



Notice of Intent to Adopt Mitigated Negative Declaration

In compliance with Section 15072 of the Public Resources Code, notice is hereby given by the City of Healdsburg that it intends to adopt a Mitigated Negative Declaration for the following project and that the Mitigated Negative Declaration is available for public review and comment.

The Healdsburg Planning Commission will consider adoption of the Mitigated Negative Declaration on November 15, 2016 at or after 6:00 pm, in the City Council chamber located at 401 Grove Street, Healdsburg, CA. The date and time of the meeting will be posted in the Healdsburg Tribune a minimum of 10-days prior to the meeting.

Project Name: Mixed Use Project Hotel and Multi-Family (DR 2016-15; TM 2016-02; CUP 2016-12; V 2016-02)

Project Location: 110 Dry Creek Road, Healdsburg, CA; APN 089-082-030

Applicant Name and Address: Seaview Investors, LLC
3334 East Coast Highway, Ste. 410
Corona Del Mar, CA 92625

Project Description: Design Review (DR) for a 122 room hotel and 42 unit multi-family development; a Conditional Use Permit (CUP) to allow residential uses as part of a mixed use development; a Tentative Subdivision Map (TM) to divide the lot into two parcels; and a Variance (V) to allow vehicular/pedestrian bridges over Foss Creek and a portion of the hotel terrace within the 35 foot Foss Creek riparian setback.

Review Period: October 7, 2016 through November 7, 2016 (5:00 p.m.)

Identified Environmental Impacts: The City has determined that there will be no adverse environmental impacts associated with this project provided the recommended mitigation measures contained in the Mitigated Negative Declaration and Initial Study are adopted.

Location of Documents: The Initial Study, proposed Mitigated Negative Declaration and Mitigation Monitoring Program, and supporting documents are available for review at the address below and at the City's web site at www.cityofhealdsburg.org in the Environmental Documents section of the Planning and Building Department area of the web site.

Submittal of Comments: Comments may be submitted to the City of Healdsburg Planning and Building Department, 401 Grove Street, Healdsburg, CA 95448 by the end of the comment period.

For further information, contact Maya DeRosa, at 707.473.4463 or mderosa@ci.healdsburg.ca.us.

Maya DeRosa, AICP, Senior Planner
Planning & Building Department
October 7, 2016

DRAFT
Initial Study/Mitigated Negative Declaration
110 Dry Creek Road Mixed Use Project
City of Healdsburg, Sonoma County, California

Prepared for:



City of Healdsburg
Building & Planning Department
401 Grove Street
Healdsburg, CA 95448
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Report Date: October 7, 2016

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Table of Contents

Acronyms and Abbreviations	vii
Section 1: Introduction	1
1.1 - Purpose.....	1
1.2 - Project Location.....	1
1.3 - Environmental Setting	1
1.3.1 - Existing Conditions	1
1.4 - Project Description	2
1.5 - Required Discretionary Approvals.....	25
1.6 - Intended Uses of this Document.....	25
Section 2: Environmental Checklist and Environmental Evaluation	27
1. Aesthetics	28
2. Agriculture and Forestry Resources	33
3. Air Quality.....	35
4. Biological Resources	49
5. Cultural Resources.....	54
6. Geology and Soils	60
7. Greenhouse Gas Emissions	66
8. Hazards and Hazardous Materials	71
9. Hydrology and Water Quality	76
10. Land Use and Planning	85
11. Mineral Resources	87
12. Noise.....	88
13. Population and Housing	100
14. Public Services	102
15. Recreation	106
16. Transportation/Traffic.....	108
17. Utilities and Service Systems.....	122
18. Mandatory Findings of Significance	126
Section 3: References.....	129
Section 4: List of Preparers.....	131
4.1 - Lead Agency’s Environmental Consultant	131
4.2 - Technical Consultants	131
Appendix A: Air Quality and Greenhouse Gas Emission	
A.1 - Air Quality/Greenhouse Gas Emission Analysis	
A.2 - Health Risk Assessment	
Appendix B: Biological Resources Study	
Appendix C: Phase I Cultural Resources Assessment	
C.1 - Northwest Information Center Records Search Results	
C.2 - Native American Heritage Commission and Native American Correspondence	
C.3 - Site Photographs	
C.4 - Paleontological Records Search	
C.5 - AB-52 Correspondence	

Appendix D: Geotechnical Report

Appendix E: Hazards and Hazardous Materials

E.1 - Phase I Environmental Site Assessment

E.2 - Phase II Environmental Site Assessment

Appendix F: Noise Technical Memorandum

Appendix G: Traffic Impact Study

List of Tables

Table 1: Thresholds of Significance36

Table 2: Annual Construction Emissions (Unmitigated)37

Table 3: Construction Emissions (Unmitigated Average Daily Rate)38

Table 4: Unmitigated Daily Operational Emissions39

Table 5: Project Annual PM_{2.5} Construction Emissions.....42

Table 6: Exposure Assumptions for Cancer Risk.....44

Table 7: Estimated Health Risks and Hazards: Project Construction—No Mitigation.....46

Table 8: Odor Screening Distances47

Table 9: Construction Greenhouse Gas Emissions67

Table 10: Operational Greenhouse Gas Emissions (2020)69

Table 11: Traffic Noise Model Results Summary93

Table 12: Bicycle Facility Summary111

Table 13: Existing Peak-Hour Intersection Levels of Services113

Table 14: Trip Generation Summary114

Table 15: Existing and Existing plus Project Peak-Hour Intersection Levels of Service115

Table 16: Baseline Conditions and Baseline plus Project Peak-Hour Intersection Levels of Service116

Table 17: Future and Future plus Project Intersection AM and PM Peak-Hour Levels of Service118

Table 18: Urban Water Management Plan Update 2015 Planning Assumptions124

List of Exhibits

Exhibit 1: Regional Location Map	3
Exhibit 2: Local Vicinity Map, Aerial Base	5
Exhibit 3a: Site Photographs.....	7
Exhibit 3b: Site Photographs	9
Exhibit 4: Proposed Site Plan.....	11
Exhibit 5: Existing General Plan Land Use Designations	13
Exhibit 6: Grove Street Neighborhood Plan Land Use Plan Designations	15
Exhibit 7a: Hotel (Northeast Rendering)	17
Exhibit 7b: Hotel (Northwest Rendering)	19
Exhibit 8a: Multifamily Housing (West Rendering—Along Grove St)	21
Exhibit 8b: Multifamily Housing (West Rendering—Along Drive Way)	23
Exhibit 9: FEMA Flood Map	81

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ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/m ³	micrograms per cubic meter
ARB	California Air Resources Board
BAAQMD	Bay Area Quality Management District
BMP	Best Management Practice
BRA	Biological Resources Assessment
CalEEMod	California Emissions Estimator Model
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHL	California State Historic Resources Inventory
CNDDDB	California Natural Diversity Database
CO	carbon monoxide
CPHI	California Points of Historical Interest
CR	California Register of Historic Resources
CSD	Community Services Department
DPR	Department of Parks and Recreation
DTSC	California Department of Toxic Substances Control
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Agency
GMO	Growth Management Ordinance
HC	highway commercial
HRI	California State Historic Resources Inventory
HUSD	Healdsburg Unified School District
LID	Low Impact Development
LOS	Level of Service
mgd	million gallons per day
MLD	most likely descendant
MM	Mitigation Measure
mph	miles per hour
MU	mixed use
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination Systems
NR	National Register of Historic Places

Acronyms and Abbreviations

NSCAPCD	Northern Sonoma County Air Pollution Control District
NWIC	Northwest Information Center
NWP	Northwestern Pacific Railroad
PM ₁₀	particulate matter
RWQCB	Regional Water Quality Control Board
SHPO	State Historic Preservation Office
SMART	Sonoma Marin Area Rail Transportation
SR-116	State Route 116
SUSWMP	Standard Urban Storm Water Mitigation Plan
SWMPPP	Stormwater Pollution Prevention Plan
TCR	Tribal Cultural Resources
UCMP	University of California Museum of Paleontology
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VOC	volatile organic compounds
WQMP	Water Quality Management Plans
WWTP	Wastewater Treatment Plant

SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from implementation of the 110 Dry Creek Road Mixed Use Project in Healdsburg, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Healdsburg is the Lead Agency in the preparation of this IS/MND and any additional environmental documentation required for the project. This document also incorporates the Healdsburg 2025 General Plan Environmental Impact Report (EIR) by reference. The City has discretionary authority over the project. The intended use of this document is to determine the level of environmental analysis required to adequately prepare the project IS/MND and to provide the basis for input from public agencies, organizations, and interested members of the public.

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. Section 3 elaborates on the information contained in the environmental checklist, along with justification for the responses provided in the environmental checklist.

1.2 - Project Location

The 3.88-acre project site consists of one parcel Assessor's Number (Assessor's Parcel Number 089-082-030-000) located at 110 Dry Creek Road, in the City of Healdsburg, California (Exhibit 1 and Exhibit 2). The project site is bound on the north by Dry Creek Road, on the east by the inactive Northwestern Pacific Railroad, on the west by Foss Creek and a motel, and to the south by a mini-storage business. US 101 runs north to south approximately 600 feet west of the project site. Access to the project site is available via Dry Creek Road.

1.3 - Environmental Setting

1.3.1 - Existing Conditions

The project site is flat with limited topographical relief and is located approximately 127 feet above mean sea level. The project site contains four utilized structures, one vacant structure, a parking lot, and an equipment and storage yard, as shown in the site photos (Exhibits 3a and 3b). Two construction-oriented businesses operate from the site: Engelke Construction, Inc., a road construction and engineering company; and Domenichelli Masonry.

Foss Creek runs north to south, forming the western boundary of the project site, with riparian vegetation located within the 35-foot creek riparian buffer zone. Some of the existing development on the site appears to encroach in the riparian zone. Ornamental vegetation is located along Dry Creek Road and the eastern Northwestern Pacific Railroad boundary. There is a parking lot along the northern boundary on Dry Creek Road, and additional parking is located on a small portion of the western boundary along Foss Creek. Most of the site is paved.

On-site drainage runs off to existing storm drains along Dry Creek Road.

Both the City of Healdsburg General Plan and Zoning Ordinance designate the project site as “Mixed Use” (Exhibit 5). The project site is located within the Grove Street Neighborhood Plan area and is designated “Highway Commercial” (Exhibit 6).

The Northwestern Pacific Railroad (NWP) track, owned by the North Coast Railroad Authority, bounds the eastern portion of the project site. The NWP is a regional railroad dating back to the late 1800s, which served the North Coast of California. There is currently no train service on the NWP. The Foss Creek Pathway Plan, adopted by the City of Healdsburg in 2006, proposes to introduce the Foss Creek bicycle and pedestrian pathway along the historic railway right-of-way, while the Sonoma Marin Area Rail Transportation (SMART), due to come on line late 2016, would reinstate passenger use of the rail.

1.4 - Project Description

The project applicant proposes to demolish all five structures on the project site and develop a four-story, 122-room (82,330-square-foot) hotel, and 42 affordable multi-family units, with parking on the 3.88-acre site. The multi-family units would be constructed as three stories with some units on a fourth floor over a ground-level podium garage (Exhibit 4).

The four-story hotel would be located along Dry Creek Road, and would include 122 guest rooms and additional facilities. The main entrance to the hotel would include the lobby, front desk, office, lounge area, restroom, and the following facilities: meeting room, fitness room, employee lounge, laundry room, breakfast room and prep station. A bike rack and plaza area would be located near the front entrance of the hotel. The hotel guest rooms would surround an open area with the following amenities: fire pit, bocce ball, and swimming pool. Two driveways would provide access from Dry Creek Road to the hotel and its service areas as shown in Exhibit 4. The architectural renderings are depicted in Exhibits 7a, 7b, 8a, and 8b.

The multi-family units would be located on the southwest end of the project site near the setback line of Foss Creek. To provide access by way of Grove Street, the applicant is proposing both a vehicular bridge and a pedestrian bridge over Foss Creek across the southwest corner of the project site. The development will include a lobby, bicycle storage area, tot lot, picnic tables, barbeque patio, fitness center, and a total of 131 parking spaces (76 guest parking and 55 valet spaces), and the total amount of open space for the residential project is 10,019 consisting of 2,214 square feet of private open space and 7,805 square feet of common open space.

As mentioned above, a segment of the Foss Creek Pathway is planned along the Northwestern Pacific Railroad on the eastern boundary of the project site. The City is requiring that the project applicant build a portion of that bike path as part of the proposed project. This proposal would necessitate a 5-foot-tall vinyl-clad chain link fence with interwoven slats constructed between the train and the 10-foot-wide paved bike path. The barrier would be located no closer than 15 feet to the track centerline.



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



Exhibit 1 Regional Location Map

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Source: ESRI Imagery, 2014

Exhibit 2

Local Vicinity Map Aerial Base



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Photograph 1



Photograph 2



Photograph 4

Source: FirstCarbon Solutions, 2016.



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Exhibit 3a Site Photographs

CITY OF HEALDSBURG • 110 DRY CREEK ROAD
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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Photograph 7



Photograph 9



Photograph 10



Photograph 11

Source: FirstCarbon Solutions, 2016.

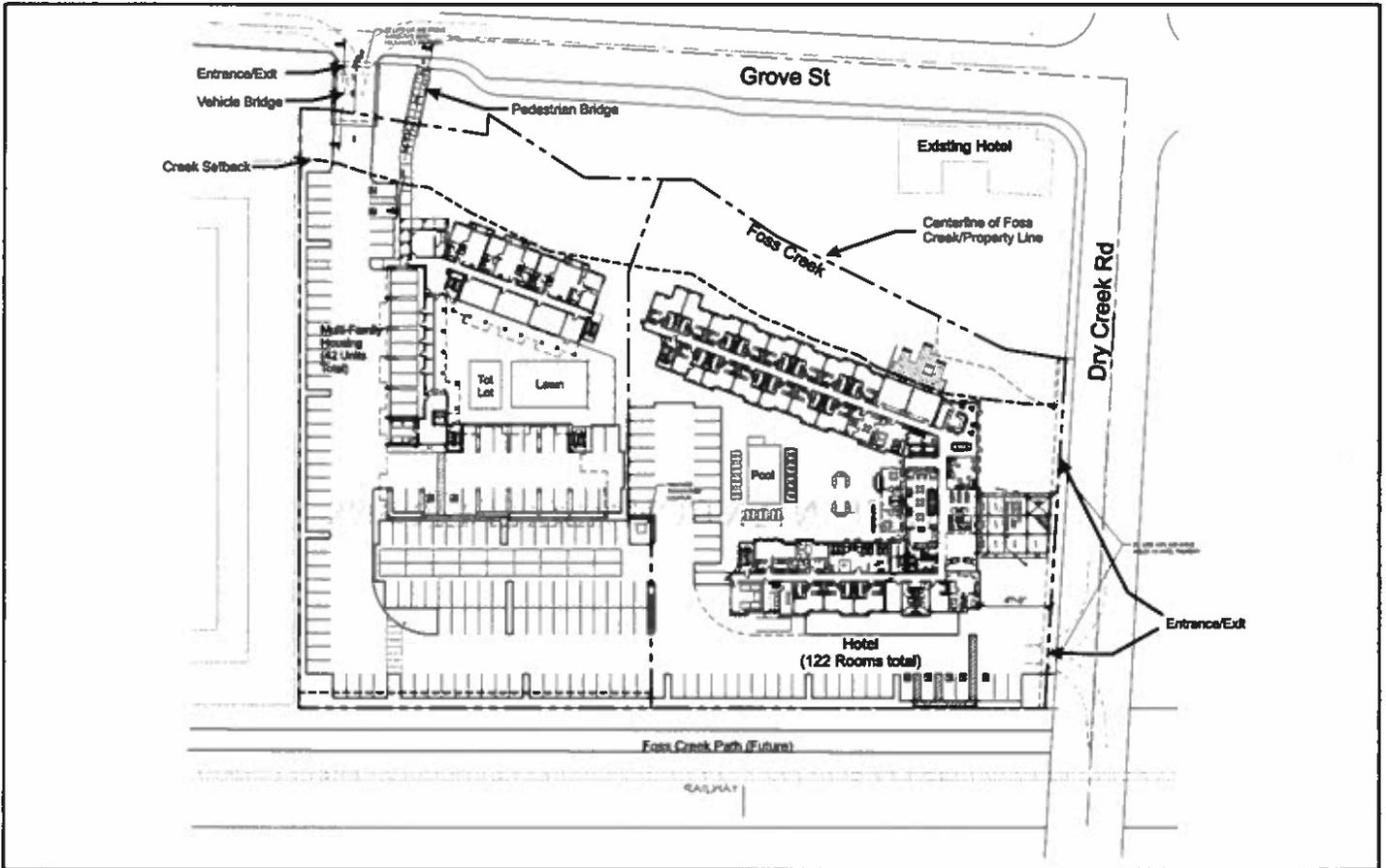


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Exhibit 3b Site Photographs

CITY OF HEALDSBURG • 110 DRY CREEK ROAD
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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Source: AXS Architecture Design, 2016

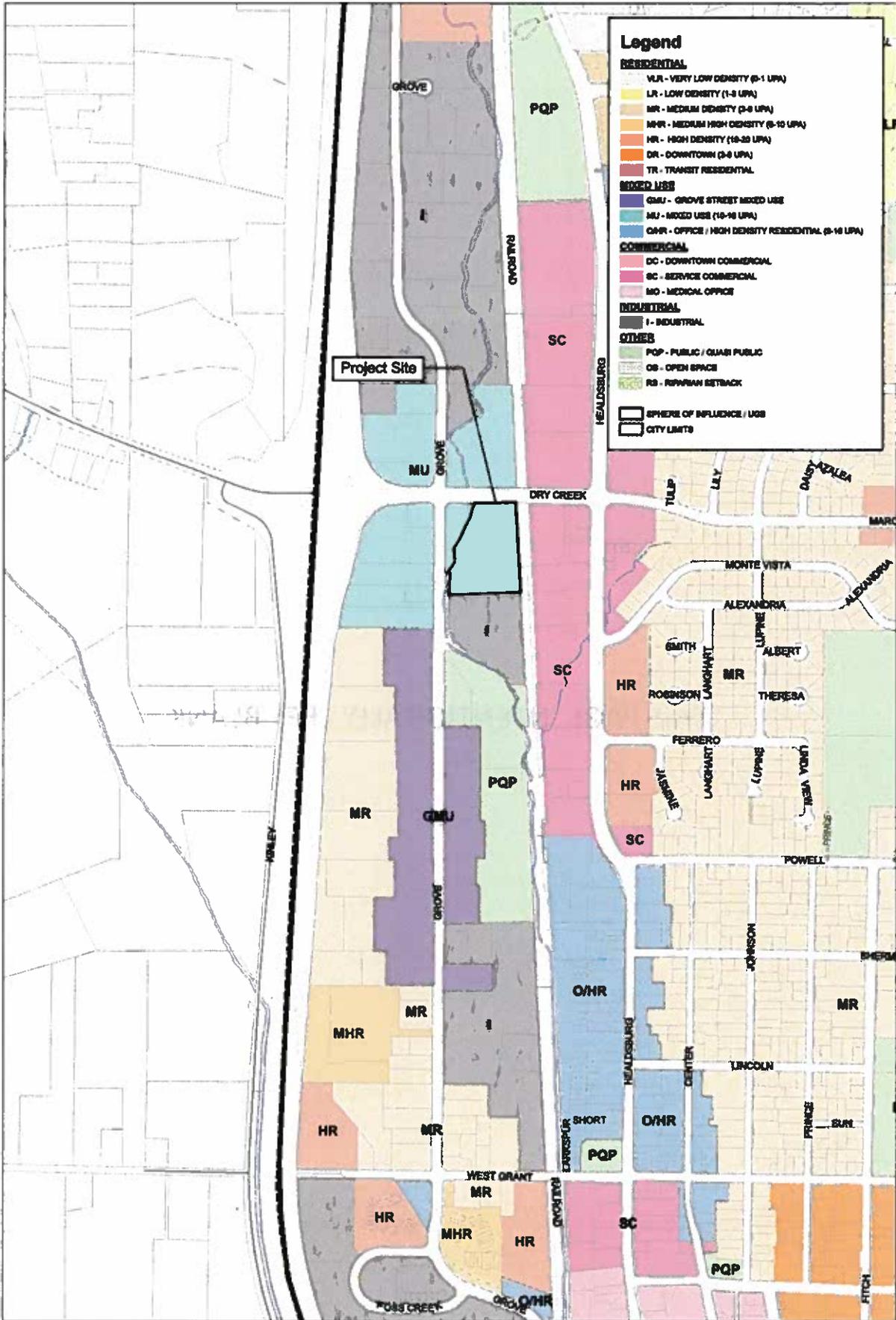


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Exhibit 4 Proposed Site Plan

CITY OF HEALDSBURG • 110 DRY CREEK ROAD
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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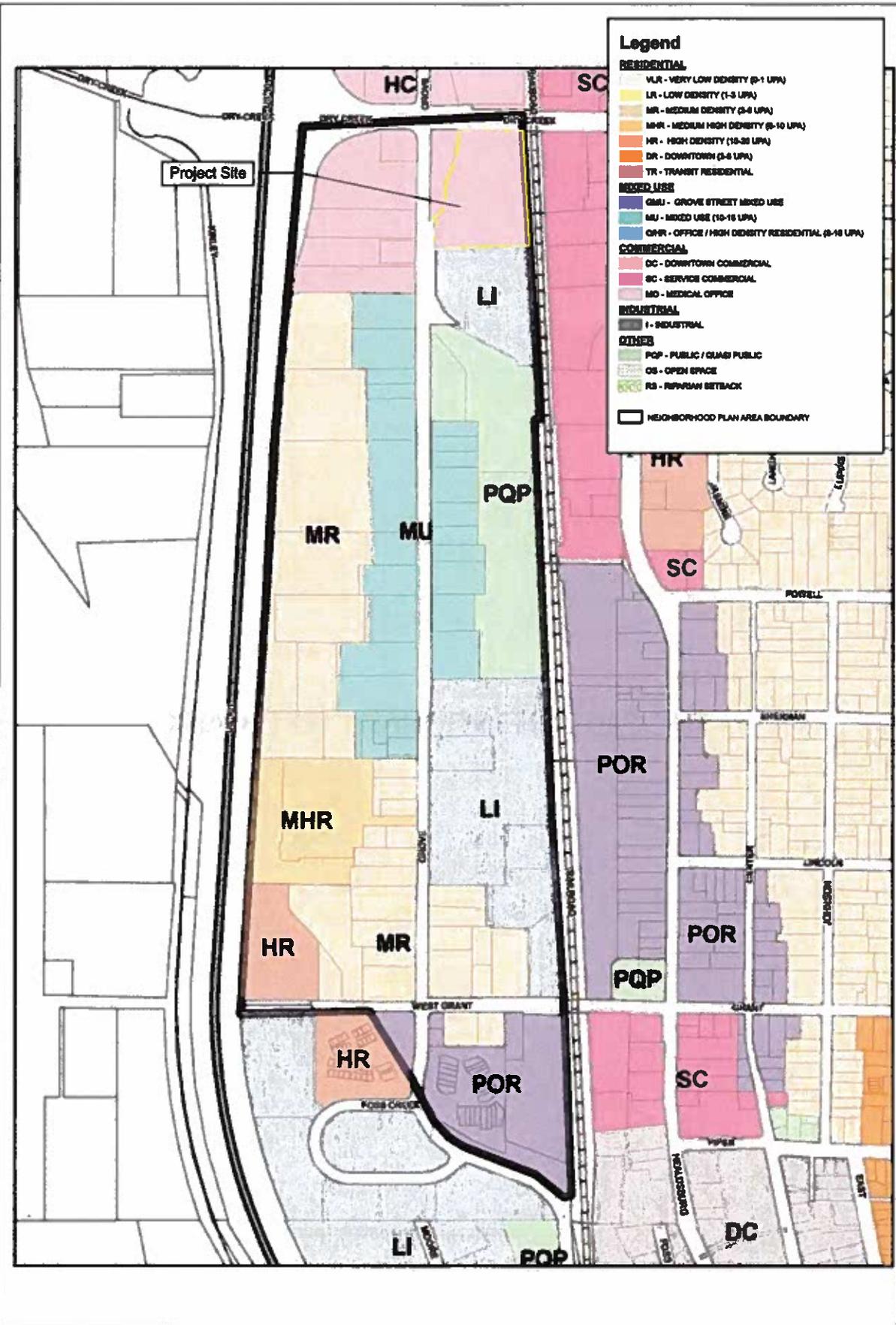


Source: City of Healdsburg 2030 General Plan, Adopted July 2009.



Exhibit 5
Existing General Plan Land Use Plan Designations

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Source: City of Healdsburg Grove Street Neighborhood Plan, 2000



Exhibit 6
Grove Street Neighborhood Plan Land Use Plan Designations

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Source: AXIS Architecture Design, 2016



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Exhibit 7A
Hotel (Northeast Rendering)

CITY OF HEALDSBURG • 110 DRY CREEK ROAD
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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Source: AXS Architecture Design, 2016



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Exhibit 7b
Hotel (Northwest Rendering)

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INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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Source: AXS Architecture Design, 2016



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Exhibit 8a Multifamily Housing (West Rendering - Along Grove St)

CITY OF HEALDSBURG • 110 DRY CREEK ROAD
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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Source: AXIS Architecture Design, 2016



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Exhibit 8b
Multifamily Housing (West Rendering - Along Drive Way)

CITY OF HEALDSBURG • 110 DRY CREEK ROAD
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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1.5 - Required Discretionary Approvals

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

- Tentative Map
- Conditional Use Permit
- Design Review
- Variance for encroachment into the City's Riparian setback (vehicle and pedestrian bridges, hotel patios and hotel terrace)

Under Municipal Code 20.08.155, the project would require a conditional use permit for the 42 dwelling units because residential uses as part of a mixed-use development are conditionally permitted by the Mixed Use zoning district.

In addition, a floodplain encroachment permit is required from the City of Healdsburg for the construction of the project.

1.6 - 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 available for a period of 30 days, during which comments concerning the analysis contained in the Draft IS/ND should be sent to:

Maya DeRosa, Senior Planner
City of Healdsburg
Building & Planning Department
401 Grove Street
Healdsburg, CA 95448
Phone: 707.431.3317
Email: mderosa@ci.healdsburg.ca.us

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

Environmental Determination

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions 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 proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a "potentially significant impact" or "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 proposed 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 proposed project, nothing further is required.

Date: 10/6/16 Signed: *Meaghan Decker*

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

Environmental Evaluation

This section provides a description of existing visual conditions near the project site and an assessment of changes to those conditions that would occur from implementation of the project. Effects of the project on the visual environment are generally defined in terms of the following: 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). The descriptions of visual resources in this section include photographs of the proposed project site that were taken during site reconnaissance performed by FirstCarbon Solutions (FCS) in May 2016.

Visual Distance Zones

The following distance zones (foreground, middle ground, and background) can be used to characterize the dominant visual character from each vantage point and describe views in terms that can be analyzed and compared. The sensitivity of views, which could be modified by the proposed project, are defined in order to establish thresholds for the analysis of potential visual impacts resulting from the implementation of the project.

Foreground Views. These views include elements that can be seen at a close distance and dominate the entire view. Sensitive viewer groups, such as surrounding residents, workers, pedestrians, or regular motorists are most impacted by modified views at this distance.

Middle Ground Views. These views include elements that can be seen at a middle distance and that partially dominate the view. A sensitive viewer group would consider these impacted views potentially adverse.

Background Views. Although background views are part of the overall visual composition of the view, these views include elements that are seen at a long distance and typically do not dominate the view. A sensitive viewer group would consider these impacted views potentially adverse.

Regional Setting

The project is located in Sonoma County, in the City of Healdsburg. The City of Healdsburg is located in a small, flat valley running roughly north to south following the Russian River, and is surrounded by gently rolling hills covered with oak trees, grassland, and other vegetation. US 101 provides both northbound and southbound views of the City. Views northbound consist of the Russian River approaching two old truss bridges with the Fitch Mountain and Mayacama Mountain in prominent view in the background. Views of the surrounding foothills and open space areas, such as community separators, agricultural lands, creeks, and woodlands are scenic values experienced from a number of public vantage points throughout the City.

Visual Setting

The semi-rectangular project site is located along the east side of Grove Street, south of Dry Creek Road, west of Healdsburg Avenue, and east of US 101. For the visual analysis, the local study area corresponds to those land uses and residences that currently have views of the site. Foreground views of the project site include the second-largest waterway in the City of Healdsburg, Foss Creek. The project is visible driving west on Dry Creek Road, but would not block foreground views of the hill and redwood trees. As one approaches the project site from US 101, middle grounds views include open space remnants of agricultural land to the north and a Travel Lodge to the west that is three stories tall. East of the site on Dry Creek Road, one can view foothills and Fitch Mountain in the background. Fitch Mountain is recognized as a Scenic Resource in the City of Healdsburg General Plan. However, the proposed Project would not obscure views of the mountain. The Northwestern Pacific Railroad borders the eastern boundary of the project site and extends throughout the City of Healdsburg. Background views have scenic value that can be experienced from a number of public vantage points through the City. Background views include surrounding foothills and open space community separators, including agricultural lands, creeks, and woodlands.

The project is within the Grove Street Neighborhood Plan, which includes an approximately 104-acre area and contains about 70 properties. The plan is intended to provide a well-organized planning framework that maintains or enhances the neighborhoods' existing character. The project must adhere to the policies set forth by both the General Plan and the Grove Street Neighborhood Plan. The project is also within the Healdsburg Design Review Manual District 4—Dry Creek Road Area. The Review Manual describes the design standards for this area in the following way: "District 4 includes Dry Creek Inn and Adel's restaurant as well as older industrial and commercial uses along Dry Creek Road from the freeway to Healdsburg Avenue. The key issue in this district is for establishing a quality visual image for the city freeway entry while still accommodating commercial freeway development. A framework for establishing a coherent image would include generous

landscape frontage for all new developments. New landscape design should take cues from the existing off-ramp landscape. Regular street tree planting should be introduced to visually tie this area to Healdsburg Avenue. Signage should be of monument type not to exceed 8 feet in height and must be located to provide vision clearance for traffic. Sign materials should be consistent with those of the building. Well-designed directional and informational signage should be introduced to inform the freeway traveler of other services and destinations within the City and the region” (37).

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

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 has designated several ridgelines in the General Plan as scenic resources; however, the project would not obstruct views of ridgelines identified in the General Plan (IV.B-9). Fitch Mountain sits to the east of the project site and is a known Scenic Resource. The Russian River is mostly visible from bridges and parks that front the River and views are relatively limited within the City.

The proposed buildings would be four stories tall at their highest point. The proposed dwellings are similar in scale, size, and building height to dwellings in surrounding land uses, including the adjacent Travelodge. As mentioned in the project description, the City is requiring that the project applicant build a portion of the Foss Creek Pathway as part of the proposed project. This proposal would necessitate a 5-foot-tall vinyl-clad chain link fence constructed between the train and the 10-foot wide bike path. The barrier would be located no closer than 15 feet to the track centerline. Existing views would not be blocked by the proposed development or the Pathway. Therefore, impacts would be less than significant.

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

Less than significant 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. State Route 116 (SR-116) is one of the two designated Scenic Highways in Sonoma County. SR-12 is the second designated highway, located approximately 16 miles south of the project site.

The City of Healdsburg General Plan designates US 101 and various segments of Healdsburg Avenue as scenic roads within the city limits. The project’s setback, building heights, massing, orientation, color, building materials, and landscaping will not be visible from US 101, so there is less than a significant impact to this scenic highway. Healdsburg Avenue is located 0.13 mile east of the project site, but, as mentioned previously in the project specifications, the project would not block or change views of Healdsburg Avenue. The project would be consistent with the General Plan and would have a less than significant impact on scenic resources such as rock outcroppings, trees, or historic buildings within view from a scenic highway.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than significant impact with mitigation incorporated. The Grove Street Neighborhood Plan area has a semi-rural character with various historic homes exhibiting architectural styles ranging from the

late 19th to early 20th century. Residential developments near the project site in the Grove Street neighborhood incorporate mature landscaping, large trees, and a variety of architectural styles.

The proposed design attempts to match the existing character, streetscape, and surrounding developments but would be taller than the characteristic residential buildings. The proposed hotel would be four stories tall with a lower massing of three stories along Dry Creek Road, while the multi-family housing would be up to four stories tall. Both buildings would be set back from the street to limit the visual impact of the buildings. Balconies would be included on the fourth floor units of the hotel to provide additional relief in the massing.

Eldorado Stone would be used as a stone veneer at the base of both buildings to create a rustic texture. Cement plaster would be used as the main building material, with selective use of board and batten to create architectural rhythm. The proposed color palette for the hotel and multi-family housing uses earth tones that complement the building design... The design plan attempts to ensure the architectural design for the proposed hotel and multi-family housing fits within the suburban and rural wine country style in this area of Healdsburg.

The project's landscape design will be compatible with the building architecture. At the hotel, landscape plantings, canopy shade structures, and benches for public use would be provided along the sidewalk on Dry Creek Road. The plant palette for the project would consist of low-water-use, drought-tolerant native or adaptive trees: shrubs, ground covers, and vines. Existing oak, willow, and ash trees along Foss Creek would be retained, and landscape practices would be in keeping with the Russian River Friendly Landscape Guidelines. New shade trees, such as Coast Live Oak, would be planted throughout the site. As mentioned above, the City is requiring that the project applicant build a portion of the Foss Creek Pathway as part of the proposed project. The Foss Creek Pathway Plan establishes guidelines to ensure the pathway is visually harmonious with the railroad and surrounding land uses.

Pursuant to the Healdsburg Land Use Code LUC Section 20.28.105(B), the project would need to undergo design review for compliance with design guidelines enumerated in the Grove Street Neighborhood Plan and Healdsburg Design Review Manual. Compliance with the design standards would minimize the appearance of uniformity and encourage variety in architectural details and styling. Mixed-use in the Grove Street Neighborhood Plan Area would be visually compatible with and subordinate to existing and future adjoining residential uses.

Mitigation Measure (MM) AES-1 requires this review and ensures that the project would not substantially degrade the visual character of the project site or its surroundings. Impacts would be less than significant with the incorporation of this mitigation.

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

Less than significant impact. The proposed project would develop 42 units of multi-family housing and 122 hotel rooms. The project site currently contains four utilized structures and one vacant structure that do not generate substantial daytime or nighttime lighting. Therefore, new sources of

light and glare caused by the development could be intrusive. The new sources of light would include interior and exterior lighting for decorative and security purposes. There would be two parking lot lights along Grove Street: one at the northern end of the parking lot and one at the southern end. These parking lot lights would have LED light fixtures with the ability to be dimmed, which would be in accordance with using low illumination fixtures along Grove Street, which is laid out in the Circulation Plan of the Grove Street Neighborhood Plan. In addition, the trees along Foss Creek would help shield surrounding land uses from the ambient light produced by the proposed project. Therefore, the project would not create a substantial new source of light in the area that would adversely affect views, and impacts would be less than significant.

Mitigation Measures

- MM AES-1** Require that the design of the hotel and multi-family development be reviewed by the Planning Commission to ensure compatibility with the scale and materials of the surrounding land uses in compliance with the City's Design Review Guidelines.
- MM AES-2** Prior to issuance of grading permits for the project, the Applicant shall provide a streetscape lighting plan for lighting along Dry Creek Road for the City of Healdsburg to review and approve. The Plan shall include provisions to ensure that outdoor lighting is designed so that potential glare or light spillover to surrounding roadways and land uses is minimized through appropriate site design and shielding of light fixtures. The City will review the streetscape lighting plan to ensure that all lighting is directed downward and away from residences. This mitigation measure does not preclude the use of small-scale decorative lighting that may be directed upward, such as wall wash lighting or spot lighting for landscaping. This type of lighting is allowed if it does not spill over onto adjacent properties.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>2. Agriculture and Forestry Resources <i>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.</i> Would the project:</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

- 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?**

No impact. The project site is currently developed containing four utilized structures and one vacant structure, a parking lot, and an equipment and storage yard. The northern portion of the site is predominately covered with asphalt, while the southeastern and southwestern surficial soils consist

of native clayey soils and gravel fill, respectively. The topsoil within the site consists of sand, composted organic matter, and clay.

The California Department of Conservation's Farmland Mapping and Monitoring Program designates the project as "Urban and Built-Up" land, which is a non-agricultural designation. Therefore, development of the project would not convert Important Farmland to non-agricultural use and no impacts would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No impact. The project site is zoned "Mixed Use," which is a non-agricultural zoning designation. The California Department of Conservation's Farmland Mapping and Monitoring Program designates the project as "Urban and Built-Up" land, which is a non-agricultural designation. The land is not encumbered by a Williamson Act contract. Therefore, the project would not conflict with existing agricultural zoning or with a Williamson Act contract, and no impacts would occur.

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))?

No impact. The project site is zoned "Mixed Use," which is a non-forest zoning designation. The California Department of Conservation's Farmland Mapping and Monitoring Program designates the project as "Urban and Built-Up" land, which is a non-forest designation. Therefore, no impacts would occur.

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

No impact. The project site is currently developed containing four utilized structures and one vacant structure, a parking lot, and an equipment and storage yard. Therefore, the site is not considered suitable forestry land. This condition precludes the possibility of the loss of forest land. Therefore, no impacts would occur.

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?

No impact. The project site is currently developed containing four utilized structures and one vacant structure, a parking lot, and equipment and storage yard. The project site is not considered suitable forestry land. This condition precludes the possibility of the loss of forestland. Therefore, no impacts would occur.

Mitigation Measures

No mitigation measures are required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
3. Air Quality <i>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.</i> <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

The analysis in this section is based, in part, on the California Emissions Estimator Model (CalEEMod) analysis completed by FirstCarbon Solutions (FCS). The modeling data is provided in its entirety in Appendix A. Where available, the significance criteria established or recommended by the North Sonoma County Air Pollution Control District were used to make the following determinations. The Northern Sonoma County Air Pollution Control District has not adopted standards of significance for operational activities and instead suggests the use of the BAAQMD thresholds and mitigation measures. The thresholds of significance are shown below in Table 1. In developing thresholds of significance for air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Project construction and operational impacts are assessed separately below.

Table 1: Thresholds of Significance

Pollutant	Construction Thresholds Average Daily Emissions (lbs/day)	Operational Thresholds	
		Average Daily Emissions (lbs/day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀ (exhaust)	82	82	15
PM _{2.5} (exhaust)	54	54	10

Source: BAAQMD 2010.

The CEQA evaluation process addresses the following criteria.

Would the project:

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

No Impact. The project is located in the North Coast Air Basin, where air quality is regulated by the North Sonoma County Air Pollution Control District. The Air Basin is in attainment for all federal and state ambient air quality standards. Therefore, the North Sonoma County Air Pollution Control District is not required to prepare or implement an air quality plan. There is no applicable air quality plan. As such, no impacts would occur.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less than significant impact with mitigation incorporated. This impact relates to localized criteria pollutant impacts. Potential localized impacts would be exceedances of state or federal standards for oxides of nitrogen (NO_x), particulate matter (PM₁₀ and PM_{2.5}), or carbon monoxide (CO). PM₁₀ and PM_{2.5} are of concern during construction because of the potential to emit exhaust emissions from the operation of off-road construction equipment and 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. NO_x emissions are of concern because of potential health impacts from exposure to NO_x emissions during both construction and operation and as a precursor in the formation of airborne ozone. Reactive organic gases (ROG) emissions are also important because of their participation in the formation of airborne ozone. Ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and that can cause substantial damage to vegetation and other materials. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, elderly, and young children. Construction and operational emissions are discussed separately below.

Construction Emissions

During construction, fugitive dust (PM₁₀ and PM_{2.5}) 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. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from this source. Exhaust emissions would also be generated from the operation of the off-road construction equipment, as shown in Table 2.

Construction of the project was assumed to begin in January of 2017 and conclude in February of 2018. The construction schedule utilized in the analysis represents a “worst-case” analysis scenario since emission factors for construction equipment decrease as the analysis year increases, due to improvements in technology and more stringent regulatory requirements. Therefore, construction emissions would decrease if the construction schedule moves to later years. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA guidelines. As shown in Table 3, the construction emissions for all years are well below the recommended thresholds of significance. The project would implement MM AIR-1 as recommended by the BAAQMD. As such, the dust control measures described above and best management practices (BMPs) that reduce fugitive dust emissions from the construction equipment shall be incorporated as MM AQ-1 to further reduce potential impacts. Therefore, the project would have a less than significant impact.

Table 2: Annual Construction Emissions (Unmitigated)

Construction Phase	Tons/Year			
	ROG	NO _x	PM _{2.5} (Exhaust)	PM ₁₀ (Exhaust)
2017				
Demolition	0.04	0.44	0.02	0.02
Site Preparation	0.01	0.13	0.01	0.01
Grading	0.01	0.14	0.01	0.01
Building Construction (2017)	0.50	3.49	0.21	0.20
2017 Total Emissions	0.56	4.20	0.25	0.23
2018				
Building Construction (2018)	0.01	0.04	<0.01	<0.01
Paving	0.02	0.13	0.01	0.01
Architectural Coating	2.71	0.02	<0.01	<0.01
2018 Total Emissions	2.73	0.19	0.01	0.01
Total Construction Emissions	3.30	4.39	0.26	0.24
Notes: ROG = reactive organic gases NO _x = oxides of nitrogen PM ₁₀ = particulate matter 10 microns in diameter PM _{2.5} = particulate matter 2.5 microns in diameter Calculations use unrounded numbers. Source: CalEEMod Output (see Appendix A).				

Table 3: Construction Emissions (Unmitigated Average Daily Rate)

Parameter	Air Pollutants			
	ROG	NO _x	PM ₁₀ ¹	PM _{2.5} ¹
Total Emissions (tons/yr)	3.2971	4.3876	0.2571	0.2407
Total Emissions (lbs/yr)	6,594	8,775	514	481
Average Daily Emissions (lbs/day) ²	22.1	29.3	1.7	1.6
Significance Threshold (lbs/day)	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No

Notes:
¹ Exhaust only
² Calculated by dividing the total lbs by the total 299 working days of construction for the duration of construction (2017-2018).
 Calculations use unrounded totals.
 lbs = pounds ROG = reactive organic gases NO_x = oxides of nitrogen
 PM₁₀ = particulate matter 10 microns in diameter
 PM_{2.5} = particulate matter 2.5 microns in diameter
 Source: CalEEMod Output (see Appendix A).

The BAAQMD considers any project’s construction emissions to be less than significant if the following measures are implemented:

- Water all active construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
- Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

MM AQ-1 During construction activities, the following air pollution control measures shall be implemented:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered with non-potable water two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

- All roadways, driveways, and sidewalks shall be paved as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The Northern Sonoma County Air Pollution Control District’s phone number shall also be visible to ensure compliance with applicable regulations.

Operational Emissions

As previously discussed, the pollutants of concern include ROG, NO_x, PM₁₀, and PM_{2.5}. The project operational emissions for the respective pollutants were calculated using the California Emissions Estimator model (CalEEMod.2013.2.2). In order to provide the most conservative estimate, 2018 was used as the operational year for all phases. For reasons previously discussed, the BAAQMD Criteria Air Pollutant Significance thresholds were used. The operational emissions were modeled for summer and winter seasons. The results for winter were the highest and are presented in Table 4. The unmitigated daily operational emissions would be less than significant.

Table 4: Unmitigated Daily Operational Emissions

Emissions Source	Pounds per Day			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Area	6.33	0.04	0.05	0.05
Energy	0.20	1.78	0.14	0.14
Mobile	7.92	15.31	5.50	1.58
Total	14.44	17.13	5.69	1.77
Thresholds of Significance	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No
Notes: ROG = reactive organic gases NO _x = nitrous oxides PM ₁₀ = particulate matter 10 microns or less in diameter PM _{2.5} = particulate matter 2.5 microns or less in diameter Source: Source: CalEEMod Output (see Appendix A).				

Carbon monoxide. The CO emissions from traffic generated by the project are a concern at the local level. Congested intersections can result in high, localized concentrations of CO.

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).

As indicated in Section 16, Transportation, a congestion management plan is not applicable to the project. No intersections impacted by the project experience intersection traffic volumes of 44,000 vehicles per hour. According to the Traffic Impact Study for the 110 Dry Creek Road Mixed Use Project, the intersection of Dry Creek Road and Grove Street will experience the highest cumulative peak-hour traffic volumes among the intersections impacted by the project, with 2,778 vehicles per hour during the PM peak hour (W-Trans 2016). Therefore, the proposed project would not exceed the CO screening criteria. Furthermore, the adjacent roadways are not located in an area where vertical or horizontal mixing is substantially limited. Therefore, based on the above criteria, the project would have a less than significant impact related to CO.

- 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)?**

Less than significant impact with mitigation incorporated. The North Coast Air Basin (Air Basin) is in attainment for federal standards for criteria pollutants. The Air Basin is in non-attainment for the state standard for 24-hour PM₁₀. However, the Sonoma County portion of the Air Basin has been designated as being in attainment of the state PM₁₀ standards since 2006.

Construction Emissions

Emissions from construction-related activities are generally short-term in duration but may still cause adverse air quality impacts. The project would generate emissions from construction equipment exhaust, worker travel, and fugitive dust. These construction emissions include criteria air pollutants from the operation of heavy construction equipment. As provided in the discussion of Impact 3b) the project's construction emissions would not exceed any significance threshold adopted for this project after application of mitigation. Therefore, the project would have a less than significant cumulative impact during construction.

Operational Emissions

Operational pollutants of concern include ROG, NO_x, CO, and particulate matter (PM₁₀ and PM_{2.5}). As provided in the discussion of Impact 3b) the project's operational emissions would not exceed any significance threshold adopted for this project after application of mitigation. Therefore, the project would have a less than significant cumulative impact during operation.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. A sensitive receptor is defined as the following: "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." The project site is bound on the north by Dry Creek Road, on the east by the inactive Northwestern Pacific Railroad, on the west by Foss Creek and a motel, and on the south by industrial land uses. There are residential and commercial buildings adjacent to the project, of which the closest residences are located approximately 347 feet southwest from the southern boundary of the project site. Other residential areas are located to the east of the project across Healdsburg Avenue.

Construction Period Toxic Air Contaminant Impacts

Construction-period toxic air contaminant (TAC) emissions could contribute to increased health risks to nearby residents. While BAAQMD does not provide a screening level to determine whether small projects can be assumed to be below significance thresholds, recent technical memoranda prepared for similar projects in the BAAQMD state that industry experience indicates significant impacts are not usually seen unless residential projects include approximately 200 or more dwelling units (Lamphier-Gregory 2014).

The proposed project would implement the BAAQMD BMPs through the implementation of MM AQ-1. This includes requirements for reduced idling time and proper equipment maintenance for diesel equipment, which would reduce emissions from this equipment and therefore would reduce potential impacts to nearby receptors. Residents located adjacent to the project site and within the vicinity would be exposed to construction contaminants only for the duration of construction.

An assessment was made of the potential health impacts to surrounding sensitive receptors resulting from the emissions of TACs during construction. TACs are air pollutants present in miniscule amounts in the air that, if a person is exposed to them, could increase the chances of experiencing health problems. Exposures to TAC emissions can have both chronic long-term (over a year or longer) and acute short-term (over a period of hours) health impacts. The TACs of greatest concern are those that cause serious health problems or affect many people. Health problems can include cancer, respiratory irritation, nervous system problems, and birth defects. Some health problems occur very soon after a person inhales a TAC. These immediate effects may be minor, such as watery eyes; or they may be serious, such as life-threatening lung damage. Other health problems may not appear until many months or years after a person's first exposure to the TAC. Cancer is one example of a delayed health problem.

Fine particle pollution or PM_{2.5} describes particulate matter that is 2.5 micrometers in diameter and smaller—one-thirtieth the diameter of a human hair. Fine particle pollution can be emitted directly

or formed secondarily in the atmosphere. PM_{2.5} health impacts are important because their size can be deposited deeply in the lungs causing respiratory effects.

For purposes of this study, exhaust emissions of PM_{2.5} are represented as diesel particulate matter (DPM), a major component of PM_{2.5}. Studies indicate that DPM poses the greatest health risk among airborne TACs. 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 long-term health risk. DPM differs from other TACs in that it is not a single substance but a complex mixture of hundreds of substances. Although DPM is emitted by diesel-fueled, internal combustion engines, the composition of the emissions varies, depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present. Unlike the other TACs, however, no ambient monitoring data are available for DPM because no routine measurement method currently exists. The California Air Resources Board (ARB) has made preliminary concentration estimates based on a DPM exposure method. This method uses the ARB emissions inventory's PM₁₀ database, ambient PM_{2.5} monitoring data, and the results from several studies to estimate concentrations of DPM.

In addition to the DPM (as exhaust PM_{2.5} emissions), the construction of the project would also result in emissions of fugitive dust primarily from earth-moving activities. During grading, in particular, the project would require involve the demolition of existing structures from the project site and the removal of materials from the project site that would generate fugitive dust. Fugitive dust emissions were also included in this assessment. The health risk significance thresholds adopted for this assessment were derived from the BAAQMD significance thresholds as the Northern Sonoma County APCD has not adopted health risk thresholds. These thresholds are:

- Cancer Risk: 10 in one million
- Non-cancer Hazard Index: 1.0
- Annual PM_{2.5}: 0.3 µg/m³

Estimation of DPM (as PM_{2.5} Exhaust) and PM_{2.5} Fugitive Dust Emissions

The PM_{2.5} construction emissions were estimated using the CalEEMod Land Use Emission Model (Version 2.13.2.2). Table 5 summarizes the unmitigated annual construction emissions of PM_{2.5}.

Table 5: Project Annual PM_{2.5} Construction Emissions

Year	On-site DPM (as PM _{2.5} Exhaust) (tons/year)	On-site PM _{2.5} Fugitive Dust ⁽¹⁾ (tons/year)	Off-site DPM (as PM _{2.5} Exhaust) (tons/year)	Off-site PM _{2.5} Fugitive Dust (tons/year)	Total PM _{2.5} (tons/year)
Annual Construction Emissions (No Mitigation)					
2017	0.224	0.018	0.007	0.032	0.281
2018	0.013	0.000	0.0001	0.001	0.014
Note: ⁽¹⁾ On-site PM _{2.5} fugitive dust emissions assumes incorporation of Mitigation Measure MM AIR-1, Best Management Practices Source: see Attachment A to this report.					

Air Dispersion Modeling

An air dispersion model is a mathematical formulation used to estimate the air quality impacts at specific locations (receptors) surrounding a source of emissions given the rate of emissions and prevailing meteorological conditions. The air dispersion model applied in this assessment was the EPA AERMOD air dispersion model that is approved by the BAAQMD for air dispersion assessments. Specifically, the AERMOD model was used to estimate levels of TACs at sensitive receptor locations from the project's construction PM_{2.5} exhaust and PM_{2.5} fugitive dust emissions. The use of the AERMOD model provides a refined methodology for estimating construction impacts by utilizing long-term measured, representative meteorological data for the project site and a representative construction schedule.

Four emission sources were used to represent the project's PM_{2.5} construction emissions. One source represented the generation of on-site construction DPM emissions (as PM_{2.5} exhaust) from the off-road construction equipment while a second source was used to represent the project's construction PM_{2.5} fugitive dust emissions. Both sources were assumed to each cover the entire construction area of approximately 3.4 acre. The emissions from the exhaust source was assumed to be emitted at a height of 5 meters above ground to account for the top of the equipment exhaust stack where the emissions are released to the atmosphere and the increase in the height of the emissions due to its heated exhaust. The emissions from the fugitive source were assumed to be released from a height of 1 meter above ground. Two additional emission sources were included to account for the off-site DPM (as PM_{2.5}) emissions and paved road dust from worker, haul truck, and vendor truck vehicles. The off-site vehicle emissions were represented in the AERMOD model as line volume sources with a release height of 3.7 meters for the DPM vehicles and 1 meter for the paved road dust. Construction vehicles were assumed to travel from the project site along Dry Creek Road to US101. Construction was assumed to take place on an 8-hour-per-day/5-day-per-week basis for the years 2017 and 2018.

Receptor locations within the AERMOD model were placed at locations of existing residences surrounding the project. The air dispersion model assessment used meteorological data from the Santa Rosa Airport for the time period of 2009 to 2014.

Estimation of Cancer Risks

The BAAQMD has developed a set of guidelines¹ for estimating cancer risks that provide adjustment factors that emphasize the increased sensitivities and susceptibility of young children to exposures to TACs. These adjustment factors include age-sensitivity weighting factors, age-specific daily breathing rates, and age-specific time-at-home factors. The recommend method for the estimation of cancer risk is shown in the equations below with the cancer risk adjustment factors provided in Table 6 for various sensitive/residential receptors (infant, child, and adult) over the construction time period.

$$\text{Cancer Risk} = C_{\text{DPM}} \times \text{Inhalation Exposure Factor}$$

¹ BAAQMD 2016. Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines. Website: http://www.baaqmd.gov/~media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines_clean_jan_2016.pdf?la=en.

Where:

Cancer Risk = Total individual excess cancer risk defined as the cancer risk a hypothetical individual faces if exposed to carcinogenic emissions from a particular source for specified exposure durations; this risk is defined as an excess risk because it is above and beyond the background cancer risk to the population; cancer risk is expressed in terms of risk per million exposed individuals.

C_{DPM} = Period average DPM air concentration calculated from the air dispersion model in $\mu\text{g}/\text{m}^3$

Inhalation is the most important exposure pathway to impact human health from DPM and the inhalation exposure factor is defined as follows:

$$\text{Inhalation Exposure Factor} = \text{CPF} \times \text{EF} \times \text{ED} \times \text{AAF}/\text{AT}$$

Where:

CPF = Inhalation cancer potency factor for the TAC: 1.1 (mg/kg-day)⁻¹ for DPM

EF = Exposure frequency (days/year)

ED = Exposure duration (years)

AAF = set of age-specific adjustment factors that include age sensitivity factors (ASF), daily breathing rates (DBR), and time at home factors (TAH)—see Table 6.

AT = Averaging time period over which exposure is averaged (days)

Table 6: Exposure Assumptions for Cancer Risk

Receptor Type	Exposure Frequency		Exposure Duration (years)	Age Sensitivity Factors (ASF)	Time at Home Factor (TAH) (%)	Daily Breathing Rate (DBR) ⁽¹⁾ (l/kg-day)
	Hours/day	Days/year				
Sensitive/Residential—Infant						
3 rd Trimester	24	350	0.25	10	85	361
0–2 years	24	350	1	10	85	1,090
Sensitive Receptor—Child						
3–16 years	24	350	1	3	73	572
Sensitive Receptor—Adult						
> 16 years	24	350	1	1	72	261
<p>Notes:</p> <p>⁽¹⁾ The daily breathing rates recommended by the BAAQMD for sensitive/residential receptors assume the 95th percentile breathing rates for all individuals less than 2 years of age and 80th percentile breathing rates for all older individuals.</p> <p>(l/kg-day) = liters per kilogram body weight per day</p> <p>Source: BAAQMD 2016. Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines. Website: http://www.baaqmd.gov/~media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines_clean_jan_2016-pdf.pdf?la=en</p>						

Estimation of Non-Cancer Hazards

An evaluation of the potential non-cancer effects of chronic chemical exposures was also conducted. Adverse health effects are evaluated by comparing the annual receptor concentration of each chemical compound with the appropriate reference exposure limit (REL). Available RELs promulgated by the California Office of Environmental Health Hazards Assessment (OEHHA) were considered in the assessment.

To quantify non-carcinogenic impacts, the hazard index approach was used.

$$HI = C_{ann}/REL$$

Where:

HI = chronic hazard index

C_{ann} = annual average concentration of TAC as derived from the air dispersion model ($\mu\text{g}/\text{m}^3$)

REL = reference exposure level above which a significant impact is assumed to occur ($\mu\text{g}/\text{m}^3$)

The hazard index assumes that chronic sub-threshold exposures adversely affect a specific organ or organ system (toxicological endpoint). For each discrete chemical exposure, target organs presented in regulatory guidance were used. To calculate the hazard index, each chemical concentration or dose is divided by the appropriate toxicity reference exposure level. For compounds affecting the same toxicological endpoint, this ratio is summed. Where the total equals or exceeds 1, a health hazard is presumed to exist. For purposes of this assessment, the TAC of concern is DPM for which the OEHHA has defined a REL for DPM of $5 \mu\text{g}/\text{m}^3$. The principal toxicological endpoint assumed in this assessment was through inhalation.

Estimation of $\text{PM}_{2.5}$ Hazards

The BAAQMD has included significance thresholds for $\text{PM}_{2.5}$ from recent studies that show health impacts from exposure to this pollutant. The construction emissions of $\text{PM}_{2.5}$ incorporated into this assessment included both DPM (as $\text{PM}_{2.5}$ exhaust) and $\text{PM}_{2.5}$ fugitive dust.

Estimates of Health Risks and Hazards from Project Construction

The estimated health and hazard impacts at the maximum impacted sensitive receptor from the project's construction emissions are provided in Table 7. The maximum impacted sensitive receptor (MIR) was found at an existing residence located approximately 200 meters (660 feet) southeast of the project across Healdsburg Avenue. As noted from Table 7, the project's construction DPM emissions would not exceed the cancer risk significance thresholds adopted for this assessment at the maximum impacted sensitive receptors and thus would not result in a significant impact to nearby sensitive receptors during construction.

Table 7: Estimated Health Risks and Hazards: Project Construction—No Mitigation

Source	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index ⁽²⁾	Annual PM _{2.5} Concentration (µg/m ³)
Risks and Hazards at the Maximum Impacted Sensitive Receptor (MIR): Infant ⁽¹⁾	7.4	0.01	0.05
Risks and Hazards at the Maximum Impacted Sensitive Receptor (MIR): Child ⁽¹⁾	0.9	0.01	0.05
Risks and Hazards at the Maximum Impacted Sensitive Receptor (MIR): Adult ⁽¹⁾	0.1	0.01	0.05
BAAQMD Significance Threshold	10	1	0.30
Exceeds Individual Source Threshold?	No	No	No
Notes: ⁽¹⁾ Maximum impacted sensitive receptor is a residence located approximately 200 meters (660 feet) southeast of the project across Healdsburg Avenue. ⁽²⁾ Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as PM _{2.5} exhaust) by the REL of 5 µg/m ³ . Source: Attachment A.			

Project as a Receptor

The project is locating new sensitive receptors (residents) that could be subject to existing sources of TACs. However, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* concluded that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project’s future users or residents. Therefore, impacts from existing sources of TAC emissions on sensitive receptors in the project are not subject to CEQA.

e) Create objectionable odors affecting a substantial number of people?

Less than significant impact. As stated in the BAAQMD 2010 Air Quality Guidelines, odors are generally regarded as an annoyance rather than a health hazard and the ability to detect odors varies considerably among the populations and overall is subjective.

The BAAQMD does not have a recommended odor threshold for construction activities. However, BAAQMD recommends screening criteria that are based on distance between types of sources known to generate odor and the receptor. For projects within the screening distances, the BAAQMD has 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 Table 3-3 [of the BAAQMD’s guidance].

The BAAQMD's 2010 Air Quality Guidelines provide a table with odor screening distances recommended by BAAQMD for a variety of land uses. Projects that would site an odor source or a receptor farther than the applicable screening distance, shown in Table 8, would not likely result in a significant odor impact.

Table 8: Odor Screening Distances

Land Use/Type of Operation	Project Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Metal Smelting Plants	2 mile
Source: BAAQMD, 2010.	

Project Construction

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 therefore would not create objectionable odors affecting a substantial number of people. As such, construction odor impacts would be less than significant.

Project Operation

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not contain land uses typically associated with emitting objectionable odors.

Off-site land uses may impact residents on the project site. The City of Healdsburg 2025 General Plan EIR (2009) discusses potential odor impacts within the City. It indicates that there are two

potential odor sources known to exist within the City: the Healdsburg Landfill and the Healdsburg Transfer Station.

The Healdsburg Landfill is located approximately 1.7 miles northeast from the project site; however, the landfill has not been operational since 1995. The Healdsburg Transfer station is directly adjacent to the Healdsburg Landfill, also approximately 1.7 miles northeast of the project site. The transfer station is not located within the 1-mile screening distance. According to the City's General Plan EIR, despite the high odor potential from both facilities, no objectionable odors were detected during a series of site visits by consultants in 2008. Multiple residences are located within 1,000 feet of both the landfill and the transfer station. The project is located over 8,500 feet from these facilities, which is further than the aforementioned residences. As such, it can be reasoned that the landfill and transfer station would not have a substantial odor impact on the project. Therefore, the project would not place sensitive receptors near a location of substantial objectionable odor, and operational odor impacts would be less than significant.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Biological Resources <i>Would the project:</i>				
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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

This section evaluates potential effects on biological resources that may result from project implementation. Descriptions and analysis in this section are based on results from the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB) and the United States Fish and Wildlife Service (USFWS) database searches (as cited in Appendix A), the reconnaissance-level biological survey and Biological Resources Assessment (BRA) completed by FCS.

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 Game or U.S. Fish and Wildlife Service?**

Less than significant impact with mitigation incorporated. The project site consists of approximately 3.88 acres of urban developed land, with a border of riparian habitat along Foss Creek at the western boundary of the site. The site's property line follows the center line of Foss Creek. A 35-foot setback along the creek is imposed by the city to prevent construction adjacent to the creek. Although construction of patios and an outdoor terrace will encroach on the setback area, there is no existing riparian vegetation in that area. No special-status plant and wildlife species have been determined to be likely to occur on-site, primarily because of the absence of suitable habitat. However, construction activities could disturb nesting and breeding birds in trees and shrubs near the construction site, specifically the riparian habitat along Foss Creek.

Potential impacts on special-status and migratory birds that could result from the construction and operation 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. Impacts on special-status bat species could result from increased noise due to project construction and operation, or through a reduction of habitat. If these species were found to be present, impacts to these species would be significant. MM BIO-1a would reduce impacts to federally listed species, and to migratory and nesting raptors protected under the Migratory Bird Treaty Act (MBTA) to less than significant.

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

Less than significant impact with mitigation incorporated. The project proposes the development of a vehicular bridge and a pedestrian bridge across Foss Creek on the southwest corner of the site.

Riparian Habitat

Sensitive habitats include those that are of special concern to resource agencies and those that are protected under CEQA, Section 1600 of the California Fish and Game Code, or Section 404 of the Clean Water Act. Riparian habitats are also considered to be a sensitive natural community under CEQA. The riparian habitat associated with Foss Creek, which borders the site to the west, is considered a sensitive community.

Project activities may result in the loss of riparian habitat from proposed vegetation disturbance or removal; disrupted reproduction depending on the time of year construction occurs; alteration or loss of canopy cover from proposed vegetation trimming; noise, light, dust, and ground vibration during construction; and possible increased sedimentation into the ephemeral drainages resulting from fill material inadvertently entering the waterway. Construction of the two bridge crossings over Foss Creek could result in significant impacts to the riparian habitat if no mitigation is incorporated. The project is currently seeking a Streambed Alteration Agreement with the CDFW for

the construction of the bridges. Therefore, implementation of MM BIO-2 concurrent with the 1602 Streambed Alteration Agreement would reduce potential impacts to the riparian habitat to less than significant.

The proposed project would also be developed in a manner consistent with both City of Healdsburg regulations requiring a 35-foot setback from streams with riparian vegetation and/or aquatic life, and with the Healdsburg 2030 General Plan. As discussed above, an encroachment permit for patios and an indoor terrace will allow some construction within the 35-foot setback in an area where no riparian habitat currently exists because it was developed prior to the City's implementation of the setback. 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.

- 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?**

Less than significant impact with mitigation incorporated. As stated above implementation of MM BIO-2 concurrent with a 1602 Streambed Alteration Agreement and a Section 404 permit from the United States Army Corps of Engineers (USACE) would reduce impacts to less than significant.

- 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?**

Less than significant impact with mitigation incorporated. The project site contains developed and disturbed land, and the surrounding area consists of light commercial use, agricultural, and urban developments. Special status plant and wildlife species have been determined unlikely to be found on-site. However, Foss Creek may support the movement of special status species. Compliance with the federal and state regulations related to the protection of migratory fish and wildlife species along with the proposed General Plan policies that protect biological resources (Policy PS-D-2; Policy NR-2; Policy S-C-3) would reduce impacts to less than significant. MM BIO-2 would reduce impacts to these species to less than significant.

As discussed in impact BIO-1, the project may have adverse effects on nesting birds and raptors, including special-status birds and species protected under the Migratory Bird Treaty Act (MBTA). Impacts to these species would be potentially significant. Implementation of MM BIO-1 would reduce these impacts to less than significant.

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

Less than significant impact with mitigation incorporated. Implementation of the project would conflict with applicable city policies and ordinances protecting biological resources, as identified in

the previous impact discussions regarding special-status species and riparian vegetation; this is a potentially significant impact.

Although there are no trees within the project development site, construction of a vehicular bridge and a pedestrian bridge across Foss Creek could result in the removal of trees on the property. Therefore, the project is subject to the Heritage Tree Protection Requirements from the City's Municipal Code Chapter 20.24 (City of Healdsburg 2015) for trees that are at least a diameter of 30 inches measured 2 feet above ground level. Removal of trees in riparian habitat would result in a significant impact. Implementation of MM BIO-3 would reduce these impacts to less than significant.

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?**

No impact. The project site is not located in an area covered by an adopted habitat conservation plan. Therefore, the project would result in no impact related to conservation plans.

Mitigation Measures

MM BIO-1 Migratory Birds and Nesting Raptors

1. If construction or tree removal is proposed during the breeding/nesting season for local avian species (typically March 1 through August 31), a focused survey for active nests of raptors and migratory birds within and in the vicinity of (no less than 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 one (1) week apart, with the second survey occurring no more than two (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, the United States Fish and Wildlife Service and/or the California Department of Fish and Wildlife (as appropriate) shall be notified regarding the status of the nest. Furthermore, construction activities shall be restricted 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 or alteration of the construction schedule.

MM BIO-2 1602 Streambed Alteration Agreement and Section 404 permit from the United States Army Corps of Engineers

If impacts to riparian and other sensitive natural communities are not avoidable, and on-site preservation is not possible, then habitat compensation shall be required at a 1:1 impact preservation ratio.

The Applicant shall prepare and implement a riparian vegetation mitigation and monitoring plan for disturbed riparian habitat. The plan shall include:

- On-site and/or off-site location(s) for replacement shrubs and trees.
- Protection measures for replacement shrubs and trees that shall ensure that 80 percent of replacement plantings are alive three years following site revegetation.
- Monitoring measures, including construction monitoring, by a qualified biologist, arborist, or ecologist.

Timing/Implementation: Prior to and during construction activities.

MM BIO-3 Ordinance-Protected Trees

Prior to issuance of a grading permit, a qualified arborist shall conduct a tree survey within the proposed construction area, prior to ground-disturbing activities, to identify trees that would be removed or potentially affected by the proposed project and trees that can be avoided. If the qualified arborist determines that project construction will require the removal of protected trees, then, in accordance with the Healdsburg Zoning Ordinance Section 18105, the project applicant shall file a Heritage Tree Removal Permit Application for the removal of heritage trees. For heritage trees that will not be removed as part of the project but may still be impacted through encroachment and development of project infrastructure, the tree protection procedures as outlined in the County of Sonoma Code of Ordinances, Section 26-88-10 (m).

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
5. Cultural Resources				
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Setting

This section describes the existing cultural resources setting and potential effects from project implementation on the project site and its surrounding area. Descriptions and analysis in this section are based on information provided by the California Native American Heritage Commission (NAHC), Northwest Information Center (NWIC), National Register of Historic Places (NR), CR, California Historical Landmarks list, California Points of Historical Interest list, California State Historic Resources Inventory, the UCMP Paleontological Database, and a pedestrian survey of the site conducted by FirstCarbon Solutions (FCS). The record search results, NAHC correspondence, historic and paleontological reports and pedestrian survey photographs are provided in Appendix C.

Northwest Information Center

To determine the presence or absence of cultural and historical resources within the proposed project area and a 0.5-mile radius, FCS conducted a records search at the Northwest Information Center (NWIC) in Rohnert Park for the project area on May 5, 2016. The current inventories of the National Register of Historic Places (NR), the California Register of Historic Resources (CR), the California Historical Landmarks list (CHL), the California Points of Historical Interest (CPHI) list, and the California State Historic Resources Inventory (HRI) for Sonoma County were reviewed to determine the existence of previously documented local historical resources.

Results from the NWIC indicate that four resources (P-49-002834, P-49-004258, P-49-004382, and P-49-004752) are on file within a 0.5-mile radius of the project area. All four resources are historic buildings and structures, none of which lie within the proposed project area. No prehistoric cultural resources have been recorded within a 0.5-mile radius of the project location. In addition, twelve

area-specific survey reports (S-010496, S-013217, S-016018, S-022666, S-022736, S-022739a, S-022736b, S-023732, S-028098, S-031737, S-031737a, and S-045474) are on file with the NWIC for the 0.5-mile search radius. While none of these surveys addressed the project area directly, adjacent parcels to the north, east, and west have been extensively surveyed for cultural resources. NWIC records search results may be found in Appendix C-1.

Native American Heritage Commission (NAHC)

On May 5, 2016, FCS sent a request to the Native American Heritage Commission (NAHC) to review its sacred lands file search and to provide a list of Native American Representatives who may be interested in providing additional information on potential Tribal Cultural Resources (TCR's) within the project area. On May 12, 2016, a response was received from the NAHC indicating that no sacred sites were listed as present in the project area. The letter included a list of five Native American representatives. Letters including a map and project details were sent to all five representatives on June 13, 2016. On July 5, 2016, FCS received a letter from the Dry Creek Rancheria Band of Pomo Indians asking to be contacted with regards to the project. On August 2, 2016, FCS Senior Archaeologist Dana DePietro, contacted Reg Elgin, Tribal Historic Preservation Officer by telephone. Mr. Elgin stated that the purpose of his letter was to obtain additional information about the proposed project. After discussing the proposed project, he asked that the original letter and location map be re-sent to him by e-mail, and stated that he would be in touch if necessary. This was done following the telephone conversation on August 2, 2016. As of this date, no response from Mr. Elgin or any of the other Native American representatives have been received. Correspondence with the NAHC, an example letter sent to the five Native American representatives, and correspondence with the Dry Creek Rancheria Band of Pomo Indians may be found in Appendix C-2. The City mailed letters to the five tribal contacts to inform them of the project and the opportunity to consult on October 6, 2016, pursuant to Public Resources Code Sections 21080.3.1 and 21080.3.2 (AB 52). Those letters are copied in Appendix C-5.

Pedestrian Cultural Resources Survey

FCS Senior Archaeologist Dana DePietro, PhD surveyed the project area for cultural resources on May 5, 2016. The project site is rectangular in shape and is bound by Dry Creek Road to the north, the Northwestern Pacific Railroad to the east, a large storage facility to the south, and Foss Creek, the Healdsburg Travelodge and Grove Street to the west. Foss Creek forms the property line to the west. The property is subject to the City's 35-foot creek setback, although the area within the setback is mostly developed or paved except for the area immediately adjacent to the creek. The majority of the site is fully developed, consisting of paved parking lots, gravel-bedded staging areas for construction equipment, and three modern buildings that contain offices, maintenance and storage facilities. All sections of the project site were surveyed using 15-meter north-south transects to insure complete coverage. Survey conditions were documented using digital photographs and field notes. During the survey, Dr. DePietro examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass,

metal, ceramics). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected.

Much of the project area was found to be either paved with asphalt or covered with imported gravel and crushed cement. The project site is highly disturbed due to construction activities, and no native soils were visible within the project site except a narrow band of riparian vegetation along the banks of Foss Creek. Particular attention was paid to the western boundary of the project area that runs parallel to Foss Creek, as natural water sources typically exhibit a higher probability of cultural sensitivity. No historic or prehistoric cultural resources or raw materials commonly used in the manufacture of tools (e.g., obsidian, Franciscan chert) were found within the project site or along the banks of Foss Creek. Survey photographs may be found in Appendix C-3.

UCMP Paleontological Records Search

On May 15, 2016, consulting paleontologist Kenneth Finger, PhD, performed a records search on the University of California Museum of Paleontology (UCMP) database for the 110 Dry Creek Road Project. The project lies within the geologic map of Blake et al., (2002), which indicates that the search area lies entirely on Quaternary alluvium.

The UCMP database was first searched for Quaternary (Pleistocene-Holocene) localities in Sonoma County, and it yielded 10 vertebrate localities in unnamed Pleistocene alluvium. A subsequent search on the Glen Ellen Formation found one locality (V90056 (Rincon Valley West) in a conglomerate questionably assigned to the unit and which yielded horse teeth of late Pleistocene (Rancholabrean) age. None of these 11 localities are close to or within the half-mile buffer zones (dashed circles on map) for the project sites. A copy of Dr. Finger's report may be found in Appendix C-4.

Impacts Evaluation

- a) **Would the project cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?**

Less than significant impact with mitigation incorporated. The results of the NWIC records search show that four historic resources lie within 0.05 mile of the project site; however, all lie beyond the boundaries of project site and will not be affected by the proposed project. Furthermore, historic maps, records, aerial photographs and an intensive pedestrian survey failed to reveal any documented buildings, structures, or other historic resources within the project area itself. For these reasons, the potential for the proposed project to have an adverse effect on known historic resources is considered low.

While unlikely, subsurface construction activities always have the potential to damage or destroy previously undiscovered historic and prehistoric resources. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, implementation of MM CUL-1 will be required to reduce potential impacts to historic resources that may be discovered during project construction. With the incorporation of mitigation, impacts associated with historic resources would be less than significant.

b) Cause a substantial adverse change in the significance of an archaeological or Tribal Cultural Resource (TCR) pursuant to §15064.5 or Public Resources Code 21074?

Less than significant impact with mitigation incorporated. Records search results from the NWIC indicate that no known archaeological resources exist within the project site or any of the previously surveyed parcels immediately adjacent to the project area. No prehistoric cultural resources have been recorded within the 0.5-mile search radius, and no Tribal Cultural Resources (TCRs) were identified as part of the NAHC Sacred Lands File search or through subsequent outreach and correspondence with Native American representatives. An intensive pedestrian survey of the project site and adjacent stretch of Foss Creek conducted by FCS on May 5, 2016 also failed to identify additional archaeological resources or raw materials traditionally utilized in the production of those resources.

The project site is therefore considered to have moderate to low sensitivity for undiscovered archaeological resources, and no archaeological resources are expected to be encountered during construction activities associated with the proposed project. However, it is always possible that subsurface excavation activities may encounter previously undiscovered archaeological resources. Such resources could consist of but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Accordingly, this is a potentially significant impact. Implementation of MM CUL-1 would ensure that this potential impact is reduced to a less-than-significant level.

c) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?

Less than significant impact with mitigation incorporated. Dr. Finger's report concluded that a preconstruction paleontological survey of the site is not recommended because the site consists of flat terrain that is heavily disturbed. Paleontological monitoring of construction activities is not recommended at this time because the Quaternary alluvium is not differentiated as the non-fossiliferous Holocene or the potentially fossiliferous Quaternary alluvium is not differentiated as the non-fossiliferous Holocene or the potentially fossiliferous Pleistocene, and no fossils have been recorded from the area. The potential, therefore, for the proposed project to have an adverse effect on paleontological resources is considered low.

Although not anticipated, sub-surface construction activities associated with the proposed project, such as grading and trenching, could result in a significant impact to paleontological resources, if encountered. Paleontological resources may include but are not limited to fossils from mammoths, saber-toothed cats, rodents, reptiles, and birds. Accordingly, implementation of MM CUL-2 will be required to reduce potential impacts to paleontological resources that may be discovered during project construction. With the incorporation of mitigation, impacts associated with paleontological resources would be less than significant.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant impact with mitigation incorporated. No human remains or cemeteries are known to exist within or near the project area. However, there is always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. Accordingly, this is a potentially significant impact. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. In the unlikely event human remains are discovered, implementation of MM CUL-3 would reduce this potential impact to a less than significant level.

MM CUL-1 In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until an archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology has evaluated the situation. The Applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. The archaeologist shall make recommendations concerning appropriate measures that will be implemented to protect the resource, 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 during construction within the project site shall be recorded on appropriate Department of Parks and Recreation (DPR) 523 forms and will be submitted to the City of Healdsburg, the Northwest Information Center, and the State Historic Preservation Office (SHPO), if required.

MM CUL-2 In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The project contractor shall notify a qualified paleontologist to examine the discovery. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If the Applicant determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Healdsburg for review and approval prior to implementation, and the Applicant shall adhere to the recommendations in the plan.

MM CUL-3 In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance within 100 feet of the remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the most likely descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.
2. Where the following conditions occur, the landowner or his or her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project site in a location not subject to further subsurface disturbance:
 - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission.
 - The descendant identified fails to make a recommendation.
 - The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

Additionally, California Public Resources Code Section 15064.5 requires the following relative to Native American Remains:

- When an initial study identifies the existence of, or the probable likelihood of, Native American Remains within a project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code Section 5097.98. The applicant may develop a plan for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American Burials with the appropriate Native Americans as identified by the Native American Heritage Commission.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Geology and Soils <i>Would the project:</i>				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

The City of Healdsburg is located in the northern Sonoma County, in the central portion of the Russian River watershed. The region is 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) **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.**

Less than significant impact. The geologic maps reviewed in the Preliminary Geotechnical Investigation determined that no active faults are present on the project site and that there is little risk of fault-related ground rupture during earthquakes.

The closest active faults to the project site are Healdsburg, Rodgers Creek, and the Maacama Faults Zone (southern extension). The maximum moment magnitudes of the nearest faults are 6.4, 7.3, and 7.4, respectively. The Healdsburg Fault is the nearest known active fault and is located approximately 1.2 miles east of the site (Caltrans 2014). According to literature reviews and field explorations, there is no evidence of existing faults or previous ground displacement on the site due to fault movement. Therefore, the likelihood of ground rupture at the site due to faulting is considered to be low and impacts would be less than significant.

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

Less than significant impact with mitigation incorporated. There are no known or potentially active faults that traverse the site, and the project site is not located within an Alquist-Priolo Earthquake Fault Zone. However, the project would be located within seismically active Northern California, putting the entire area at risk of adverse effects due to strong seismic ground shaking. Strong ground shaking would likely occur at the project site during an earthquake, and there would be a strong potential for ground shaking, due to the proximity of active faults in the region.

The City of Healdsburg General Plan has determined that the City has a 27 percent chance or higher of a large magnitude, 6.7 or higher, earthquake occurring along the Healdsburg-Rodger Creek fault or the Hayward fault in the next 30 years (General Plan EIR IV.G-11). The potential severity of ground shaking depends on many factors, including distance from the originating fault, the earthquake magnitude, and the nature of the subsurface materials. A 122-room hotel and 42 affordable multi-family units would be developed as part of the project. As such, these structures would be susceptible to strong seismic ground shaking.

All new structures would be required to conform to the seismic design parameters of the 2013 California Building Code. All proposed development would be required to adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. Compliance with building regulations and implementation of MM GEO-1 would reduce potential impacts to less than significant.

iii) **Seismic-related ground failure, including liquefaction?**

Less than significant impact with mitigation incorporated. Liquefaction and densification are phenomena associated with loose, cohesionless sands and gravels subjected to ground shaking during earthquakes and can result in unacceptable total and/or differential settlements. In accordance with the Association of Bay Area Governments interactive liquefaction susceptibility map, the site is considered to have moderate susceptibility to liquefaction during or immediately following a significant seismic event.

Soils on the project site consist of loose, silty sand and sandy silt layers. Results from the Preliminary Geotechnical Investigation show that the sandy and silty clays are moderately prone to liquefaction. The layers of silty sand and sandy silt layers were encountered at a depth of 13.5 to 14.5 feet and 15.5 to 17 feet below the existing ground surface. Liquefactions of thin layers could cause up to a 1 inch of total settlement and 0.5 inch differential settlement. These layers are fairly thin and should not settle at the surface resulting in a moderate liquefaction potential.

Because of the moderate liquefaction potential, the foundation would need to be designed to accommodate settlement as defined by the Preliminary Geotechnical study, as described in MM GEO-2. In addition, all new structures would be required to conform to the seismic design parameters of the 2013 California Building Code. All proposed development would be required to adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. Compliance with building regulations and implementation of MM GEO-1 and MM-GEO-2 would reduce potential impacts to less than significant.

iv) **Landslides?**

Less than significant impact with mitigation incorporated. The majority of the project site is relatively level with minor grade variation. The project site is not located in the State-designated earthquake induced landslide zone. According to the General Plan, no landslides have been mapped at or near the project site. Additionally, the site is located in a relatively stable area, due to low slope inclinations.

According to the Preliminary Geotechnical Report, the project site is bordered by a drainage channel to the west, and the steep banks of Foss Creek are vulnerable to slope instability and sloughing due to erosion. According to the General Plan, new buildings are required to be set back at least 35-foot setback from the top of the bank, which is described in MM-GEO 3. Impacts would be less than significant with mitigation incorporated.

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

Less than significant impact with mitigation incorporated. Short-term construction activities could potentially result in substantial soil erosion or loss of topsoil. Construction activities (including clearing, grading, trenching, and excavation), while minor, could instigate or accelerate soil erosion or the loss of topsoil. During the construction phase, high winds, rainfall, or other storm events could contribute to erosion impacts. As such, the project would be constructed in accordance with the National Pollutant Discharge Elimination Systems (NPDES) Permit. Compliance with the NPDES Permit would include a Water Quality Management Plans (WQMPs), Stormwater Pollution Prevention Plans (SWPPPs), and implementation of BMPs aimed at reducing on-site soil erosion and the loss of on-site topsoil. Therefore, impacts would be less than significant.

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?

Less than significant impact with mitigation incorporated.

Landslides

As stated above, the project site is located in a relatively stable area, due to its flat elevation. Therefore, landslides are unlikely to occur. The project site is bordered on the west by Foss Creek and, according to the Preliminary Geotechnical Report, “the steep creek banks are susceptible to slope instability and slighting due to erosion” (10). The General Plan designates Foss Creek to have a 35-foot setback to reduce the potential impacts of landslides, and this requirement is included in MM GEO-3. The Preliminary Geotechnical Report recommends a 20-foot setback, but MM GEO-3 would require the observance of the 35-foot setback as required by the General Plan. Therefore, with implementation of MM GEO-3, potential impacts would be reduced to less than significant.

Lateral Spreading

Lateral spreading is horizontal/lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water. Typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. The majority of the project site is relatively level with minor grade variation. However, the project site is bordered to the west by Foss Creek, which is a geological feature that is associated with lateral spreading. Implementation of MM GEO-3, which requires a 35-foot setback would reduce potential impacts to less than significant.

Subsidence

Land subsidence is a gradual settling or sudden sinking of the Earth’s surface owing to subsurface movement of earth materials. Subsidence is most often attributed to human activity, mainly from the removal of subsurface water. Other principal causes of subsidence are aquifer system compaction, drainage of organic soils, underground mining, hydrocompaction, natural compaction, sinkholes, and thawing permafrost. The project site contains four utilized structures, one vacant structure, a parking lot, and equipment and storage yard. The existing uses on the project site

include a road construction and engineering company, and a masonry yard. There have been no known on-site activities that required the removal of subsurface waters or drainage activities, which would have made the site susceptible to subsidence. Therefore, impacts associated with subsidence would be less than significant.

Liquefaction

As mentioned previously, in accordance with the Association of Bay Area Governments interactive liquefaction susceptibility map, the site is considered to have moderate susceptibility to liquefaction during or immediately following a significant seismic event.

Because of the moderate liquefaction potential, the foundation would need to be designed to accommodate settlement as defined by the Preliminary Geotechnical study, as described in MM GEO-2. In addition, all new structures would be required to conform to the seismic design parameters of the 2013 California Building Code. All proposed development would be required to adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. Compliance with building regulations and implementation of MM GEO-1 and MM-GEO-2 would reduce potential impacts to less than significant.

Collapse

The project site is not underlain by natural or man-made subsurface features that are typically associated with collapse, including mining or extraction operations or karst topography. All proposed development would be required to adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. Compliance with building regulations and implementation of MM GEO-1 would reduce potential impacts to less than significant.

- 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?**

Less than significant impact with mitigation incorporated. The City of Healdsburg General Plan identifies portions of the City as being underlain by expansive soils that can cause damage to structures due to the wetting and drying that occurs with soils. Such soils occur most frequently in areas underlain by rocks of the Great Valley Sequence or Sonoma Volcanics. However, all new structures would be required to conform to the seismic design parameters of the 2013 California Building Code (CBC). All proposed development would be required to adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. Compliance with building regulations and implementation of MM GEO-1 would reduce potential impacts to less than significant.

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

Less than significant impact with mitigation incorporated. The project would connect directly to the City of Healdsburg wastewater treatment plant (WWTP) and would not require septic tanks or

any other alternative wastewater disposal systems. These conditions preclude the possibility of related impacts. No impacts related to the use of septic tanks would occur.

Mitigation Measures

- MM GEO-1** Prior to issuance of building permit, the project Applicant shall submit plans to the City of Healdsburg for review and approval demonstrating project compliance with the latest adopted edition of the California Building Standards Code seismic requirements and the recommendations of a design-level geotechnical investigation. All soil engineering recommendations and structural foundations shall be designed by a licensed professional engineer. The approved plans shall be incorporated into the proposed project. All on-site soil engineering activities shall be conducted under the supervision of a licensed Geotechnical Engineer or Certified Engineering Geologist.
- MM GEO-2** Follow recommendations as specified in Miller Pacific Preliminary Geotechnical Report. A rigid shallow foundation designed to accommodate the potential of 1.5 inches of total and 0.75 inch of differential settlements.
- MM GEO-3** According to the General Plan, new buildings should not be placed within 35 feet of Foss Creek.

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

Environmental Evaluation

The analysis in this section is based, in part, on the findings of the CalEEMod analysis completed by FirstCarbon Solutions. The modeling data is provided in its entirety in Appendix A.

The Northern Sonoma County Air Pollution Control District has not adopted standards of significance for construction and operational activities and instead suggests the use of the BAAQMD's thresholds and mitigation measures.

Would the project:

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

Less than significant impact with mitigation incorporated. The project is located in the North Coast Air Basin, where air quality is regulated by the North Sonoma County Air Pollution Control District. However, the North Sonoma County Air Pollution Control District does not have any rules, regulations, or evaluation policies that pertain to greenhouse gas emissions. As such, the North Sonoma County Air Pollution Control District relies on methods used in the neighboring San Francisco Bay Area Air Basin, which is regulated by the BAAQMD. BAAQMD's project-level significance threshold for operational greenhouse gas generation was deemed appropriate to use when determining the project's potential greenhouse gas impacts. The thresholds suggested by BAAQMD for project-level operational greenhouse gas generation are as follows:

- Compliance with a qualified Greenhouse Gas Reduction Strategy, or
- 1,100 MTCO₂e/year, or
- 4.6 metric tons of CO₂ equivalent per service population (employees plus residents).

The estimated annual emissions for the project were compared with the 1,100 MTCO₂e/year bright line threshold to determine significance for this criterion.

Project Construction

The project would generate greenhouse gas emissions during construction activities such as site grading, on-site heavy-duty construction vehicle use, vehicles hauling materials to and from the project site, and construction worker trips. These emissions are considered temporary or short-term.

The BAAQMD does not have a recommended screening level or a threshold of significance for construction-related greenhouse gas emissions; however, the BAAQMD *does recommend* that lead agencies quantify and disclose construction-related greenhouse gas emissions. Therefore, additional analysis quantifying and disclosing construction-related greenhouse gas emissions was completed.

CalEEMod 2013.2.2 was used to estimate the project’s construction-generated greenhouse gas emissions. The construction period would be approximately 13 months in duration. The construction phases include site preparation, grading, building construction, paving, and architectural coating. CalEEMod defaults were used as a conservative analysis. Detailed construction assumptions and parameters are provided in Appendix A. Greenhouse gas emissions during project construction are presented in Table 9.

Table 9: Construction Greenhouse Gas Emissions

Construction Phase	MTCO ₂ e/year
2017	
Demolition	39.66
Site Preparation	9.49
Grading	11.59
Building Construction (2017)	447.13
2017 Total Emissions	507.87
2018	
Building Construction (2018)	5.80
Paving	16.53
Architectural Coating	3.74
2018 Total Emissions	26.07
Total Construction Emissions	533.94
Notes: MTCO ₂ e = metric tons of carbon dioxide equivalent Total calculated using unrounded numbers. Source: CalEEMod Output (Appendix A).	

The project would emit approximately 533.94 MTCO₂e during construction. In the absence of a construction emission threshold, the construction emissions were compared with the project

emission threshold (1,100 MTCO₂e) and the annual construction emissions were found to be below this threshold. Therefore, project construction emissions are considered less than significant.

Project Operations

Operational or long-term emissions occur over the life of the project. Sources for operational emissions include:

- **Motor Vehicles:** These emissions refer to greenhouse gas emissions contained in the exhaust from the cars and trucks that would travel to and from the project site.
- **Natural Gas:** These emissions refer to the greenhouse gas emissions that occur when natural gas is burned on the project site. Natural gas uses include heating water, space heating, dryers, stoves, or other uses.
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the project.
- **Water Transport:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.
- **Waste:** These emissions refer to the greenhouse gas emissions produced by decomposing waste generated by the project.

The analysis quantified emissions from the multi-family housing component and the hotel component separately and then combined the emissions for comparison to the service population threshold. Operational greenhouse gas emissions by source are shown in Table 10. Total operational emissions from both components were estimated at 1,409.4 MTCO₂e. As a conservative assumption, the analysis includes construction emissions amortized over the project's life. Project construction emissions were calculated as 533.94 MTCO₂e. If annualized over 30 years, construction emissions equal 31.4 MTCO₂e. The existing industrial use will be removed as part of the project; therefore, the existing emissions were included in the analysis baseline. The project would generate approximately 1,357.1 MTCO₂e in the year 2020. Therefore, the project would exceed the BAAQMD's threshold of 1,100 MTCO₂e/year, and would have a significant generation of greenhouse gases without the inclusion of additional mitigation to further reduce project emissions. Emissions must total 1,100 MTCO₂e or lower to meet the threshold. This would require additional reductions totaling 226.1 MTCO₂e per year beyond that achieved by on-site design features and a rideshare program for the hotel employees.

There are several options available to mitigate project emissions to the extent required. The project could achieve net zero electricity use through a combination of on-site generation and through purchase of 100 percent renewable electricity from the utility. The option to purchase 100 percent renewable energy is being considered by the City of Healdsburg in its draft Climate Action Plan (CAP). The project electricity emissions prior to mitigation are 199.7 MTCO₂e per year. Achieving net zero electricity use would reduce emissions by 199.7 MTCO₂e per year leaving 26.4 MTCO₂e per year remaining to achieve the service population threshold. Natural gas emissions from the project total 337.0 MTCO₂e per year. Natural gas emissions may be reduced by increased energy efficiency beyond

the requirements of Title 24 by 7.8 percent for space and water heating-related building components. This could be achieved by installing on demand water heating for a portion of the project water heaters or by providing additional insulation and similar improvements to reduce the need for heating. Implementation of MM GHG-2 would reduce GHG emissions to less than significant.

Table 10: Operational Greenhouse Gas Emissions (2020)

Emission Source	Multi-Family Housing Total MTCO ₂ e per year	Hotel Total MTCO ₂ e per year
Area	18.8	0.0047
Energy	34.0	502.8
Mobile (Vehicles)	251.2	534.0*
Waste	6.2	21.4
Water	4.8	4.8
Total Emissions	315.0	1,063.1
Construction Emissions (Amortized over 30 Years)		31.4
Total Project Emissions		1,409.0
Emissions from Existing Uses		-83.3
Net Emissions Quantified Using CalEEMod		1,326.1
Additional Off-Model Mitigation (MM GHG-2)		226.1
Net Project Emissions		1,100
Does project exceed threshold?		No
Notes: MTCO ₂ e = metric tons of carbon dioxide equivalent. Unrounded results used to calculate totals. * Includes reduction for ride sharing program Source of Emissions: CalEEMod Output (Appendix A)		

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM GHG-1 Within 40 days of issuance of certificate of occupancy for hotel, the applicant shall promote trip reductions through use of a ride-sharing program for hotel employees.

MM GHG-2 Prior to issuance of building permits, the applicant shall provide analysis to the City of Healdsburg demonstrating that the project would achieve additional GHG emission reductions totaling 226.1 MTCO₂e through any combination of the following measures or other measures approved by the City:

- The project shall commit to purchasing electricity from a utility offering 100 percent renewable power for some or all of the project's power needs.
- Install on demand electric water heating instead of natural gas water heating for some or all of the project's hot water needs
- Install on-site solar panels to generate electricity for a portion of project electricity consumption
- Exceed Title 24 Building Energy Efficiency Standards by amounts needed to achieve the required reductions in natural gas and electricity consumption.

Level of Significance After Mitigation

Less than significant impact.

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

Less than significant impact. The Sonoma County Regional CAP adopted by the Regional Climate Protection Agency (RCPA) board in July 2016 applies to the County and participating cities, including the City of Healdsburg. The CAP has yet to be adopted by the City of Healdsburg, the County of Sonoma, or the eight other participating cities. The Draft CAP includes a goal of reducing county greenhouse gas emissions by 25 percent below 1990 levels by 2020.

Under the Draft CAP, new development projects would be considered less than significant if consistency with all applicable mandatory local or regional measures is demonstrated. Appendix A of the Draft CAP includes a Climate Action Plan Consistency Checklist Template to be modified by the local jurisdictions. Since the Draft CAP has not been adopted by the City of Healdsburg at the time of this writing, the checklist consistency was not completed for the project. However, the project would comply with all mandatory measures that apply to the project. The State of California has adopted regulations that apply to the project that will help the County achieve its reduction goal. The project would be subject to Title 24 energy efficiency standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions. The project will comply with the California Green Building Standards Code, which includes requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that will reduce greenhouse gas emissions. Motor vehicle emissions associated with the project would be reduced through compliance with state regulations on fuel efficiency and fuel carbon content. The regulations include the Pavley fuel efficiency standards that require manufacturers to meet increasing stringent fuel mileage rates for vehicles sold in California and the Low Carbon Fuel Standard that requires reductions in the average carbon content of motor vehicle fuels. Emissions related to electricity consumption by the project would be reduced as the electric utility complies with the Renewable Portfolio Standard, which requires utilities to increase its mix of renewable energy sources to 33 percent by 2020. The project would not conflict with the Sonoma County CAP and regulations adopted by the State of California to reduce greenhouse gas emissions. In addition, the project would comply with all mandatory local and regional measures applicable to the project. Therefore, impacts would be less than significant.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Hazards and Hazardous Materials				
<i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

Information provided in this section was provided in part by a Phase I Environmental Site Assessment prepared by FirstCarbon Solutions (Appendix E). 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. The criteria that define a material as hazardous also define a waste as hazardous. If improperly handled, hazardous materials and hazardous 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. The 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) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less than significant impact. Residential and hotel developments do not typically 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. 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 comply with applicable federal, state, and local laws pertaining to the safe handling and transport of hazardous materials. Therefore, impacts would be less than significant.

- 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?**

Less than significant impact. As described in Impact 8a, the proposed project would involve the minor use of hazardous materials typically required during construction, such as diesel fuel and other motor lubricants. Groundwater beneath the project site may be impacted by contamination from surrounding area properties including a former Exxon Service Station #70220 (also identified as Texaco) at 186 Dry Creek Road; former Vintage Station at 1281 Healdsburg Avenue; and Aladdin Cleaners at 105 Terrace Boulevard. A letter from the Regional Water Quality Control Board (RWQCB), dated June 8, 2009, indicated that RWQCB Staff will be requiring off-site Responsible Parties to investigate the groundwater at the project site as it pertains to three local extensive groundwater contamination investigations impacted with tetrachloroethylene (PCE) and methyl tertiary-butyl ether (MTBE) at concentration above the drinking water standards.

MM HAZ-1 The project applicant shall allow responsible parties access to the project site to perform groundwater investigations.

MM HAZ-2 The RWQCB recommends restricting consumption of water from any future on-site domestic water wells due to contaminated groundwater from local area plumes that have not yet been completely remediated.

The property owner indicated that five aboveground storage tanks (three smaller and two larger) located in the eastern portion of the project site were installed on-site in the late 1950s and were removed in the late 1960s. These former aboveground storage tanks were approximately 7,000 to 10,000-gallons each and used for the storage of road oil and diesel fuel associated with the on-site road construction company.

MM HAZ-3 Based on the lack of aboveground storage tank (AST) closure documentation, it is unknown to what extent, if any, that testing was completed to determine whether soils and/or groundwater at the project site have been impacted by the former on-site ASTs. Soil sampling and testing should be performed in the vicinity of the former on-site ASTs to determine if the project site has been impacted by the former on-site ASTs. Once the analysis has been completed, the results would verify that contaminated soils above action levels are/are not present.

Evidence of stained unpaved ground surfaces were observed in the central portion of the project site located to the east and south of the shop building associated with 114 Dry Creek Road. A road-asphalt material pile and unpaved ground surface staining was observed approximately 50 feet east of the shop building. The property owner indicated this pile is used in conjunction with the on-site road construction company tenant's business activities. Large areas of stained unpaved ground surfaces were observed adjacent to the west of soil and gravel piles located south of the shop building. Stained unpaved ground surfaces located south of the shop building were also observed underneath heavily stained construction equipment used to hold road oils/asphalt. In addition, stained unpaved ground surfaces were observed adjacent to the heavy construction equipment storage areas in the southwestern portion of the project site and underneath vehicles stored in the south-central portion of the project site. Stained unpaved ground surfaces were also observed in the project site's southeast storage yard. The vertical extent of the unpaved ground surface staining is not known.

MM HAZ-4 Soil sampling and testing should be performed prior to any hotel development activities. Once the analysis has been completed, the results would verify that contaminated soils above actions levels are/are not present.

Numerous large piles of soil and gravel and one pile of road-asphalt material were located in the southeast portion and in the western central portion of the project site. The owner indicated these piles are used in conjunction with the on-site road construction company tenant's business activities and that similar piles have been stored at the property for many years. In addition, excluding retail-purchased commercial grade gravel stored on-site over the years, excavation piles from off-site construction activities are not routinely tested for the present of contaminants.

MM HAZ-5 Soil sampling and testing should be performed throughout the soil pile storage areas, including any remaining on-site piles, prior to hotel development activities. Once the analysis has been completed, the results would verify that contaminated soils above action levels are/are not present.

Based on information obtained from the historical aerial photograph records review, the southwest portion of the project site was occupied by agricultural land uses in 1952. Based on this information, there is a potential that residual agricultural chemicals are present within the on-site soils.

MM HAZ-6 Soil sampling and testing should be performed prior to any hotel development activities. Once the analysis has been completed, the results would verify that contaminated soils above action levels are/are not present.

The following business environmental risks (BERs) were identified: based on information obtained from the historical records review, the office-shop building located in the northern portion of the project site and the office building in the eastern portion of the project site (114 Dry Creek Road, constructed prior to 1965) were both constructed at a time when asbestos-containing materials (ACM) and lead-based paints (MBP) were commonly used in building materials. Based on this information, there is a potential that ACMs and lead based paint (LBP) are present within these two onsite structures.

MM HAZ-7 As these buildings are to be demolished during the development of the proposed Healdsburg Suites project, the building materials should be characterized for asbestos and lead through a program of sampling and testing. All activities involving ACM and LBP should be conducted in accordance with governmental regulations.

With the implementation of the above mitigation measures, impacts would be less than significant.

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

Less than significant impact. The project site is located approximately 0.45 mile southeast of the site Healdsburg High and approximately 0.45 mile southeast of Marce Bacerra Continuation High School, which precludes impacts to a school within ¼ mile. Furthermore, as described in impacts 8a and 8b, the 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. Therefore, impacts would be less than significant.

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?**

No impact. 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 site 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. This condition precludes the possibility of impacts in this case. Therefore, no impacts would occur.

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

No impact. The Healdsburg Municipal Airport is 3.8 miles northwest of the project site. This distance limits the potential for the project to create safety hazards for persons residing or working in the project area. Additionally, the project site is not located within an airport land use plan. Therefore, no impacts would occur.

- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No impact. There are no private airport strips in the City of Healdsburg. The nearest private airport strip is located in the City of Santa Rosa located approximately 17 miles south of the project site. Therefore, no impacts would occur.

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

Less than significant impact. Healdsburg Avenue is the primary north to south roadway in the City of Healdsburg; thus, it is used for emergency response and could be used for evacuation purposes. The 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.). Therefore, impacts would be less than significant.

- h) 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?

No impact. The 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. Therefore, no impacts would occur.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
9. Hydrology and Water Quality				
<i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

a) **Violate any water quality standards or waste discharge requirements?**

Less than significant impact. Future construction of the hotel and multi-family housing 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 National Pollutant Discharge Elimination system (NPDES) permit C.3 requirements would ensure such impacts would be less than significant.

As laid out in the Preliminary Standard Urban Storm Water Mitigation Plan (SUSWMP), the project is designed to capture and infiltrate the total runoff from the 85th percentile, 24-hour storm. Bio-retention areas are located along the perimeter of the site to treat runoff from the roofs and paved surfaces. Runoff will flow into these areas via overland flow and be treated by flowing through the vegetation and soil media. A subsurface drain will be provided to help drain the area and prevent ponding and a drain inlet will be incorporated to handle larger storm flows. The target constituents in runoff treated by bio-retention facilities include oils, grease, sediment, trash, metals, bacteria, organics, and nutrients.

As indicated in the Preliminary SUSWMP, the project would meet the required Low Impact Development (LID) standards by protecting sensitive areas and minimizing changes to the natural areas including the Foss Creek setback. Bio-retention areas have been incorporated into the site drainage design. Specific types of bio-retention to be utilized are outlined in the Preliminary SUSWMP. 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 limitation of the NPDES program, as enforced by the Regional Water Quality Control Board (RWQCB), the project would not result in an exceedance of wastewater discharge requirements. As such, impacts would be less than significant.

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?)**

Less than significant impact. The City of Healdsburg would serve the project with potable water service, which it obtains from well fields located along the Russian River and Dry Creek. The City's most recently completed 2015 Urban Water Management Plan (UWMP) indicates that the City has water rights to 4,252 acre-feet (UWMP 2015 6-3). The City's total projected demand for water in 2020 is 2,703 acre-feet, resulting in a surplus of 1,549 acre-feet. The City's Municipal Utility Department estimates residential demand at approximately 87 gallons per day per resident (Lawrence, pers. comm.) Using the projected project's resident population figure of 108, daily water use is estimated at 9,396 gallons per day or 10.52 acre-feet per year (afy).

Assuming a hotel demand of .43 afy per unit, the hotel water demand would be 52.46 afy (City of San Luis Obispo Utilities Department, 2011), and the total water demand for the project would be 62.98 afy. Therefore, the City's 1,549 afy surplus the city projected for 2020 (UWMP 4-5) would be able to meet the water demands of the project.

This project falls under the type of buildout planned for in the General Plan, as it is consistent with the land use and zoning requirements. The development would not 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. Therefore, impacts would be less than significant.

Stormwater from the proposed project would be directed to bio-retention areas on-site that would retain the water and allow it to percolate through the soil on the project site. As such, impacts to groundwater recharge would be less than significant.

- 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?**

Less than significant impact with mitigation incorporated. As previously noted, the design goal of 100 percent capture of the 85th percentile, 24-hour event would be achieved through the use of bio-retention areas that are located along the perimeter of the site as well as subsurface drains to prevent ponding. A new storm drain inlet would be constructed to conduct stormwater flows into the existing storm sewer in Dry Creek Road to handle larger storm flows. Through a combination of capture and treatment (percolation and settlement), the project's stormwater design would ensure substantial erosion siltation would not occur on- or off-site.

Construction of the two bridges for access over Foss Creek to Grove Street could affect the course of Foss Creek. A Streambed Alteration Agreement with the California Department of Fish and Wildlife and Section 404 permit from the USACE are required to ensure that any changes are mitigated to prevent substantial erosion or siltation on or off the site, as well as potential effects on habitat. These permits are described in MM BIO-2. Therefore, impacts would be less than significant with mitigation.

- 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?**

Less than significant impact. Currently on-site drainage drains to an existing storm sewer in Dry Creek Road and in part to a swale along the Northwestern Pacific Railroad along the eastern boundary of the site. On-site drainage from the proposed project would drain to the existing 48-inch storm drain in Dry Creek Road, which discharges into a culvert in Foss Creek. The project drainage design will utilize LID strategies and control BMPs to substantially reduce surface runoff that could contribute to on or off-site flooding. The project will utilize bio-retention to contain stormwater flows up to the 85th percentile, 24-hour rain event.

To comply with Sonoma County's MS4 permit requirements and with RWQCB, project drainage design would also limit post-construction peak discharge rates to at or below the existing two-year 24-hour peak flow. No alteration of the course of any stream or river would occur; however, runoff generated by the proposed project might result in impacts from the 100-year storm flow downstream. As such, prior to permitting, a complete drainage plan would be required. With this condition and implementation of on-site control measure, the off-site drainage system will be capable of handling surface runoff flows and no substantial impact would occur.

Accordingly, runoff would be managed in a manner that would not contribute to downstream flooding and impacts would be less than significant.

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?

Less than significant impact. As discussed above, stormwater runoff will be controlled by LID strategies and BMPs. As part of the LID strategy, bio-retention areas would be provided. Bio-retention areas were sized according to the Design Requirements of 100 percent treatment of runoff generated by 85th percentile, 24-hour storm event. The project would meet the required LID standards through a combination of treatment and capture in the bioswales. Excess project run off would be collected in the existing overflow inlet at the eastern portion of the project site and flow to the storm sewer in Dry Creek Road. As calculated in the Preliminary SUSWMP, the drainage for the proposed project would be less than the drainage that currently flows from the project site into the local drainage system. The local drainage system is currently able to handle the water discharged from the project site in the 100 year-storm event. Since the proposed project drainage would be less than the current drainage on the project site, the local drainage system would be able to handle runoff in the event a 100-year storm event. In summary, the existing drainage system would be capable of handling surface runoff flows from the proposed project and impacts would be less than significant.

Site design characteristics are proposed to protect natural resources by reducing or eliminating water pollution. Reduction or elimination of water pollution would be accomplished by reducing impervious cover, promoting infiltration into the ground, filtering runoff through bio-retention areas and eliminating contaminant sources. The project would meet the required LID standards through a combination of treatment and capture in bio-retention areas. In summary, the proposed stormwater drainage system would be capable of handling surface runoff flows and impacts would be less than significant.

f) Otherwise substantially degrade water quality?

Less than significant impact. Construction activities related to the project could introduce pollutants and sediment into water runoff from the site. The project would be required to fulfill requirements regarding the provision of site design measures, source controls, LID treatment measures, hydromodification management, and construction BMPs that are appropriate for the type and size of the project to control stormwater pollution. As described above, under the City's Standard Storm Water Mitigation Plan Guidelines, BMPs to avoid erosion and off-site discharges of water runoff, identified in the Preliminary Standard Urban Water Mitigation Plan would be implemented. Implementation of these BMPs would avoid water quality impacts to adjacent lands and waterways. Accordingly, impacts would be less than significant.

- g) 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?

Less than significant impact. As shown in Exhibit 9, the Federal Emergency Agency (FEMA) Flood Insurance Hazard Map, Community Parcels No. 06097C0363E, 06097C0344E, 06097C0551E, and 06097C0532E indicates that the project located partially within a 1-percent annual chance flood hazard zone and also a regulated floodway as shown on Exhibit 9. The project is required to obtain a flood zone encroachment permit from the City of Healdsburg. No buildings or residences will be constructed within the flood hazard zone; therefore, no housing will be placed within a 100-year flood zone. No impacts would occur.

- h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less than significant impact. According to the FEMA Flood Insurance Rate Map, Community Parcels 06097C0363E, 06097C0344E, 06097C0551E, and 06097C0532E are not within a 100-year flood hazard area, nor would it impede or redirect flood flows (Exhibit 9). Therefore, no impacts within a 100-year flood hazard area would occur.

- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less than significant impact. In accordance with the Healdsburg General Plan Dam Inundation Areas Map, the project site is within an area subject to risk of flooding as a result of failure of the Warm Springs Dam, located approximately 10 miles northwest of Healdsburg. The United States Army Corps of Engineers has developed an evacuation plan for affected areas in the event of dam failure. Thus, impacts from dam failure would be less than significant with compliance with the evacuation plan.

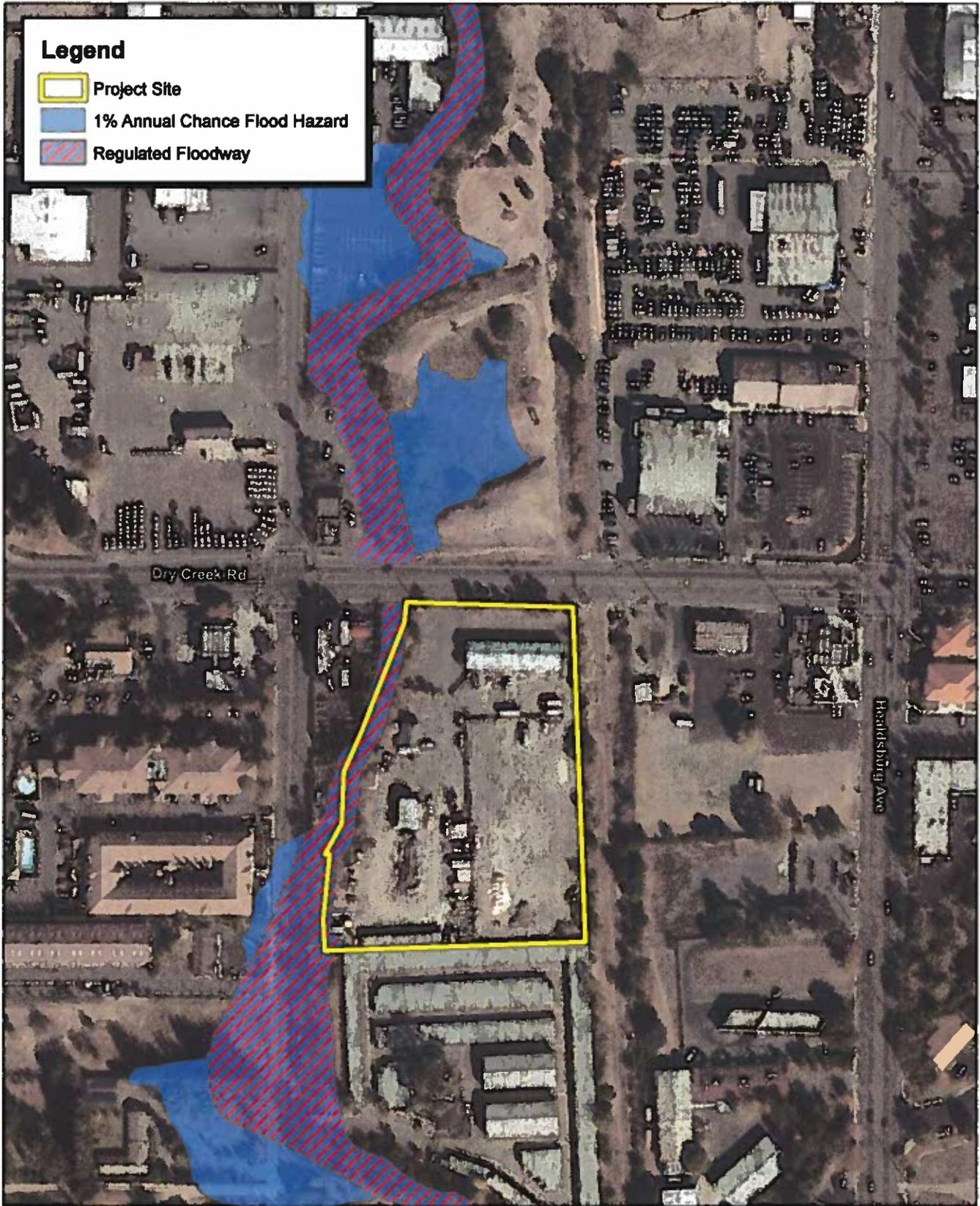
- j) Inundation by seiche, tsunami, or mudflow?

No impact. The Russian River is over 2 miles east of the project site; therefore, no impacts from seiches would occur. Since the City of Healdsburg is located well inland, tsunamis are not considered a risk. Additionally, the project site is within slope Hazard Zone A (General Plan EIR), which is the most stable zone with little or no landslide risk. Thus, no impacts would occur.

Mitigation Measures

MM HYD-1 Prior to issuance of first building permit, the project Applicant shall prepare and submit a Stormwater Pollution Prevention Plan (SWPPP) to the City of Healdsburg for review and approval. The SWPPP shall incorporate Construction Best Management Practices (BMPs) to ensure that water quality of surface runoff is maintained and no siltation of downstream waterways would occur. The SWPPP shall include the following provisions:

- Schedule construction activities during dry weather. Keep grading operations to a minimum during the rainy season (October 15 through April 15). Exposed slopes shall be protected with erosion control measures in advance of rain storms.



Source: ESRI Imagery, 2014



Exhibit 9 FEMA Flood Map

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Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
10. Land Use and Planning <i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

a) Physically divide an established community?

Less than significant impact. The proposed hotel and multi-family residence would not physically divide the existing community. The project would provide 122 hotel rooms and 42 multi-family homes, which would be consistent with the surrounding mixed-use and residential land uses. Therefore, the impacts would be less than significant.

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?

No impact. The project would be in line with the planned land use for both the Healdsburg General Plan and the Grove Street Neighborhood Plan. The Healdsburg 2030 General Plan designates the property Mixed Use (MU). Mixed Use allows for nonresidential uses, including visitor accommodations, retail, services, office, and public and quasi-public uses. Residential development is allowed provided there are no more than 16 units per acre. There would be 42 affordable units planned on the 2.0-acre parcel, which is 21 units per acre, with the density bonus provision of 35 percent. Under Municipal Code 20.08.155, the project would need a conditional use permit for the 42 dwelling units because residential uses as part of a mixed-use development are conditionally permitted by the Mixed Use zoning district.

The project would also be permissible under the Grove Street Neighborhood Plan. The Plan designates the project site Highway Commercial (HC). Hotels and multi-family units are acceptable under the Highway Commercial land use designation provided the multi-family units are within the

density range of 6.01–12.00 units per acre. The General Plan was updated after this plan was adopted. The project has land use density consistency through the General Plan.

Pursuant to Healdsburg's Growth Management Ordinance (GMO), building permits are subject to allocation availability under the GMO. However, this project is exempt from the limit set forth in the GMO because it provides affordable housing units as defined in the ordinance under Section 3. A developer of exempt affordable housing shall be required to enter into a regulatory agreement with the City Council, as necessary to require that the housing remain affordable for a time period of at least ten (10) years after initial occupancy (GMO 3). By entering into the required agreements under the provisions of the ordinance, the project would be in compliance with this land use policy, and there would be no impact.

c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?

Less than significant impact. In accordance with the Healdsburg General Plan and General Plan Environmental Impact Report, the project would not conflict with applicable city policies, ordinances, or adopted conservation plans. The project site is isolated from other habitat areas by development, roads, and the Northwestern Pacific Railroad and has been significantly distributed by previous uses. Thus, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
11. Mineral Resources <i>Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

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.

- 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?**

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 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. Therefore, no impacts would occur.

- 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?**

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

Mitigation Measures

No mitigation measures are required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
12. Noise				
<i>Would the project result in:</i>				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

This Noise Impact Analysis has been prepared by FirstCarbon Solutions (FCS) to determine the off-site and on-site noise impacts associated with the proposed 110 Dry Creek Road Mixed Use Project (Project).

Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The standard unit of measurement of the loudness of sound is the decibel (dB). The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. 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 to be the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) was derived to relate noise to the sensitivity of humans, it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various sound level metrics, including the day/night sound level (L_{dn}) and the Community Noise Equivalent Level (CNEL), both of which represent how humans are more sensitive to sound at night. In addition, the equivalent continuous sound level (L_{eq}) is the average sound energy of time-varying noise over a sample period and the L_{max} is the maximum instantaneous noise level occurring over a sample period.

Regulatory Framework

The project site is located within the City of Healdsburg. The City of Healdsburg addresses noise in the Safety Element of their General Plan and in the City of Healdsburg Municipal Code (City of Healdsburg, 2016).

City of Healdsburg General Plan

The City of Healdsburg has established Land Use Compatibility for Community Noise Environments for residential and non-residential land uses in the Safety Element of the City of Healdsburg General Plan. For long-term noise measurements or thresholds the City prefers the use of the metric dBA L_{dn} , the Day and Night Average Sound Level. According to the General Plan Land Use Category designations, the proposed project is designated as Mixed Use.

According to the City's land use compatibility standards, environments with noise levels below 65 dBA L_{dn} are considered normally acceptable for new transient lodging-motel and hotel land use development. For new multifamily residential land use development, environments with noise levels up to 65 dBA L_{dn} are considered normally acceptable. Environments with noise levels between 60 dBA and 70 dBA L_{dn} are considered conditionally acceptable for both these types of new land use development, provided new construction or development is undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

New development must be generally consistent with the Land Use Compatibility for Community Noise Environments guidelines contained in General Plan and it is demonstrated that the new development will not violate the City's ordinance regulating excessive noise. The City will require the inclusion of design techniques in new construction that minimize noise impacts, including building location and orientation, building design features, and placement of noise-tolerant components (parking, utility areas, and maintenance facilities) between noise sources and the

sensitive receptor areas where necessary to meet the Land Use Compatibility for Community Noise Environments standards.

City of Healdsburg Municipal Code

The City of Healdsburg has established noise performance standards that shall be applied to control excessive noise in the community. The applicable standards for these activities are specified in the City of Healdsburg Municipal Code Chapter 9, Noise. For example, the City has adopted sound level standards that prohibit industrial-zoned properties from creating excessive noise levels in excess of 65 dBA L₁₀ for daytime exterior sound and 55dBA L₁₀ for nighttime exterior sound level as measured at any adjacent residential-zoned property. However, noise and vibration created by construction, repair, remodeling, or grading of any real property are exempt from the noise performance standards of the Municipal Code provided these activities created do not endanger the public health, welfare, and safety and activities occur between the nighttime hours of 6:00 p.m. and 7:30 a.m. daily, or at any time on Sunday or a legal holiday. Nothing in Chapter 9 of the Municipal Code shall be interpreted to prohibit construction activities that do not exceed the ambient noise level by more than 10 dBA, such as painting or interior work. Noise produced by railroad vehicles and noise produced by delivery vehicles regulated by the Public Utilities Commission and associated loading and unloading of merchandise are also exempt from the provisions from the noise municipal codes.

Would the project:

- 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?

Less than significant impact with mitigation incorporated. Noise levels in the project area would be influenced by construction activities and from the ongoing operation of the proposed project.

Short-Term Construction 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 project site would incrementally increase noise levels on access roads leading to the project site (vehicle engine noise, the sound of vehicle doors shutting, etc.). Although there would be a relatively high single event noise exposure potential causing intermittent noise nuisance, the effect on longer-term (hourly or daily) ambient noise levels would be small. 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 construction on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase.

The site preparation construction phase is expected to require the use of front-end loaders, compactors, hydraulic backhoes, and haul trucks. Typical operating cycles for these types of construction equipment may involve one or two minutes of full-power operation followed by three or four minutes at lower power settings. Impact equipment such as pile drivers is not expected to be used during construction of this project. Because the noisiest construction equipment is earthmoving equipment, the site preparation phase is expected to be the loudest phase of construction. A characteristic of noise is that each doubling of the sound sources with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, the worst-case combined noise level during this phase of construction would be 90 dBA L_{max} at a distance of 50 feet from an active construction area.

Construction of the proposed project would require the use of heavy construction equipment. The closest off-site noise-sensitive receptor to these areas of construction is a hotel land use on Dry Creek Road whose property borders the northwest portion of the project site. The closest façade of this structure is located approximately 118 feet from the project footprint where heavy construction equipment would operate. At this distance, worst-case construction noise levels during the loudest phase of construction could range up to approximately 82 dBA L_{max} if multiple pieces of heavy construction equipment operated simultaneously at the nearest construction footprint area.

The other closest sensitive receptor to these areas of construction is another hotel land use on Grove Street, west of the project site. The closest façade of this structure is located approximately 160 feet from the construction footprint where heavy construction equipment would be operating. At this distance, worst-case construction noise levels during the loudest phase of construction could range up to approximately 80 dBA L_{max} if multiple pieces of heavy construction equipment operated simultaneously at the nearest construction footprint area.

According to the City's Municipal Code, noise and vibration created by construction, repair, remodeling, or grading of any real property are exempt from the noise performance standards of the Municipal Code provided these activities created do not endanger the public health, welfare, and safety and activities occur between the nighttime hours of 6:00 p.m. and 7:30 a.m. daily, or at any time on Sunday or a legal holiday. However, construction activities that would not exceed the ambient noise level by more than 10 dBA, such as painting or interior work, are specifically exempted from these permissible hours of construction.

Although there would be single event noise exposure potential causing intermittent noise nuisance from project construction activity, the effect on longer-term (hourly or daily) ambient noise levels would be small. In addition, compliance with the City's permissible hours of noise-producing construction activities would further reduce the potential for sleep disturbance or annoyance at the nearest off-site sensitive receptors. Therefore, implementation of the best management noise reduction techniques and practices, as well as compliance with the stated permissible hours of noise-producing construction activities included in Mitigation Measure NOI-1 would reduce any potential construction related noise impacts to less than significant.

MM NOI-1 Implementation of the following multi-part mitigation measure is required to reduce potential construction period noise impacts:

- The construction contractor shall ensure that all construction equipment have appropriate sound muffling devices, which are properly maintained and used at all times such equipment is in operation.
- The construction contractor shall ensure that all internal combustion-engine-driven equipment is equipped with mufflers that are in good operating condition and appropriate for the equipment.
- The construction contractor shall ensure that “quiet” models of air compressors and other stationary construction equipment are utilized where such technology exists.
- The construction contractor shall, to the maximum extent practical, locate 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.
- The construction 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 prohibit unnecessary idling of internal combustion engines (i.e., in excess of 5 minutes).
- The construction contractor shall designate a noise disturbance coordinator who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (starting too early, bad muffler, etc.) and institute reasonable measures warranted to correct the problem. The construction contractor shall conspicuously post a telephone number for the disturbance coordinator at the construction site.
- All noise-producing construction activities, including deliveries of materials and warmup of equipment, that have the potential to exceed ambient noise levels, as measured at the project property line, by more than 10 dBA shall be limited to the hours of 7:30 a.m. and 6:00 p.m. daily. These noise-producing construction activities shall be prohibited at any time on Sunday or a legal holiday.

Long-Term Operational Impacts

The primary sources of project-related operational noise would be project-related traffic as well as project-related stationary noise sources such as parking lot activities and new mechanical ventilation equipment. Other noise sources of concern in the project vicinity that could affect the proposed noise-sensitive land uses is the potential future activity on the UPRR/SMART railroad line to the east of the project site. A significant impact would occur if the project would be exposed to noise levels in excess of the City’s normally acceptable standard of 65 dBA L_{dn} for new noise-sensitive land use development, or if the project would result in noise level increases that could cause the noise levels at adjacent noise-sensitive land uses to be exposed to noise levels above normally acceptable standards.

Traffic Noise Impacts

The existing ambient noise environment was documented through the short-term ambient noise measurement effort. Existing ambient noise conditions were then compared for compliance with the City’s land use compatibility standards for new residential land use development. The primary noise source in the project vicinity is traffic noise levels along Dry Creek Road. Measured average ambient noise levels at the project site ranged from 62.6 dBA to 63.4 dBA L_{eq} , with maximum levels ranging from 73.3 dBA to 75.2 dBA L_{max} , as measured near the project’s western property edge. These noise measurements were taken during daytime peak noise hours. The noise monitor survey data sheets are provided in Appendix G. These existing noise levels are within the City’s “normally acceptable” range of below 65 dBA L_{dn} for new multi-family residential and hotel land use developments.

The FHWA highway traffic noise prediction model (FHWA RD-77-108) was also used to evaluate existing and future traffic noise conditions in the vicinity of the project site. Traffic data used in the model was obtained from the traffic impact analysis report for the project prepared by W-Trans (2016). The resultant noise levels were weighed and summed over a 24-hour period in order to determine the L_{dn} values. The traffic noise modeling input and output files are included in Appendix G of this document. Table 11 shows a summary of the traffic noise levels for existing background traffic noise levels without and with the project as measured at 50 feet from the centerline of the outermost travel lane.

Table 11: Traffic Noise Model Results Summary

Roadway Segment	Existing No Project (dBA) L_{dn}	Existing Plus Project (dBA) L_{dn}	Increase over Existing No Project (dBA)	Future No Project (dBA) L_{dn}	Future Plus Project (dBA) L_{dn}	Increase over Future No Project (dBA)
Dry Creek Road—US101 to Grove Street	64.1	64.3	0.2	65.6	65.7	0.1
Dry Creek Road—Grove Street to Healdsburg Avenue	63.3	63.5	0.2	64.6	64.8	0.2
Dry Creek Road—east of Healdsburg Avenue	60.5	60.5	0.0	60.7	60.7	0.0
Grove Street—north of Dry Creek Road	58.1	58.2	0.1	61.1	61.2	0.1
Grove Street—south of Dry Creek Road	59.6	59.9	0.3	60.7	60.9	0.2

Note:
 L_{dn} (dBA) is stated as measured at 50 feet from the centerline of the outermost travel lane.
 Source: FirstCarbon Solutions, 2016.

The highest traffic noise levels along any modeled roadway segment would occur under future plus project conditions. The modeling results show that traffic noise levels along the modeled roadway segment of Dry Creek Road adjacent to the project site, would range up to 65.7 dBA L_{dn} under future plus project traffic conditions as measured at 50 feet from the centerline of the outermost travel lane. The nearest façade of the proposed hotel would be located approximately 95 feet from the

centerline of the outermost travel lane. At this distance, traffic noise levels along this roadway segment would attenuate by approximately -5.6 dBA to approximately 60.1 dBA L_{dn} . Even at the closest outdoor use areas, specifically the hotel's outdoor terrace/ lounge areas facing Dry Creek, the traffic noise levels are below the City's normally acceptable threshold of 65 dBA L_{dn} for new hotel land use development. The nearest façade of the proposed residential units would be located approximately 125 feet from the centerline of Grove Street. At this distance, traffic noise levels along this roadway segment would attenuate by approximately -7.9 dBA to approximately 53 dBA L_{dn} under future plus project conditions. These traffic noise levels are well below the City's normally acceptable threshold of 65 dBA L_{dn} for new multi-family residential land use development. Therefore, traffic noise impacts to the proposed project would be less than significant and no mitigation would be required.

Stationary-Source Noise Impacts

Development of the project would result in new stationary noise sources including noise from parking lot activities and new mechanical equipment operations on the project site. Parking activities, such as people conversing or doors slamming, would typically generate instantaneous noise levels of approximately 60 dBA to 70 dBA L_{max} at 50 feet. The closest off-site noise-sensitive receptor to the proposed parking areas is the hotel land use on Grove Road west of the project site, located approximately 100 feet from the nearest proposed parking areas. At this distance, noise levels from project-related parking lot activities could range up to approximately 64 dBA L_{max} . This land use experiences similar noise levels from parking lot activity on their own site. In addition, because of their intermittent nature and short duration, parking lot activities would not result in a perceptible increase in the daily averaged ambient noise levels as measured at this nearest sensitive receptor. Therefore, project-related parking lot activities would not result in exposure of persons to noise levels in excess of existing standards, nor would they result in a substantial permanent increase in ambient noise levels compared with existing noise levels.

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 closest off-sight sensitive receptor is the existing hotel land use located adjacent the northwest portion of the project site, approximately 125 feet from the nearest possible location for proposed mechanical ventilation systems. At this distance, noise generated by rooftop mechanical ventilation equipment would attenuate to approximately 46 dBA L_{eq} as measured at the nearest off-site sensitive receptor. Existing ambient noise levels are documented to range from 62.6 dBA to 63.4 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.

Railroad Noise Impacts

The UPRR/SMART railroad line is located to the east of the project site. Although there is currently no active use of this rail line, it is planned for future use by both commuter and freight trains, according to the March 2008 Draft Supplemental EIR for the SMART Project. According to this

document, with implementation of the SMART project, this rail line could see up to 12 daily roundtrips for commuter trains and up to 6 daily pass-bys from freight trains.

This level of train activity would generate noise levels averaging 68 dBA L_{dn} , assuming a direct line of sight, at approximately 110 feet from the centerline of the railroad. When trains sound their horns as they approach the at-grade crossing on Dry Creek Road, maximum noise levels could reach up to 97 dBA L_{max} at approximately 110 feet from the centerline of the railroad.

The nearest proposed façade of the hotel the project would be located approximately 110 feet from the centerline of the rail line. An existing mini-storage commercial structure provides shielding to the south of the project site.

Assuming as a worst case that the hotel structure could be exposed to noise levels of up to 68 dBA L_{dn} from future railroad activity, these noise levels would be considered “conditionally acceptable” for new hotel land use development. According to the City’s policies, new development may occur under these conditions provided needed noise insulation features included in the design to maintain normally acceptable interior noise levels, typically defined to be 45 dBA L_{dn} for areas where sleeping would occur.

Based on the EPA’s Protective Noise Levels (EPA 550/9-79-100, November 1978), with a combination of walls, doors, and windows, standard construction for northern California residential-type buildings would provide approximately 25 dBA in exterior to interior noise reduction with windows closed and approximately 15 dBA with windows open. With windows open, interior spaces for the proposed hotel land uses would not meet the interior noise standard of 45 dBA L_{dn} (68 dBA - 15 dBA = 53 dBA). However, with windows closed, the interior noise level standard of 45 dBA L_{dn} would be met (68 dBA - 25 dBA = 43 dBA). All hotel units of the proposed project will include an alternative ventilation system, such as a mechanical ventilation system in compliance with the UBC requirements, to ensure that windows can remain closed for a prolonged period of time. This noise reduction feature would reduce railroad activity noise impacts to meet the interior noise level standard of 45 dBA L_{dn} .

However, maximum noise levels from trains sounding their warning horns as they approach the at-grade crossing at Dry Creek Road could still result in sleep disturbance of the residents of the hotel or the multi-family residential units on the project site. Studies show that limiting maximum noise levels to 55 dBA within bedrooms, or rooms for sleeping in a hotel, limits the probability of disturbing the sleep of persons with normal sensitivity. In order to achieve this type of exterior to interior noise reduction for rooms designed for sleeping, upgraded window and wall assemblies would be required. Window and wall assemblies with a minimum Sound Transmission Class (STC) rating of 42 for the façades of the hotel that have a direct line of sight to the rail line would reduce maximum railroad noise levels to below the 55 dBA L_{max} threshold for sleep disturbance impacts (97 dBA - 42 dBA = 55 dBA).

The nearest façade of the multi-family residential units would be located approximately 220 feet from the centerline of the railroad. At this distance, noise levels from railroad activities could range up to 62.4 dBA L_{dn} and up to 91.4 dBA L_{max} . Similar to the discussion above, with the incorporation of

alternate ventilation systems, the interior noise standard of 45 dBA L_{dn} would be met (62.4 dBA - 25 dBA = 37.4 dBA). However, sleep disturbance could still occur, as was also shown in the discussion above regarding railroad activity noise impacts to the proposed hotel land use. Therefore, upgraded window and wall assemblies would be required to reduce this impact. The use of combined window and wall assemblies with a minimum STC rating of 37 would be required for the façade of any bedrooms of the residential units that have a direct line of sight to the railroad line. This would reduce the potential for sleep disturbance impacts for persons of normal sensitivity (91.4 dBA - 37 dBA = 54.4 dBA).

Therefore, implementation of the project design features included in Mitigation Measure NOI-2 would reduce any potential railroad activity noise impacts to less than significant.

MM NOI-2: In order to reduce the potential for sleep disturbance related to noise from railroad activity along the UPRR/SMART railroad line, the project shall incorporate the following design features, or the equivalent thereof:

- For the proposed hotel land use, all façades of rooms designed for sleeping that have a direct line of sight to the railroad line shall be designed and built to achieve a combined minimum STC rating of 42. The combined window and wall assemblies must be designed and constructed in a manner that ensures that no gaps are permitted around windows and all protrusions or openings are properly sealed.
- For the proposed multi-family residential land use, all façades of bedrooms that have a direct line of sight to the railroad line shall be designed and built to achieve a combined minimum STC rating of 42. The combined window and wall assemblies must be designed and constructed in a manner that ensures that no gaps are permitted around windows and all protrusions or openings are properly sealed.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. 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 UPRR/SMART railroad line, located approximately 103 feet west of the proposed hotel building façade. According to the Federal Transit Administration (FTA), the screening distance for potential groundborne vibration impacts from intermediate capacity rail activity for residential type land uses, such as hotels, is 100 feet. As the UPRR/SMART railroad line is located more than 100 feet away from the proposed hotel structures, groundborne vibration impacts from railroad activity on the proposed project would be less than significant.

Construction Vibration Impacts

Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground radiate vibration waves through various soil and rock strata to the foundations of nearby buildings. When assessing annoyance from groundborne noise, vibration is typically expressed as root mean square (rms) velocity in units of decibels of 1 micro-inch per second. To distinguish vibration levels from noise levels, the unit is written as "VdB." Human perception to vibration starts at levels as low as 67 VdB and sometimes lower. Annoyance due to vibration in residential settings starts at approximately 70 VdB. Common sources of groundborne vibration include construction activities such as blasting, pile driving and operating heavy earthmoving equipment. Construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV).

Of the variety of equipment that is expected to be used during construction, the large vibratory rollers that would be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Large vibratory rollers produce groundborne vibration levels ranging up to 0.210 inch per second (in/sec) peak particle velocity (PPV) at 25 feet from the operating equipment.

The closest structure to the construction footprint is a commercial storage facility structure on Grove Street whose property borders directly south of the project site. The closest façade of any structure on this land use is located approximately 65 feet from the footprint where the largest heavy construction equipment would operate. At this distance, construction-related groundborne vibration levels could range up 0.05 PPV. This is below the industry standard vibration damage criterion of 0.2 PPV for this type of structure, a building of non-engineered timber and masonry construction. The next closest off-site structure is the hotel located to the northwest of the project site, approximately 118 feet from the construction footprint where heavy construction equipment would operate. At this distance, construction-related groundborne vibration levels could range up 0.02 PPV.

Therefore, construction-related groundborne vibration impacts on existing off-site land uses would be considered less than significant.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

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 with 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, after deductions for existing trips are taken into account, the project is expected to generate 1,218 new trips on a daily basis, including

78 during the morning peak hour and 91 during the evening peak hour; these new trips represent the increase in traffic associated with the project compared with existing volumes. 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. These project trips would not result in a doubling of traffic volumes along any roadway segment in the project vicinity. Thus, implementation of the project is not expected to result in even a perceptible increase (defined to be a 3-dBA or greater increase) in traffic noise levels on any of the local roadways in the project vicinity. This has been verified through the traffic noise modeling performed for the project and summarized in Table 11 above. All the modeled roadway segments would experience an increase in traffic noise levels with implementation of the project of less than 1 dBA compared to noise levels that would exist without the project. Therefore, project-related traffic noise impacts on off-site receptors would be less than significant.

The proposed project tentative site map shows potential surface parking spaces. As shown in the discussion under impact 12a), noise levels from project-related parking lot activities could range up to approximately 64 dBA L_{max} as measured at the closest off-site sensitive receptor. Because of their intermittent nature and short duration, project-related parking lot activities would not result in a perceptible increase in the daily averaged ambient noise levels as measured at this nearest sensitive receptor. Therefore, noise impacts from project-related parking lot activities would be less than significant.

As shown in the discussion under impact 12a), noise levels from the operation of proposed mechanical ventilation systems would not exceed 46 dBA L_{eq} as measured at the nearest off-site sensitive receptor. As such, stationary operational noise sources would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; and would therefore result in a less than significant impact.

d) **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Less than significant impact with mitigation incorporated. Refer to Section 12.a. Project-related construction activities could result in high intermittent noise levels of up to 83 dBA L_{max} at the façade of the Travel Lodge along Grove Street, which is the closest noise-sensitive receptor. 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 above, including restrictions on permissible hours of construction, 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.

- 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?

No impact. The Healdsburg Municipal Airport is located approximately 8 miles northwest of the project site. In addition, the project site is not located within in the boundaries of an airport land use plan. The project site lies outside of the 55 dBA CNEL noise contour of this airport. Therefore, impacts associated with public airport noise would not expose people residing or working in the project area to excessive noise levels and would therefore be less than significant. There are no private airstrips located in the project vicinity. Therefore, no impacts associated with private airstrip noise would occur.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No impact. There are no private airstrips within the project vicinity. The closest private airstrip is the Graywood Ranch Airport, located over 20 miles southeast of the project site. Therefore, no impacts associated with private airstrip noise would occur.

Environmental Issues	Potentially Significant Impact	Less than Significant impact with Mitigation Incorporated	Less than Significant Impact	No Impact
13. Population and Housing <i>Would the project:</i>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

The Growth Management Ordinance, adopted February 2008, sets forth established annual quantified limit on the rate of residential growth.

The City of Healdsburg’s 2015–2023 Housing Element is a strategic planning process to address the challenges of results from a 30 Year Regional/Urban Design Assistance Team Study. The study showed the need for attainable workforce housing, in addition to affordable housing for young families and core professionals in the City of Healdsburg.

As of January 2016, the population of the City of Healdsburg was estimated at 11,699. Estimating 2.59 per dwelling, the project’s assumed 42 new homes may result in up to 108 new residents.

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)?

Less than significant impact. The project would develop 42 multi-family homes on a 2.00-acre site. Using the City of Healdsburg’s 2010 average household size figure of 2.59 provided by the California Department of Finance, the project could increase the population by as much as 108 persons. This represents an increase of 0.84 percent relative to the City’s 2020 estimated population of 12,900.

The project would introduce new residents to the project area, which would be consistent with the City of Healdsburg 2015–2023 Housing Element to attain workforce housing, and affordable housing. In addition, the project site is designated by the General Plan and Zoning Ordinance for mixed uses;

therefore, the population increase associated with the project would be considered planned growth. Finally, the project site is surrounded by urban uses that are served by urban services and utilities (roadways, potable water, sewer, electricity, natural gas, etc.). Although the project would introduce new residents to the project area, the implementation of the project would not induce substantial population growth within the City. The impact would be less than significant.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No impact. There is no existing housing on the project site. The project site contains five non-residential structures, including four utilized structures and one vacant structure, a parking lot, and equipment and storage yard. All five structures would be demolished, but would not result in any displacement of residents. The project would ultimately construct 42 multi-family dwellings and a 122-room hotel on the site, which would be consistent with the housing needs assessed in the City's General Plan. Therefore, the project would not displace substantial numbers of existing housing and there would be no impact.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No impact. The project site contains five non-residential structures. The project would not remove any existing housing that if removed would displace people. Therefore, there would be no impact.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
14. Public Services				
<i>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:</i>				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

a) Fire protection?

Less than significant impact. The project site is located within the service area of Healdsburg Fire Department, which operates from one fire station located at 601 Healdsburg Avenue approximately 0.8-mile south of the project site. The fire station maintains minimum on-duty shift staffing of two persons augmented by two 40-hour firefighters. In addition, the Fire Department utilizes two Chief Officers, the 40-hour Fire Inspector/ Engineer and Reserve Firefighters. The organization is comprised of 12 paid personnel and 15 Reserve Firefighters (Collister, pers. comm.). According to the most recent data available (2014), average response times for the Healdsburg Fire Department are 4 minutes and 2 seconds (Adams, pers. comm.).

The project would develop a 122-room hotel and parking on a 1.88-acre site and a 42-unit multi-family housing with parking on the adjacent 2.00-acre portion of the 3.88-acre project site. This project would result in a population increase of approximately 108 people. Fire protection services would increase incrementally relative to the increased population. In accordance with California Government Code Section 53090, the project would pay a fee to offset the increased demand. The City of Healdsburg standard conditions of approval would require the provision of a fire flow analysis to ensure adequate water pressure and flow rates are available on-site for firefighting purposes. The City of Healdsburg's Municipal Code requires the installation and maintenance of an automatic fire sprinkler system in all newly constructed buildings, including each hotel room and multi-family dwelling unit. Project implementation would not increase the Healdsburg Fire Department's response times to the project site or surrounding vicinity; thus, no additional fire personnel or equipment would be necessary to serve the proposed project. The project would not physically alter existing fire protection facilities, nor require the construction of new facilities. In addition, the project site is located within an urban, built-up area with adequate response times and

infrastructure; thus, the project would not significantly increase the demand for fire protection services. The impact would be less than significant.

b) Police protection?

Less than significant impact. The City of Healdsburg's Police Department (HPD) would provide police protection services. The Police Department is headquartered at 238 Center Street, approximately 0.4 mile south from the project site. The HPD has 18 sworn officers, including the Chief of Police, one Lieutenant, one administrative sergeant, four patrol sergeants, and 11 patrol officers, as well as 11 civilian employees. (Jenkins, pers. comm.). According to the General Plan, HPD responds to approximately 18,500 service calls annually and maintains an emergency response time of 2 to 3 minutes for emergency calls within the Urban Service Area.

The officer-to population-ratio is 1:644, and the new development would not significantly increase that ratio. The proposed project would not physically alter police protection facilities, nor would the project create an environment generally associated with unlawful activities requiring increased law enforcement services. The project would not inhibit HPD's response times, and the increased population would not be enough for the construction a new police station. In accordance with California Development Code Section 53090, the project would be required to pay a fee to offset the increased demand and pay for any additional services. Therefore, the impacts would be less than significant.

c) Schools?

Less than significant impact. The project's 42 multi-family residences could result in an increased demand for school services. Based on a student generation rate of 0.6 student per dwelling (Healdsburg General Plan IV.N-17), the project would generate 25 new students.

Healdsburg Unified School District (HUSD) would serve the project site. The 2014–2015 total student enrollment for HUSD schools is 1,736 students, 2,226 fewer students than HUSD's 2007–2008 capacity of 3,962 students, as stated in the City of Healdsburg General Plan. The addition of 25 new students would not exceed the HUSD's capacity. Students from the project site would attend the following educational facilities:

- Healdsburg Elementary, kindergarten-second, located approximately 0.66 mile east of the site
- Fitch Mountain Elementary, kindergarten-second, located approximately 0.70 mile east of the site
- Healdsburg Junior High, sixth-eighth, located approximately 0.72 mile southeast of the site
- Healdsburg High, nine-twelve, located approximately 0.45 mile southeast of the site
- Marce Bacerra, continuation high school, located approximately 0.45 mile southeast of the site

With the implementation of mitigation measure outlined below, impacts would be less than significant.

d) Parks?

Less than significant impact. The addition of 42 new multi-family residences could increase the demand for park facilities in the area. Byron Gibbs Park is a 2.5-acre park located approximately 0.53 mile northeast of the project site and includes picnic areas, restrooms, and a playground. The 4.0-acre Carson Warner Memorial Skatepark is located 0.2 mile south of the project site.

For planning purposes, the General Plan sets a minimum overall citywide ratio of 5.0 acres of parkland per 1,000 residents. The Plan indicates that the City is currently almost 16 acres short of meeting this goal relative to neighborhood and community park acreage. 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. With this proposed park, the citywide ratio would be greater than the minimum requirement.

Project implementation would result in a net increase of 42 multi-family residences, with a potential population increase of 108 people. The General Plan sets a minimum citywide ratio of 5.0 acres per 1,000 residents. Project implementation would require the addition of approximately 0.54 acre of parkland. Even with this population increase, the citywide ratio would still be greater than the minimum requirement with the construction of the community park associated with the Saggio Hills project.

The City is requiring the project to include extension of the Foss Creek Pathway on the east side of the project site. The Foss Creek Pathway would run parallel to the Northwestern Pacific Railroad and would be part of a 4.1-mile-long bicycle and pedestrian facility through the City (Foss Creek Pathway Plan 3). The construction of this portion of the Pathway is in line with policy T-D-5 of the General Plan EIR, which states that the Foss Creek Pathway shall provide a central bicycle and pedestrian pathway through town as well as provide access to Foss Creek (General Plan EIR IV.N-22). The project does not include the development of public recreational facilities. The multi-family component will include children's play area, barbeque/picnic shelter, and lawn area to be used by residents. The total amount of open space for the residential project is 10,019 square feet consisting of 2,214 square feet of private open space and 7,805 square feet of common open space.

With the implementation of MM PUB-2, outlined below, the proximity of nearby parkland, and the proposed Saggio Hills Project, there would be no need to build new parks. Impacts would be less than significant.

e) Other public facilities?

Less than significant impact. The Healdsburg Regional Library is located approximately 0.82 mile south of the project site, and the Healdsburg Community Center is located approximately 0.49 mile north of the project site. The addition of 42 new multi-family residences would create an incremental increase in the demand for library facilities and community centers. In accordance with

California Development Code Section 53090, development impact fees would be required to offset any additional public service needs. Considering the legislated development fees and proximity of existing public facilities, impacts would be less than significant.

Mitigation Measures

- MM PUB-1** California Government Section 65996 stipulates that a Project Applicant must provide school impact fees to ensure adequate school and related facilities will be available.
- MM PUB-2** In accordance with the City of Healdsburg's General Plan Policy PS-H-6, the City will continue to assess park development fees on all new commercial, industrial, and residential development sufficient to fund system-wide park improvements.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

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 covers 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 limits with 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 (City of Healdsburg 2015a).

The City's goal is to provide 5.0 acres of developed neighborhood and community parkland per 1,000 residents. The City's 2030 General Plan indicates that the City is currently deficient by almost 16 acres in meeting its goal of developed neighborhood and community park acreage relative to population. In addition to a deficiency of 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. With this proposed park, the citywide ratio would be greater than the minimum requirement.

- 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?

Less than significant impact. Byron Gibbs Park, a 2.5-acre park, is located approximately 0.53 mile northeast of the project site and includes picnic areas, restrooms, and playground. The 4.0-acre Carson Warner Memorial Skatepark is located approximately 0.2 mile south of the project site.

The project could increase the local population by as many as 108 people, which would incrementally increase the use of existing neighborhood and regional parks as well as other recreational facilities. The population increase would not be substantial enough to result in physical deterioration of existing parks or other recreational facilities. In accordance with City of Healdsburg Municipal Code Section 17.08.350, the project Applicant would be required to dedicate land or pay a fee in-lieu thereof, or both, for park or recreational purposes. With the mandatory compliance with the City's in-lieu fee requirements, the project's impacts to recreational facilities would be less than significant.

- 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?**

Less than significant impact with mitigation incorporated. Development of the proposed project would incrementally increase the demand for parks and recreation facilities in the City. The population increase would not be substantial enough to result in the construction or expansion of recreational facilities. As described in MM PUB-1, above, the project applicant would be required to dedicate land or pay a fee in-lieu thereof, or both, for park or recreational purposes.

The City is requiring the project to include extension of the Foss Creek Pathway on the east side of the project site. The Foss Creek Pathway would run parallel to the Northwestern Pacific Railroad and would be part of a 4.1-mile-long bicycle and pedestrian facility through the City (Foss Creek Pathway Plan 3). This proposal would necessitate a 5-foot-tall vinyl-clad chain link fence constructed between the train and the 10-foot wide bike path. The Foss Creek Pathway system links the Carson Warner Memorial Skate Park and other recreational facilities, which increases access to recreation facilities within the City. Development of the Pathway is consistent with the General Plan and would provide more access to parkland.

The multi-family housing development would include a 7,840-square-foot courtyard complete with playground, which would provide recreation area for the residents and would further help alleviate use of public recreation facilities. Because of a small population increase, mandated mitigation provided by the Healdsburg Municipal Code, and recreation facilities provided by the development, the impacts would be less than significant.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
16. Transportation/Traffic <i>Would the project:</i>				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

The transportation analysis is based on a Traffic Impact Study, prepared by Whitlock & Weinberger Transportation, Inc. (W-Trans), dated September 21, 2016. The study is provided in Appendix G.

Traffic impacts are evaluated by determining the number of new trips that the project would be expected to generate, distributing these trips to the surrounding street system based on existing or anticipated travel patterns specific to the project, then analyzing the impact the new traffic would be expected to have on critical intersections or roadway segments.

Intersection Operations

Operating conditions during the AM and PM peak hours were evaluated under Existing, Existing plus Project, Cumulative, and Cumulative plus Project conditions. Operating conditions during the AM and PM peak periods were evaluated to capture the highest potential impacts for the proposed project as well as the highest volumes on the local transportation network. The morning peak hour occurs between 7:00 and 9:00 a.m. and reflects conditions during the home to work or school commute, while the PM peak hour occurs between 4:00 and 6:00 p.m. and typically reflects the highest level of congestion during the homeward bound commute.

The study roadways include the sections of Dry Creek Road and Grove Street fronting the project site at 110 Dry Creek Road in Healdsburg.

Four study intersections were selected for analysis:

1. US 101 North Ramps/Dry Creek Road
2. US 101 South Ramps/Dry Creek Road
3. Dry Creek Road /Grove Street
4. Dry Creek Road-March Avenue/Healdsburg Avenue

Primary access would be provided via two driveways off Dry Creek Road to the hotel portion of the project, and via a driveway over a bridge crossing Foss Creek off Grove Street to the multi-family residential portion of the project. Intersections and roadway segments as well as alternative modes of transportation within the project study area are described below.

Study Intersections

- **US 101 North Ramps/Dry Creek Road** is an unsignalized intersection with a stop sign on the south leg for the Northbound off-ramp. The north leg is a one-way on-ramp. There are no crosswalks.
- **US 101 South Ramps/Dry Creek Road** is an unsignalized intersection with a stop sign on the north leg for the Southbound off-ramp. The south leg is a one-way on-ramp. There are no crosswalks.
- **Grove Street/Dry Creek Road** is a signalized intersection with protected left turns on the east and west legs. There are crosswalks and pedestrian phasing on each leg.
- **Dry Creek Road-March Avenue/Healdsburg Avenue** is a four-legged intersection with protected left-turn phasing and pedestrian crossings on each approach.

Study Roadways

- **Grove Street** is a north-south street with one lane in either direction measuring approximately 12 feet in width each. The posted speed limit on Grove Street is 30 miles per hour (mph).
- **Dry Creek Road** is an east-west arterial road with one to two lanes in each direction. The posted speed limit is 30 mph. Dry Creek Road west of US 101 is under the jurisdiction of the County of Sonoma, and the ramps and interchange are under California Department of

Transportation (Caltrans) jurisdiction, so the US 101 South Ramps Intersection is actually completely outside the City of Healdsburg limits. Only the east Dry Creek Road leg of the US 101 North Ramps Intersection is under the City of Healdsburg's jurisdiction; the remaining three-quarters of the intersection belong to Caltrans. However, despite the intersections being predominantly outside its jurisdiction, the City of Healdsburg has been collecting funds with the intent of signaling both of the interchange intersections to address current and anticipated future deficient operation.

Alternative Modes

Pedestrian Facilities

Given the proximity of schools, and residential and retail uses surrounding the site, it is reasonable to assume that some project residents, patrons, and employees would want to walk, bicycle, and/or utilize transit to reach the project site. Existing and planned bicycle and pedestrian facilities in Healdsburg are shown in the W-Trans report in Appendix G to this document.

Currently, the network of sidewalks in the vicinity of the proposed project site is discontinuous: sidewalk gaps, obstacles, and barriers can be found along all of the roadways connecting to the project site. Existing gaps and obstacles along the connecting roadways impact convenient and continuous access for pedestrians and present safety concerns in those locations where appropriate pedestrian infrastructure would address potential conflict points.

- **Dry Creek Road**—Intermediate sidewalk coverage is provided on Dry Creek Road with significant gaps on the north side of the street.
- **Grove Street**—There are currently sidewalks along both sides for about 400 feet south of Dry Creek Road, and for another 200 feet on the west side only. There is a continuous paved path on the east side of the street that connects to the Foss Creek Pathway just south of the project site.

The existing asphalt path along Grove Street fronting the project site should be upgraded to a sidewalk meeting the City's standards.

Bicycle Facilities

The Highway Design Manual, California Department of Transportation (Caltrans) 2012 classifies bikeways into three categories:

- **Class I Multi-Use Path:** a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- **Class II Bike Lane:** a striped and signed lane for one-way bike travel on a street or highway.
- **Class III Bike Route:** signing only for shared use with motor vehicles within the same travel lane on a street or highway.

In the project area, there is a Class I pathway to the south and adjacent to Grove Street, Class II bike lanes on Grove Street to the north, and Class III bike routes on Dry Creek Road and Healdsburg Avenue.

Future plans will extend the Foss Creek Pathway from the northerly city limits to Front Street on the south, near the future SMART station. Additionally, March Avenue is expected to be striped with Class II bike lanes in the near future. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project study area. Table 12 summarizes the existing and planned bicycle facilities in the project vicinity, as contained in the Healdsburg Bicycle and Pedestrian Master Plan.

Table 12: Bicycle Facility Summary

Status Roadway	Class	Length (miles)	Begin Point	End Point
Existing				
Foss Creek Pathway*	I	1.4	Grove Street south of Dry Creek Road	Mill Street
Grove Street	II	0.60	North of Dry Creek Road	Healdsburg Ave
March Avenue	II	0.47	Healdsburg Avenue	University Avenue
Healdsburg Avenue	III	0.82	Dry Creek Road	Parkland Farms Boulevard
Planned				
Dry Creek Rd	III	0.18	Grove Street	Healdsburg Avenue
Foss Creek Pathway*	I	2.45	Northern city Limits	Front Street
Grove Street	II	0.12	Dry Creek Road	North of Dry Creek Road
Grove Street	III	1.0	Vine Street	North of Dry Creek Road
Healdsburg Avenue	II	0.79	Parkland Farms Boulevard	City Limits
<p>Note: * A portion of this pathway exists, as noted Source: City of Healdsburg Bicycle and Pedestrian Master Plan, Sonoma County Transportation Authority, 2008.</p>				

Transit Facilities

Bus and paratransit service

Sonoma County Transit (SCT) provides fixed route bus service in Healdsburg. SCT Route 60 provides service to destinations throughout the City, connecting to Cloverdale to the north and Santa Rosa to the south and running approximately hourly from 7:00 a.m. to 10:00 p.m. The route travels north on Healdsburg Avenue and south on Grove Street, and stops on Dry Creek Road east of Grove Street going north and on Healdsburg Avenue near Dry Creek Road going south. Weekend service runs from 10:00 a.m. to 9:00 p.m. with headways of 1.5 to 2 hours.

Healdsburg Transit provides loop service at approximately 1-hour headways on Monday through Saturday from 9:00 a.m. to 4:00 p.m. The closest stop is just south of Grove Street/Dry Creek Road and other stops are located on Grove Street and Healdsburg Avenue near the project site.

Two bicycles can be carried on most SCT buses. Bike rack space is on a first come, first served basis. Additional bicycles are allowed on SCT buses at the discretion of the driver.

Dial-a-ride, also known as paratransit or door-to-door service, is available for those who are unable to independently use the transit system due to a physical or mental disability. SCT Paratransit is designed to serve the needs of individuals with disabilities within Healdsburg.

Rail Service

The project site is immediately adjacent to railway tracks that are planned to be incorporated into the Sonoma-Marín Area Rail Transit (SMART) system. SMART, at buildout, will provide rail service within Sonoma and Marin counties, extending to Cloverdale to the north and Larkspur to the south, connecting with the Larkspur Ferry Terminal. The first phase of construction is nearing completion and initial rail service as far north as Santa Rosa is expected to begin in late 2016. There is no currently planned date by which service would be extended to Healdsburg. Service would be accessed at the downtown Healdsburg station.

Regulatory Context

City of Healdsburg

The City's General Plan states that the City shall strive to maintain Level of Service (LOS) D operation during periods of peak traffic flow at critical intersections, and LOS C operation at all other times. These standards only apply to intersections of an arterial street with either another arterial or a collector street and intersections of two collector streets. Additionally, LOS F operation shall be acceptable for a stop-controlled approach to a through street provided the higher levels of delay affect 25 vehicles per hour or fewer. (LOS methodologies are explained in the W-Trans report in Appendix G to this document.)

In addition, the following additional guidance is provided in the Healdsburg 2025 General Plan Update Environmental Impact Report (2009).

An impact on intersection operation would be considered significant if:

- a) The addition of traffic generated by a project degrades the peak-period LOS of an all-way stop-controlled or signalized intersection from A, B, C, or D (without the project) to E or F (with the project);
- b) The addition of Project generated traffic degrades the overall operation on a minor, stop-controlled approach to an unsignalized intersection from LOS A, B, C, D, or E (without the project) to LOS F (with the project) and the affected approach or movement serves 25 or more vehicles per hour; or
- c) The LOS (without project) is E or F and Project-generated traffic would increase the peak period average vehicle delay by 5 seconds or more.

Caltrans

Caltrans indicates that they endeavor to maintain operation at the transition from LOS C to LOS D. Based on previous discussions with Caltrans staff, it is understood that the standard is to be applied to the overall average intersection delay and not that associated with any single movement or approach. Under this approach, if one movement experiences very high delay and also has moderate to high traffic volumes, the overall delay and LOS should reflect the critical nature of the condition. However, if one movement is expected to experience high delay, but has very low traffic volumes, the overall intersection operation will likely still meet Caltrans standards. For that reason, all levels of service for Caltrans facilities in this analysis show both the overall operational status of the intersection and the LOS on the off-ramp.

Where intersections are integral to a local jurisdictions transportation system, Caltrans often accepts the operational standard applied by the local agency; in this case, the City of Healdsburg.

Existing Conditions

The Existing Conditions scenario provides an evaluation of current operation based on existing lane configurations and traffic volumes during the AM and PM peak periods. Some counts were obtained specifically for this study in June 2016 before local schools dismissed for the summer, while others were taken in July 2014 when schools were not in session, but the City's tourist industry was flourishing. Project-generated traffic volumes are not included. Since vehicles currently use the US 101 off-ramps as if there were two approach lanes (the single-lane off-ramp is wide enough for two cars to use it at the same time if one is turning right and the other turning left), for evaluation purposes it was assumed that the ramps have two approach lanes. Existing traffic LOS are provided in Table 13.

Table 13: Existing Peak-Hour Intersection Levels of Services

Intersection	Existing Conditions			
	AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS
Dry Creek Road/US 101 South Ramps overall— <i>Southbound Approach only</i>	31.5 **	D F	37.8 **	E F
Dry Creek Road/US 101 North Ramps overall— <i>Northbound Approach only</i>	7.6 18.7	A C	6.4 20.6	A C
Dry Creek Road/Grove Street	23.7	C	29.1	C
Dry Creek Road-March Avenue/ Healdsburg Avenue	34.3	C	37.1	D

Notes:
 Delay is measured in average seconds per vehicle
 LOS = Level of Service
 Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*; the LOS for minor approaches is factored into the overall LOS calculation for the intersection.
 ** = delay greater than 120 seconds

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?

Less than significant impact with mitigation. W-Trans evaluated project impacts on Level of Service (LOS). The following is a summary of the analysis.

Trip Generation

The anticipated trip generation for the proposed project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 9th Edition, 2012 for “Hotel” (ITE LU 310) and “Apartment” (ITE LU 220). Trips that would be created by the proposed ancillary uses at the hotel, such as a meeting room, etc., are included in the standard ITE trip generation rate for a hotel as these uses are typical for the hotel land use. Because the site is currently occupied, the trip generation of this existing use was considered. “General Light Industrial” rates (ITE_LU 100) were applied to estimate trips associated with existing uses at the site.

The proposed project is expected to generate an average of 1,276 trips per day, including 86 trips during the AM peak hour and 99 during the PM peak hour. After deductions for existing trips are taken into account, the project would be expected to generate 1,218 new trips on a daily basis, including 78 during the morning peak hour and 91 during the evening peak hour as shown in Table 14; these new trips represent the increase in traffic associated with the project compared to existing volumes.

Table 14: Trip Generation Summary

Land Use	Units	Weekday									
		Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Existing General Light Industrial	8.26 ksf	6.97	-58	0.92	-8	-7	-1	0.97	-8	-1	-7
Proposed Hotel	122 rooms	8.17	997	0.53	65	38	27	0.60	73	37	36
Apartment	42 du	6.65	279	0.51	21	4	17	0.62	26	17	9
Total	—	—	1276	—	86	42	44	—	99	54	45
Net New Trips	—	—	1218	—	78	35	43	—	91	53	38

Notes:
du = dwelling unit; ksf = 1,000 square feet
Source: W-Trans, 2016.

Existing Plus Project Intersection Levels of Service

The “Existing Plus Project Intersection” scenario evaluates the addition of project traffic to the study area intersections. A summary of the LOS calculations under this scenario is provided in Table 15.

Table 15: Existing and Existing plus Project Peak-Hour Intersection Levels of Service

Intersection	Existing Conditions				Existing Plus Project Conditions			
	AM Peak-Hour		PM Peak-Hour		AM Peak-Hour		PM Peak-Hour	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Dry Creek Road/US 101 South Ramps-overall <i>Southbound Approach only</i>	31.5 **	D F	37.8 **	E F	39.6 **	E F	48.1 **	E F
Dry Creek Road/US 101 North Ramps overall <i>Northbound Approach only</i>	7.6 18.7	A C	6.4 20.6	A C	7.9 19.9	A C	7.0 22.4	A C
Dry Creek Road/Grove Street	23.7	C	29.1	C	25.2	C	30.7	C
Dry Creek Road-March Avenue/Healdsburg Avenue	34.3	C	37.1	D	34.8	C	38.2	D

Notes:
 Delay is measured in average seconds per vehicle
 LOS = Level of Service
 Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*; the LOS for minor approaches is factored into the overall LOS calculation for the Intersection
 ** = delay greater than 120 seconds

Baseline Conditions

Baseline operating conditions were determined with traffic from nearby projects that have been approved or are pending added to the existing volumes. The nearby projects included in the analysis are the residential projects of Chiquita Grove, the Midtowne project, the Oaks at Foss Creek, 1201 Grove Street, and Farmstand together with the commercial project proposed at 255 Dry Creek Road. The locations of the Baseline scenario projects, and trip generation and distribution assumptions for these projects are summarized in Appendix G.

The peak hour intersection LOS are shown in Table 16 for the baseline conditions before and after planned improvements are implemented. As described below, these improvements are expected to be installed in the Spring of 2017.

Table 16: Baseline Conditions and Baseline plus Project Peak-Hour Intersection Levels of Service

Study Intersection/Approach	Baseline Conditions				Baseline plus Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Dry Creek Road/US 101 South Ramps <i>Southbound Approach</i>	46.0	E	55.9	F	55.9	F	69.4	F
	**	F	**	F	**	F	**	F
Improvement: AWSC, WB left-turn	12.2	B	14.0	B	12.6	B	14.3	B
Dry Creek Road/US 101 N Ramps <i>Northbound Approach</i>	8.0	A	7.3	A	8.4	A	8.1	A
	20.1	C	23.4	C	21.4	C	25.9	D
Improvement: EB Left-turn lane Northbound Approach	8.0	A	7.3	A	8.4	A	8.1	A
	20.0	C	23.4	C	21.4	C	25.9	D
Dry Creek Road/Grove Street	28.8	C	34.5	C	31.3	C	36.7	D
Dry Creek Road-March Avenue/Healdsburg Avenue	34.8	C	37.8	D	35.3	D	39.3	D

Note: Delay is measured in average seconds per vehicle
LOS = Level of Service
Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*
** = delay greater than 120 seconds
Bold text = deficient operation
Shaded cells = conditions with recommended improvements
AWSC = All-way Stop Controls

In the Dry Creek Intersection Control Traffic Study, Healdsburg, CA Revised Draft Memorandum (2016) by Kimley-Horn, several alternative improvements at the Dry Creek Road interchange were considered as short-term solutions to the impending deficient operation. Scenario #3 was selected as the preferred alternative, and the description of this option as contained in the study is provided below:

Scenario #3:

Install all-way stop-control (AWSC) at the intersection of Dry Creek Road/US 101 South Ramps and restripe the westbound approach to be a westbound left-turn lane for 125 feet and a westbound through lane. The eastbound approach at the intersection of Dry Creek Road/US 101 north ramps will be restriped to be an eastbound through lane and an eastbound left turn lane for 50 feet. This assumes no change to the intersection control at the Dry Creek Road/US 101 North Ramps and no change to the intersection of Dry Creek Road/Grove Street.

City staff have indicated that work is proceeding to install these improvements in the spring of 2017. It is further anticipated that the cost of these improvements will be shared proportionately by the following projects currently in the approval process: The Oaks at Foss Creek, 255 Dry Creek Road, and this project currently in the approval process that cause the need for these improvements through proportional share payments. With all-way stop-controls, as detailed above and assuming the south and north ramps would continue to operate as two-lane approaches, under the projected

Baseline volumes the intersection of Dry Creek Road/US 101 South Ramps would be expected to operate at an acceptable service level during both peak periods. Though not operating unacceptably without improvements, the provision of a left-turn pocket as part of the planned improvements would provide some improvement to operation at Dry Creek Road/US 101 North Ramps.

Baseline plus Project Conditions

The Dry Creek Road/US 101 Southbound Ramps intersection, which operates at an unacceptable service level overall with or without the project during the PM peak hour, would fall to an unacceptable LOS during the AM peak hour with the addition of project trips. The deterioration would not necessarily be project-specific; rather, it is a cumulative impact that would be associated with the last of the pending projects that is occupied, and the timing of these various development projects cannot be anticipated. All other study intersections would operate at an acceptable LOS. The project would pay its proportional share of the planned short term improvements described above.

Future and Future plus Project Intersection Levels of Service

The Future Cumulative plus Project scenario evaluates the combined addition of project traffic and approved project traffic to the study area intersections. Where available, segment volumes for the horizon year of 2040 were obtained from the County's gravity demand model and translated to turning movement volumes at most of the study intersections using a combination of the "Furness" method and factoring, depending on how the model was configured at each intersection. The Furness method is an iterative process that employs existing turn movement data, existing link volumes and future link volumes to project likely turning future movement volumes at intersections.

The lane configurations used for the future conditions at the Dry Creek Road study intersections are detailed in Dry Creek Road Infrastructure Needs Analysis for the City of Healdsburg (March 2002). These improvements would include widening Dry Creek Road to two lanes in each direction starting at the US 101 North Ramps to east of Healdsburg Avenue. An eastbound right-turn and westbound left-turn lane would be added at Dry Creek Road/US 101 South Ramps and an eastbound left-turn lane at the US 101 North Ramps (the left-turn lanes will be added in the short term under plans underway by the City).

The eastbound approach on Dry Creek Road to Healdsburg Avenue would be modified to change the through lane to a shared through/left-turn lane, an additional left-turn lane would be provided on the northbound approach, and the westbound lanes would be modified to be through/left-turn and through/right-turn. The changes at Dry Creek Road-March Avenue/Healdsburg Avenue would require changing the signal phasing from protected left-turn phasing east-west to split phasing.

Since the analysis methodologies used in the 2002 analysis have been updated, additional modifications at the Dry Creek Road/Grove Street intersection are suggested to achieve acceptable operation under the City's standards based on application of the more current methodology. The northbound Grove Street approach should be reconfigured to have a separate left-turn lane with protected left-turn phasing and the right-turn lane converted to use for through/right-turn movements. This change in lane assignment and phasing could be achieved within the existing right-of-way on the northbound approach.

These improvements were assumed to exist for purposes of the Future Conditions analysis and are shown in Figure 5 in the Traffic Impact Study (Appendix G). Additionally, since vehicles currently use the US 101 on and off-ramps as two lanes, it was assumed in the analysis that the off-ramps would both be widened and striped to provide two lanes approaching the intersections.

Under the anticipated Future volumes, and with signalization of the US 101 Ramp intersections and the lane reconfigurations along Dry Creek Road, the study intersections are expected to operate acceptably. Future operating conditions are summarized in Table 17.

Table 17: Future and Future plus Project Intersection AM and PM Peak-Hour Levels of Service

Study Intersection/Approach	Future Conditions				Future plus Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Dry Creek Road/US 101 South Ramps	35.3	D	32.9	C	35.2	D	33.1	C
Dry Creek Road/US 101 North Ramps	36.1	D	51.9	D	36.6	D	54.8	D
Dry Creek Road/Grove Street	27.2	C	44.4	D	28.0	C	48.2	D
Dry Creek Road-March Avenue/Healdsburg Avenue	36.6	D	47.4	D	36.8	D	49.4	D

Notes:
Delay is measured in average seconds per vehicle; LOS = Level of Service

All LOS measured would be LOS D or better *with project traffic added* during the AM and PM peak hours. The project would not cause LOS to rise to levels considered significant by the City. The project would not increase peak period average vehicle delay by more than five seconds which is a threshold of significance identified in the City of Healdsburg 2025 General Plan EIR.

Short-term improvements are needed at Dry Creek Road/US 101 South Ramps as an intermediate improvement to address impacts associated with adding traffic projects that are currently going through the approval process. The funding and specific plan for these improvements is discussed further in MM TRANS-4.

Future Improvements

Because the changes to the geometrics and phasing at Dry Creek Road/Grove Street were not previously identified, the proportional share of the cost for modifying this intersection was also estimated. This improvement is not necessary in the short term, so the proportional share was estimated as a percent of the total volume change between current and future conditions. With an estimated planning level cost of \$50,000, the project’s 11.6 percent share of the impact translates to a cost of \$5,242.

In summary, with the payment of the proportional share of required improvements, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness of the circulation system. Impacts would be less than significant.

Queueing

Under the future plus project conditions, projected queues on Dry Creek Road to turn into the project would fit within the existing storage areas. Queueing on northbound Grove Street is expected to exceed the length of the existing turn lane, though the changes to the lane configuration proposed to accommodate future volumes could include extension of the left-turn lane to 150 feet by prohibiting on-street parking. On-street parking on the east side of Grove Street should be projected for a total distance of 175 feet south of Dry Creek Road and the turn lane extended to provide 150 feet of storage space. This can be accomplished as part of the proposed modifications to the geometrics and phasing at this location.

- 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?**

No impact. The project area is not subject to a congestion management program.

- 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?**

No impact. The Healdsburg Municipal Airport is located approximately 3.8 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. The project does not include features that could change air traffic patterns such as tall buildings, smoke emissions, or wildlife attractants. No impacts would occur.

- d) **Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Less than significant impact. Access to the project site is proposed via a driveway on Grove Street and two on Dry Creek Road. Circulation on-site between the land uses would be unrestricted. The current width of Grove Street narrows along the project frontage approximately where the proposed driveway would be located, because Foss Creek is located to the east. If feasible, the roadways should be widened to match the existing street cross-section to the north; this would include the installation of curb, gutter and sidewalks at the project's frontage. Incorporation of the widened roadway would reduce impacts from hazardous design features to less than significant.

- e) **Result in inadequate emergency access?**

Less than significant impact. Emergency access would be provided via Grove Street or one of the two driveways off Dry Creek Road. All parts of the project are accessible through either Grove Street or Dry Creek Road. Additionally, all internal drive aisles would be subject to California Fire Code requirements, including provisions associated with minimum width and prohibition on parking

(where necessary). As such, adequate emergency access would be provided and impacts would be less than significant.

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?

Less than significant impact with mitigation incorporated. Sonoma County Transit provides public transit service within the Healdsburg city limits. There is an existing bus stop on Grove Street, approximately 320 feet west of the project site, and another stop on Dry Creek Road, approximately 0.1 mile east of the project site, and, therefore, the proposed project would be accessible to public transit.

Sidewalks exist along the northern frontage on Dry Creek Road but are not provided on the opposite side. On Grove Street, there are sidewalks north of the proposed driveway, but to the south of the driveway, there is only a paved path. Where the project fronts Grove Street, sidewalks should be provided. According to the most current site plan, the driveway on Grove Street would be located where the roadway narrows. The project should improve the existing asphalt path on the project Grove Street frontage to provide a standard sidewalk. The existing asphalt path along Grove Street fronting the project site should be upgraded to a sidewalk meeting the City's standards. These improvements are specified in MM TRANS-1 and would reduce impacts to less than significant.

Existing bicycle facilities, including bike lanes on Grove Street north of Dry Creek Road, together with shared use of minor streets provide adequate access for bicyclists. Since there are plans to provide a direct connection from Foss Creek pathway to Dry Creek Road along the eastern frontage of the project site, the project should build the portion of the pathway along the site as provided in MM TRANS-2. Until this segment is connected to the existing pathway to the south, the entrance at Dry Creek Road should be fenced off to alert potential users that it is incomplete. There are also plans to designate Grove Street from Vine Street to Dry Creek Road as a Class II bike route. As such, it is recommended that the project add "sharrows" north and south of where the roadway narrows. The "sharrow" would alert drivers that the cyclists are likely occupy a portion of the travel lane and assist the cyclist in positioning themselves laterally within the lane. As such, no adverse impacts on alternative transportation would occur. Impacts would be less than significant with mitigation.

Mitigation Measures

Prior to certificate of occupancy, the following mitigation measures must be completed to the City's satisfaction:

MM TRANS-1 Prior to the certificate of occupancy for the multi-family project, improve the existing asphalt path on Grove Street and install sidewalk to City standards along Grove Street frontage.

MM TRANS-2 Prior to the certificate of occupancy for the multi-family project, construct Foss Creek Pathway along project's eastern boundary, pursuant to City standards.

- MM TRANS-3** Prior to the issuance of a certificate of occupancy for the multi-family project, stripe the left-turn bay along the Dry Creek Frontage pursuant to City standards.
- MM TRANS-4** Prior to the issuance of a building permit for the multi-family project, the project should pay its proportional share towards the planned short-term improvement to install all-way stop signs at the southbound ramp intersection and add left-turn lanes on Dry Creek Road at both intersections.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
17. Utilities and Service Systems				
<i>Would the project:</i>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

The City of Healdsburg is dependent on a network of utilities. Each type of utility has constraints that required it to adapt to growth differently. The City of Healdsburg is unique in that it provides most of the key facilities and services required to support growth.

- a) **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

Less than significant impact. The City of Healdsburg owns and operates the sewage collection, treatment, and disposal facilities. The City's Wastewater Treatment Plant (WWTP) is located on Foreman Lane, approximately one mile southwest of the city limits just south of the confluence of Dry Creek and the Russian River. The treatment plant has an average daily flow of 0.8 million gallons per day (mgd). The WWTP has a permitted dry-weather capacity of 1.4 mgd. The highest dry

weather flow was 0.98 mgd between 2000 and 2008. The unused dry-weather capacity available for development and growth under the General Plan is a minimum of 0.42 million gallons per day. The project is estimated to generate 18,856 gallons per day (0.019 mgd) of effluent daily. The unused treatment capacity could accommodate the 0.019 mgd of effluent generated by the project, and it would not exceed wastewater treatment requirements. The impacts would be less than significant.

- 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?**

Less than significant impact. As discussed in impacts 17a and 17c, the proposed project would be readily served by the City's existing wet utilities, which no construction of new or expansion of existing treatment facilities necessary. Therefore, the proposed project would not require construction of new water or wastewater treatment facilities or expansion of existing facilities. Therefore, impacts would be less than significant.

- 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?**

Less than significant impact. Any project drainage from on-site would be contained in one of six sub-drainage areas: "A," "B1," "B2," "B3," "B4," and "B5." Area "A" consists of a paved drive aisles and parking and discharges to the existing 48-inch storm drain in Dry Creek Road. Areas "B1" and "B2" contain the Healdsburg Suites and parking area and discharges to the existing 48-inch storm drain in Dry Creek Road. Areas "B3," "B4," and "B5" consists of the Healdsburg Multi-family Housing building and parking areas and discharges to the existing 48-inch storm drain in Dry Creek Road which discharges into Foss Creek. Bio-retention areas are located along the perimeter of the site to treat runoff from the roofs and paved surface. Runoff will flow into these areas via overland flow. A subsurface drain will be provided to help drain the area and prevent ponding and a drain inlet will be incorporated to handle larger storm flows. By filtering runoff through BMPs such as bio-retention areas, and by eliminating contaminant sources, the project can implement a stormwater management plan that captures and treats the stormwater runoff from the 85th percentile, 24-hour rain event. However, runoff generated by the proposed project might result in impacts to stormwater drainage downstream. The applicant has already prepared a preliminary SUSWM that shall be refined and submitted to the City for review and approval prior to permitting. The project would follow the recommendations laid out in the final SUSWM. Accordingly, impacts would be less than significant.

- d) **Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

Less than significant impact. The City of Healdsburg would serve the proposed project with potable water service, obtained from well fields located along the Russian River and Dry Creek. The City has the rights to 4,254.5 afy of water with as much as 5134.5 afy available assuming acquisition of pending water rights (Healdsburg 2015 Urban Water Management Plan Update 6-3,4). The City's UWMP indicates the City's total demand for water in 2015 was estimated at 1,644 afy, resulting in a

surplus of 2,610.5 afy, not including the pending water rights (Healdsburg 2015 Urban Water Management Plan Update 4-5).

Table 18 summarizes the supply and demand comparisons set forth in the UWMP for normal year, single dry year, and multiple dry year scenarios between 2020 and 2040. As shown in the table, the UWMP anticipates the adequate potable and non-potable water supplies would be available under all water year scenarios.

Table 18: Urban Water Management Plan Update 2015 Planning Assumptions

Scenario	Category	Acre-Feet				
		2020	2025	2030	2035	2040
Normal Year	Supply	5,029	5,029	5,106	5,106	5,106
	Demand	2,751	3,100	3,259	3,425	3,599
	Difference	2,278	1,929	1,847	1,682	1,507
Single Dry Year	Supply	3,058	3,164	3,241	3,241	3,241
	Demand	2,751	3,100	3,259	3,425	3,599
	Difference	307	64	(18)	(184)	(358)
Multiple Dry Year—1 st Year	Supply	3,784	3,784	3,861	3,861	3,861
	Demand	2,751	3,100	3,259	3,425	3,599
	Difference	1,033	684	602	436	262
Multiple Dry Year—2 nd Year	Supply	3,784	3,784	3,861	3,861	3,861
	Demand	2,751	3,100	3,259	3,425	3,599
	Difference	1,033	684	602	436	262
Multiple Dry Year—3 rd Year	Supply	3,784	3,784	3,861	3,861	3,861
	Demand	2,751	3,100	3,259	3,425	3,599
	Difference	1,033	684	602	436	262

Note:

Supply values include potable and non-potable water sources. Demand values exclude conservation.

Source: City of Healdsburg Urban Water Management Plan Update 2015, June 2016.

The General Plan EIR did not find a significant impact due to anticipated developments in relation to water supplies available. This project falls under the type of buildout planned for in the General Plan, as it is consistent with the land use and zoning requirements. No new or expanded entitlements would be needed to serve the annual water demand from 122 hotel rooms and 42 multi-family units. Therefore, impacts would be less than significant.

- 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?**

Less than significant impact. The proposed project is estimated to generate less than 19,000 gallons of effluent on a daily basis. As explained in Impact 17a, the Healdsburg Wastewater Treatment Plant has adequate capacity to serve the proposed project in addition to the provider's existing commitments. Therefore, impacts would be less than significant.

- f) **Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

Less than significant impact. According to City of Healdsburg, residential units have a solid waste generation rate of 11.4 pounds per dwelling unit per day. The potential 42 new multi-family residences would generate 478.8 pounds of solid waste daily (0.239 ton) or approximately 87.4 tons annually. A hotel generates 4 pounds per room per day. Therefore, a 122-room hotel would generate 488 pounds of solid waste daily (0.244 ton) or approximately 89.06 tons annually (General Plan DEIR, IV.P-24). In total, the proposed development would generate approximately 176.46 tons of solid waste annually. Solid waste from Healdsburg is transferred first to the North County Transfer Station and then transported to landfill sites located outside Sonoma County. 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, which is more than enough to accommodate the solid waste potentially produced by this project. Therefore, impacts to landfills would be less than significant.

- g) **Comply with federal, state, and local statutes and regulations related to solid waste?**

Less than significant impact. The project would be served with curbside solid waste, recycling, and green waste collection service, which are standard services for residential uses in Healdsburg. Solid waste disposal must follow the requirements of the contracted waste hauler and receiving landfill. These waste haulers must 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. Given project characteristics, no further recycling or waste reduction requirements would be applicable. Impacts would be less than significant.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

- 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 impact with mitigation incorporated. The proposed project may result in several impacts associated with biological resources that would be significant if left unmitigated. MMs BIO-1 and BIO-2 would fully mitigate all potential impacts to levels of less than significant. With the implementation of these mitigation measures, the proposed 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 impact with mitigation incorporated. All cumulative impacts related to aesthetics, air quality, biological resources, hydrology and water quality, noise, and traffic are either less than significant after mitigation or less than significant and do not require mitigation. MM AES-1, MM AQ-1, MM BIO-1 through MM BIO-3, MM CUL-1 through MM CUL-3, MM GEO-1 through MM GEO-3, MM GHG-1 and MM GHG-2, MM HAZ-1 through MM HAZ-7, MM HYD-1 and MM HYD-2, and MM NOI-1 and NOI-2, MM PUB-1 and MM PUB-2, MM TRANS-1 through MM TRANS-4 would fully mitigate all potential impacts to levels of less than significant. Pursuant to CEQA Section 15168(c)(2), the significant cumulative and unavoidable impact to the US 101 Southbound ramps on Dry Creek Road were addressed within the scope of the Healdsburg 2025 General Plan EIR. 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 on these areas, and 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 impact with mitigation incorporated. As described throughout the preceding environmental checklist, the project would not result in substantial environmental effects on human beings. All impacts identified in this IS/MND are either less than significant after mitigation or less than significant and do not require mitigation. Implementation of 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. Impacts would be less than significant.

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