noise along some portions of Grove Street and Healdsburg Avenue, and unacceptable traffic operating conditions at the Dry Creek Road/ U.S. 101 interchange if signalization improvements are not constructed. However, given the size of the project and its impacts and mitigation measures, the incremental effects of this project are not considerable relative to the effects of past, current, and probably future projects. Therefore, the proposed project would not result in cumulatively considerable impacts. Impacts would be less than significant.

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

Less than significant with mitigation incorporated. As described throughout the preceding environmental checklist, the project would not result in substantial environmental effects on human beings. Mitigation measures are identified in this IS/MND to reduce potential significant impacts related to air quality, biological resources, cultural resources, noise, and transportation. Implementation of these mitigation measures would ensure that the project would not result in impacts that would cause substantial adverse effects on human beings, either directly or indirectly.

Mitigation Measures

Implement MMs AIR-1, BIO-1 through BIO-5, CUL-1, CUL-2, HAZ-1, NOI-1, NOI-2, NOI-3, TRANS-1, TRANS-2,.

SECTION 3: REFERENCES

Bay Area Air Quality Management District. 2010. Air Quality Guidelines. Website: www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/Draft_BAAQMD_CEQA_Guidelines_May_2010_Final.ashx?la=en. Accessed June 25, 2014.

Bay Area Air Quality Management District. 2010. Air Quality Guidelines. Website: www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/Draft_BAAQMD_CEQA_Guidelines_May_2010_Final.ashx?la=en. Accessed June 25, 2014.

Brown, Jesse. Personal Communication. Email attachment. September 15, 2014.

California Air Resources Board (ARB). 1998. The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines. Website: www.arb.ca.gov/toxics/dieseltac/factsht1.pdf. Accessed July 18, 2013.

California Air Resources Board (ARB). 1998. The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines. Website: www.arb.ca.gov/toxics/dieseltac/factsht1.pdf. Accessed July 18, 2013.

California Department of Finance. 2014. E-5 City/County Population and Housing Estimates. May.

California Department of Fish and Wildlife (CDFW). 2014a. California Natural Diversity Database (CNDDB), Wildlife and Habitat Data Analysis Branch, RareFind Version 5. Commercial version accessed July 8, 2014.

California Department of Fish and Wildlife (CDFW). 2014b. California Natural Diversity Database (CNDDB): QuickViewer. Wildlife and Habitat Data Analysis Branch, California Department of Fish and Wildlife, Sacramento, California. Website: http://www.dfg.ca.gov/whdab/html/quick_viewer_launch.html. Accessed July 8, 2014.

California Department of Transportation. 2014. "Scenic Highway System." Website: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm. Accessed June 25, 2014.

California Environmental Health Tracking Program. 2004. CEHTP Traffic Linkage Service Demonstration. Website: http://www.ehib.org/traffic_tool.jsp. Accessed June 30, 2014.

California Environmental Health Tracking Program. 2004. CEHTP Traffic Linkage Service Demonstration. Website: http://www.ehib.org/traffic_tool.jsp. Accessed June 30, 2014.

California Native Plant Society (CNPS). 2014. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society. Sacramento, California. Website: http://www.cnps.org/inventory. Accessed July 7, 2014.

CalRecycle. 2014. Service Sector: Estimated Solid Waste Generation and Disposal Rates. Website: http://www.calrecycle.ca.gov/wastechar/wastegenrates/Service.htm Accessed June 25, 2014.

City of Healdsburg. 2005. City of Healdsburg 2005 Urban Water Management Plan.

City of Healdsburg. 2007. Emergency Operations Plan.

City of Healdsburg. 2009. Healdsburg 2030 General Plan Environmental Impact Report.

City of Healdsburg. 2010. Healdsburg 2030 General Plan Background Report. Adopted by the Healdsburg City Council on July 6, 2009 (Resolution 108-2009). Amended by the Healdsburg City Council on January 4, 2010 (Resolution 3-2010).

City of Healdsburg. 2011a. Healdsburg 2030 General Plan Land Use Map.

City of Healdsburg. 2011b. Healdsburg 2030 General Plan Policy Document.

City of Healdsburg. 2014. Healdsburg Municipal Code.

Environmental Protection Agency (EPA) 550/9-79-100, November 1978.

Federal Highway Administration (FHWA). 2006. Highway Construction Noise Handbook.

Federal Transit Administration (FTA). 2006. Transit Noise and Vibration Impact Assessment, Table 9-2. May.

FirstCarbon Solutions (FCS). 2014. Preliminary Delineation of Wetlands and Other Waters of the United States. September 2014.

Harris & Lee Environmental Sciences, LLC. 2014. Underground Storage Tank Removal and Interim Remedial Action Report. June.

Institute of Transportation Engineers (ITE). 2012. Trip Generation, 9th Edition.

Mayer, K. E., and W.F. Laudenslayer, Jr. 1988. *A Guide to Wildlife Habitats of California*. State of California Resources Agency, California Department of Fish and Game. Sacramento, California. Website: http://www.dfg.ca.gov/whdab/html/wildlife_habitats.html. Accessed June 20, 2014.

Omni-means. 2010. Memorandum Re: Traffic Counts Collected. November 3.

Sonoma County. 2001. Comprehensive Airport Land Use Plan for Sonoma County.

State Water Resources Control Board. 2014. GeoTracker Query.

United States Environmental Protection Agency (EPA). 1994. Waste Prevention, Recycling and Composting Options: Lessons from 30 Communities.

United States Fish and Wildlife Service (USFWS). 2014a. Species List for Healdsburg USGS topographical 7.5-minute quadrangle. Website: http://www.fws.gov/sacramento /es_species/Lists/es_species-lists_quad-finder.htm. Accessed July 7, 2014.

United States Fish and Wildlife Service (USFWS). 2014b. Critical Habitat Data Portal. Electronic online mapping program accessed online at http://crithab.fws.gov/. Accessed July 7, 2014.

United States Fish and Wildlife Services (USFWS). 1998. California Freshwater Shrimp Recovery Plan, Region 1. July.

United States Geological Survey. 1981. Healdsburg, California, United States 7.5-Minute Topographic Quadrangle.

SECTION 4: LIST OF PREPARERS

4.1 - Lead Agency's Environmental Consultant

FirstCarbon Solutions - Environmental Consultant
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597
Phone: 925.357.2562
Fax: 925.357.2572

Project Director .....Mary Bean
Project Manager ..... Janna Waligorski
Senior Air Quality Analyst.....Elena Nuño
Intern .....Jacqueline De La Rocha
Editor/Word Processing..... Ed Livingston
GIS/Graphics ..... Karlee McCracken
GIS/Graphics ..... John DeMartino
Reprographics ..... Octavio Perez
Administrative Assistant .....Alicia Yuen

4.2 - Applicant's Technical Consultants

Whitlock & Weinberger Transportation, Inc.
490 Mendocino Avenue, Suite 201
Santa Rosa, CA, 95401
Phone: 707.542.9500
Fax: 707.542.9540

Edd Clark & Associates, Inc.
P.O. Box 3039
Rohnert Park, CA, 94927
Phone: 707.792.9500
Fax: 707.792.9504

David Baker Architects
461 Second Street, Loft c127
San Francisco, CA 941074
Phone: 415.896.6700
Fax: 415.896.6103

Andrea Cochran Architecture Landscape
2325 Third Street #210
San Francisco, CA 94107
Phone: 415.503.0060
Fax: 415.503.0070

Wilson Ihrig & Associates
6001 Shellmound Street, Suite 400
Emeryville, CA 94608
Phone: 510.658.6719
Fax: 510.652.4441