

APPENDIX A – INITIAL STUDY

COUNTY OF SONOMA

PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-1900 FAX (707) 565-1103

ENVIRONMENTAL CHECKLIST FORM

FILE #: PLP02-0045
PROJECT: Wolf House Inn
State Clearinghouse #: 88021615

PLANNER: Nick Chase
DATE: September 23, 2004
Revised February 24, 2005

Note: Revisions have been made by PRMD Project Review as a result of a Public Scoping Meeting held on November 16, 2004. The revisions are overbolded.

LEAD AGENCY: Sonoma County Permit and Resource Management Department

PROJECT LOCATION: 14211 Arnold Drive, Glen Ellen

APPLICANT NAME: John Pflueger, Architect

APPLICANT ADDRESS: 8860 Sonoma Mountain Rd., Glen Ellen

GENERAL PLAN DESIGNATION: Limited Commercial

SPECIFIC/AREA PLAN: North Sonoma Valley

ZONING: Planned Community (PC), Scenic Resources (SR), Secondary Floodplain (F2), Biotic Resources (BR)

BACKGROUND:

An EIR for an on-site 22 room hotel was certified by the County in 1988. The approval of the project has expired. The current Initial Study addresses a proposed 46 room project. Responses have been received on the Notice of Preparation (NOP) dated October 26, 2004. The responses received will be considered by the County when developing the scope of assessment in the Draft EIR.

DESCRIPTION OF PROJECT:

The proposed project is for a 46 room condominium hotel identified as the Wolf House Inn. The components of the application include: 1) General Plan Amendment from the LC land use designation to the General Commercial land use designation ; 2) Zone Change that adds hotels as a permitted use in the Planned Community zoning district ; 3) Major Subdivision for the 46 room condominium hotel, and 4) Use Permit and Design Review for the 46 room inn. The footprint of the inn is 18,512 square feet, and the gross floor area is 37,266 square feet. Parking for the inn will be shared with the adjoining Jack London Village commercial center; the total number of parking spaces will be 119.

SURROUNDING LAND USES AND SETTING: Briefly describe the project's surroundings:

North: residential; South: Commercial (balance of Jack London Village); West: residential; East: Sonoma Valley Regional Park

Other Public Agencies whose approval is required (e.g. permits, financing approval, or participation agreement): Department of Fish and Game, San Francisco Regional Water Quality Control Board

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation" as indicated by the checklist on the following pages.

Environmental Checklist

Page 2

File# PLP02-0045

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural 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"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use and Planning |
| <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input checked="" type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance | |

DRAFT

DETERMINATION

On the basis of this initial evaluation:

- The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- 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 by in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- 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.

The environmental documents which constitute the Initial Study and provide the basis and reasons for this determination are attached or referenced herein, and hereby made a part of this document.

Incorporated Source Documents

In preparation of the Initial Study checklist, the following documents were referenced/developed, and are hereby incorporated as part of the Initial Study. All documents are available in the project file or for reference at the Permit and Resource Management Department.

- Project Application and Description
- Initial Data Sheet
- County Planning Department's Sources and Criteria Manual
- Sonoma County General Plan and Associated EIR
- Specific or Area Plan: North Sonoma Valley
- Sonoma County Zoning Ordinance
- Sonoma County Rare Plant Site Identification Study
- Project Referrals from Responsible Agencies
- State and Local Environmental Quality Acts (CEQA)
- Full record of previous hearings on project in File (1988 EIR by Earth Metrics Inc. for a 32 room hotel at same site)
- Other technical reports: Noise Study by Illingworth and Rodkin Inc. 2002
Traffic Study by TJKM 2002

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 17 at the end of the checklist, "Earlier Analysis" may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated", describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

1. **AESTHETICS** Would the project:

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
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- a) Have a substantial adverse effect on a scenic vista?

_____	_____	_____	<u> X </u>
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The subject property lies between Arnold Drive and Sonoma Creek. While Arnold Drive is a designated Scenic Corridor Route, setbacks from the roadway only apply outside Urban Service Areas. The elevation drop from Arnold Drive to the top of bank along Sonoma Creek is approximately 10 feet. The riparian vegetation along the creek includes many native oak trees; as a result, there is little if any view to the Sonoma Valley Regional Park beyond. Thus the construction of the inn on the site will not block views of any scenic vista.

There was testimony at the scoping meeting that the proposed project would affect a scenic vista as viewed from Arnold Drive to the east. However, as this view is not a distant one, staff maintains the project will not have such an impact.

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

_____	_____	_____	<u> X </u>
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The location of the inn building project site does not contain any structures and there are no rock outcroppings, or trees within the footprint of the proposed inn building. Riparian vegetation will be augmented primarily in the area between the top of bank and the top of fill as identified on the Existing Site Plan and Survey.

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

<u> X </u>	_____	_____	_____
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The project site is adjacent to the existing parking lot serving the Jack London Village. It is an open area, basically containing weeds. While the development of the site will improve the existing visual character of the site, the proposed inn's height and mass may not be in scale with the surrounding development. A comparison of the projects' perspective sketches to the architectural elevations suggests the elevations are rather two dimensional and do not reflect the architectural character of the former Jack London Wolf House as intended by the applicant. This view was echoed in an August 3, 2004 review by the Sonoma County Landmarks Commission. The applicant should prepare revised architectural elevations for the proposed inn and the EIR consultant should prepare a minimum of two photo montages for the project with the vantage points being Arnold Drive. The project EIR should evaluate potential visual impacts in accordance with PRMD's Visual Assessment Guidelines.

One Goal of the Glen Ellen Development and Design Guidelines is to "Ensure that the size, scale and intensity of all developments are consistent and compatible with the character of Glen Ellen." A guideline states that new structures visible from Arnold Drive at the South Entrance area should not exceed two stories above street level. The project EIR needs to evaluate the proposed project's consistency with the Glen Ellen Development and Design Guidelines.

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

<u> X </u>	_____	_____	_____
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The proposed inn will have a Spanish tile roof and walls that are both dark wood and stone. The building will be approximately 40 feet from Arnold Drive. Eight rooms will have windows facing Arnold Drive. There may be an increase in day time glare from the windows of these rooms and the vehicles parked in the adjoining parking lot. There may be an increase in night time glare from light emanating from the inn rooms, site lighting, signage or vehicles coming and going to the inn and parking lot. Such night lighting could have an impact upon adjoining residential properties. The project EIR will need to evaluate to extent of day and night time light and glare and prescribe mitigations to reduce them to an insignificant level. Such mitigations will likely include non-glare glazing on inn windows, landscaping with trees and shrubs and use of light fixtures with their light sources shielded.

The County Design Review Committee will review the project lighting plan to ensure project lighting does not wash out onto adjoining properties. All fixtures can have their light sources shielded. With such mitigations, staff concludes the project will not result in significant night light impacts upon the sky or adjoining properties.

2. AGRICULTURE RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
<p>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. 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?	_____	_____	_____	_____X_____
<p>The Important Farmlands Map identifies all of Glen Ellen as "Urban Built-up Land", so the project will not result in the conversion of farmlands to non-agricultural use.</p>				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	_____	_____	_____	_____X_____
<p>The existing zoning is Planned Community with a Limited Commercial General Plan designation. The site is not zoned for agricultural use and is not under a Williamson Act.</p>				
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	_____	_____	_____	_____X_____

There is no agricultural use of the subject property, so there will be no conversion of farmland to non-agricultural use.

3. AIR QUALITY

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
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Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

The proposed project site is located within the Bay Area Air Quality Management District (BAAQMD) jurisdiction, which is a regional agency responsible for the overseeing of compliance with State and Federal laws, regulations, and programs within the San Francisco Bay Area Air Basin. The project does not include any stationary emission sources (i.e. smoke stacks) and would not generate any mobile source emissions beyond that generated by vehicles. Fireplaces in the inn will all be gas fired, not wood burning. The project will not generate enough traffic to cause significant air emissions per the BAAQMD CEQA guidelines. A referral describing the project was sent to the BAAQMD, which did not respond.

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

The Bay Area Air Quality Management District (BAAQMD) is considered a non-attainment area for ozone under both the Federal Clean Air Act and the California Clean Air Act. The Bay Area is also considered non-attainment for PM10 under the California Clean Air Act but not the Federal Act. The Bay Area was previously a non-attainment area for carbon monoxide maintenance under the Federal Clean Air Act. Attainment means the region normally does not violate air standards. Projects with substantial carbon monoxide emissions or which generate substantial traffic affecting congested intersections must undergo detailed carbon monoxide analysis to predict local concentrations of that air pollutant. The project will not generate enough traffic to cause significant air emissions per the BAAQMD CEQA guidelines.

- 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)?

___ X ___

The BAAQMD CEQA Guidelines (BAAQMD, December, 1999) include screening criteria to identify projects that may have significant emissions of criteria pollutants. These criteria are based on the size of the project and the amount of vehicle traffic it would generate. The Air District does not recommend further analysis of vehicle emissions if the amount of new traffic generated would be less than 2,000 vehicles per day. Since this project would generate an average of 196 vehicle trips or less per day, such emissions would be less than significant.

Particulate matter (PM10) emissions from inn fireplaces or from construction activities may be significant and will be addressed in the project EIR.

d) Expose sensitive receptors to substantial pollutant concentrations?

___ X ___

The California Air Resources Board has determined that diesel emissions contain toxic air contaminants. Exposure of people to these emissions over a long period of time is considered to increase the risk of cancer. e BAAQMD CEQA guidelines define sensitive receptors as facilities where sensitive receptor groups (i.e. children, the elderly, the acutely ill, and the chronically ill) are likely to be located. Such uses typically include residences, schools, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and medical clinics. The exhaust emissions from trucks associated with construction of the project would result in only a short term impact upon residents to the north and west of the project site. Dust from construction of the development may be considered significant due to the extent of development on this site. The following dust control measures can be included in the project: 1) water or dust palliative shall be sprayed on unpaved construction and staging areas during construction twice daily or as required by PRMD and construction inspectors. 2) trucks hauling soil, sand and other loose materials over public roads will cover the loads, or will keep the loads at least two feet below the level of the sides of the container, or will wet the load sufficiently to prevent dust emissions. 3) paved roads will be swept as needed to remove soil that has been carried onto them from the project site. 4) water or other dust palliative will be applied to stockpiles of soil as needed to control dust. 5) avoid and/or halt grading in exposed areas during periods of heavy wind. The project EIR will evaluate the full range of mitigations necessary to reduce pollutant concentrations to a less than significant level.

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

___ ___ X ___

The proposed inn will not prepare any food, so there will not be any food odors created by the project. Exhaust emissions, as discussed in 3e above represent a short term impact upon area residents, so odors associated with construction activities will not be significant.

4. **BIOLOGICAL RESOURCES** Would the project:

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
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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? X

The proposed inn will be located upon an area that has been graded in the past and is now dirt and non-native weeds. An August 16, 2002 e-mail correspondence from Liam Davis of the California Department of Fish and Game states that, based upon a site visit and reference files, no sensitive or rare terrestrial species will be impacted by the proposed project. This e-mail states that the inn footprint must be at least 50 feet back from the top of bank along Sonoma Creek. As the establishment of a creek walk along the existing sewer easement may impact riparian resources, the Department of Fish and Game recommends the applicant remove all non-native vegetation within the 50 foot creek setback area and replant the riparian corridor in accordance with a revegetation plan to be reviewed and approved by the Department.

A May 17, 2004 referral from the Department of Fish and Game recommends an "assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened and locally unique species and sensitive habitats,...". The nexus for requiring such an assessment would be that drainage facilities from the project site into the creek area would be below top of bank of the adjacent creek or stream. Any work or facility proposed below top of bank will necessitate a Streambed Alteration Agreement from the Department of Fish and Game. In addition, erosion and sediment control measures must be taken to ensure the riparian zone is not impacted by the construction of the project..

The project EIR will analyze whether the construction of the creek walk or other project grading and drainage facilities will impact any unique species adjacent to or within Sonoma Creek.

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

Sonoma Creek, adjacent to the subject property, is designated Biotic Resources on the General Plan Open Space Map. The Biotic Resources Combining District is applied to stream side conservation areas along designated riparian corridors. Sonoma Creek in this area is an urban riparian corridor for which a 50 foot setback is prescribed for any structures, grading, fill or excavation. The replanting of the riparian corridor between the top of bank and the inn which will be at the 50 foot setback line, will be a positive impact to the riparian habitat along Sonoma Creek.

Ashbury Creek is located on the south side of the project site. It currently separates the property from the Jack London Village; a footbridge provides a connection from the parking lot from one property to the other. According to the Department of Fish and Game e-mail, this creek also has an abundance of non-native vegetation. Creek restoration efforts have been under way for a number of years within the creek. It appears that the proposed project's creek walk will end at a point close to the footbridge at Ashbury Creek. It is not clear from the site plan what amount of grading is necessary to complete the creek walk in the area of Ashbury Creek.

The project EIR will fully analyze the proposal to replant the riparian corridor between the top of bank and the inn. The project EIR will also examine whether the project's creek walk will have any impact upon Ashbury Creek.

- 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?

No referring agency has indicated there are, or may be, other wetlands upon the subject property. The project EIR will evaluate the site to determine if there are any project impacts upon Sonoma Creek.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

See discussion under 4a. It is unknown if there any migratory fish species within Sonoma Creek or Ashbury Creek. Project activities that may impact any migratory fish species in these waterways include grading activities associated with the construction of the inn and the river walk along the creek bank.

There was testimony at the meeting and also confirmed by the applicant in writing that Sonoma Creek and Ashbury Creek contain migratory fish. Staff has identified an occurrence South of the project site within Sonoma Creek of freshwater shrimp. The project EIR needs to evaluate to what extent the project may impact such species within those waterways.

It is not known if any native wildlife species use the subject property to get to/from Sonoma Creek. In any case, the project will not close off the Ashbury Creek area to migration of such species. Further, other than the inn building, there are no fences proposed along the perimeters of the property that would impede the movement of wildlife species into the area.

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

The Sonoma County Tree Protection Ordinance provides protection for certain native tree species including most native oak trees. While there are a number of oak trees on the subject property, none are proposed to be removed with the construction of the inn or the creek walk. However, proposed hard surfaces, including parking lots and base rock for the creek walk, could impact the root zones of trees protected by the ordinance. An arborist needs to provide an analysis of potential project impacts to all significant trees on site that could be impacted by project construction. The project EIR will analyze potential impacts to trees protected under the Sonoma County Tree Protection Ordinance.

- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat conservation plan?

There are no habitat conservation plans in effect at or near the project site.

5. **CULTURAL RESOURCES** Would the project:
- | | Potentially Significant Impact | Less than Significant with Mitigation Incorporation | Less than Significant Impact | No Impact |
|---|--------------------------------|---|------------------------------|--------------------------|
| 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"/> |

The subject property is immediately adjacent to the Jack London Village, a commercial center that is a designated Sonoma County Landmark property. According to a July 9, 2002 referral from the Northwest Information Center at Sonoma State, a Fredrickson study in 1987 concluded a hotel project proposed at that time on the same site would likely impact significant cultural resources. Intensive field survey and cultural resources identification were recommended upon removal of fill material where the proposed hotel was proposed. Accordingly, the current referral from the Northwest Information Center at Sonoma State recommends that an archaeologist study and provide project specific recommendations during the construction phase of the proposed project. The project EIR needs to prescribe that archaeological monitoring occur during site grading.

The Sonoma County Landmarks Commission reviewed the project on August 3, 2004 to determine if the proposed design is consistent with the historical character of other historic buildings in the Jack London Village and other buildings in the Glen Ellen area. While the Commission recommended approval of the project, they did express concern that the architectural elevations did not reflect the Jack London Wolf House design as shown in the perspective sketches prepared by the applicant. The applicant should prepare revised architectural elevations for the project.

The applicant submitted revised elevations of the proposed inn on October 28, 2004. These should be evaluated by the Sonoma County Landmarks Commission and their comments should be incorporated into the project EIR.

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

Other than the potential for historical resources identified in 5a above, there was no suggestion by the Northwest Information Center that other historical or archaeological resources may be present on the subject property. However, as there is the possibility that unknown cultural resource may be uncovered during construction, mitigations need to be established to halt work in the area of such a find until an archaeologist is consulted. These mitigations will be established in the project EIR.

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

Based upon site inspection from Project Review Planning staff, there are no unique geological features upon the subject property.

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

As with any development project, there is the possibility that human remains could be discovered during the construction phase. Standard mitigations should be prescribed in the project EIR to address the possibility of an accidental discovery of such remains.

6. **GEOLOGY AND SOILS** Would the project:

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
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- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

l) 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.

___ ___ X ___

The subject property is located approximately 5 miles east of the Rodgers Creek Fault (the closest Alquist-Priolo Earthquake fault zone). There are no landslides shown on or adjacent to the property .

ii) Strong seismic ground shaking?

___ ___ X ___

The Seismic Shaking Map identifies the area as one with semi-consolidated and consolidated rocks - areas where shaking and liquefaction are generally minimal.

iii) Seismic-related ground failure, including liquefaction?

___ ___ X ___

See response to 6a(ii).

iv) Landslides?

___ ___ X ___

The Landslide and Relative Slope Stability Map identifies this area as "C" which are relatively unstable rock and soil units. However, there are no landslides shown in the immediate area. When new construction occurs, it must comply with the seismic design requirements of the Building Code. Geotechnical reports for the proposed inn's foundation will be required by the Building Official.

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

X ___ ___ ___

The ground floor of the proposed inn will be constructed closest to the creek. The portion of the property where the hotel will be constructed had approximately 10 ft. of fill deposited upon it in the 1970's. The existing grade under the ground floor is from 221 ft. above sea level to 224 ft. above sea level; the finished floor elevation of the ground floor is 215 ft. above sea level, a cut from 6 to 9 feet. Grading permits will be required. Drainage improvements must be designed by a civil engineer and approved by the Drainage Review section of PRMD. The project must meet NPDES (National Pollution Discharge Elimination System) and SUSMP (Standard Urban Stormwater Management Plan) requirements and any required waste discharge requirements as prescribed by the San Francisco Bay Regional Water Quality Control Board. Thus, grading permits issued by Sonoma County will ensure that the project will not result in significant soil erosion. Mitigations to ensure soil erosion will not be significant will be established in the project EIR. Also, please refer to Item 8: Hydrology and Water Quality.

Staff has directed the applicant to have his civil engineer provide a preliminary grading plan for the project as well as a cross-section of the creek which will allow PRMD to confirm the location of the building 50 ft. back from top of bank also meets the standard Water Agency creek setback.

It is not known where excavated soil from the project will be deposited. The project EIR needs to address how and where it will be used onsite and address the volumes to be exported offsite.

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,

There are no schools within one-quarter mile of the project site and no hazardous materials will be emitted in conjunction with the operation of the hotel.

- 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? X

There are no underground fuel storage tanks on the subject property as identified on the Sonoma County LOP (Local Oversight Program). However, unknown contamination may have occurred when fill was placed upon the project site. The impacts of a potential unearthing of contaminated materials would be considered potentially significant and will analyzed in the project EIR.

- 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? X

The project site is not located within two miles of a public airport.

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

The project site is not located within two miles of a private airstrip.

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

The project site is located immediately adjacent to Arnold Drive which is designated as primary arterial on the Sonoma County General Plan Circulation Element. The project's intersection with Arnold Drive will be improved to meet County standards as required by the Transportation and Public Works Department. See discussion under Item 15d..

- 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? X

The northerly half of the Sonoma Valley, including Glen Ellen, is designated as an "Area with very high or high potential for large wildland fires. The proposed hotel will be located along Sonoma Creek and the Sonoma Valley Regional Park; as both are heavily wooded, it may be difficult to implement a standard vegetation management plan for this project. The project EIR will address establishment of a defensible space zone between the hotel and Sonoma Creek.

The project will obtain its water supply from the Valley of the Moon Water District. The Glen Ellen Fire Station is located at the north end of Glen Ellen, approximately one mile from the project site and the response time is approximately 4 minutes (Jack London Village EIR, 1988). The roof of the proposed hotel building will be Spanish tile which will provide a measure of protection in the

event of a wildland fire in the area. The project site is subject to the requirements of the Sonoma County Commercial Development Guide. The hotel building will have to be sprinklered. Hydrants will be located per the Glen Ellen Fire Protection District's and the Department of Emergency Services' requirements. To establish adequate fire flows in the water system located at Arnold Drive, water main improvements are required for the proposed project (see Item 13. Public Services). The details of all necessary mitigations will be identified in the project EIR.

8. HYDROLOGY AND WATER QUALITY

Would the project:

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
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- a) Violate any water quality standards or waste discharge requirements?

X	_____	_____	_____
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All sewage wastewater will be disposed of using the existing public sewer main located at Arnold Drive. The sewage is directed to the Sonoma Valley Sanitation District sewage treatment plant on 8th Street East, Sonoma. The plant operates under a current National Pollution Elimination Discharge Permit administered by the San Francisco Bay Water Quality Control Board.

Project construction activities, including excavation, grading, soil stockpiling and placement of engineered fill, could result in increase erosion of soils and sedimentation or introduction of pollutants into Sonoma Creek. Increased construction vehicle traffic on the site may increase concentrations of lead, oil and grease into the storm drain system. Use of chemicals (pesticides, herbicides) on landscaped areas of the site may also affect water quality in Sonoma Creek. The above potential impacts could be considered less than significant with the implementation of standard best management practices (BMPs) that are commonly implemented to minimize or eliminate the occurrence of soil erosion ore release of chemicals and other foreign materials into waterways. Soil erosion and the potential release of chemicals will be analyzed further in the project EIR.

The proposed project will be subject to the National Pollution Discharge Elimination System (NPDES) requirements. The project will have to meet the General Construction Permit Requirements as established by the San Francisco Bay Regional Water Quality Control Board. A copy of the Notice of Intent (NOI) must be filed by the applicant, and a Waste Discharge Identification Number (WDID) will be issued by the SFBWQCB and submitted to the PRMD Drainage Review Section.

- 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?)

_____	X	_____	_____
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The proposed project will be connected to the Valley of the Moon Water system. This District's referral on the proposed project did not cite any capacity problems with regard to serving the hotel. The project site is located within a Marginal Groundwater Availability Area (Zone 3), yet wells will not be used to provide water to the project. The project area is not within a Groundwater Recharge Area as shown on the General Plan Resource Conservation Element maps, so the project should not interfere with groundwater recharge.

Recently, the Valley of the Moon Water District has been citing potential capacity problems. The project EIR will need to address potential short-term capacity problems during peak summer periods as well as the ability of the District to serve the project based upon its allocation from the

aqueduct and its service responsibilities.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

- e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Discussion of items c), d) and e): The project site is adjacent to Sonoma Creek and Ashbury Creek. Project grading and construction of the hotel will not require the alteration of the course of either waterway as the building will meet a 50 ft. setback as required by the Department of Fish and Game and as required by the Biotic Resource Combining District in the Sonoma County Zoning Ordinance. The proposed hotel building will create approximately 29,000 square feet of new impervious surface on the 2.4 acre site. Project grading, particularly the removal of much of the 10 ft. depth of fill at the project site, may induce substantial erosion or siltation on and off site. The proposed creek walk should be of pervious materials. The construction details for the creek path should be identified in the project EIR. The introduction of additional impervious surface on the project site will increase the rate and amount of runoff from the site into Sonoma Creek. The location and number of storm drain outlets into Sonoma Creek is unknown. Drainage improvements must be designed by a civil engineer registered in the State of California in accordance with the Sonoma County Water Agency Flood Control Design Criteria and such plans must include a site grading plan and an erosion control plan. The applicant must show on the project site plan that the proposed hotel will meet the standard creek setback (see referral from Drainage Review). Potential drainage and flood impacts should be further analyzed in the project EIR.

Per new comment on Item 6b, the applicant has been directed to have a civil engineer prepare a preliminary grading plan for the proposed project. Said plan will identify locations of stormwater outfalls, etc..

A December 3, 2004 letter from the Water Quality Control Board recommends a 100 foot setback from the top of bank to provide an ample buffer to reduce water quality impacts to Sonoma Creek and Ashbury Creek. The letter offers that such a "buffer zone will help provide treatment of the incidental stormwater and runoff not captured and treated by the development's stormwater treatment systems." The inn is proposed to be situated upon an area of the property where up to 10 ft. of fill is located. The proposed creek walk, adjacent to the top of bank, is located where the sewer was constructed years ago. The Department of Fish and Game has confirmed that no riparian vegetation exists west of the top of bank. The balance of the site has an existing parking lot within 50 feet of the top of bank. The project EIR should evaluate the feasibility of using landscape-based stormwater treatment measures, such as biofilters and vegetated swales or detention basins, to manage runoff from the project site.

- f) Otherwise substantially degrade water quality? ___ ___ X ___

There are no other known potential water quality impacts that are associated with the proposed project.

- g) Place housing within a 100-year hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? ___ X ___ ___

The area along Sonoma Creek is within the 100-year flood hazard area as shown on the Flood Insurance Rate Map. The extent of the 100-year flood hazard area must be shown on the project site plan. According to the Drainage Review Section of PRMD, the 100-year flood elevation is estimated to range from 201 to 210 feet above sea level. As a result of previous fill upon the property, the lowest elevation at the hotel site is currently about 222 feet above sea level. If the excavation for the hotel building is 10 feet, the ground floor elevation of the hotel would be approximately 212 feet above sea level. As the proposed ground floor elevation of the inn has been identified as approximately 215 feet above sea level, the project EIR should evaluate flood elevations and specify the minimum ground floor elevation for the inn building (which must be at least one foot above the established flood level at the building site).

The proposal does not place housing within the 100-year flood hazard area.

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

The proposed creek walk will be constructed at the top of the creek bank along Sonoma Creek. The top of bank elevation ranges from 211 feet above sea level at the proposed north terminus of the creek walk to approximately 207 feet above sea level at the south terminus of the creek walk. It appears that the ground floor elevation of the proposed hotel building, approximately 212 feet above sea level, will be above the highest 100-year flood level, 210 feet above sea level, on the property. However, as much of the creek walk will be located within the 100-year flood plain, it is possible that the establishment of the creek walk could have some impact upon flood water flows. This potential impact should be evaluated in the project EIR.

- 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? ___ ___ X ___

The inn is not proposed to be within the flood plain. There is no levee or dam along Sonoma Creek. Persons on site during a flood event may not be able to access the creek walk, but is not a significant hazard.

9. **LAND USE AND PLANNING** Would the project: Potentially Significant Impact Less than Significant with Mitigation Incorporation Less than Significant Impact No Impact

- a) Physically divide an established community? ___ ___ X ___

The proposed project will not physically divide the established community of Glen Ellen as the Jack London Village is already 1/2 mile south of the town center. The site has been designated

Limited Commercial on the General Plan Land Use maps since 1989.

There was testimony at the public scoping meeting that an inn on this site would further divide the Glen Ellen community as the “downtown” area is further to the North. Staff does not agree this is a significant potential impact as the property is already developed with a commercial center and zoned for commercial use. However, as this concern is a focal point for many, the EIR should discuss this in the context of the Glen Ellen Development and Design Guidelines and the North Sonoma Valley Specific Plan.

- 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?

The proposed hotel application was submitted in 2002. In March 2004, the project description was amended to reduce the number of rooms from 65 to 46. The revised project also identifies the project as one that has “fractional shared units of ownership sold.” The applicant has made it clear that the project is a condominium hotel. A General Plan Amendment from Limited Commercial to Recreation and Visitor-Serving Commercial was initially required to accommodate the project for a 65 room hotel as described in 2002. In order to accommodate the revised proposal for a condominium hotel, a General Plan Amendment to the General Commercial land use category is now required. The reason for the change is that condominium projects are permitted in the General Commercial land use category, not the Recreation and Visitor-Serving Commercial land use designation or the implementing K zoning district.

The applicant has revised his project description to include the following components:

- (1) General Plan Amendment from the Limited Commercial land use category to the General Commercial land use category
- (2) Zone Change that adds hotels as permitted uses in the Planned Community zoning district
- (3) Major Subdivision for the condominium hotel
- (4) Use Permit and Design Review for the condominium hotel project. An expanded discussion of the project’s consistency with the General Plan will be included in the project EIR.

Please note that the Comprehensive Planning Division of PRMD has provided a determination of the proposed project’s consistency with the General Plan based upon the project being described as a hotel. Aside from the change in General Plan land use category to General Commercial as noted in the previous paragraph, this consistency analysis finds:

1. The project complies with Policy LU-4f regarding public infrastructure and services.
2. The project complies with Policies OS-5c, OS-5e, and OS-5f regarding riparian corridors.
3. The project complies with Policies LU-4b, LU-4c, CT-2a, CT-2b, CT-2k and CT-13f pertaining to traffic and circulation.
4. The project complies with Policies of the North Sonoma Valley Specific Plan and the Glen Ellen Development and Design Guidelines.

There was testimony at the public scoping meeting that the General Plan Amendment from Limited Commercial to General Commercial, a designation that permits hotels, should not be approved; the feeling was the 1989 General Plan placed the Limited Commercial land use designation upon the property to prohibit more intensive uses such as hotels. Glen

Ellen has numerous bed and breakfast establishments and small inns near the town center and outlying area, and the community has a history of recreational and tourist use. Glen Ellen does not appear to be lacking in an adequate supply of land for local serving commercial uses; there are over 30 businesses in the community. Approximately 20 acres of land are designated for Limited Commercial use and approximately 3.5 acres are designated for Visitor Serving Commercial use. Staff does not believe the intent of the 1989 General Plan was to apply the Limited Commercial land use designation to commercial properties in Glen Ellen so as to preclude hotels and inns. General Plan amendments for several inns or inn expansions have been approved in recent years. It is because the proposed inn is proposed to be a condominium hotel that an amendment to the General Commercial instead of the Recreation and Visitor Serving Commercial designation is required.

Goals and policies within the Glen Ellen Development and Design Guidelines state that the land uses should correspond to those of the General Plan, that limited commercial land uses are intended to accommodate local serving retail sales and service needs of the community, and that the South Entrance area, where the project site is located, should be understated so as to maintain the inconspicuous nature of the community. The Guidelines are silent on recreation and visitor serving uses. Another concern was that such an amendment might set an inappropriate precedent for future similar requests. The project EIR should examine this issue in light of the policies of the General Plan, the North Sonoma Valley Specific Plan and the Glen Ellen Development and Design Guidelines.

In any case, a judgment as to whether the proposed project's size, scale, and intensity is consistent and compatible with the character of Glen Ellen will be a critical one for the decision-makers.

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

There are no habitat conservation plans or natural community conservation plans that apply to the project site.

10. **MINERAL RESOURCES** Would the project:
- | | | | |
|--------------------------------|---|------------------------------|-----------|
| Potentially Significant Impact | Less than Significant with Mitigation Incorporation | Less than Significant Impact | No Impact |
|--------------------------------|---|------------------------------|-----------|

- 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?

The project site and the adjoining Sonoma Creek are not designated as Mineral Resource sites on the General Plan land use map or zoning map.

- 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?

Same response as 10a).

11. **NOISE** Would the project result in:

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
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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? X _____ _____ _____

There is a noise contour that extends 93 ft. from the centerline of Arnold Drive for which traffic noise impacts must be evaluated. The hotel building will be located approximately 27 feet inside this noise contour. There are 7-8 hotel rooms on the upper floor level which may be impacted by traffic noise. The Project Review Health Specialist indicated a noise consultant must address this potential impact. .

The applicant commissioned a noise study by Illingworth and Rodkin, Inc. (2002). This report analyzed traffic noise impacts upon the guest rooms at the inn and also noise impacts of the inn upon residential properties to the north. The report concludes that even with windows open, traffic noise levels within guest rooms facing Arnold Drive will not exceed the noise limits of Table NE-2 of the Noise Element of the General Plan. The report concludes that inn activities will not impact residential properties to the north because only guest rooms face to the north; all common areas, courtyard areas, reception areas, building service areas and mechanical rooms are located away from residential receivers. The EIR consultant needs to confirm that the applicant's noise consultant's conclusions are correct and that the analysis is comprehensive. The noise study evaluated a two story inn atop a parking garage and did not evaluate the residence to the west across Arnold Drive (the parking garage has been deleted from the project).. The EIR consultant should determine whether the study needs to be expanded or modified to reflect these circumstances..

The project EIR should also consider potential noise impacts upon residents to the west of the Arnold Drive.

b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels? _____ _____ _____ X

There are no existing sources of ground borne noise or ground borne vibration at or near the site that the occupants of the hotel would be exposed to. The proposed project will not introduce any new permanent sources of ground borne noise or vibration.

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

Over the long term, motor vehicle trip noise and HVAC system noise on the hotel building may result in an overall increase in ambient noise levels in the area. This is a potential impact that needs to be analyzed in the project EIR.

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

Construction vehicles and equipment could result in the temporary increase of noise levels in the vicinity of the project. This is a potentially significant impact that could be mitigated by limiting time of construction activities, use of mufflers on equipment, etc.. This potentially significant

impact will be analyzed in detail in the project EIR.

e) For a project located within an airport land use plan or, where such 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?

___ ___ ___ X

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?

___ ___ ___ X

Comment for 11e) and f): The project site is located over 5 miles from either the Sonoma Valley Airport or the Sonoma Skypark. Therefore, the project would not expose people residing or working at the property to excessive noise levels from aircraft operations.

12. **POPULATION AND HOUSING** Would the project:

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Significant Impact
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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)?

___ ___ X ___

Generally, a project would be considered growth inducing if it would result in substantial population increases and/or new development that might not occur if the project were not implemented. The proposed project will, essentially, build out the Jack London Village center. The proposed project may give rise to a limited amount of new commercial development at the center, but lack of additional parking will be a limiting factor. The applicant indicates that approximately 10 persons will be employed at the hotel. It is assumed that these new employees will reside in Glen Ellen or a neighboring community. With these considerations, the proposed project should not induce substantial population growth.

There was testimony at the scoping meeting that since the inn would require the hiring of employees, a community impact report should be prepared for the project. Staff disagrees as the inn will employ only about 10 persons, and as there the proposed project will be located within the community of Glen Ellen, and close to other communities within five miles where employees can reside. The literature and excerpts submitted by the speaker at the scoping meeting indicate that community impact reports have been typically required for major projects in urban areas. One writer suggested that community impact reports be required for commercial projects over 50,000 sf in size and housing projects with over 100 units. While it can be debated whether it is appropriate to approve an inn of this size outside Glen Ellen's town center, staff cannot agree that a community impact report is required to analyze housing needs for a relatively small number of employees associated with this proposed project.

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

___ ___ ___ X

c) Displace substantial numbers of people,

Parks? _____ X _____

The project site is in very close proximity to the Jack London State Park and the Sonoma Valley Regional Park. Thus, there are ample opportunities for the estimated 10 new employees who may reside in the community to recreate.

Other public facilities? _____ X _____

The proposed project would not require new or altered governmental facilities to maintain adequate service levels.

14. **RECREATION**

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Significant Impact
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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? _____ X _____

The hotel's guests will likely use the services in the Town of Glen Ellen and also visit Jack London State Park and/or the Sonoma Valley Regional Park. However, this would represent a minor increase in the use of these parks. No recreational facility would be displaced by the project.

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? _____ X _____

When the proposed project was first submitted, there were discussions and site visits with the applicant and Regional Parks Department staff regarding the possibility of constructing a pedestrian bridge from the Jack London Village property over Sonoma Creek to the Sonoma Valley Regional Park. However, it was determined by Regional Parks staff that grade differentials across Sonoma Creek rendered this option unpractical.

15. **TRANSPORTATION/TRAFFIC** Would the project:

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Significant Impact
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a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections? _____ X _____

TJKM Transportation Consultants prepared a traffic study in 2002 for what was then proposed to be a 65 room hotel. As part of the environmental analysis, the EIR consultants will peer review the TJKM study.

The TJKM traffic study indicates the trip generation rate for a hotel room is 8.94 trips. The study states the daily weekday trip total for the 65 room hotel would be 580 trips with 40 trips during the

p.m. peak hour (adjusted for the revised project of 46 rooms, the total daily weekday trip total would be 410 trips with approximately 28 p.m. peak hour trips)

The County of Sonoma Guidelines for Traffic Studies is now being used to determine when traffic studies are required and to detail the scope of required studies. One criterion is that if a proposed project is anticipated to generate more than 25 trips during the critical peak hour, then a full traffic study is required. As noted in the previous paragraph, the proposed project is anticipated to generate more than 25 p.m. peak hour trips. The traffic study prepared by TJKM was for a 65 room hotel, not the revised 46 room hotel. This study does not contain a cumulative traffic impact analysis. The study does not analyze traffic impacts at Arnold Drive and Hwy 12 as recommended by a referral from Caltrans dated June 29, 2004. Other intersections and road segments may have to be analyzed. A full traffic study needs to be prepared for the project EIR.

The Transportation and Public Works Department referral on the project indicates a full traffic study is required. Additionally, the Department states the study must address the need for a left turn lane pocket for south-bound traffic turning into the project site, the existence of diagonal parking on Arnold Drive at the south end of the Jack London Village and the requested stop sign along Arnold Drive.

The December 6, 2004 letter from Caltrans reports that in conjunction with a proposed project to rehabilitate Hwy 12 from Boyes Boulevard to Sonoma Creek, the Arnold Drive-Hwy 12 intersection will be realigned. The EIR needs to take this into account as well as the responsibility of the Mayo Winery to share the cost of certain improvements at this realigned intersection.

- b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? X

The TJKM traffic study indicates the level of service on Arnold Drive in the vicinity of the project site is currently at LOS C (7,300 vehicles/day according to the Sonoma County General Plan). The p.m. peak hour volume is 1,270 vehicles per hour with 59% (752 vehicles) in the heavier direction which is LOS D according to the Sonoma County General Plan. According to the traffic study, the traffic for the 65 room hotel would cause two intersections to degrade from LOS B to LOS D in the p.m. peak hour: London Ranch Road-Arnold Drive and the Jack London Village driveway-Arnold Drive. It is not known if the reduced project for 46 rooms will cause the same deterioration in level of service. As per the discussion under 15a. above, other intersections and roadway segments may need to be analyzed. The County of Sonoma Guidelines for Traffic Studies includes a criterion that a full traffic study is required when a project is proposed in a study area where one or more streets or intersections are currently or proposed to operate at LOS D or worse. Level of service impacts need to be analyzed by the consultant in the project EIR.

There was testimony at the scoping meeting that the cumulative analysis should be as broad as possible, taking into account as large a geographical area as possible. The EIR consultant should work closely with County staff to identify projects for the cumulative analysis.

- 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? X

There are no airports in the vicinity of the proposed project. Sonoma Skypark is approximately 6 miles to the East and the Sonoma Valley Airport is 6 miles to the South.

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

The sight distance in both directions on Arnold Drive at the entrance to the Jack London Village is quite adequate. The drop in elevation between Arnold Drive and the parking lot is approximately 7 feet which may be somewhat dangerous for turning movements in/out of the property. Such hazards may be exacerbated with the increase in traffic associated with the proposed hotel project and should be analyzed further in the project EIR.

There was testimony at the public scoping meeting that left turn movements at Meadow Lane across from the project are already hazardous due to a blind curve to the north on Arnold Drive. The EIR needs to address this potential impact. Pedestrian safety should also be analyzed in the EIR as there are no sidewalks along Arnold Drive. The consultant should compare accident counts from the Glen Ellen Fire Department with such data from the California Highway Patrol.

- e) Result in inadequate emergency access?

With direct access from Arnold Drive into the site and close proximity to the Glen Ellen Fire Station, there should be no emergency access impacts posed by the proposed project.

In response to testimony at the scoping meeting, the EIR should address emergency access impacts associated with overflow parking that might result from the project.

- f) Result in inadequate parking capacity?

The applicant has prepared a shared parking analysis for the proposed project and the balance of the Jack London Village. The hour with the maximum total number of required spaces was determined in the analysis to be 9 p.m.. Using the County parking standards, the required number of parking spaces at that time for all uses at the Jack London Village is 96. The north parking lot will contain 73 spaces and the south parking lot will contain a minimum of 23 spaces. The head-on spaces on Arnold Drive at the south end of the Village were never approved and presumably will need to be removed since back-up movements appear to create a traffic hazard for thru traffic. The project EIR consultant should examine the shared parking analysis prepared by the applicant. Staff has learned that the Olive Press business at Jack London Village may be relocating, so the effect of this vacancy needs to be addressed by the EIR consultant. The project EIR consultant should also examine whether the distribution of the two Village parking lots works for the property. The Transportation and Public Works Department should evaluate whether the head-in spaces on Arnold Drive at the south parking lot are acceptable.

At the public scoping meeting, there was considerable concern voiced about the adequacy of parking, for the existing center as well as after the addition of the inn. The EIR must address employee parking needs as well as inn guest parking needs. Parking needs for all tenant spaces, filled or vacant, must be addressed. The EIR should also verify there is adequate area for truck parking and turning movements.

- g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

There may be a bus stop at/near the entry to Jack London Village. The Transit Division of the Transportation and Public Works Department should be consulted as to the need for a bus turnout on Arnold Drive.

16. **UTILITIES AND SERVICE SYSTEMS**

Would the project:

Potentially Significant Impact Less than Significant with Mitigation Incorporation Less than Significant Impact No Impact

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

The project will be connected to the public sewer which is in the Sonoma Valley Sanitation District. While it is presumed that the Sonoma Valley treatment plant on 8th Street East has sufficient capacity to serve the proposed project, this should be verified by the project EIR consultant.

- 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?

The proposed project would have to construct sanitary sewer facilities (connections) to the existing sewer lines adjacent to the project site. Based upon a confirmation from the Water Agency that they have capacity to accommodate the additional sewage from the proposed hotel project, no new wastewater facilities will have to be constructed.

Based upon a referral from the Water Agency dated December 2, 2004, the sanitation design for the project must be in compliance with the Design and Construction Standards for Sanitation Facilities and the Sanitation Code. The EIR should note this.

For a discussion of water facilities for the proposed project, refer to Item 13.

- 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?

As the project site slopes from Arnold Drive down to Sonoma Creek, site drainage will include outfalls into Sonoma Creek. Other than those facilities, no other drainage facilities are anticipated. Permits from PRMD and from the Water Quality Control Board will be required for the project. Construction impacts related to the storm water outfalls will be addressed in the project EIR and are also discussed in Item 4b.

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

See discussion under Item 13.

- 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?

See discussion under Item 16a..

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

Sonoma County has a solid waste management program in place that provides solid waste collection and disposal services for the entire County. Solid waste from the Jack London Village is taken to the Sonoma Transfer Station located at 4376 Stage Gulch Road, where it is sorted and sent to the Central Landfill, southwest of Cotati. The landfill is owned by the County and is permitted to accept up to 2,500 tons per day of non-hazardous municipal solid waste. Currently the landfill accepts approximately 1,300 tons per day, but is approaching its capacity. While the County has embarked on a 14-acre expansion that was to assure capacity through the year 2015, that expansion has been delayed by the North Coast Regional Water Quality Board, which refused to grant permits for the expansion until the County resolves the problem of a leaking liner designed to prevent ground water pollution. As a result of the delay, the County may be forced to truck solid waste to a landfill in Solano County. In addition, cumulative impacts due to growth in the County will eventually affect the landfill unless each project and generator reduces wastes. A mitigation measure to reduce this project's potential impacts to less than significant levels could include the provision for all on-site facilities to encourage recycling by providing convenient locations and containers for the disposal of glass and bottles by guests of the hotel and tenants of the Jack London Village. This potential impact needs to be evaluated further in the project EIR.

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

See discussion under 16f.

17. **MANDATORY FINDINGS OF SIGNIFICANCE**

Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
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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? X

See Item 4. Biological Resources

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)? X

See Item 15. Transportation

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