THE BARLOW HOTEL PROJECT

California Public Resources Code Section 21083.3 and California Environmental Quality Act Section 15183 Statutory Exemption Checklist (Statement of Reasons for Exemption from Additional Environmental Review)

Prepared for
City of Sebastopol

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ESA

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THE BARLOW HOTEL PROJECT

Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist

Date:	July 2024
Project Title:	The Barlow Hotel Project
GP Designation:	Light Industrial (LI)
Density:	12.1 to 25 units per acre
Zoning:	Hotel Site: Commercial Industrial (CM)
	Parking Lot Site: Industrial (M) and Environmental and Scenic Open Space (ESOS) Combining District
Applicant:	Aldridge Development, Inc
Staff Contact:	John Jay, Associate Planner
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Introduction

California Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that (1) are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent; (2) are potentially significant off-site impacts and cumulative impacts that were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action; or (3) are previously identified significant effects which, as a result of substantial new information that was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact. Accordingly,

this document comprises a statement of reasons for exemption from additional environmental review under CEQA for the proposed Barlow Hotel Project in the City of Sebastopol.

Project Description

Introduction

The Barlow Hotel Project ("proposed project" or "project") consists of a proposed 83-room hotel and an associated parking lot in the City of Sebastopol. The project is intended to add to the diversity of uses at the existing Barlow market district in downtown Sebastopol and provide support for Barlow industrial producers and retailers as well as surrounding Sebastopol businesses. The project would be approved via a Development Agreement.

Project Location

The project site includes a hotel site at 6782 Sebastopol Avenue and a separate parking lot site at 385 Morris Street. Collectively, the project site includes the primary hotel and parking lot components and related areas for utilities, landscaping, other minor improvements, and construction staging. **Figure 1** shows the regional location for the project. **Figure 2** shows the hotel and parking lot sites and the construction staging areas.

The hotel would replace the existing 36,402-square-foot Guayakí organic beverage company warehouse building at the Barlow, which spans from Sebastopol Avenue to McKinley Avenue. The parking lot site was formerly a concrete batch plant. Structures and equipment associated with that former use were removed several years ago. The parking lot site, much of which is paved, is currently vacant and used for overflow Barlow parking for events and temporary vehicle storage.

The Barlow is a 12.4-acre pedestrian-oriented development with a wide range of uses, with most square footage occupied by industrial uses, but also including retail shops; artisan restaurants, cafes, and food producers; a community-based supermarket; premium wine, beer, and cider-makers; and other uses. In addition, music and other special events are regularly conducted. The Barlow is a destination for Sebastopol-area residents as well as visitors to the area. There are approximately 36 tenants in the Barlow, ranging from one tenant occupying less than 230 square feet to a winery occupying over 60,000 square feet. Total building square footage in the Barlow is approximately 222,000 square feet in 18 buildings. Industrial space comprises approximately 61 percent of the Barlow square footage; food and beverage comprise 23 percent; office comprises 7 percent; retail and service uses comprise 5 percent; and vacant, common, and property management comprise approximately 4 percent of the total square footage.

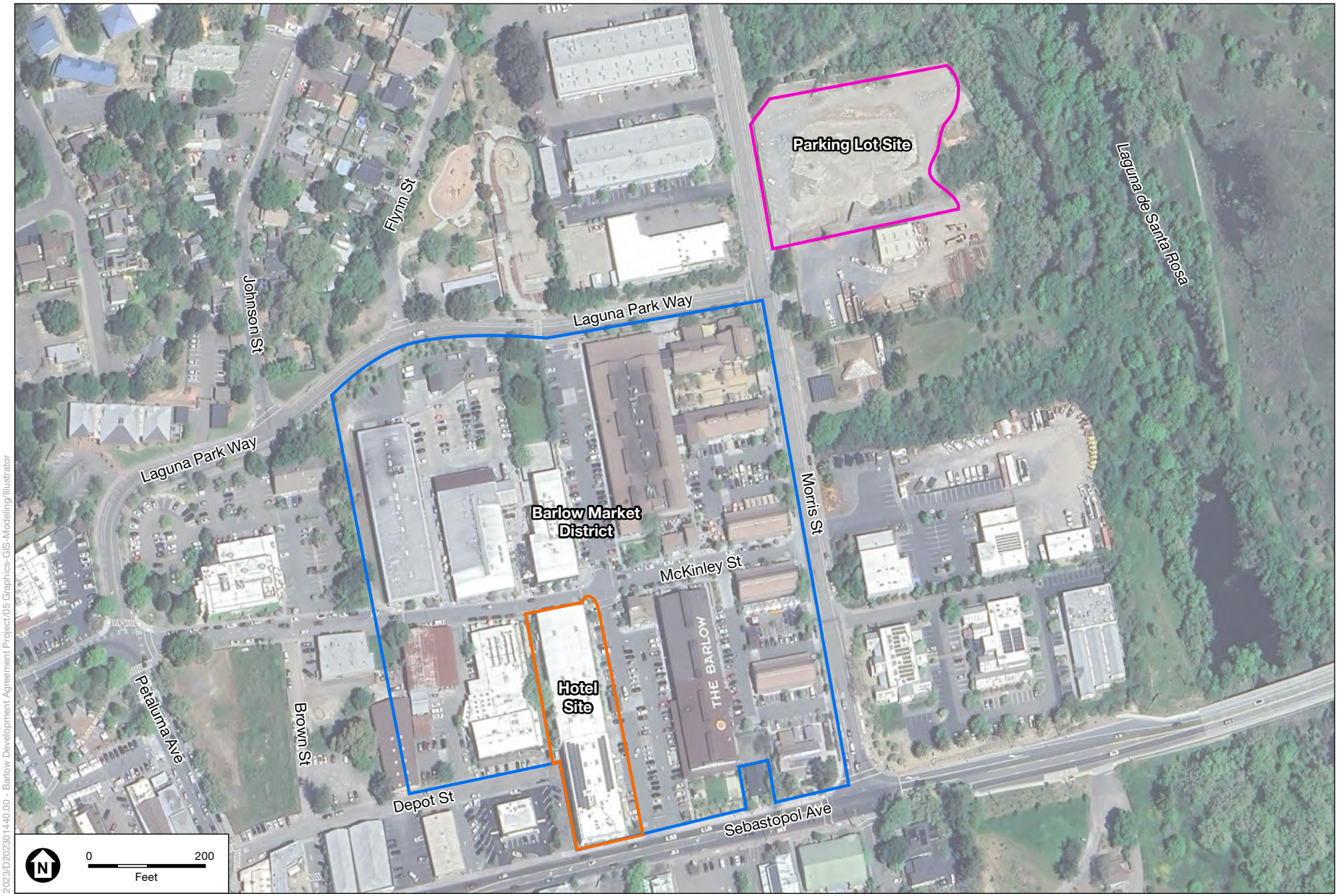
The Barlow is located just east of downtown Sebastopol. To the north are industrial uses along Morris Street. Land uses on the east side of Morris Street include a combination of office, industrial, and utility uses; the Laguna Preserve public park; and the Sebastopol Community Cultural Center. Across Depot Street and across Sebastopol Avenue are a variety of commercial uses, with one retail site having townhomes behind it. Further east on Sebastopol Avenue is a single-family residence, with rental units behind it, as well as the City-owned Park Village mobile home park. Sebastopol Avenue is State Route 12 (SR-12). To the north across Laguna Park Way is the City's Skategarden park and residential uses.

SOURCE: ESRI

Barlow Hotel Project

Figure 1
Regional Location

ESA



2023/D202301440.00 - Barlow Development Agreement Project/05 Graphics-GIS-Modeling/Illustrator

SOURCE: Aldridge Development, 2024; ESA, 2024; Google Earth, 2024

Barlow Hotel Project

Figure 2
Project Site

ESA

Riparian habitat is present to the north and east of the parking lot site in association with the Laguna de Santa Rosa, which is the largest freshwater wetlands complex on the northern California coast. The Laguna's fourteen-mile channel forms the largest tributary to the Russian River, draining a 254-square-mile watershed which encompasses nearly the entire Santa Rosa Plain. This includes parts of the communities of Windsor, Santa Rosa, Rohnert Park, Cotati, Forestville, and Sebastopol.

Land Use Designation and Zoning

The project site (both the hotel site and parking lot site) is designated as Light Industrial (LI) on the City of Sebastopol General Plan Land Use Map. The LI designation provides for a wide variety of commercial, wholesale, service, and processing uses. Other uses allowed in this designation include office ancillary to industrial uses; warehousing and agricultural products sales and services; auto sales and repair; food and drink processing; construction yards; research and development, laboratories; light manufacturing; and similar uses. Residential uses are permitted as a secondary use to the primary light industrial uses allowed in this land use designation at a density of 12.1 to 25 units per acre. Maximum floor area ratio (FAR) shall not exceed 0.75 (not including the residential use).

The hotel site is zoned Commercial Industrial (CM) in the City of Sebastopol Zoning Code (Title 17 of the City of Sebastopol Municipal Code). The CM District is intended to encourage local production, innovation, and sales of local art, textile, food, beverage, and other tangible goods by allowing a range of complementary, community-oriented building types and spaces that accommodate small- and mid-size makers, fabricators, producers, and manufacturers, as well as specified commercial, residential, and other uses. The City of Sebastopol Zoning Code defines hotels as residential uses. The maximum FAR (not including residential uses) in the CM District is 0.75. The maximum building height is 35 feet (two stories). Up to four stories and up to 50 feet in height are allowed for projects with residential uses, including hotel rooms, on upper floors, provided a conditional use permit is obtained and the City of Sebastopol Planning Commission finds that the project design provides appropriate massing, height transitions and variations, and suitable relationships to neighboring sites. It should be noted that a Development Agreement must be adopted by ordinance and thus need not conform to the strict provisions of the zoning regulations but must be compatible with uses permitted in the district.

The parking lot site is zoned Industrial (M) and Environmental and Scenic Open Space (ESOS) Combining District. The purpose of the M District is to implement the industrial land use category of the General Plan and to provide areas for the manufacture, assembly, packaging, or storage of products which are not harmful, injurious, or detrimental to property or the general welfare of the City and its residents; and other general commercial and residential uses that are compatible with the industrial uses. Parking facilities are allowed in the M district with the issuance of a conditional use permit. The purpose of the ESOS Combining District is to control land use within areas of great scenic or environmental value to the citizens of the Sebastopol General Plan area, to control any alteration of the natural environment and terrain in areas of special ecological and educational significance to the entire community as unique vegetative units or wildlife habitats or as unique geological or botanic specimens, and to enhance and maintain for the public welfare and well-being the public amenities accrued from the preservation of the scenic beauty and environmental quality of Sebastopol. The ESOS Combining District is applicable to areas of great natural beauty, high visibility, or ecological significance such as areas bordering Atascadero

Creek or the Laguna de Santa Rosa. The ESOS Combining District was established to implement the goals, policies, and objectives of the Conservation, Open Space and Parks Element of the General Plan.

Project Description

Project Objectives

While an EIR is not being prepared for the proposed project, the key objectives of the proposed project are provided below for informational purposes.

- Strengthen and enhance the diversity of uses and economic activity at the Barlow and in Sebastopol's downtown by constructing a high-quality, architecturally unique, 83-room hotel with associated commercial uses and a 242-space parking lot, both of which are in compliance with intended uses and standards in the Sebastopol General Plan.
- Design the project in a manner that reflects the unique and diverse character of Sebastopol.
- Support the Barlow's Sonoma County artisan producers making local food, cheese, bread, wine, beer, and crafts onsite, as well as the local farm market. These producers rely on selling their goods directly to customers, and the Barlow's goal with this project is to bring additional customers to the area to help these producers thrive, thereby bolstering and preserving the Barlow's industrial character as well as supporting Sebastopol's and West Sonoma County's economic vitality.
- Create an additional unique local venue for weddings, small conferences, and other special events.
- Protect existing environmental resources of the project sites, including native oak trees, wetlands, and sensitive species at the Batch Plant site by limiting development at that site to the previously developed/disturbed portion of the site, and by maintaining appropriate setbacks from the preserved open space area of the property.
- Minimize visual impacts of the project through careful siting, varied building massing, the use of a rich blend of building materials and colors, and lighting that does not intrude on surrounding areas, while also providing visual amenities for visitors and residents.
- Minimize traffic impacts by enhancing the mix of uses in the Barlow and downtown area, promoting a 'park once' strategy, and by developing in an existing pedestrian-oriented area.

Project Components

Hotel

The proposed project would include demolition of the existing 36,402-square-foot Guayakí organic beverage company warehouse building at 6782 Sebastopol Avenue and construction and operation of a hotel with associated restaurant, two bars (indoor and rooftop), retail, gym, spa, and meeting room uses. In addition, there would be a kitchen serving the restaurant, bars, meeting rooms, and guest rooms, as well as other 'back of house' uses, including restrooms, storage, and equipment rooms. The hotel will be a four-story, 50-foot-high, 83-room hotel with architectural features that will not exceed 65 feet in height.[1] The gross square footage of the hotel would be approximately 88,821 square feet with a net square

[1] The current design shows the tallest building element (mechanical penthouses that shelter the building's elevators) to be approximately 62 feet.

footage of approximately 77,639 square feet.[2] A detailed breakdown of square footages for hotel components is included in Appendix A, Project Plans.

The hotel restaurant, indoor bar, retail, spa, and meeting rooms would be open to the public. The restaurant would be open seven days a week, from 7 a.m. to 10 p.m. The bars would be open seven days a week from 12 p.m. up to 10 p.m. The spa would also be open seven days a week from about 10 a.m. up to 7 p.m. The meeting rooms would be open seven days a week from about 8 a.m. up to 10 p.m. There would be a rooftop pool, which would be open from 10 a.m. up to 10 p.m. The rooftop bar would include speakers playing music, but no live music is planned. Amplified music at the rooftop bar would be limited to 12 p.m. up to 10 p.m. daily, and speakers at the rooftop bar would be directed inward to reduce the potential for off-site noise propagation. The rooftop bar would not be open to the public.

It is anticipated that the hotel, including staffing for hotel, restaurant, bars, retail, gym, spa, and meeting room uses, would include up to 50 employees.

The hotel would be constructed and operated in compliance with the applicable requirements of the City of Sebastopol Zoning Code. All hotel rooms and most of the other square footage would be located a minimum of two feet above the 100-year flood elevation in compliance with City flood protection regulations. Any non-residential areas below this level would be protected with flood barriers in the event of projected flooding.

Twelve (12) bicycle parking spaces would be provided at the hotel site for use by guests, visitors, and staff, along with an additional 20 at the parking lot site. To help reduce vehicle trips, hotel workers would be offered bus passes. The proposed project would include demolition of the existing parking lot directly east of the existing warehouse building. Under the proposed project there would be a net increase in parking spaces, with the existing at 87 spaces increased to 91 spaces.

The hotel is conceived as a unique destination with a distinct identity and image yet complimenting the rest of the Barlow district. The architectural character of the hotel is inspired by the regional vernacular, specifically farmhouses and local agricultural buildings found in the surrounding wine country. The adjacent Gravenstein Court parking lot would be enhanced to include a grove of trees, extending the rural character beyond the footprint of the structures.

The hotel building is organized around a sequence of five landscaped courtyards, each with a distinct image and character, together creating a visual and experiential sequence between open-to-sky and covered spaces. The building would be entered in three locations: along McKinley Street via a covered paseo, along Gravenstein Court from the drop-off area, and at Sebastopol Avenue. Both the McKinley Street and Gravenstein Court entries lead one into the first large courtyard from where one enters the lobby, bar, and restaurant.

The 83 hotel rooms would be configured around single-loaded arms overlooking the courtyards. The public functions of the hotel, such as the restaurant, meeting rooms, bar, and kitchen would be situated closer to McKinley Street, around the entrance courtyard. The restaurant would wrap around to line the

[2] Gross square footage is the total space a building takes up. It includes all of the area inside the building including unusable space between walls. Net square footage includes only the areas of the building that are accessible by the user or tenant.

street, along with more retail to enliven the pedestrian experience. The hotel spa would be located along and entered within the hotel, as well as from Sebastopol Avenue.

The building's highest massing would comprise a fourth-story rooftop bar and would be located in the least visible part of the site. The rest of the building would be a combination of two and three stories. This varied design is intended to provide a human-scale massing as opposed to a single monolithic building. The roofs would include a combination of flat and sloping roofs of varying slopes and materials.

Parking Lot

The proposed project would construct and operate a 242-space partially valet-operated parking lot on the 2.9-acre site of the former concrete batch plant at 385 Morris Street. The parking lot site, much of which is paved, is currently vacant and used for overflow Barlow parking for events and temporary vehicle storage. The parking lot would supply parking for the hotel and the Barlow generally. While specifics would be set by the hotel operator, valet parking is planned to operate seven days a week and likely be staffed from 8 a.m. to 8 p.m. and by hotel front desk staff in off hours. It is anticipated that there would be two employees for valet operations during the 12 staffed hours. In addition to the valet operation, it is anticipated that some of the parking spaces would be self-park and used by employees of Barlow businesses and by the general public for event parking. Employee parking at the parking lot is anticipated to free up existing parking spaces in the Barlow proper and help reduce circulation of vehicles seeking convenient parking. In addition to vehicle parking, there will be 20 bicycle parking spaces at the site. The parking lot would include 18 electric vehicle charging stations. A small maintenance shed would also be located on the parking lot site. The easterly portion of the parking lot site, which was not actively used by the former batch plant, would remain undeveloped and protected with a 50-foot setback. As proposed, with the addition of bioswales, engineered drainage systems, and the reintroduction of native plants for landscaping, development of the parking lot is anticipated to improve water quality as compared to current conditions. Extensive native planting would be employed for landscaping, and lighting would be the minimum necessary for safety, to comply with 'dark sky' objectives, and to minimize impacts on wildlife. The parking lot would be developed and operated in compliance with the applicable requirements of the City of Sebastopol Zoning Code, including required use, setbacks, and other development parameters.

Utilities

Water

The City of Sebastopol would provide water service to the hotel building via an existing 8-inch water supply main in Sebastopol Avenue. No off-site improvements to the existing water mains are needed to serve the hotel building. The water line to the hotel building would be slightly relocated as is shown on the project plans (included as Appendix A, Project Plans), but an 8-inch supply pipe would continue to serve the hotel building. No new water supply infrastructure is proposed for the parking lot site.

Wastewater

Wastewater generated by the hotel building would be collected by the City of Sebastopol's sewer system via an 8-inch main located in Sebastopol Avenue. No off-site improvements to the existing sewer mains are needed to serve the hotel building. The 8-inch main located in Sebastopol Avenue would be slightly relocated as is shown on the project plans (included as Appendix A, Project Plans), but an 8-inch main

would continue to serve the hotel building. No new wastewater infrastructure is proposed for the parking lot site.

Storm Drainage

Storm drainage facilities that are owned and maintained by the City of Sebastopol would serve the hotel building (with facilities located in McKinley Street) and the parking lot site (with facilities located in Morris Street). Storm water on both the hotel building and parking lot site would be managed with a combination of Low Impact Development (LID), storm water quality treatment, and flood control measures. These measures would include, but are not limited to, planting new trees, handling roof downspouts, and installing bioretention areas. Storm water on the project site (i.e., the two locations that primarily comprise the project site) would be directed to on-site bioretention areas. No off-site improvements to the existing drainage infrastructure are needed to serve the proposed project, including both the hotel building and parking lot sites.

Natural Gas Service

Natural gas service to the project site would be provided by the Pacific Gas and Electric Company (PG&E) via the existing gas pipes on-site. No off-site improvements to existing natural gas infrastructure are needed to serve the proposed project and there would be no increase or change in pipe size to serve the proposed project.

Electrical Service

Electrical service to the hotel and parking lot site would be provided by PG&E via existing infrastructure in the project area. No off-site improvements to existing electrical infrastructure are needed at this time.

Tree Program

Hotel Site

As described above, the proposed project would include demolition of the existing parking lot directly east of the existing warehouse building. This would include removal of the existing trees in the parking lot. Approximately 36 larger trees and 27 smaller trees in the existing parking lot would be removed. Most of the trees that would be removed are in the 2- to 4-inch diameter range, with one tree approximately 8 inches in diameter. All trees that would be removed from this area are below the 10-inch diameter threshold for protected native trees or the 20-inch threshold for protected non-native trees as defined in the City Tree Protection Ordinance (Sebastopol Municipal Code, Title 18, Health and Safety, Chapter 8.12, Tree Protection). The removed trees would be replaced by 26 large and 31 smaller trees (a net reduction of 10 large trees and a net increase of four small trees) for a net reduction of six trees in the parking lot area directly east of the hotel building. Proposed new trees elsewhere on the hotel site would also include one large oak tree and 18 smaller trees in the hotel courtyard areas.

Construction of the hotel building would require the removal of two protected trees directly to the west of the existing warehouse building (on APN 004-750-034). As indicated in the tree report prepared for the proposed project (discussed and cited in Section 4, *Biological Resources*, of this document), these protected trees (as defined in the City Tree Protection Ordinance) include a valley oak with a 27-inch diameter and a Hankow willow with a 10.2-inch diameter. While the willow is a protected tree, it is non-native, and, as a result, the City Tree Protection Ordinance threshold for protection is 20-inches in diameter. As discussed in the tree report, given the location of the trees and the necessary excavation

required for the hotel, preservation of these trees is not possible and, as a result, would be removed to accommodate the hotel building. The removal of these two protected trees would be approved via either the Development Agreement or approval of a tree removal permit obtained pursuant to the City Tree Protection Ordinance.

Parking Lot Site

No trees are proposed for removal at the parking lot site. The proposed project would add 40 mixed live and valley oaks, eight valley oaks as street trees, 14 large canopy riparian trees (in bioswales and bioretention areas), and 60 small understory native and/or riparian trees at the parking lot site.

Summary of Project Parcel Information

Table 1 presents parcel information for the proposed project, including assessor parcel numbers (APNs), General Plan land use designations and zoning, property owners, project components, and approximate acreage of project development that would occur within each parcel. This table is referred to throughout this checklist, as appropriate.

TABLE 1
PROJECT PARCEL INFORMATION

Name/Description	Project Component	APN	Project Development Acreage[a]	Owner	General Plan Land Use Designation	Zoning
Hotel Parcel	Hotel Structure	004-750-030	1.23	Highway Partners, LCC	Light Industrial (LI)	Commercial Industrial (CM)
Former Batch Plant	Parking and electric vehicle charging stations	004-011-017	1.4	Sebastopol Industrial Park, LCC	Light Industrial (LI)	Light Industrial (LI) with ESOS combining
Former Batch Plant	Parking and electric vehicle charging stations	004-011-020	1.5	Sebastopol Industrial Park, LCC	Light Industrial (LI)	Light Industrial (LI) with ESOS combining
McKinley Street	Landscaping and sidewalk	004-750-019	0.46	Sebastopol Industrial Park, LCC	Light Industrial (LI)	Commercial Industrial (CM)
Co-op Parcel	Landscaping and sidewalk	004-750-034	0.90	Barlow Star, LLC	Light Industrial (LI)	Commercial Industrial (CM)
Gravenstein Court	Demolish part of parking lot, valet access to hotel, parking, utilities, landscaping	004-750-020	0.21	Sebastopol Industrial Park, LCC	Light Industrial (LI)	Commercial Industrial (CM)

NOTES:

a. Indicates the approximate acres of development that would occur within each parcel for the specified project component.

SOURCE: Aldridge Development, 2024; Adobe Associates, Inc, 2024.

Project Construction

Project construction is anticipated to start in 2026 and could start as early as 2025, depending on if and when discretionary approvals are final. Construction of the hotel is estimated to occur over a duration of 18 months and include approximately 75 peak daily construction workers. Construction of the parking lot

is estimated to occur over a duration of 90 days and include approximately 6 peak daily construction workers. Construction activities would occur between 7 a.m. and 5 p.m. Construction activities would include demolition of the existing 36,402-square-foot Guayakí organic beverage company warehouse building on the hotel site; site preparation, including grading and excavation on the hotel and parking lot sites; and development of the hotel and parking lot. The maximum depth of excavation for the hotel is anticipated to be 5 feet below ground surface. The maximum depth of excavation for the parking lot is anticipated to be 4 feet below ground surface. Construction staging for the hotel would be located at the east end of Depot Street, immediately west of the Guayakí warehouse building, and on the parking spaces immediately east of the Guayakí warehouse building. Construction staging for the parking lot would be located on the parking lot site. Parking for construction worker vehicles would be located on the parking spaces immediately east of the Guayakí warehouse building and on the parking lot site. All construction equipment would meet Tier 4 emission standards.[3]

Required Project Approvals

The hotel site fronts Sebastopol Avenue, a State Highway (SR-12), so any frontage improvements (sidewalks, driveways, utilities) would require a California Department of Transportation (Caltrans) encroachment permit. Alcohol uses would require permits from the California Department of Alcoholic Beverage Control (ABC). Required discretionary project approvals are listed below.

- CEQA Compliance
- Ordinance Approving Development Agreement
- Development Agreement

City of Sebastopol General Plan Update and Final EIR

The City of Sebastopol General Plan Update (GPU) is a comprehensive, long-term general plan for the physical development of the City's Planning Area. The GPU Final EIR (GPU FEIR) was certified in conjunction with adoption of the GPU on November 15, 2016. The GPU FEIR comprehensively evaluated environmental impacts that would result from implementation of the GPU, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

Terminology Used in This Document

GPU FEIR and GPU DEIR

For the reasons explained in this subsection, this document references both the GPU FEIR and the GPU Draft EIR (GPU DEIR).

[3] Tier 4 standards are emission standards created by the California Air Resources Board and the U.S. Environmental Protection Agency (EPA). These standards apply to new engines used in heavy equipment and off-road machinery used in several industries, including mining, construction, and agriculture. Tier 4 standards target two exhaust pollutants. The first is particulate matter (PM), which contains soot and other unconsumed hydrocarbons. The second is NOx, a chemical compound made up of nitrogen and oxygen. NOx is the main pollutant in smog.

In accordance with CEQA, the GPU DEIR described and analyzed the environmental effects of implementing the GPU and discussed ways of mitigating or avoiding potentially significant effects, where feasible. The Draft GPU and the GPU DEIR were made available for public review from May 23, 2016, through July 8, 2016. In accordance with CEQA, the GPU FEIR was prepared to address comments received in response to the GPU DEIR and included textual changes to the GPU DEIR, where warranted. Responses to comments received during the comment period did not involve any new significant impacts or significant new information that required recirculation of the GPU DEIR pursuant to CEQA. The GPU FEIR was certified in conjunction with adoption of the GPU on November 15, 2016.

Because the GPU DEIR contains the primary environmental analysis that supports the GPU FEIR, this document makes frequent reference (by impact number and page numbers) to the GPU DEIR. These references to the GPU DEIR incorporate any and all revisions to the GPU DEIR that were incorporated into the certified GPU FEIR. References in this document to the GPU FEIR refer to the certified EIR for the adopted GPU, including all textual changes to the GPU DEIR.

Planning Area

As described on pages 2-1 to 2-2 of the GPU Land Use Element and shown on GPU Figure 2.1, *General Plan Land Use Map*, the Sebastopol Planning Area consists of the incorporated City limits, the City's Sphere of Influence (SOI), and the City's Urban Growth Boundary (UGB).

Summary of Findings

A comprehensive environmental evaluation has been completed for the proposed project as allowed by PRC Section 21083.3 (for the statutory exemption) and as further clarified by CEQA Guidelines Section 15183. This evaluation concludes that the proposed project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the City of Sebastopol GPU, as analyzed by the GPU FEIR (State Clearinghouse [SCH] Number 2016032001).

In accordance with CEQA Guidelines Section 15183, the proposed project qualifies for an exemption because the following findings can be made:

1. **The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**

   The proposed project consists of an 83-room hotel with associated restaurant, bars, retail, gym, spa, and meeting room uses and an associated parking lot in the City of Sebastopol. The project site (both the hotel site and parking lot site and other associated landscaping, sidewalk, and utilities uses) is designated as Light Industrial (LI) on the City of Sebastopol General Plan Land Use Map. GPU Policy LU 1-4 specifies that the LI land use designation provides for a wide variety of commercial, wholesale, service, and processing uses that do not generate excessive adverse environmental impacts. Other uses allowed in this designation include office ancillary to industrial uses; warehousing and agricultural products sales and services; auto sales and repair; food and drink processing; construction yards; research and development, laboratories, light manufacturing; and similar uses. Residential uses are permitted as a secondary use to the primary light industrial uses allowed in this land use designation at a density of 12.1 to 25 units per acre. Maximum floor area ratio (FAR) shall not exceed 0.75 (not including the residential use). The proposed project is consistent with Policy LU 1-4 in that it includes residential and ancillary uses (commercial uses in the

hotel and required parking). Within the context of the Barlow development, including non-residential uses on the parcel where it would be developed, the residential uses are secondary to other uses. With regard to density, hotel rooms are not dwelling units in that they lack kitchens, which under the City's definition, must be present for the use to count as a residential unit.[4] Therefore, the residential unit density standards do not apply to the proposed project. As a residential use, the hotel is not subject to GPU FAR limits, and the parking lot has no FAR, except for a small storage shed. The proposed project is consistent with the General Plan.

It is anticipated that the Development Agreement for the proposed project will allow an extended term for the project approval; allow the project components, including proposed variations from specific zoning standards or procedures; approve Design Review; provide some allowance and procedure for possible future modification of the project components; provide for streamlined plan checks; and modify the application or timing of some impact fee requirements.

2. **There are no project specific effects which are peculiar to the project or its site, and which the GPU FEIR failed to analyze as significant effects.**

   As detailed in the CEQA Guidelines Section 15183 Exemption Checklist included in this document, there are no project specific effects which are peculiar to the project or its site, and which the GPU FEIR failed to analyze as significant effects.

3. **There are no potentially significant off-site and/or cumulative impacts which the GPU FEIR failed to evaluate.**

   As detailed in the CEQA Guidelines Section 15183 Exemption Checklist included in this document, there are no potentially significant off-site and/or cumulative impacts which the GPU FEIR failed to evaluate.

4. **There is no substantial new information which results in more severe impacts than anticipated by the GPU FEIR.**

   As detailed in the CEQA Guidelines Section 15183 Exemption Checklist included in this document, there is no substantial new information which results in more severe impacts than anticipated by the GPU FEIR.

5. **The project will undertake feasible mitigation measures specified in the GPU FEIR.**

   As detailed in the CEQA Guidelines Section 15183 Exemption Checklist included in this document, there are no mitigation measures specified in the GPU FEIR that the proposed project would be required to undertake. However, all applicable GPU policies would be undertaken through project design, compliance with regulations and ordinances, or through the project's conditions of approval.

Signature	Date
Printed Name	Title

[4] As specified in Section 17.08.060 of the City of Sebastopol Zoning Code, "Dwelling" or "dwelling unit" means a room or group of internally connected, habitable rooms that have sleeping, cooking, and sanitation facilities, but not more than one kitchen occupied by or intended for one household on a long-term basis. A "dwelling" is the same as an independent housekeeping unit.

CEQA Guidelines Section 15183 Exemption Checklist

The checklist below provides an analysis of potential environmental impacts resulting from implementation of the proposed project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the proposed project would result in a potentially significant impact triggering additional review under CEQA Guidelines Section 15183.

- Items checked "Significant Project Impact" indicate that the proposed project could result in a significant effect that is peculiar to the proposed project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR.
- Items checked "Project Impact not Identified by GPU FEIR" indicate that the proposed project would result in a significant project-specific impact that was not identified in the GPU FEIR.
- Items checked "Off-Site or Cumulative Impact not Identified by GPU FEIR" indicate that the proposed project would result in a significant off-site or cumulative impact that was not identified in the GPU FEIR.
- Items checked "Substantial New Information" indicate that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GPU FEIR.

A project does not qualify for a CEQA Guidelines Section 15183 exemption if it is determined that it would meet any of the above conditions. As shown in the following checklist, none of the above items are checked. An analysis of potential environmental impacts resulting from the proposed project is provided in the checklist below for each environmental resource topic included in CEQA Guidelines Appendix G.

1. Aesthetics

AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☐	☐

Discussion

a) Impacts related to scenic vistas that would result from implementation of the GPU were evaluated under Impact 3.1-1 on pages 3.1-1 to 3.1-23 of the GPU DEIR. The analysis determined that, while the City's Planning Area contains numerous areas and viewsheds with relatively high scenic value, there are no officially designated scenic vista points in the Planning Area. Additionally, the analysis determined that there are no officially designated scenic highways located in the City of Sebastopol. The analysis identified that significant visual resources in the Planning Area include views of agricultural land, grassland, woodlands, riverine, wetlands, and public art. These resources can be viewed from public vantage points, including highways, roads, open space areas, and private residences throughout the Planning Area. The analysis determined that buildout of the GPU would allow for new development to occur in areas that have historically been used for agricultural operations and areas that have been previously undeveloped. The analysis determined that the introduction of new development into previously undisturbed areas or areas that have been historically used for agricultural operations may result in potentially significant impacts to scenic resources or result in the degradation of the Planning Area's visual character. The analysis determined that implementation of the policies and programs contained in the GPU Land Use, Community Design, and Conservation and Open Space Elements would ensure that new urban residential and commercial development in the City's Planning Area is located in and around existing urbanized areas and developed to be visually compatible with nearby open space resources, which would limit impacts to scenic resources. However, the analysis determined that even with the implementation of the policies and actions in GPU, the potential for new development to interrupt scenic views, particularly new industrial and commercial development on agricultural or undeveloped lands, would remain. The analysis determined that the only method to completely avoid impacts to scenic resources would be to severely limit the development potential on all undeveloped lands. The analysis determined that this type of mitigation is not consistent with the objective of the GPU to support local

employment opportunities and expand the local jobs base. Therefore, the analysis concluded that the impact would be significant and unavoidable.

As described in the Project Description of this document, the proposed project would include demolition of the existing 36,402-square-foot Guayakí organic beverage company warehouse building at 6782 Sebastopol Avenue and construction and operation of a hotel with related parking, landscaping, and utilities improvements. The hotel will be a four-story, 50-foot-high, 83-room hotel with architectural features that will not exceed 65 feet in height.[5] The proposed project would also construct and operate a parking lot on the site of the former concrete batch plant at 385 Morris Street. The proposed development sites are urbanized, and both sites have been previously developed. The hotel would replace an existing warehouse in relatively poor condition. The parking lot site, much of which is paved, is currently vacant and used for overflow Barlow parking for events and temporary vehicle storage. The sites are both urban infill areas, except that the parking lot site is adjacent to the Laguna de Santa Rosa (as well as adjoining industrial uses).

The proposed project has been designed to be consistent with the GPU (see discussion of plan consistency in Section 11, *Land Use and Planning*, of this document) and would conform with the City of Sebastopol Zoning Code in terms of use, setbacks, and other development parameters. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista.

b) Impacts related to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway that would result from implementation of the GPU were evaluated under Impact 3.1-1 on pages 3.1-1 to 3.1-23 of the GPU DEIR. The analysis determined that there are no officially designated scenic highways located in the City of Sebastopol. SR-12 and SR-116 are the principal highway corridors through the City's Planning Area. The analysis determined that development under the GPU would allow primarily for infill commercial and industrial land uses along these highway corridors, primarily in areas that are currently urbanized. However, the analysis determined that buildout of the GPU has the potential to result in new and expanded development along highway corridors with high scenic values, even though these corridors are not officially designated as State Scenic Highways. The analysis determined that the only method to completely avoid impacts to scenic resources would be to severely limit the development potential on all undeveloped lands. The analysis determined that this type of mitigation is not consistent with the objective of the GPU to support local employment opportunities and expand the local jobs base. Therefore, the analysis concluded that the impact would be significant and unavoidable.

As discussed above, the proposed project has been designed to be consistent with the GPU (see discussion of plan consistency in Section 11, *Land Use and Planning*, of this document) and would conform with the City of Sebastopol Zoning Code in terms of use, setbacks, and other development parameters. Therefore, the proposed project would not substantially damage scenic

[5] The current design shows the tallest building element (mechanical penthouses that shelter the building's elevators) to be approximately 62 feet.

resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

c) As discussed above, the proposed project has been designed to be consistent with the GPU (see discussion of plan consistency in Section 11, *Land Use and Planning*, of this document) and would conform with the City of Sebastopol Zoning Code in terms of use, setbacks, and other development parameters. Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality.

d) Impacts related to creation of new sources of substantial light or glare which would adversely affect daytime or nighttime views that would result from implementation of the GPU were evaluated under Impact 3.1-2 on pages 3.1-23 to 3.1-24 of the GPU DEIR. The analysis determined that the primary sources of nighttime lighting in the City's Planning Area are generally from exterior building lights, streetlights, and vehicle headlights. The analysis determined that exterior lighting around commercial and industrial areas may be present throughout the night to facilitate extended employee work hours, ensure worker safety, and to provide security lighting around structures and facilities. The analysis determined that nighttime lighting impacts that would result from buildout of the GPU would be most severe in areas that do not currently experience high levels of nighttime lighting. The analysis determined that increased nighttime lighting can reduce visibility of the night sky, resulting in fewer stars being visible and generally detracting from the rural quality of life in Sebastopol. The analysis determined that the primary sources of daytime glare in the Planning Area are generally sunlight reflecting from structures and other reflective surfaces and windows. The analysis determined that implementation of the GPU would introduce new sources of daytime glare into previously undeveloped areas of the Planning Area and increase the amount of daytime glare in existing urbanized areas. The analysis determined that future development would be required to be consistent with the GPU, as well as lighting requirements in the Municipal Code. The analysis determined that the GPU contains policies and action items related to the regulation and reduction of daytime glare and nighttime lighting. The analysis concluded that, through the implementation of these policies and action items during the development review process, the City can ensure that adverse impacts associated with daytime glare and nighttime lighting are reduced to a less than significant level.

As discussed above, the proposed project has been designed to be consistent with the GPU, as well as the lighting requirements in the Municipal Code. Therefore, the proposed project would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area.

Conclusion

As discussed above, the proposed project would not result in effects related to aesthetics that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

2. Agriculture and Forestry Resources

AGRICULTURE AND FORESTRY RESOURCES — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☐
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☐

Discussion

a) Impacts related to conversion of farmland that would result from implementation of the GPU were evaluated under Impact 3.2-1 on pages 3.2-6 to 3.2-8 of the GPU DEIR. The analysis determined that Sebastopol does not have any prime farmlands, unique farmlands, or farmlands of statewide importance within the City's Planning Area, as designated by the California Department of Conservation Farmland Mapping and Monitoring Program. The analysis determined that portions of locally important farmlands may be converted to accommodate additional residential and industrial opportunities. However, the analysis concluded that, with implementation of GPU policies and actions that provide protection and preservation of agricultural lands, the impact would be less than significant impact.

The project site (both the hotel site and parking lot site) is designated as Urban and Built-Up Land by the California Department of Conservation Farmland Mapping and Monitoring Program (California Department of Conservation, 2024a). The proposed project would construct and operate a hotel and associated parking lot on development sites that are urbanized and have been previously developed. The proposed project would not convert any prime farmlands, unique farmlands, farmlands of statewide importance, or farmlands of local importance to non-agricultural use.

b) Impacts related to conflicts with existing zoning for agricultural use or a Williamson Act contract that would result from implementation of the GPU were evaluated under Impact 3.2-2 on pages 3.2-8 to 3.2-9 of the GPU DEIR. The analysis determined that no parcels within the City's

Planning Area are under a Williamson Act Contract. The analysis determined that several parcels within the city are zoned for Residential Agricultural (RA) uses in the City of Sebastopol Zoning Code (Title 17 of the City of Sebastopol Municipal Code). The analysis determined that the majority of the RA zoned parcels within the city are designated Low Density Residential (LDR) on the City of Sebastopol General Plan Land Use Map. The analysis determined that the GPU includes a comprehensive set of policies and actions aimed at protecting, enhancing, and preserving agricultural lands and agricultural resources throughout the Planning Area and lands in the vicinity of Sebastopol. The analysis determined that implementation of the GPU would have a less than significant impact relative to this topic and no mitigation is required.

The project site (both the hotel site and parking lot site) is designated as Light Industrial (LI) on the City of Sebastopol General Plan Land Use Map. The hotel site is zoned Commercial Industrial (CM), and the parking lot site is zoned Industrial (M) and Environmental and Scenic Open Space (ESOS) Combining District. The project site is not on or adjacent to land under a Williamson Act Contract or zoned for agricultural use, and there would be no impact under this significance criterion.

c,d) As discussed on pages 3.2-2 to 3.2-3 of the GPU DEIR, there are no forest lands or timber lands located within the City's Planning Area. There would be no impacts related to forest lands or timber lands.

e) As previously discussed, the proposed project would construct and operate a hotel and associated parking lot on development sites that are urbanized, have been previously developed, and do not include agricultural or forest uses. There would be no impacts related to forest lands or timber lands.

Conclusion

As discussed above, the proposed project would not result in effects related to agriculture and forestry resources that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

California Department of Conservation, 2024a. California Important Farmland Finder. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed April 28, 2024.

3. Air Quality

AIR QUALITY — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GPU FEIR*	*Off-Site or Cumulative Impact not Identified by GPU FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR*
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☐
b) 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?	☐	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☐

Discussion

a) Impacts related to conflicting or obstructing implementation of the applicable air quality plan resulting from implementation of the GPU were evaluated under Impact 3.3-1 on pages 3.3-25 to 3.3-31 of the GPU DEIR. The analysis determined that implementation of the GPU would not conflict with or obstruct implementation of the Bay Area Air Quality Management District (BAAQMD) 2010 Clean Air Plan (CAP) (BAAQMD, 2010), which was the latest plan when the GPU was adopted. The analysis identified that the CAP's primary goal is to protect air quality, which it does with 55 control measures aimed at reducing air pollution in the Bay Area. The GPU Conservation and Open Space Element includes an extensive list of policies and action measures that are specifically aimed at improving air quality. These policies and action measures are consistent with the intent of the CAP's control measures.

Additionally, the Circulation Element of the GPU includes a wide range of policies and actions that would effectively reduce vehicle miles traveled throughout the City's Planning Area. Therefore, the analysis concluded that implementation of the GPU would not disrupt, delay, or otherwise hinder the implementation of the CAP, and the impact was found to be less than significant.

As described in the Project Description of this document, the proposed project would include demolition of the existing 36,402-square-foot Guayakí organic beverage company warehouse building at 6782 Sebastopol Avenue and construction and operation of a four-story, 83-room hotel, with related parking, landscaping, and utilities improvements. The proposed project would also construct and operate a 242-space parking lot on the site of the former concrete batch plant at 385 Morris Street. These activities would result in combustion pollutants from construction equipment and vehicles, fugitive dust from demolition and earthmoving, and reactive organic compounds from parking lot paving. These emissions were estimated using the CalEEMod land use emissions model (version 2022.1.1), approved by all California air districts for use in CEQA projects. Dust control measures, consistent with GPU Action COS-7g were incorporated in the

modeling. The resulting construction emissions are presented in **Table AQ-1** below, and as shown, would not exceed BAAQMD significance thresholds.

TABLE AQ-1
CONSTRUCTION EMISSIONS

	Proposed Project Emissions (average pounds/day)			
Project Site/Construction Year[a]	**ROG**	**NO_X**	**PM_{10} Exhaust**	**$PM_{2.5}$ Exhaust**
Year 2025 Construction				
Hotel	0.92	7.57	0.29	0.27
Parking Lot	0.34	2.21	0.1	0.09
Total Year 2025 Emissions	*1.26*	*9.78*	*0.39*	*0.36*
Threshold	54	54	82	54
Significant?	No	No	No	No
Year 2026 Construction				
Hotel	2.28	2.18	0.08	0.07
Threshold	54	54	82	54
Significant?	No	No	No	No

NOTES:

a. Emissions were calculated for the construction years of 2025 and 2026. A subsequent change to 2026 and 2027 will result in marginally reduced emissions due to improvements in the construction equipment fleet. Therefore, these emission estimates are conservative.

SOURCE: ESA, CalEEMod (see Appendix B).

The development sites are urbanized, and both sites have been previously developed. The hotel would replace an existing warehouse. The parking lot site, much of which is paved, is currently vacant and used for overflow Barlow parking for events and temporary vehicle storage. The sites are both urban infill areas, except that the parking lot site is adjacent to the Laguna de Santa Rosa (as well as adjoining industrial uses).

As discussed in Section 17, *Transportation*, of this document, the proposed project (i.e., the hotel) would result in a decrease in vehicle miles traveled (VMT) compared to existing conditions, as visitors attracted to the area would not have to travel as far for lodging (Fehr & Peers, 2024). This decrease in VMT was incorporated into the criteria pollutant emissions analysis. Additional emissions would be generated from natural gas combustion for space and water heating, plus consumer product use (solvents, paints, cleaning products). These operational emissions are summarized in **Table AQ-2** below, and as shown, would not exceed BAAQMD significance thresholds.

The proposed project would also not disrupt, delay, or otherwise hinder the implementation of the CAP. The proposed project is an allowable use under the GPU. The GPU DEIR demonstrated that development allowed under the GPU would not conflict with or hinder implementation of the CAP, because the policies and action items included throughout the GPU, most specifically within the Conservation and Open Space, Land Use, and Circulation Elements, cover the full breadth of air quality issues as recommended in the 2010 Clean Air Plan.

TABLE AQ-2
DAILY AND ANNUAL OPERATIONAL EMISSIONS

Project Source	ROG	NO_X	PM_{10}	$PM_{2.5}$
Average Daily Emissions (lbs/day)				
Mobile	-0.28	-0.28	-0.41	-0.11
Area	1.94	0.01	<0.01	<0.01
Energy	0.03	0.54	0.04	0.04
Total Daily Emissions	*1.69*	*0.27*	*-0.37*	*-0.07*
Threshold	54	54	82	54
Significant?	No	No	No	No
Annual Emissions (tons/yr)				
Mobile	-0.05	-0.05	-0.07	-0.02
Area	0.35	<0.01	<0.01	<0.01
Energy	0.01	0.1	0.01	0.01
Total Annual Emissions	*0.31*	*0.06*	*-0.06*	*-0.01*
Threshold	10	10	15	10
Significant?	No	No	No	No

SOURCE: ESA, CalEEMod (see Appendix B).

b) The GPU DEIR did not include a separate impact discussion that addressed impacts related to 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. The following analysis addresses this significance criterion for the proposed project.

Construction and operational emissions from the proposed project were estimated using the CalEEMod land use emissions model, which is recommended by all California air districts for analysis of land use emissions. These emissions are summarized in Tables AQ-1 and AQ-2 below. As shown in the tables, the emissions would be below BAAQMD significance, and this impact would be less than significant.

c) Impacts related to health risks associated with toxic air contaminants (TACs) resulting from implementation of the GPU were evaluated under Impact 3.3-2 on pages 3.3-31 to 3.3-32 in the GPU DEIR and found to be less than significant. As explained in the GPU DEIR, the GPU includes policies that are intended to minimize exposure of TACs to sensitive receptors. These policies and actions are consistent with the BAAQMD recommendations that are intended to reduce health risks associated with TACs. Implementation of the GPU, including the policies and actions that are intended to mitigate TACs impacts, would ensure that this impact is reduced to a less than significant level.

Emissions of TACs from the proposed project were analyzed for a potential to increase cancer risk, chronic hazard index, and $PM_{2.5}$ concentrations above BAAQMD significance thresholds.

The proposed project was evaluated to assess the potential for exposure to sensitive and workplace receptors from TAC concentrations during construction. Diesel exhaust particulate matter (DPM) is a carcinogen and chronic health hazard pollutant that would be emitted from heavy, diesel-fueled equipment during construction. Emissions of $PM_{2.5}$ would also result from construction activities (fugitive dust and diesel exhaust).

Sensitive receptors are located within 1,000 feet of the hotel and parking lot location. Sensitive receptors are individuals that are more susceptible to the effects of air pollutants and include children, the elderly, and those with chronic health conditions. Residences are considered sensitive receptors, as these individuals could be present there. In addition to residences, nearby workers or employees of businesses could also be exposed to TAC concentrations. The BAAQMD CEQA guidelines, updated in 2022, require the evaluation of exposure to these workers from TAC concentrations (BAAQMD, 2022).

A health risk assessment (HRA) was conducted to evaluate the cancer risk, chronic hazard index, and annual average $PM_{2.5}$ concentrations at nearby sensitive and workplace receptors from the proposed project construction DPM emissions. The results are presented for the maximally exposed individual resident (MEIR) and maximally exposed individual worker (MEIW). The operational phase of the proposed project would not generate substantial TAC emissions, because the majority of emissions would be from gasoline-powered passenger vehicles. The health risk driver from mobile sources is from heavy, diesel-powered vehicles.

The HRA follows the protocols outlined by the Office of Environmental Health Hazard Assessment (OEHHA, 2015). Consistent with guidelines and recommendations from these agencies, the HRA evaluated the estimated incremental increase in cancer risks, chronic hazard index (DPM concentrations divided by an acceptable reference exposure level), and $PM_{2.5}$ concentrations from exposure to emissions from heavy construction equipment.

The OEHHA guidelines provide age sensitivity factors to apply to the cancer risk calculation. These factors reflect the increased sensitivity of children to the effects of carcinogens. In addition, children have higher breathing rates, which increases the intake of pollutants. The modeling exposure assumptions for the nearby residences conservatively assume a child in the age group from third-trimester fetus to 2 years of age, which is the age group most susceptible to DPM emissions from a cancer risk perspective, could be living at these residences.

The HRA was conducted using the U.S. Environmental Protection Agency (EPA) AERMOD dispersion model (version 23132) and measured meteorology from the Sonoma County Airport to predict conservative concentrations at specific locations defined by a Cartesian coordinate system. Diesel construction equipment would be used during the site preparation, grading, building construction, paving, and architectural coating phases. A conservative representation of the on-site construction equipment within the hotel site and parking lot site was modeled as a rectangular area source for each site. The modeling parameters are as follows:

Rectangular area sources covering the hotel site and parking lot, with:

- Release height of 5 meters for construction equipment exhaust;

- Initial vertical dimension of 1.4 meters; and
- Emissions occurring only between the hours of 7:00 a.m. and 5:00 p.m.
- Release height of 2.55 meters for haul truck exhaust;
- Receptor flagpole height of 1.5 meters (ground-level receptor at breathing height).

The sources were modeled with an emission rate of one gram per second to obtain a dispersion factor (unit concentration) at each receptor location. Emissions of exhaust PM_{10} were assumed to be DPM. The DPM concentrations were calculated using the modeled dispersion factors and the DPM and $PM_{2.5}$ emissions from Table AQ-1.

The cancer risk (expressed as a probability per million) was calculated using the resulting DPM concentrations along with equations and factors from the OEHHA 2015 Risk Assessment Guidelines (OEHHA 2015). The results of the HRA are presented in **Table AQ-3** below. The cancer risk probability and chronic hazard index are below BAAQMD thresholds, resulting in a less than significant impact. The MEIR is at a residence south of SR-12, near Morris Street, and the MEIW is a business on McKinley Street, north of the hotel site.

TABLE AQ-3
MODELED MAXIMUM CANCER RISK, CHRONIC HAZARD INDEX, AND ANNUAL AVERAGE PM2.5 CONCENTRATIONS AT THE MEIR AND MEIW LOCATION

	Cancer Risk (in 1 million)	Chronic Hazard Index (unitless)	$PM_{2.5}$ ($\mu g/m^3$)
MEIR	6.9	0.01	0.06
MEIW	2.0	0.04	0.28
BAAQMD Significance Threshold	10	1.0	0.3
Exceeds Threshold?	No	No	No

SOURCE: ESA, see Appendix B.

d) The impact related to generation of objectionable odors from implementation of the GPU was evaluated under Impact 3.3-3 on page 3.3-33 of the GPU DEIR and found to be less than significant. The BAAQMD CEQA Guidelines recommendation for assessing plan level odor impacts is to identify the location of existing and planned odor sources in the plan area and policies to reduce potential odor impacts in the plan area. Common odor sources in the project vicinity may include skunks, livestock, and their waste, decomposing dead animals along roadways, stagnant water, etc. Wastewater from Sebastopol travels to Santa Rosa for treatment so wastewater odor issues are not expected. There are not any industrial or commercial users in the City Planning Area that are expected to cause nuisance odors. Lastly, fresh asphalt can be a temporary odor nuisance for people. Dust emissions can contribute to increased ambient concentrations of PM_{10} and can also contribute to reduced visibility and soiling of exposed surfaces. There are no other existing or planned sources of odors within Sebastopol.

The proposed project would not introduce any new sources of odors, other than those associated with temporary construction-related sources. These were addressed in the GPU DEIR, as discussed above.

Conclusion

As discussed above, the proposed project would not result in effects related to air quality that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

Bay Area Air Quality Management District (BAAQMD), 2010. Bay Area 2010 Clean Air Plan. September. Available at: https://www.baaqmd.gov. Accessed May 13, 2024.

BAAQMD, 2022. CEQA Thresholds and Guidelines Update. Available at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed May 10, 2024.

Office of Environmental Health Hazard Assessment (OEHHA), 2015. Air Toxics Hot Spots Program – Risk Assessment Guidelines, March 2015. Available at: https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0. Accessed May 10, 2024.

4. Biological Resources

BIOLOGICAL RESOURCES — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
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?	☐	☐	☐	☐
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?	☐	☐	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☐

BIOLOGICAL RESOURCES — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GPU FEIR*	*Off-Site or Cumulative Impact not Identified by GPU FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR*
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?	☐	☐	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☐

Discussion

a) Impacts related to substantial adverse effects, 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 (CDFW) or the U.S. Fish and Wildlife Service (USFWS) that would result from implementation of the GPU were evaluated under Impact 3.4-1 on pages 3.4-21 to 3.4-31 of the GPU DEIR. The analysis determined that implementation of the GPU would allow and facilitate future development in Sebastopol, which could result in adverse impacts to special-status plant and wildlife species, as well as sensitive natural habitat or wildlife movement corridors. The analysis determined that subsequent development projects would be required to comply with the General Plan and adopted state, federal, and local regulations for the protection of special status plants and wildlife, including habitat. The analysis identified that the GPU Conservation Element includes numerous policies designed for the protection of special-status species. For example, Policy COS 2-1 requires protection and enhancement of sensitive habitats, which include creek corridors, wetlands, vernal pools, riparian areas, wildlife and fish migration corridors, native plant nursery sites, waters of the United States, sensitive natural communities, and other habitats designated by state and federal agencies. Policy COS 2-2 requires preservation and enhancement of those biological communities that contribute to the City's and the region's rich biodiversity including, but not limited to, annual grasslands, freshwater marshes, wetlands, vernal pools, riparian areas, aquatic habitat, and agricultural lands. Policy COS 3-1 requires the protection and enhancement of streams, channels, seasonal and permanent marshland, wetlands, sloughs, riparian habitat, and vernal pools through sound land use planning, community design, and site planning. Policy COS 3-1 further requires the conservation of riparian habitat along local creeks, including but not limited to the Laguna de Santa Rosa. Policy COS 3-8 requires new development to include maintained and managed setbacks and buffers along creeks, wetlands, riparian corridors, and adjacent to sensitive habitat. GPU Action COS 2b specifies that, where sensitive biological habitats have been identified on or immediately adjacent to a project site, the project shall include

appropriate mitigation measures identified by a qualified biologist, which may include, but are not limited to the following:

- Pre-construction surveys for species listed under the State or Federal Endangered Species Acts, or species identified as special-status by the resource agencies, shall be conducted by a qualified biologist;
- Construction barrier fencing shall be installed around sensitive resources and areas identified for avoidance or protection, and to reduce potential soil compaction in sensitive areas; and
- Employees shall be trained by a qualified biologist to identify and avoid protected species and habitat.

The analysis concluded that implementation of GPU policies and action measures, as well as federal and state regulations, would reduce impacts to special status plants and wildlife, including habitat, to a less than significant level.

Biological resources on the parking lot site were evaluated in a biological assessment report prepared by WRA in May 2024 (WRA, 2024). In addition, on May 18, 2024, senior ESA biologist Brian Pittman CWB, reviewed the hotel site at 6782 Sebastopol Avenue and the parking lot site at 385 Morris Street, and areas within 500 feet of each area to characterize sensitive and regulated biological resources, and to verify findings of the WRA (2024) biological review. In addition, the California Natural Diversity Database (CDFW, 2024) was reviewed to examine the known distribution of sensitive plant or wildlife species in the project area. The hotel site exists within a fully developed urban envelope. Neither the hotel site nor adjacent developed areas provide habitat for sensitive or special-status plants and wildlife.

The parking lot site has a long history of high-impact use and exists as denuded, bare ground that lacks habitat for special-status plants and wildlife. The nearby Laguna de Santa Rosa provides aquatic and basking habitat for western pond turtle (*Actinemys marmorata*; federal proposed threatened, California Species of Special Concern); however, habitat for this species does not occur on the parking lot site.

As identified in the biological resources report (WRA, 2024) the only potential sensitive species constraint associated with the proposed project is the potential for migratory birds and raptors to nest in the riparian floodplain located north and east of the parking lot site. Potential impacts to nesting birds at the parking lot site could occur if project construction at the parking lot site would occur during avian nesting period (February 15 to September 1). However, these impacts would be avoided with proposed project's required adherence to GPU Action COS 2b (provided above) which specifies that, where sensitive biological habitats have been identified on or immediately adjacent to a project site, the project shall include appropriate mitigation measures identified by a qualified biologist, including pre-construction surveys for sensitive species conducted by a qualified biologist; installation of construction barrier fencing around sensitive resources and areas; and training for construction workers by a qualified biologist to identify and avoid protected species and habitat. The proposed project's required adherence to GPU Action COS 2b and the other applicable GPU policies designed for the protection of special-status

species identified above, as well as federal and state regulations, would ensure that potential impacts to special-status species would be less than significant with no mitigation required.

b) Impacts related to substantial adverse effects on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS that would result from implementation of the GPU were evaluated under Impact 3.4-2 on pages 3.4-31 to 3.4-38 of the GPU DEIR. The analysis identified that the City of Sebastopol contains numerous aquatic habitats that qualify as federally protected wetlands and jurisdictional waters. The most prominent aquatic habitat in Sebastopol is the Laguna de Santa Rosa. As discussed on page 3.4-16 of the GPU DEIR, the Laguna de Santa Rosa is the largest freshwater wetlands complex on the northern California coast. The Laguna's fourteen-mile channel forms the largest tributary to the Russian River, draining a 254-square-mile watershed which encompasses nearly the entire Santa Rosa Plain. This includes parts of the communities of Windsor, Santa Rosa, Rohnert Park, Cotati, Forestville, and Sebastopol. As further discussed under Impact 3.4-2, the Laguna de Santa Rosa is important in maintaining water quality and flood control for the region. It provides an important overflow area for the Russian River during periods of heavy winter rain, serving as a natural holding basin which captures and slows floodwaters, easing their impact on lower Russian River communities. Additionally, the Laguna de Santa Rosa provides a unique ecological system for the region. With over 30,000 acres, the Laguna provides a mosaic of creeks, open water, perennial marshes, seasonal wetlands, riparian forests, oak woodland, and grassland. It is home to hundreds of species of birds, mammals, fish, amphibians, reptiles, and invertebrates. The Laguna de Santa Rosa provides habitat for a range of species, including several rare and endangered species.

The analysis identified that the GPU Conservation Element includes numerous policies designed to address sensitive natural communities, including the Laguna de Santa Rosa and other local waterways. Policy COS 2- 5 requires the City to implement a range of measures and tools to protect, enhance, and restore environmentally sensitive areas. Policy COS 2-6 maintains the Zoning Ordinance provisions to ensure that development proposals for land located within, or adjacent to, an environmentally sensitive areas include a resources analysis that contains all of the information required in order for the City to determine that impacts to sensitive habitat and natural resources have been reduced, avoided, or mitigated to the greatest extent feasible. Policy COS 3-1 requires the protection and enhancement of streams, channels, seasonal and permanent marshland, wetlands, sloughs, riparian habitat, and vernal pools through sound land use planning, community design, and site planning. Policy COS 3-1 further requires the conservation of riparian habitat along local creeks, including but not limited to the Laguna de Santa Rosa. Policy COS 3-8 requires new development to include maintained and managed setbacks and buffers along creeks, wetlands, riparian corridors, and adjacent to sensitive habitat. Policy COS 3-10 requires the city, consult with state and federal agencies during the development review process to help identify wetland and riparian habitat that has candidacy for restoration, conservation, and/or mitigation, and focuses restoration and/or conservation efforts on areas that would maximize multiple beneficial uses for such habitat. The analysis determined that subsequent development projects would be required to comply with the General Plan and adopted state, federal, and local regulations for the protection of sensitive natural communities, including riparian habitat. The analysis concluded that implementation of General Plan policies and action

measures, as well as federal and state regulations, would reduce impacts to these resources to a less than significant level.

Biological resources on the parking lot site were evaluated in a biological assessment report prepared by WRA in May 2024 (WRA, 2024), and an ESA biologist reviewed the hotel site and parking lot site on May 18, 2024, to characterize sensitive and regulated biological resources. Based on these assessments, no riparian habitat or sensitive natural communities occur on or near the hotel site. Hence, no impacts would occur to such areas from site redevelopment. The fully disturbed parking lot site also does not support riparian habitat or sensitive natural communities. Hence, no direct or indirect impacts would occur to riparian habitat or sensitive natural communities (arroyo willow thicket) that occur in association with the Laguna de Santa Rosa.

c) Impacts related to substantial adverse effects on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means that would result from implementation of the GPU were evaluated under Impact 3.4-3 on pages 3.4-38 to 3.4-45 of the GPU DEIR. The analysis identified that the City of Sebastopol contains numerous aquatic habitats that qualify as federally protected wetlands and jurisdictional waters. The analysis identified that the most prominent aquatic habitat in Sebastopol is the Laguna de Santa Rosa, and there are also various tributaries and drainages to the Laguna de Santa Rosa within the City's Planning Area. The analysis determined that construction activities associated with individual future projects could result in the disturbance or loss of waters of the United States. This includes perennial and intermittent drainages; unnamed drainages; vernal pools; freshwater marshes; and other types of seasonal and perennial wetland communities. The analysis determined that wetlands and other waters of the United States could be affected through direct removal, filling, hydrological interruption (including dewatering), alteration of bed and bank, and other construction-related activities. The analysis further determined that there is a reasonable chance that water features could be impacted throughout the buildout of the individual projects. The analysis identified that the implementation of an individual project would require a detailed and site-specific review of the site to determine the presence or absence of water features. If water features are present and disturbance is required, federal and state laws require measures to reduce, avoid, or compensate for impacts to these resources. The requirements of these federal and state laws are implemented through the permit process. The analysis further identified that the GPU Conservation Element includes numerous policies specifically designed to address wetland features within the City's Planning Area. Policy COS 2-1 calls for the protection and enhancement of sensitive habitats, which include creek corridors, wetlands, vernal pools, riparian areas, fish migration corridors, waters of the United States, sensitive natural communities, and other habitats designated by state and federal agencies. Policy COS 3-1 requires the protection of streams, channels, seasonal and permanent marshland, wetlands, sloughs, riparian habitat, and vernal pools through sound land use planning, community design, and site planning. The analysis concluded that implementation of General Plan policies and action measures, as well as federal and state regulations, would reduce impacts to these resources to a less than significant level.

Biological resources on the parking lot site were evaluated in a biological assessment report prepared by WRA in May 2024 (WRA, 2024), and an ESA biologist reviewed the hotel site and

parking lot site on May 18, 2024, to characterize sensitive and regulated biological resources. Based on these assessments, no state or federally protected wetlands were identified on the hotel site or the parking lot site. Hence, no impacts would occur from the proposed project. Additionally, the parking lot development area is set back greater than 50 feet from wetlands that occur east of the project site. Hence, no impacts would occur to state or federally regulated wetlands.

d) Impacts related to substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedance to the use of native wildlife nursery sites that would result from implementation of the GPU were evaluated under Impact 3.4-4 on pages 3.4-45 to 3.4-51 of the GPU DEIR. The analysis identified that movement corridors for wildlife through Sebastopol include creeks, drainages, open space, as well as various low density or rural developed areas. Species using these areas include aquatic, terrestrial, and avian species. The analysis determined that many of the policies already presented in the impact discussions above have ancillary benefits of protecting movement habitat for wildlife. Additionally, Policy COS 2-1 ensures the protection of sensitive habitats, which include creek corridors, wetlands, vernal pools, riparian areas, wildlife and fish migration corridors, native plant nursery sites, waters of the United States, sensitive natural communities, and other habitats designated by state and federal agencies. Policy COS 2-3 focuses conservation efforts on high priority conservation areas that contain suitable habitat for native, endangered, threatened, migratory, or special-status species and that can be managed with minimal interference from nearby urban land uses and are in proximity to other habitat corridors. Policy COS 3-8: requires new development to include maintained and managed setbacks and buffers along creeks, wetlands, riparian corridors, and adjacent to sensitive habitat. Implementation of the policies and action measures listed below would ensure that all future projects are designed to facilitate the movement of wildlife to the greatest extent feasible. Where full design mitigation is not feasible, compliance with state and federal permit requirements would offset any potential impacts associated with project implementation through requirements to provide habitat connectivity and compensatory mitigation required by any applicable state or federal regulations. The analysis concluded that implementation of GPU policies and action measures, as well as federal and state regulations, would reduce impacts to these resources to a less than significant level.

Given the developed and disturbed character of the hotel site and the parking lot site, these areas do not support known or expected wildlife movement corridors or serve as wildlife nursery sites. The parking lot site is situated adjacent to an important wildlife area; however, no common or special-status wildlife species rely upon the mostly fenced, and denuded site during their normal movement or migration. The Laguna de Santa Rosa riparian corridor provides many opportunities for wildlife movement, and development of the site as a parking lot would not substantially alter or interfere with continued wildlife movement through and use of this area. As a result, potential impacts to wildlife movement and/or nursery sites would be less than significant with no mitigation required.

e) Impacts related to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that would result from implementation of the

GPU were evaluated under Impact 3.4-5 on pages 3.4-52 to 3.4-53 of the GPU DEIR. The analysis determined that the GPU includes numerous policies and action measures intended to protect biological resources, including special status species, habitat, creeks, wetlands, and trees, and the GPU itself does not conflict with its policies. In addition, the analysis determined that the GPU supports the City Tree Protection Ordinance (Chapter 8.12, Tree Protection, of the City of Sebastopol Municipal Code), which defines City-protected trees; requires a tree protection plan prepared by a certified arborist for projects that may affect protected trees; requires a tree removal permit for specified tree removals, and requires that the tree removal permit shall include a condition requiring the provision of replacement trees, in-lieu fee payment, or an approved alternative as specified in Section 8.12.060, Tree Removal Permit. The analysis concluded that implementation of applicable GPU policies and action measures, as well as required compliance with the provisions of the City Tree Protection Ordinance, would reduce impacts to these resources to a less than significant level.

The proposed project would include demolition of the existing parking lot directly east of the existing warehouse building. This would include removal of the existing trees in the parking lot. Approximately 36 larger trees and 27 smaller trees in the existing parking lot would be removed. Most of the trees that would be removed are in the 2- to 4-inch diameter range, with one tree approximately 8 inches in diameter. All trees that would be removed from this area are below the 10-inch diameter threshold for protected native trees or the 20-inch threshold for protected non-native trees as defined in the City Tree Protection Ordinance. The removed trees would be replaced by 26 large and 31 smaller trees (a net reduction of 10 large trees and a net increase of four small trees) for a net reduction of six trees in the parking lot area directly east of the hotel building. Proposed new trees elsewhere on the hotel site would also include one large oak tree and 18 smaller trees in the hotel courtyard areas. In addition, construction of the hotel building would require the removal of two protected trees directly to the west of the existing warehouse building (on APN 004-750-034). As indicated in the tree report prepared for the proposed project, these protected trees (as defined in the City Tree Protection Ordinance) include a valley oak with a 27-inch diameter and a Hankow willow with a 10.2-inch diameter (Balcerak Design, 2022). While the willow is a protected tree, it is non-native, and, as a result, the City Tree Protection Ordinance threshold for protection is 20-inches in diameter. As discussed in the tree report, given the location of the trees and the necessary excavation required for the hotel, preservation of these trees is not possible and, as a result, would be removed to accommodate the hotel building. The removal of these two protected trees would be approved via the Development Agreement or approval of a tree removal permit obtained pursuant to the City Tree Protection Ordinance. Hence, no impact would occur related to conflicts with the City Tree Protection Ordinance.

Riparian habitat is present to the north and east of the parking lot site in association with the Laguna de Santa Rosa. The site is zoned M (Industrial) and ESOS (Environmental and Scenic Open Space). The proposed development is located less than 100 feet but greater than 50 feet from the Laguna de Santa Rosa wetland/riparian boundary (WRA, 2024). Sebastopol Municipal Code, Title 17, Zoning, Chapter 17.46, Section 17.46.050 specifies a 100-foot minimum setback buffer from the edge of a wetland or identified riparian dripline, which may be reduced to no less than 50 feet with approval from the Planning Commission. The Planning Commission may modify the setback requirements based on substantial evidence provided by a qualified

professional that specific resources of potential concern do not occur on the property or will not be affected by the project. It is the opinion of the biological resource study (WRA, 2024) that the proposed use of the site as a parking lot would not differ significantly from current conditions. Approval of the parking lot site plan by the City, including for areas within 100 feet of wetland and riparian habitat associated with Laguna de Santa Rosa would be consistent with the review approach identified in the GPU, which provides for variances from minimum stated avoidance buffer distances. For the proposed site development to move forward, a buffer distance variance would be required by the City, and the project would therefore not conflict with the Environmental and Scenic Open Space ordinance.

f) Impacts related to conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan that would result from implementation of the GPU were evaluated under Impact 3.4-6 on page 3.4-53 of the GPU DEIR. The analysis determined that there are no adopted habitat conservation plans or natural community conservation plans that are applicable to the proposed project. As such, implementation of the GPU would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Conclusion

As discussed above, the proposed project would not result in effects related to biological resources that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

Balcerak Design, 2022. Arborist's Report, 6782 Sebastopol Avenue, Sebastopol, California, February 14, 2022.

California Department of Fish and Wildlife (CDFW), 2024. California Natural Diversity Database, RareFind 5. Wildlife and Habitat Data Analysis Branch, Sacramento, CA. Accessed May 24, 2024.

WRA, 2024. Updated Preliminary Biological Assessment for the Batch Plant Parking Lot. May 8, 2024.

5. Cultural Resources

CULTURAL RESOURCES — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GPU FEIR*	*Off-Site or Cumulative Impact not Identified by GPU FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR*
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☐

Discussion

a,b) Impacts related to substantial adverse change in the significance of a historical resource or archaeological resource pursuant to CEQA Guidelines Section 15064.5 that would result from implementation of the GPU were evaluated under Impact 3.5-1 on pages 3.5-15 to 3.5-20 of the GPU DEIR. The analysis determined that a substantial adverse change in the significance of a historical resource is defined at Section 15064.5 (b)(1) of the CEQA Guidelines as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The analysis determined that known historical and prehistoric resource sites are located throughout Sebastopol and the City's Planning Area, and it is expected that additional undiscovered sites may be located in various areas of the city as well. The analysis determined that future development allowed under the GPU could affect known historical and archaeological resources or unknown historical and archaeological resources which have not yet been identified. The analysis determined that prehistoric Native American sites are most likely to occur where several environmental factors combine to provide readily available resources, such as at the interface between valley and hills.

The analysis determined that future development projects considered by the City would be evaluated for conformance with the City's General Plan, Municipal Code, and other applicable state and local regulations. The analysis identified that the GPU includes policies and actions that would reduce impacts to cultural, historical, and archaeological resources. Policies COS 10-5, COS 10-6, CD 3-1, and CD 3-2 encourage the protection and preservation of cultural and historical resources. Action COS-10c addresses the discovery of significant archaeological and historical resources during construction and grading activities, requiring that development work be stopped in the event of a discovery and that appropriate measures be implemented to protect the resource. The analysis concluded that implementation of GPU policies and action measures, as well as state and local regulations, would reduce impacts to significant historical and archaeological resources to a less than significant level.

Historic Architectural Resources

The hotel would replace the existing 36,402-square-foot Guayakí organic beverage company warehouse building at 6782 Sebastopol Avenue. If the warehouse building were determined to be historically significant, its demolition and removal would result in a significant impact.

Consequently, a historical resource evaluation was conducted by Yarbrough Architectural Resources to determine if the warehouse building qualifies as an historical resource pursuant to CEQA Guidelines Section 15064.5. The historical resource evaluation report is included as Appendix C to this document (Yarbrough Architectural Resources, 2024).

CEQA Guidelines Section 15064.5 defines an "historical resource" as a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) or included in a local register of historical resources. Furthermore, CEQA specifies that any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be historically significant if the resource meets any of the following criteria for listing in the CRHR.

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The historical resource evaluation determined that the warehouse building at 6782 Sebastopol Avenue was constructed in 1924–1925 as the Sebastopol Coop Cannery building, from which preserved apple and other fruit products were shipped to market. As described in the historical resource evaluation report, the building is a utilitarian warehouse with a raised concrete platform foundation set approximately five feet above grade, typical of twentieth century railroad warehouses. As described in the historical resource evaluation report, the wood-frame building is composed of two primary interior spaces: a two-story office portion at the south end and a much larger handling and storage portion comprising about 80 percent of the building's interior. As described in the historical resource evaluation report, the elongated rectangular plan of the building allowed for two long exterior elevations facing the railroad tracks for loading to its west and for truck loading doors to its east.

The historical resource evaluation determined that the warehouse building at 6782 Sebastopol Avenue is not listed in the CRHR, the National Register of Historic Places, or a local register of historical resources; is not associated with a significant historical event (Criterion 1) or persons of particular historical significance (Criterion 2); is illustrative of a railroad warehouse type that was well established in California by the 1920s and does not represent innovation or mastery in design or construction (Criterion 3); and is a common structural form and does not embody information that may answer an unresolved historical question regarding design, construction, or history (Criterion 4). For these reasons, the historical resource evaluation report recommends that the warehouse building at 6782 Sebastopol Avenue is not an historical resource as defined under

CEQA. Consequently, demolition and removal of the warehouse building to allow for construction of the hotel on the site of the warehouse building would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. No other buildings or structures that could qualify as historical resources would be demolished or materially altered for construction or operation of the proposed project. Therefore, no impacts to historic architectural resources would result from implementation of the proposed project.

Archaeological Resources

In accordance with Policy COS-10-1 and Action COS-10b, ESA completed a records search and background research at the Northwest Information Center (NWIC) of the California Historical Resources Information System on May 9, 2024 (File No. 23-1599). The purpose of the records search was to (1) determine whether known cultural resources have been recorded in the vicinity of the project site; (2) assess the likelihood for unrecorded cultural resources to be present based on historical references and the distribution of nearby sites; and (3) develop a context for the identification and preliminary evaluation of cultural resources. The records search consisted of an examination of the following documents:

- NWIC digitized base maps (USGS Sebastopol 7.5-minute topographic map) to identify recorded archaeological resources and studies within a 0.5-mile radius of the project site.
- NWIC digitized base maps (USGS Sebastopol 7.5-minute topographic map) to identify recorded historic-era resources of the built environment (building, structures, and objects) within and adjacent to the project site.
- Resource Inventories: California Inventory of Historical Resources (California Register), California Historical Landmarks, Built Environment Resources Directory (BERD) (through March 2021).

The result of the background research indicates that no pre-contact Native American resources have been previously recorded in the project site. There are several previously recorded pre-contact archaeological resources in the records search radius. These resources consist of the remains of use and occupation areas, including burial sites. None of these resources would be directly impacted by the proposed project.

ESA completed a pedestrian survey of the project site on May 13, 2024. The survey entailed walking the parking lot site and hotel site in transects to provide an overall assessment of site conditions.

The parking lot site is highly disturbed from the construction and activities associated with the former batch plant. The site has been graded and filled to accommodate former structures. Remnant concrete pads, foundations, pavement, and concrete blocks as well as piles of gravel and soil are located throughout the site. No pre-contact Native American resources or other evidence of indigenous human use or occupation were identified during the survey of the parking lot site. Given the negative survey results, extensive ground disturbance, and relatively shallow depth of

grading (maximum of 2 feet below the existing surface), the parking lot site has a relatively low potential to uncover pre-contact resources during ground disturbing activities.

The remnant features of the former batch plant are recommended not eligible for listing in the CRHR. The concrete pads, foundations, pavement, and concrete blocks are remnant utilitarian features that are not associated with events that have made a significant contribution to the broad patterns of local or regional history (Criterion 1) or associated with the lives of persons important to local or California history (Criterion 2). The features do not embody the characteristics of a type, period, region, or method of construction or possess artistic values (Criterion 3). In addition, the features would not have the potential to yield information important to the history of the local area or California (Criterion 4). Therefore, the remnant features of the batch plant are not considered historical resources for the purposes of CEQA, and no further consideration is necessary for the project.

There is no ground visibility at the hotel site. Geologic maps show the hotel project site as Pleistocene-age alluvium. Based on the age of this landform, pre-contact archaeological resources would be located at or near to the surface. Given the general disturbance of the surface of the hotel project site from the existing building and former railroad, there is a relatively low potential to uncover pre-contact archaeological resources during ground disturbing activities.

Historic maps show that prior to construction of the existing building, a dwelling was located at the hotel site. The dwelling (labeled “Priest’s Residence”) was associated with an adjacent church (outside of the project site) and included a water tower and large outbuilding at the rear (within the project site). Outbuildings such as this may have held an outhouse or privy prior to the advent of indoor plumbing. When indoor plumbing became more commonplace, privy pits were often used as refuse containers. Privies can therefore include artifact deposits that, if associated with the lives of persons important to local history, may be considered eligible for listing in the CRHR as significant historical resources. Therefore, based on the results of the background research there is the potential to uncover significant historic-era archaeological resources during ground disturbing activities at the hotel site.

The Development Agreement also includes the following requirement, or condition, to address impacts to historical resources:

> Based on a reasonable presumption that historic-era archaeological resources may be present within the project site, the project sponsor shall retain the services of a Secretary of the Interior qualified archaeologist to conduct an archaeological testing and data recovery program. Testing shall be completed following demolition of the existing building, prior to any ground disturbing activity below grade. The archaeological consultant shall prepare an archaeological testing and data recovery plan (plan) that specifically identifies the expected archaeological resource(s), the testing method to be used, and the locations recommended for testing. The purpose of the plan will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate encountered archaeological resources. In the event archaeological resources are encountered, archaeological data recovery shall be implemented according to the plan, which includes the identification of research questions and data requirements. The plan will also include field

methods and procedures, cataloging and laboratory analysis, interpretive plans, security measures, and development of a final report.

In addition, Action COS-10c addresses the discovery of significant archaeological and historical resources during construction and grading activities, requiring that development work be stopped in the event of a discovery and that appropriate measures be implemented to protect the resource. With implementation of the contractual condition and Action COS-10c, as well as state and local regulations, impacts to significant archaeological resources would be reduced to a less than significant level.

c) Impacts related to disturbance of human remains that would result from implementation of the GPU were evaluated under Impact 3.5-2 on pages 3.5-20 to 3.5-21 of the GPU DEIR. The analysis determined that indications are that humans have occupied areas along the Laguna de Santa Rosa, east of Sebastopol, for at least 11,000 years and it is not always possible to predict where human remains may occur outside of formal burials. Therefore, excavation and construction activities allowed under the GPU may yield human remains that may not be marked in formal burials. The analysis determined that future development projects considered by the City would be evaluated for conformance with the City's General Plan, Municipal Code, and other applicable state and local regulations. The analysis determined that Public Resources Code Section 5097 has specific stop-work and notification procedures to follow in the event that Native American human remains are inadvertently discovered during development activities. The analysis determined that GPU includes Policy COS 10-2, which requires that human remains be treated with sensitivity and dignity and ensures compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. GPU Action COS-10c includes specific provisions that must be enacted if human remains are inadvertently discovered during construction activities. The analysis concluded that implementation of these policies and actions would ensure that potential adverse impacts to human remains would be less than significant. The proposed project would adhere to all applicable laws, regulations, and policies regarding human remains.

Conclusion

As discussed above, the proposed project would not result in effects related to cultural resources that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

Yarbrough Architectural Resources, 2024. Historical Resource Evaluation Report. Constraints Analysis for 6780 Depot Street and 6782 Sebastopol Avenue Sebastopol, Sonoma County, California. January.

6. Energy

ENERGY — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GPU FEIR*	*Off-Site or Cumulative Impact not Identified by GPU FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR*
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☐

Discussion

a) Impacts related to non-renewable energy resources that would result from implementation of the GPU were assessed in Section 4.2, Growth-Inducing Effects, on pages 4.0-21 to 4.0-22 of the GPU DEIR. The analysis found that while non-renewable energy resources such as electricity, natural gas, propane, gasoline, and diesel would be consumed during the construction and operation of development projects allowed under the GPU, the GPU includes a variety of policies that seek conserve, protect, and enhance energy resources. These policies focus on energy efficiency in the design, materials, construction, and use of buildings; the use of alternative energy systems; and alternative transportation modes. For example, Policy COS 7-3 encourages implementation of policies and programs contained in the GPU Circulation Element to reduce vehicle trips, vehicle miles travelled, and increase the use of non-vehicular modes of transportation such as bicycling, walking, and the use of shared transit. Policy COS 9-1 requires all new public and privately constructed buildings to meet and comply with CALGreen Tier 1 standards. Policy COS 9-3 directs the City to support innovative and green building best management practices, including, but not limited to, Leadership in Energy and Environmental Design (LEED) certification for new development, and encouraging project applicants to exceed the most current "green" development standards in the California Code of Regulations (CCR), Title 24, if feasible. Policy COS 9-5 promotes the use of sustainable and carbon-neutral energy sources in new development.

Construction of the proposed project would require the use of on-road trucks for deliveries of construction materials and hauling of soil and demolition debris, and the use of off-road equipment such as excavators, cranes, forklifts, and pavers. Construction activities would comply with state and local requirements designed to minimize idling and associated emissions, which would also minimize the use of fuel. Specifically, pursuant to 13 CCR Sections 2485 and 2449, idling of commercial vehicles over 10,000 pounds and off-road equipment over 25 horsepower would be limited to a maximum of five minutes.

Operational energy use would occur the use of electricity to power the proposed project. The proposed project would utilize existing energy hookups on the project site and would not extend new natural gas service. Sustainable elements of the proposed project include installation of electric vehicle chargers at the parking lot consistent with CALGreen standards, and compliance with the latest Title 24 energy standards for building construction (see additional discussion of

required project compliance with Title 24 in item b) below). In addition, as discussed in Section 17, *Transportation*, of this document, the proposed project would result in a net decrease in vehicle miles traveled in the region, and there would be a resultant net reduction in operational consumption of gasoline and diesel. Consequently, the proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Construction of new buildings are subject to California's Title 24 standards, including the Building Energy Efficiency Code and CALGreen Code, both of which are adopted in Title 15, Buildings and Construction, of the City's Municipal Code. California's Title 24 reduces energy use in residential and commercial buildings through progressive updates to both the Green Building Standards Code (Title 24, Part 11) and the Energy Efficiency Standards (Title 24, Part 6). Provisions added to Title 24 over the years include consideration and incorporation of new energy efficiency technologies and methods for building features such as space conditioning, water heating, and lighting, as well as construction waste diversion goals. Additionally, some standards focus on larger energy-saving concepts such as reducing loads at peak periods and seasons, improving the quality of energy-saving installations, and performing energy system inspections. Pursuant to Policy COS 9-1 of the GPU, the proposed project would meet and comply with CALGreen Tier 1 energy standards. Because the City has mechanisms in place as part of the building permit process to ensure that these state and local energy efficiency measures are implemented, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Conclusion

As discussed above, the proposed project would not result in effects related to energy resources that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

7. Geology and Soils

GEOLOGY AND SOILS — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GPU FEIR*	*Off-Site or Cumulative Impact not Identified by GPU FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR*
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☐
ii) Strong seismic ground shaking?	☐	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☐
iv) Landslides?	☐	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☐
d) Be located on expansive or corrosive soil creating substantial direct or indirect risks to life or property?	☐	☐	☐	☐
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?	☐	☐	☐	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☐

Discussion

a) Impacts related to the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, that would result from implementation of the GPU were evaluated under Impact 3.6-1 on pages 3.6-19 to 3.6-22 of the GPU DEIR. The analysis determined that there are no known active or potentially active faults, or Alquist-Priolo Earthquake Fault Zones, located within the City's Planning Area. However, the analysis determined that there are numerous faults located in the region. Figure 3.6-1 of the GPU DEIR illustrates the location of these faults. These include the San Andreas Fault System, the Rodgers Creek Fault, the Healdsburg Fault, West Napa Fault, and the Mayacama Fault. The analysis determined that rupture of any of these faults, or of an unknown fault in the region could cause seismic ground shaking. As a result, the analysis determined that future development in the City of Sebastopol may expose people or structures to potential adverse effects associated with a seismic event, including strong ground shaking and seismic-related ground failure.

The analysis determined that all projects undertaken in the City of Sebastopol would be required to comply with the provisions of the California Building Code, which requires development projects to perform geotechnical investigations in accordance with state law, engineer improvements to address potential seismic and ground failure issues, and to use earthquake-resistant construction techniques to address potential earthquake loads when constructing buildings and improvements. The analysis determined that, as future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the California Building Code, the City's General Plan, Municipal Code, and other applicable regulations related to seismic hazards. The analysis further identified that GPU policies require new land development proposals to avoid unreasonable exposure to geologic hazards, including earthquake damage, subsidence, liquefaction, expansive soils, and landslides. The analysis concluded that, with the implementation of the policies and actions in the GPU, as well as applicable state and local codes, potential impacts associated with a seismic event, including rupture of an earthquake fault, seismic ground shaking, and liquefaction would be less than significant.

The project site (both the hotel site and parking lot site) is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act or located within any other area with substantial evidence of a known fault (California Department of Conservation, 2024b). As a condition of approval, the proposed project would be required to conform to the requirements of the California Building Code, the City's General Plan and Municipal Code, and other applicable regulations related to seismic hazards to ensure that potential impacts associated with a seismic event, including rupture of an earthquake fault, seismic ground shaking, liquefaction, expansive soils, and landslides would be less than significant.

b) Impacts related to substantial soil erosion or the loss of topsoil that would result from implementation of the GPU were evaluated under Impact 3.6-2 on pages 3.6-22 to 3.6-23 of the GPU DEIR. The analysis determined that the GPU allows development and improvement projects that would involve some land clearing, mass grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. The analysis determined that construction-related erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters. The analysis determined that the majority of soils in the City of Sebastopol fall within the low to moderate range for erosion potential.

The analysis determined that all projects undertaken in the City of Sebastopol would be required to comply with the provisions of the California Building Code, the General Plan, Municipal Code, and other regulations. In addition to compliance with City standards and policies, the Regional Water Quality Control Board (RWQCB) will require a project-specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for each project that disturbs an area of one acre or larger. The analysis determined that the SWPPPs will include project-specific best management measures (BMPs) that are designed to control drainage and erosion. The analysis determined that, with implementation of the policies and actions in the GPU, as well as applicable state and local requirements, potential impacts associated with erosion and loss of topsoil would be less than significant.

Based on information obtained from the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey on-line database, the hotel site is mapped as Goldridge fine sandy loam, and the parking lot site is mapped as Blucher fine sandy loam and Clear Lake clay (NRCS, 2024). As discussed on pages 3.6-11 to 3.6-12 of the GPU DEIR, these soils fall within the low to moderate range for erosion potential. As a condition of approval, the proposed project would be required to conform to the requirements of the California Building Code, the City's General Plan, and Municipal Code that address and minimize soil erosion. In addition, the RWQCB would require a project-specific SWPPP to be prepared for the proposed project, which would include project-specific BMPs that are designed to control drainage and erosion. The proposed project's required compliance with the above regulations would ensure that potential impacts associated with soil erosion or the loss of topsoil would be less than significant.

c,d) Impacts related to unstable geologic units or soils, landslides, lateral spreading, subsidence, liquefaction, or collapse were evaluated under Impact 3.6-3 on pages 3.6-23 to 3.6-26 of the GPU DEIR. The analysis determined that the Planning Area does not have a significant risk of becoming unstable as a result landslide, lateral spreading, subsidence, or collapse. The analysis determined that limited portions of the Planning Area are subject to liquefaction. The analysis determined that, as future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the California Building Code, the General Plan, Municipal Code, and other applicable regulations. The analysis further identified that GPU policies require new land development proposals to avoid unreasonable exposure to geologic hazards, including landslides, lateral spreading, subsidence, liquefaction, or collapse. The analysis concluded that, with the implementation of the policies and actions in the GPU, as well as applicable state and local codes, potential impacts associated unstable geologic units or soils, landslides, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

As shown on Figure 3.6-2, Liquefaction Susceptibility, on page 3.6-33, Figure 3.6-4, Soil Erosion Susceptibility, on page 3.6-37, Figure 3.6-5, Soils Shrink-Swell Potential, on page 3.6-39, and Figure 3.6-6, Landslide Potential, on page 3.6-41 of the GPU DEIR, the project site (both the hotel site and parking lot site) is not located in an area with high risk for unstable geologic units or soils, landslides, lateral spreading, subsidence, liquefaction, or collapse. In addition, the proposed project would be required to conform to the requirements of the California Building Code, the City's General Plan, and Municipal Code that address and minimize these risk factors. The proposed project's required compliance with the above regulations would ensure that impacts associated with unstable geologic units or soils, landslides, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

e) The proposed project would connect to the existing City sanitary sewer collection system and does not propose any septic tanks or alternative wastewater disposal systems. There would be no impact under this significance criterion.

f) Impacts related to unique paleontological resources or site or unique geologic features that would result from implementation of the GPU were evaluated under Impact 3.5-3 on page 3.5-21 of the GPU DEIR. The analysis determined that there are no known paleontological resources located in

the Sebastopol Planning Area. However, the analysis determined that development allowed under the GPU could result in the discovery and disturbance of previously unknown or undiscovered paleontological resources. The analysis determined that the GPU provides guidance regarding the conservation of paleontological resources, ensuring that any unique paleontological resources discovered during implementation of the GPU are conserved appropriately. Specifically, GPU Action COS-10c includes specific provisions that must be enacted if paleontological resources are inadvertently discovered during construction activities. The analysis concluded that implementation of GPU Action COS-10c would ensure that potential adverse impacts to paleontological resources would be less than significant.

Geologic maps show the project site (both the hotel site and parking lot site) as Pleistocene-age alluvium. Pleistocene-age sedimentary deposits are generally considered to have a moderate to high potential to contain significant paleontological resources due to their age and previous discoveries of paleontological resources within this geologic unit (Sub Terra Consulting, 2017). Given the general disturbance of the surface of the hotel and parking lot sites from the existing warehouse building and former concrete batch plant, respectively, there is a relatively low potential to uncover paleontological resources during ground-disturbing activities for the proposed project, which would occur at a maximum depth of 5 feet below the existing ground surface. In addition, the proposed project would adhere to the provisions GPU Action COS-10c, which would ensure that potential adverse impacts to paleontological resources would be less than significant.

Conclusion

As discussed above, the proposed project would not result in effects related to geology and soils that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

California Department of Conservation, 2024b. California Earthquake Hazards Zone Application ("EQ Zapp"). Available at: https://www.conservation.ca.gov/cgs/geohazards/eq-zapp. Accessed May 9, 2024.

Sub Terra Consulting, 2017. Northwest California Integrated Resources Management Plan, Inventory of Existing Date for Paleontological Resources and Potential Fossil Yield Classification GIS Database. Prepared by Dr. Russel Shapiro.

University of California Museum of Paleontology (UCMP), 2024. UC Museum of Paleontology Localities database. Fossil localities within Sonoma County. Available at: https://ucmpdb.berkeley.edu/loc.html. Accessed May 25, 2024.

United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), 2024 Web Soil Survey On-Line Database. Available at: https://websoilsurvey.nrcs.usda.gov/app/. Accessed May 25, 2024.

8. Greenhouse Gas Emissions

GREENHOUSE GAS EMISSIONS — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☐

Discussion

a) Impacts related to GHG emissions that would result from implementation of the GPU were evaluated under Impact 3.7-1 on pages 3.7-15 to 3.7-24 of the GPU DEIR. The analysis determined that the GPU and its policies and actions would encourage the development of a compact urban community, while preserving the agricultural and open space resources in the City's Planning Area. The analysis determined that implementation of the GPU would result in increased local employment opportunities, increased transportation and transit options, and the incorporation of conservation and energy efficiency into new development. The analysis determined that the GPU is consistent with the policy guidance provided by the California Air Pollution Control Officers Association (CAPCOA) and the Bay Area Air Quality Management District (BAAQMD) and would assist the state in meeting the GHG reduction goals established by Assembly Bill 32 (AB 32).[6] Therefore, the analysis concluded that the impact related to GHG emissions would be less than significant.

Construction Emissions

Construction of the proposed project would involve the combustion of diesel fuel to provide power for the operation of various construction equipment and gasoline for worker commutes, resulting in the generation of GHGs. Construction emissions associated with the proposed project were estimated using project-specific information provided by the project applicant, such as construction schedule and phasing.

Carbon dioxide (CO_2), methane (CH_4) and nitrous oxide (N_2O) emissions from off-road construction equipment and construction vehicle trips were estimated using CalEEMod. N_2O and CH_4 emissions were multiplied by their respective Global Warming Potentials GWPs (25 and

[6] Signed into law in 2006 by the California Legislature, AB 32 required California to reduce its GHG emissions to 1990 levels by 2020 -- a reduction of approximately 15 percent below emissions expected under a "business as usual" scenario.

298) and added to the CO_2 emissions to obtain emissions in terms of carbon dioxide equivalents (CO_2e).

Table GHG-1 shows that project construction would generate a total of approximately 382 Metric tons of CO_2e ($MTCO_2e$) over the 18-month construction period, with annual amortized averages for project construction emission to be 12.7 $MTCO_2e$.

GHG emissions from the construction phase of a project represent a small portion of emissions over a project's lifetime, which would be at least 30 years for the proposed project. The BAAQMD's proposed thresholds are instead designed to address operational GHG emissions from land use development projects which represent the majority of a project's GHG emissions. The primary source of GHG emissions from construction is diesel-powered construction equipment. Large reductions in construction emissions are difficult to realize because there are currently no economical alternatives to diesel fuel for powering most construction equipment. Improvements in statewide regulations governing construction equipment and fuel standards driven by Senate Bill 32 (SB 32) and other initiatives will also contribute to reduced emissions from construction activities. Therefore, GHG emissions associated with construction of the proposed project would be considered less than significant.

TABLE GHG-1
ANNUAL PROJECT CONSTRUCTION GHG EMISSIONS

Construction Year[a]	CO_2e metric tons/year
2025	295
2026	87.1
Total	**382**
Amortized	**12.7**

NOTES: $MTCO_2e$ = metric tons of carbon dioxide equivalent

Construction-related GHG emissions were amortized over 30 years, which is a commonly accepted method for including construction emissions as part of the Project's average annual emissions.

a. Emissions were calculated for the construction years of 2025 and 2026. A subsequent change to 2026 and 2027 will result in marginally reduced emissions due to improvements in the construction equipment fleet. Therefore, these emission estimates are conservative.

SOURCE: Data compiled by Environmental Science Associates in 2024 (Appendix B)

Operational Emissions

Direct GHG emissions during operation of the proposed project would occur from onsite energy use and other sources, such as landscape maintenance and fugitive emissions from refrigeration. Indirect GHG emissions would come from electricity used to power the proposed project, treatment and transportation of water and wastewater, and disposal of generated solid waste. There are no backup generators associated with the proposed project and no other sources of GHG emissions that would have unusual levels of emissions. In addition, as discussed in Section 17, *Transportation*, of this document, the proposed project would result in a net decrease in vehicle miles traveled in the region, and there would be a resultant net reduction in mobile GHG emissions. For informational purposes, proposed project operational emissions are presented in **Table GHG-2**. As can be seen from the table, with the net decrease in vehicle miles

traveled, the project would have an overall marginal increase from operational CO_2eGHG emissions of 123 metric tons per year.

TABLE GHG-2
ANNUAL PROJECT OPERATIONAL GHG EMISSIONS

Operational Source	CO_2e metric tons/year
Mobile	-77
Area	1
Energy	150
Water	4
Waste	14
Refrigeration	18
Amortized construction emissions	13
Total Project Operations	**123**

NOTE: Emissions were calculated for an operational year of 2027. A subsequent change to 2028 will result in marginally reduced emissions due to reductions in carbon-based electricity by PG&E. Therefore, these emission estimates are conservative.

SOURCES: Data compiled by Environmental Science Associates in 2024 (Appendix B)

The proposed project has been designed to be consistent with the GPU (see discussion of plan consistency in Section 11, *Land Use and Planning*, of this document). Therefore, the emissions related to project construction and operation were considered in the GPU FEIR, which determined that GHG emissions from development under the GPU would result in a 62 percent reduction in GHG emissions compared to existing conditions, and the impact of GHG emissions associated with the GPU was determined to be less than significant.

Since certification of the GPU EIR in 2016, the State of California has updated its statewide climate Change Scoping Plan twice: in 2017 and 2022. An interim 2030 GHG target of 40 percent reduction in GHG emissions relative to 1990 levels was established in the 2017 Scoping Plan update. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279 (CARB, 2022).

The square footage of the proposed project land use development was considered in the calculation of GHG emissions in the GPU FEIR, which determined that GHG emissions from development under the GPU would result in a 62 percent reduction in GHG emissions compared to existing conditions. However, as conservative analysis, project emissions in Table GHG-2 may be added to the total 34,653 MTCO2e estimated in the GPU FEIR for mitigated emissions upon buildout of the General Plan. This results in a total emission of 34,776 MTCO2e. Comparing these emissions to the 91,603 MTCO2e estimated in the GPU FEIR for mitigated emissions upon buildout of the GPU under existing conditions still results in a 62 percent reduction in emissions compared to exiting conditions.

Even if the Barlow Hotel project was analyzed outside of CEQA Guidelines Section 15183, it would not have a significant impact on GHG. The existing Guayaki warehouse building is estimated to produce 146 metric tons of GHG per year, which means the difference in GHG emissions with the Guayaki warehouse building in the proposed hotel is 23 metric tons per year, a de minimus amount. The hotel project achieves a reduction in VMT as is discussed later in this document, which contributes to achieving statewide GHG reduction goals.

Because this estimated reduction would be consistent with the subsequently adopted reduction targets for 2030 and would also be consistent with an interpolated reduction target of the 2035 horizon year of the GPU, estimated to be 55 percent, the proposed project would be consistent with both the less-than-significant finding of the 2016 GPU as well as the updated GHG reduction targets of the State Scoping Plan, as they would pertain to the 2016 GPU. Therefore, the proposed project would not have a substantial adverse effect on GHG emissions.

b) Impacts related to potential conflicts with applicable plans, policies, or regulations adopted to reduce GHG emissions that would result from implementation of the GPU were evaluated under Impact 3.7-2 on pages 3.7-24 to 3.7-25 of the GPU DEIR. The analysis determined that the 2016 GPU Policies are consistent with the City's Climate Change Action Plan (CCAP) and would assist in meeting the regional GHG reduction goals established by the CCAP.

State of California Climate Change Scoping Plan and Updates

Further, the GPU FEIR determined that to ensure consistency with the City's CCAP and the provisions of Assembly Bill 32, new projects are required to fully implement the City's Electrical, Energy, and Green Building Standards. The analysis determined that compliance with the City's Electrical, Energy, and Green Building Standards would reduce GHG emissions from future development to the greatest extent feasible and would further ensure that any future development following adoption of the GPU would be consistent with all applicable plans and policies adopted for the purpose of reducing GHG emissions.

As discussed above in response to question a), because of the GPU's estimated 62 percent reduction in GHG emissions compared to existing conditions would be consistent with the subsequently adopted reduction targets for 2030 and would also be consistent with an interpolated reduction target of the 2035 horizon year of the GPU estimated to be 55 percent, the proposed project would be consistent with both the less-than-significant finding of the 2016 GPU as well as the updated GHG reduction targets of the State Scoping Plan, as they would pertain to the 2016 GPU.

Sebastopol Climate Action Framework

On July 19, 2022, the Sebastopol City Council unanimously adopted the Sebastopol Climate Action Framework, The Climate Action Framework provides Sebastopol with the next steps towards reaching the goals of the Climate Emergency Resolution adopted in 2019, which included a goal of reducing emissions to net zero by 2030, sequestering additional carbon from the atmosphere, preparing for current and future climate impacts, and centering equity and community engagement in the City's ongoing climate actions.

As stated in the Framework, the goals in the Framework refer to General Plan goals. Many actions suggested in Appendix A of the Framework, or similar actions, are already included in the City's 2016 GPU. Actions in the GPU have been reviewed for compliance with CEQA, removing one barrier to implementation.

The proposed project has been designed to be consistent with the GPU (see discussion of proposed project consistency in Section 11, *Land Use and Planning*, of this document). Therefore, by virtue of the project's consistency with the 2016 GPU, the project would also be consistent with actions of the City's 2022 Climate Action Framework. Consequently, the proposed project would not have a substantial adverse effect with respect to conflicts with applicable plans, policies, or regulations adopted to reduce GHG emissions.

Conclusion

As discussed above, the proposed project would not result in effects related to GHG emissions that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

California Air Resources Board (CARB), 2008. Climate Change Scoping Plan: A Framework for Change. Published December 2008. Amended version posted May 11, 2009. Available at: https://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm. Accessed May 2024.

CARB, 2017. California's 2017 Climate Change Scoping Plan. Published November 2017. Available at: https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm. Accessed May 2024.

CARB, 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. November 16, 2022. Available at: https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf. Accessed May 2024.

City of Sebastopol, 2022. Sebastopol Climate Action Framework, July 2022.

9. Hazards and Hazardous Materials

HAZARDS AND HAZARDOUS MATERIALS — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☐

Discussion

a,b) Impacts related to the potential for implementation of the GPU to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment were evaluated under Impact 3.8-1 on pages 3.8-18 to 3.8-20 of the GPU DEIR. The analysis determined that future development, infrastructure, and other projects allowed under the GPU may involve the transportation, use, and/or disposal of hazardous materials. The analysis determined that the use, transportation, and disposal of hazardous materials is regulated and monitored by local fire departments, Certified Unified Program Agencies (CUPAs),[7] the California Division of Occupational Safety and Health (Cal/OSHA), and the California Department of Toxic Substances Control (DTSC), consistent

[7] The California Environmental Protection Agency designates specific local agencies as Certified Unified Program Agencies (CUPA), typically at the county level. In Sonoma County, the Sonoma County Fire and Emergency Services Department Hazardous Materials Division is responsible for the County's Certified Unified Program Agency (CUPA) programs. Each designated CUPA is responsible for the implementation of six statewide programs within its jurisdiction. These programs include underground storage of hazardous substances (USTs), hazardous materials business plan (HMP) requirements, hazardous waste generator requirements, the California Accidental Release Prevention (Cal-ARP) program, the Uniform Fire Code hazardous materials management plan, and above ground storage tanks (Spill Prevention Control and Countermeasures Plan only).

with the requirements of federal, state, and local regulations and policies, as enumerated in the regulatory setting of the Hazards section on pages 3.8-11 to 3.8-17. The analysis determined that all future projects allowed under the GPU would be required to comply with the provisions of federal, state, and local requirements related to hazardous materials. In addition to the requirements associated with state and federal regulations and the City Municipal Code, the analysis determined that the GPU includes policies and actions to address potential impacts associated with hazardous materials among other issues. These policies and actions in the would ensure that potential hazards are identified on a project site, that development is located in areas where potential exposure to hazards and hazardous materials can be mitigated to an acceptable level, and to require that businesses operations comply with federal and state regulations regarding the use, transport, storage, and disposal of hazardous materials. The analysis concluded that compliance with applicable GPU policies and actions, as well as state and federal regulations, would ensure that potential impacts associated with the routine use, transport, storage, or disposal or accidental release of hazardous materials would be less than significant.

Construction

During project construction, construction equipment and materials would include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. Construction activities would be required to comply with numerous hazardous materials regulations to ensure that hazardous materials would be transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including stormwater and downstream receiving water bodies. Contractors would be required to prepare and implement Hazardous Materials Business Plans (HMBPs) that would require that hazardous materials used for construction would be used properly and stored in appropriate containers with secondary containment to contain a potential release. The California Fire Code would also require measures for the safe storage and handling of hazardous materials.

As discussed in Section 7, *Geology and Soils*, and Section 10, *Hydrology and Water Quality*, of this document, the construction contractor would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) for construction activities that would list the hazardous materials proposed for use during construction; describe spill prevention measures, equipment inspections, equipment and fuel storage; protocols for responding immediately to spills; and describe best management practices (BMPs) for controlling site runoff.

In addition, the transportation of hazardous materials would be regulated by the United States Department of Transportation (USDOT), Caltrans, and the California Highway Patrol (CHP). Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release.

Finally, in the event of an accidental spill that could release hazardous materials at the project site, a coordinated response would occur at the state and local levels, including, but not limited to, the Sonoma County Fire and Emergency Services Department Hazardous Materials Division,

which is the local CUPA, along with the CHP and the Sebastopol Police Department, to respond to and assess the situation, as needed.

The required compliance with the numerous laws and regulations discussed above that govern the transportation, use, handling, and disposal of hazardous materials would limit the potential for creation of hazardous conditions due to the use or accidental release of hazardous materials, and this impact would be less than significant.

Operation

Once constructed, the hotel would likely result in the use of common types of hazardous materials that are typically associated with hotel uses, such as cleaning products, disinfectants, and solvents. These products are labeled to inform users of their potential risks and provide instruction regarding appropriate handling procedures. However, most of these materials are consumed through use, resulting in relatively little waste. Routine maintenance activities at the parking lot may involve the transportation, use, or temporary storage of a variety of hazardous materials such as lubricants, paints, and solvents. However, due to the largely self-operating nature of the parking lot, such actions would occur infrequently. In addition, the quantities of hazardous materials used would be relatively small. For these reasons, operation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) Impacts related to the potential for implementation of the GPU to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school were evaluated under Impact 3.8-2 on pages 3.8-20 to 3.8-21 of the GPU DEIR. The analysis determined that all hazardous materials would be handled in accordance with federal, state, and local requirements, as described under Impact 3.8-1, which would limit the potential for projects allowed under the GPU to expose nearby uses, including schools, to hazardous emissions or an accidental release. The analysis determined that hazardous emissions are monitored by the Bay Area Air Quality Management District (BAAQMD), the Regional Water Quality Control Board (RWQCB), the California Department of Toxic Substances Control (DTSC), and the local CUPA. In the event of a hazardous materials spill or release, notification and cleanup operations would be performed in compliance with applicable federal, state, and local regulations and policies, including hazard mitigation plans. The analysis concluded that compliance with all existing regulations and hazard mitigation plans as well as GPU policies and actions discussed under Impact 3.8-1 of the GPU DEIR would ensure that the impact would be less than significant.

The nearest educational center to the proposed project is a student resource center for students of Analy High School, which is located at 445 Taft Street, approximately 0.2 mile west of the parking lot site and approximately 0.2 mile north of the hotel site. As discussed under question a,b) above, required compliance with the numerous laws and regulations that govern the transportation, use, handling, and disposal of hazardous materials would ensure that potential for creation of hazardous conditions due to the use or accidental release of hazardous materials associated with construction and operation of the proposed project would be less than significant.

Therefore, the proposed project would have a less-than-significant impact related to hazardous emissions or materials within 0.25 mile of a school.

d) Impacts related to implementation of the GPU to result in projects located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5[8] and, as a result, create a significant hazard to the public or the environment were evaluated under Impact 3.8-3 on pages 3.8-21 to 3.8-23 of the GPU DEIR. The analysis determined that development allowed by the GPU could create a hazard to the public or the environment through a disturbance or release of contaminated materials if the development occurs on or adjacent to contaminated sites without appropriate measures to contain or mitigate the existing contamination. The analysis determined that state and federal regulations, including those enforced by the U.S. Environmental Protection Agency (EPA), the DTSC, and the RWQCB, ensure that existing hazards, including those associated with known hazardous materials sites, are addressed prior to development. The analysis determined that compliance with state and federal regulations would ensure that potential impacts associated with the hazardous conditions on sites listed pursuant to Government Code Section 65962.5 would be less than significant.

The Cortese List, compiled pursuant to Government Code Section 65962.5 includes listings of hazardous waste sites from the DTSC EnviroStor database, leaking underground storage tank sites from the State Water Resources Control Board (SWRCB) GeoTracker database, solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit, active cleanup and desist orders and cleanup and abatement orders from the RWQCB, and hazardous waste facilities subject to corrective action by DTSC. ESA conducted a search of the DTSC EnviroStor database and the SWRCB GeoTracker database on May 20, 2024. The results are included as Appendix D of this document and demonstrate that no known active hazardous materials sites are located within, adjacent to, or within 1,000 feet of the project site (both the hotel site and parking lot site) (DTSC/SWRCB, 2024).

In addition, the Phase I Environmental Site Assessment (Phase I ESA) prepared for the parking lot site in May 2024 revealed no evidence of any recognized environmental condition (REC[9]), controlled recognized environmental condition (CREC[10]), or Business Environmental Risk (BER[11]) in connection with the parking lot site. The report identified one historical recognized

[8] Section 65962.5(a)(1) requires that DTSC shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) all hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC). The hazardous waste facilities identified in HSC Section 25187.5 are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under HSC Section 25187, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment. This is a very small and specific subgroup of facilities, and they are not separately posted on the DTSC or CalEPA's website.

[9] A recognized environmental condition (REC) refers to the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.

[10] A controlled recognized environmental condition (CREC) refers to a REC affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

[11] A Business Environmental Risk (BER) is a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated in this practice.

environmental condition (HREC[12]) on the parking lot site, which comprised two former underground storage tanks (USTs) that have been removed and all required cleanup has been completed (GeoTracker ID T0609700461). Based on these findings, the Phase I recommends no further investigation of parking lot site (Partner Engineering and Science 2024). In addition, a Phase I ESA prepared for the Barlow in August 2016 did not directly address the hotel site (6782 Sebastopol Avenue) but as part of its adjacent property reconnaissance identified a former leaking underground storage tank (LUST) at 6782 Sebastopol Avenue (GeoTracker ID T0609700195) with a status of cleanup complete and case closed (Partner Engineering and Science, 2024).

The findings of the Phase I reports are consistent with ESA's updated searches of the DTSC EnviroStor database and the SWRCB GeoTracker database, which demonstrate that the project site (both the hotel site and parking lot site) is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and there would be no impact under this significance criterion.

e) As discussed under Impact 3.8-4 on pages 3.8-23 to 3.8-24 of the GPU DEIR the City of Sebastopol does not have any airport facilities located within the city limits, sphere of influence, or urban growth boundary. The closest airport is the Charles M. Schulz – Sonoma County Airport located approximately 11 miles north of the City of Sebastopol. There would be no impact under this significance criterion.

f) Impacts related to the potential for implementation of the GPU to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan were evaluated under Impact 3.8-5 on pages 3.8-24 to 3.8-26 of the GPU DEIR. The analysis determined that the GPU would allow a variety of new development, including residential, commercial, industrial, and public service projects, which would result in increased jobs and population in the City of Sebastopol. The analysis determined that roads and infrastructure improvements would occur to accommodate the new growth. The analysis determined that future projects are not anticipated to remove or impede evacuation routes and the GPU does not include land uses, policies, or other components that conflict with adopted emergency response or evacuation plans. The analysis determined that the GPU would improve transportation systems throughout the City and includes policies and actions designed to ensure that an emergency response plan is prepared and maintained. The analysis determined that the GPU would also ensure that the City's emergency access routes, emergency contact lists, and public information regarding designated facilities and routes are regularly reviewed to ensure that up to date information is available to the City and the public in the event of an emergency. The analysis concluded that implementation of the GPU would have a less than significant impact with regards to this issue.

The City of Sebastopol Local Hazard Mitigation Plan (LHMP) was adopted on June 7, 2022, and received final approval from the Federal Emergency Management Agency (FEMA) on July 15, 2022 (City of Sebastopol, 2022). The LHMP provides emergency management guidance related

[12] A historical recognized environmental condition (HREC) refers to a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations).

to prevention, preparedness, response, and recovery. The LHMP uses an all-hazards approach to emergency planning and, therefore, encompasses all hazards that are applicable to the city, both natural and manmade, ranging from planned events to large-scale disasters. The City ensures fire safety primarily through provisions of the building and fire codes. Final building plans for the proposed project would be reviewed and approved by the City fire department, building department, public works department, and planning department to ensure conformance with the applicable provisions related to emergency response plan and emergency evacuation. Implementation of the proposed project could add incrementally to transportation conditions in the immediate area in the event of an emergency evacuation. The proposed project's contribution to traffic conditions would not be substantial within the context of the urban setting of the project site, and it is expected that project-related traffic would be dispersed within the existing street system, such that there would be no significant adverse impacts on transportation conditions. Therefore, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

g) Impacts related to the potential for implementation of the GPU to expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires were evaluated under Impact 3.8-6 on pages 3.8-26 to 3.8-29 of the GPU DEIR. The analysis determined that there are no Fire Hazard Severity Zones (FHSZs) within State Responsibility Areas (SRAs) or Very High Fire Hazard Severity Zones (VHFHSZs) within any Local Responsibility Areas (LRAs) in the City of Sebastopol.[13] The analysis identified that the nearest moderate and high level FHSZs are located approximately three miles to the west of the City of Sebastopol. The analysis identified that LRAs are concentrated in the incorporated areas of Sonoma County. The City of Sebastopol is an LRA that is served by the Sebastopol Fire Department within the city limits and the Gold Ridge Fire Protection District, which provides fire protection services to unincorporated rural areas surrounding Sebastopol. The analysis identified that SRAs within the vicinity of Sebastopol are primarily found to the south and west of the city limits. The analysis identified that there are no Federal Responsibility Areas (FRAs) within the vicinity of City of Sebastopol.[14] The analysis identified that all future projects allowed under the GPU would be required to comply with the provisions of federal, state, and local requirements related to wildland fire hazards, including state fire safety regulations associated with wildland-urban interfaces, fire-safe building standards, and defensible space requirements. The analysis determined that as future development and infrastructure projects are considered by the City, each project would be evaluated for potential impacts, specific to the project, associated with wildland fire hazards as required under CEQA. The analysis identified that the GPU includes policies and actions that would ensure that potential wildland fire hazards are mitigated through requirements for adequate water supply and water flow availability, ensuring adequate emergency access, adequate fire protection services, and ensuring public awareness regarding fire safety. The

[13] The state has charged CAL FIRE with the identification of Fire Hazard Severity Zones (FHSZ) within State Responsibility Areas. In addition, CAL FIRE must recommend Very High Fire Hazard Severity Zones (VHFHSZ) identified within any Local Responsibility Areas. The FHSZ maps are used by the state Fire Marshall as a basis for the adoption of applicable building code standards.

[14] An updated query of the CAL FIRE Fire Hazard Severity Zone Viewer conducted by ESA on May 26, 2004, confirmed that there are no FHSZs within SRAs or VHFHSZs within any LRAs within or near the City of Sebastopol (CAL FIRE 2024).

analysis concluded that implementation of the GPU would have a less than significant impact with regards to this issue.

The project site (both the hotel site and the parking lot site) are both urban infill areas and are not adjacent to wildlands that have the potential to support wildland fires. Construction and operation of the proposed project would adhere to all applicable state and local regulations, codes, and policies that address fire safety, ensuring that impacts related to fire risk would be less than significant.

Conclusion

As discussed above, the proposed project would not result in effects related to hazards and hazardous materials that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

California Department of Forestry and Fire Protection (CAL FIRE), 2024. Fire Hazard Severity Zones in State Responsibility Area. Available at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps-2022. Accessed May 26, 2024.

City of Sebastopol, 2022. City of Sebastopol Local Hazard Mitigation Plan. Adopted June 7, 2022. Available at: https://www.cityofsebastopol.gov/local-hazard-mitigation-plan-lhmp/. Accessed May 26, 2024.

Department of Toxic Substances Control and State Water Resources Control Board (DTSC/SWRCB), 2024. Combined EnviroStor and GeoTracker Online Databases. Accessed May 20, 2024.

Partner Engineering and Science, 2024. Phase I Environmental Site Assessment Report for 385 Morris Street, Sebastopol, California 95472. May 1, 2024.

Partner Engineering and Science, 2016. Phase I Environmental Site Assessment Report for the Barlow Sebastopol, California 95472. August 10, 2016.

10. Hydrology and Water Quality

HYDROLOGY AND WATER QUALITY — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☐
iv) impede or redirect flood flows?	☐	☐	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☐

Discussion

a) Impacts related to the potential for implementation of the GPU to result in a violation of water quality standards or waste discharge requirements were evaluated under Impact 3.9-1 on pages 3.9-15 to 3.9-17 of the GPU DEIR. The analysis determined that compliance with the Clean Water Act and regulations enforced by the Regional Water Quality Control Board (RWQCB) would ensure that construction-related impacts to water quality are minimized and future projects comply with all applicable laws and regulations. The analysis determined that the City's stormwater system is covered under a National Pollutant Discharge Elimination System (NPDES) MS4 Phase II permit program, which requires both mitigation of stormwater quantity and stormwater quality. The analysis determined that the Santa Rosa Storm Water Low Impact Development Technical Design Manual (LID Manual) provides specific guidance for postconstruction stormwater control measures (as required under GPU Action COS-3d). The analysis determined that implementation of the requirements of the NPDES permit, the LID Manual requirements (or any successor documents), as well as the various GPU policies that address water quality would ensure that future development projects under the GPU do not result in significant adverse effects to water quality, and the impact would be less than significant.

Construction

Grading, excavation, and other activities associated with construction of the proposed project could temporarily increase runoff, erosion, and sedimentation. In addition, construction of the proposed project would require the use of hazardous materials (e.g., fuels, oil, lubricants, solvents, or other potentially hazardous materials commonly used in construction), which could be mobilized and transported offsite potentially degrading the water quality of local surface waters, including the Laguna de Santa Rosa, which is adjacent to the parking lot site. However, because the proposed project would disturb greater than one acre, it is subject to coverage under the NPDES Construction General Permit, which would require the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that would describe best management practices (BMPs) such as settlement basins, silt fences, and straw wattles to prevent sediment and other pollutants from leaving the work site and entering waterways. Therefore, impacts relative to water quality during construction would be less than significant.

Operation

The proposed project would construct a hotel on a currently developed site and a parking lot on the 2.9-acre site of the former concrete batch plant, much of which is paved. The proposed project, specifically the parking lot would add additional areas of impervious surface which could introduce constituents into storm water flows that are typically associated with urban runoff, including sediments, petroleum hydrocarbons, pesticides, fertilizers, and heavy metals such as lead, zinc, and copper. As discussed above, the City's stormwater system is covered under an NPDES MS4 Phase II permit program, which requires both mitigation of stormwater quantity and stormwater quality. In addition, the LID Manual provides specific guidance for postconstruction stormwater control measures (as required under GPU Action COS-3d). The proposed project would be designed and operated in compliance with these programs and all applicable GPU policies that address post-construction water quality. These policies include Policy COS 3-6, which requires the use and site design integration of natural features such as bioswales, vegetation, retention ponds, and other measures to remove surface water pollutants prior to discharge into surface waters; and Policy COS 3-8, which requires new development to include maintained and managed setbacks and buffers along creeks, wetlands, riparian corridors, and adjacent to sensitive habitat. The project's required compliance with applicable federal, state, and local regulations and policies would ensure that operational impacts related to water quality would be less than significant.

b) Impacts related to the potential for implementation of the GPU to substantially decrease groundwater supplies or interfere substantially with groundwater recharge were evaluated under Impact 3.9-2 on pages 3.9-20 to 3.9-26 of the GPU DEIR. The analysis determined that subsequent development projects under the GPU, such as residential, commercial, industrial, and roadway projects would result in new impervious surfaces and could reduce rainwater infiltration and groundwater recharge. The analysis determined that projects located in urban areas would have less of an impact than projects converting open lands and spaces. The analysis identified that the City is participating in the regional voluntary Santa Rosa Plain Groundwater Management Plan to better manage groundwater resources now and into the future. The analysis determined that the GPU Community Services and Facilities Element and the Conservation and Open Space

Element include policies and action items, which include numerous requirements that would reduce impermeable surfaces and increase groundwater recharge opportunities throughout the city. For example, Policy COS 5-3 encourages new groundwater recharge opportunities and protects existing groundwater recharge areas throughout the Sebastopol Planning Area. Policy COS 5-4 promotes the use of permeable surface materials and provides for ample areas of open space and naturalized land in order to decrease surface runoff and promote groundwater recharge. Policy COS 5-5 ensures the City seeks opportunities to expand the groundwater recharge capacity of City-owned parcels throughout Sebastopol, and Action CSF-3j calls for the preparation of a study that accurately establishes the groundwater recharge area for Sebastopol. Policy CSF 3-1: requires that prior to the approval of new development, projects must demonstrate proof of adequate water supply. The analysis concluded that implementation of GPU policies and action measures relating to water conservation and groundwater recharge, in addition to the City's participation in the regional Santa Rosa Plain Groundwater Management Plan, would ensure that the GPU would have a less than significant impact related to groundwater supplies or interfere substantially with groundwater recharge.

The proposed project would construct a hotel on a currently developed (e.g., paved) site and a parking lot on the 2.9-acre site of the former concrete batch plant, much of which is paved. Both sites are urbanized and neither site currently allows for substantial rainwater infiltration and groundwater recharge. In addition, as discussed in Section 19, *Utilities and Service Systems*, of this document, there are sufficient water supplies to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. Consequently, development of the hotel and surface parking lot on the sites would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and this impact would be less than significant.

c) Impacts related to the potential for implementation of the GPU to alter the existing drainage pattern in a manner which would result in substantial erosion, siltation, flooding, or polluted runoff were evaluated under Impact 3.9-3 on pages 3.9-26 to 3.9-27 of the GPU DEIR. The analysis determined that individual future projects developed after adoption of the GPU would create new impervious surfaces. This would result in an incremental reduction in the amount of natural soil surfaces available for infiltration of rainfall and runoff, potentially generating additional runoff during storm events. In addition, the increase in impervious surfaces, along with the increase in surface water runoff, could increase the discharge of pollutants that could degrade the quality of receiving waters. Additionally, the analysis determined that individual future projects developed after adoption of the GPU could potentially alter surface drainage patterns as a result of directly altering flow patterns, or placing structures in a floodway, all of which could yield increased amounts of stormwater runoff. The analysis determined that the GPU Community Services and Facilities Element and Conservation and Open Space Element include policies and action items, which include numerous requirements that would reduce the potential for GPU implementation to result in increased flooding or result in water quality impacts associated with increased runoff, siltation or erosion, and polluted runoff. For example, Policy CSF 1-4 provides for adequate public infrastructure including storm drainage to meet the needs of existing and future development. Policy CSF 4-4 ensures adequate funding is available for needed improvements to the wastewater conveyance infrastructure, and to reduce stormwater infiltration

to the greatest extent feasible. Policy COS 3-5 requires discretionary projects, as well as new flood control and stormwater conveyance projects, to integrate BMPs and natural features to the greatest extent feasible, while ensuring that these features adequately convey and control stormwater to protect human health, safety, and welfare. Policy COS 3-6 requires the use and design integration of natural features such as bioswales, vegetation, retention ponds, and other measures to remove surface water pollutants prior to discharge into surface waters. Policy COS 3-7 preserves the existing and future floodwater carrying capacity of creeks and channels during creek restoration. Policy COS 3-8 requires new development to include maintained and managed setbacks and buffers along creeks, wetlands, riparian corridors. The analysis determined that implementation of these policies and action items would ensure that implementation of the GPU would have a less than significant impact from these issues.

Construction and operation of the proposed project would adhere to all applicable regulations, development standards, and policies that address drainage and potential water quality impacts associated with increased runoff, siltation or erosion, and polluted runoff. As discussed above under question a) construction of the proposed project would be subject to coverage under the NPDES Construction General Permit, which would require the preparation and implementation of a SWPPP that would describe (BMPs such as settlement basins, silt fences, and straw wattles to prevent sediment and other pollutants from leaving the work site and entering waterways, ensuring that impacts relative to water quality during construction would be less than significant. As also discussed above under question a), the project's required compliance with applicable federal, state, and local regulations and policies would ensure that operational impacts related to water quality would be less than significant. Consistent with GPU Policy COS 3-6 the design for the parking lot integrates bioswales, vegetation, and other measures to remove surface water pollutants prior to discharge into surface waters. Consistent with GPU Policy COS 3-7, The easterly portion of the parking lot site, which was not actively used by the former batch plant, would remain undeveloped and protected with a 50-foot setback in compliance with the City of Sebastopol Zoning Code.

d) Water quality impacts related to flood hazard, tsunami, or seiche zones in relation to implementation of the GPU were addressed under Impact 3.9-6 on pages 3.9-37 to 3.9-38 of the GPU DEIR. The analysis identified that a tsunami is a sea wave caused by a submarine earthquake, landslide, or volcanic eruption. Tsunami can cause catastrophic damage to shallow or exposed shorelines. The analysis concluded that the Planning Area is sufficiently distant from the San Francisco Bay to preclude effects from a tsunami, and this impact would be less than significant. The analysis identified that seiches are changes or oscillations of water levels within a confined water body. Seiches are caused by fluctuation in the atmosphere, tidal currents, or earthquakes. The effect of this phenomenon is a standing wave that would occur when influenced by the external causes. The analysis concluded that the Planning Area is not located within close proximity to a confined water body that would pose a significant risk from a seiche, and this impact would be less than significant.

The analysis determined that the City of Sebastopol is located within dam inundation areas. As shown on Figure 3.9-3, of the GPU DEIR, the city is subject to inundation through the failure of one, or a combination of several area dams including Matanzas Creek Reservoir, Coyote Valley

Dam (Lake Mendocino), and Warm Springs (Lake Sonoma). Dam failure is generally a result of structural instability caused by improper design or construction, instability resulting from seismic shaking, or overtopping and erosion of the dam. The analysis identified that larger dams that are higher than 25 feet or with storage capacities over 50 acre-feet of water are regulated by the California Dam Safety Act, which is implemented by the California Department of Water Resources, Division of Safety of Dams (DSD). The DSD is responsible for inspecting and monitoring these dams. The Act also requires that dam owners submit to the California Office of Emergency Services inundation maps for dams that would cause significant loss of life or personal injury as a result of dam failure. The County Office of Emergency Services is responsible for developing and implementing a Dam Failure Plan that designates evacuation plans, the direction of floodwaters, and provides emergency information. Through regular inspections by DSD and maintenance by the dam owners ensure that the dams are kept in safe operating condition. As such, the analysis identified that failure of these dams is considered to have an extremely low probability of occurring and is not considered to be a reasonably foreseeable event. The analysis further identified that the GPU Safety Element includes Action SA-1k to maintain an inventory of all natural hazards, including projected dam failure inundation areas. The analysis concluded that implementation of the GPU would result in a less than significant impact relative to this topic.

Impacts related to the potential for implementation of the GPU to place housing and structures 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 were evaluated under Impact 3.9-5 on pages 3.9-33 to 3.9-37 of the GPU DEIR. The analysis determined that the City of Sebastopol is subject to flooding problems along the natural creeks and drainages that traverse the area. The Laguna de Santa Rosa is the most prominent drainages in Sebastopol that is subject to flooding. Small areas in the western-most portion of the city are also subject to flooding from Atascadero Creek. The 100-year floodplain extends onto many properties that are located immediately adjacent to these drainages. Additionally, the analysis determined that land near the downtown area, and in the southeast portions of the city is within the 500-year floodplain. The flood hazards in Sebastopol are illustrated on Figure 3.9-2 on page 3.9-41 of the GPU DEIR. The analysis determined that approximately 15.6 percent of the land within the city limits is located within an area with a Federal Emergency Management Agency (FEMA) flood zone AE, which is an area that is subject to 100-year flooding (a one percent chance of being flooded in any given year). The analysis determined that approximately 2.3 percent of the land within the city limits is located within an area with a FEMA flood zone X, which is an area that is subject to 500-year flooding (a 0.2 percent chance of being flooded in any given year). The analysis determined that approximately 82.1 percent of the land within the city limits is located within an area with a FEMA flood zone X, which is an area that is determined to be outside the 500-year, and 100-year floodplain.

The analysis identified that the GPU Safety Element includes numerous policies specifically designed to address flood hazards. Policy SA 2-1 supports strong local and countywide measures to protect and increase the floodwater storage capacity in the Laguna de Santa Rosa. Policy SA 2-2 ensures the City utilizes the most recent FEMA Flood Insurance Rate Maps (FIRMs) to reduce risk of flooding, identify special flood hazard areas subject to 100-year flood inundation, and

calculate flow rates within identified stream channels. Policy SA 2-3 requires the City to continue to work with Sonoma County agencies to ensure that additional storm drain runoff resulting from development occurring in unincorporated areas upstream from drainage channels in the Sebastopol Planning Area is adequately mitigated through improvements on-site and/or downstream. Policy SA 2-5 reduces flood risk to development and infrastructure by maintaining effective flood drainage systems and regulating construction. Policy SA 2-7 requires new critical facilities and essential public buildings, including hospitals and health care facilities, emergency shelters, emergency command centers, and emergency communications facilities to be outside of flood hazard zones to protect from any unreasonable risk of flooding. Policy SA 2-8 requires all development projects to demonstrate how storm water runoff will be detained or retained on-site, treated, and/or conveyed to the nearest drainage facility, and to demonstrate that project implementation would not result in increases in the peak flow runoff to adjacent lands or drainage facilities that would exceed the design capacity of the drainage facility or result in an increased potential for offsite flooding. Policy SA 2-9 disallows development in the 100-year flood zone unless requirements of the City's Flood Damage Protection Ordinance criteria are met. Policy SA 2-10 ensures that the structural and operational integrity of critical facilities is maintained during flooding.

Additionally, the analysis identified that any development allowed within a flood hazard zone could potentially impede or redirect flood flows. All future projects would be required to comply with Title 15, Building and Construction, Chapter 15.16, Flood Damage Protection, of the Sebastopol Municipal Code, which contains requirements and standards for the placement of fill and elevated structures in special flood hazard areas.

The analysis determined that subsequent development, infrastructure, and planning projects would be subject to applicable GPU policies and actions. The analysis determined that the policies and actions contained in the Safety Element of the GPU represent a comprehensive and holistic approach by the City of Sebastopol to reduce the risks of flooding to city residents and properties to the greatest extent feasible. Furthermore, the analysis identified that numerous federal, state, and local agencies are responsible for maintaining flood protection features in the City of Sebastopol, including the U.S. Army Corps of Engineers (USACE), the California Department of Water Resources (DWR), and the California Department of Fish and Wildlife (CDFW) at the federal and state level, as well as the Sonoma County Water Agency at the local level. The analysis determined that areas prone to flooding within the Sebastopol Planning Area are largely built-out. However, the analysis determined that even with the implementation of the policies, actions, and requirements stated above, implementation of the GPU could result in additional people and structures placed within a delineated flood hazard area. The analysis concluded that this impact is mitigated to the greatest extent feasible through GPU policies and actions; however, the impact is considered significant and unavoidable.

The proposed project (both the hotel site and parking lot site) is located in area with a FEMA flood zone AE, which is an area that is subject to 100-year flooding (FEMA, 2024). The proposed project would conform with Title 15, Building and Construction, Chapter 15.16, Flood Damage Protection, of the Sebastopol Municipal Code, which contains requirements and standards for the placement of fill and elevated structures in special flood hazard areas. All hotel rooms and most

of the other square footage would be located a minimum of two feet above the 100-year flood elevation, in compliance with City requirements. Any non-residential areas below this level would be protected with flood barriers in the event of projected flooding. Both the hotel and parking lot would adhere to all applicable development standards and General Plan policies that address flood risk, including Policy SA 2-8, which requires all development projects to demonstrate how storm water runoff will be detained or retained on-site, treated, and/or conveyed to the nearest drainage facility and to demonstrate that project implementation would not result in increases in the peak flow runoff to adjacent lands or drainage facilities that would exceed the design capacity of the drainage facility or result in an increased potential for offsite flooding.

e) As discussed above under question a) construction of the proposed project would be subject to coverage under the NPDES Construction General Permit, which would require the preparation and implementation of a SWPPP that would describe BMPs such as settlement basins, silt fences, and straw wattles to prevent sediment and other pollutants from leaving the work site and entering waterways, ensuring that impacts relative to water quality during construction would be less than significant. As also discussed above under question a), the project's required compliance with applicable federal, state, and local regulations and policies would ensure that operational impacts related to water quality would be less than significant. As discussed above under question b), the proposed project would construct a hotel on a currently developed (e.g., paved) site and a parking lot on the 2.9-acre site of the former concrete batch plant, much of which is paved. Both sites are urbanized and neither site allows for substantial rainwater infiltration and groundwater recharge. In addition, as discussed in Section 19, *Utilities and Service Systems*, of this document, there are sufficient water supplies to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. Consequently, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and this impact would be less than significant.

Conclusion

As discussed above, the proposed project would not result in effects related to hydrology and water quality that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

Federal Emergency Management Agency (FEMA), 2024. FEMA Flood Hazard and Risk Data Viewer. Available at: https://experience.arcgis.com/experience/e492db86d9b348399f4bd20330b4b274. Accessed May 29, 2024.

11. Land Use and Planning

LAND USE AND PLANNING — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Physically divide an established community?	☐	☐	☐	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☐

Discussion

a) The potential for implementation of the GPU to physically divide an established community was evaluated under Impact 3.10-1 on page 3.10-13 of the GPU DEIR. The analysis determined that the land uses allowed under the GPU provide opportunities for cohesive new growth at in-fill locations within existing communities, as well as new growth areas adjacent to existing communities but would not create physical division within existing communities. The analysis determined that new development and redevelopment projects would be designed to complement the character of the existing community and neighborhoods and provide connectivity between existing development and new development. The analysis determined that the GPU land use map designates sites for a range of urban and rural developed uses as well as open space. The analysis determined that the GPU does not include any new areas designated for urbanization or new roadways, infrastructure, or other features that would divide existing communities. The analysis concluded that the GPU would have a less than significant impact associated with the physical division of an established community.

The proposed project would construct and operate a hotel and associate parking lot on infill sites in downtown Sebastopol in consistency with the GPU land use designations for the project sites as evaluated in the GPU FEIR. The proposed project would not substantially alter existing circulation or access or impede movement in the project area compared to existing conditions. The proposed project does not include any features such as new roadways or other physical elements that would physically divide an established community. The impact would be less than significant.

b) The potential for implementation of the GPU to cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect was evaluated under Impact 3.10-2 on page 3.10-13 to 3.10-14 of the GPU DEIR. The analysis determined that the GPU was prepared in conformance with state laws and regulations associated with the preparation of general plans, including requirements for environmental protection. The analysis identified that discussion of the GPU's consistency with state regulations, plans, and policies associated with specific environmental issues (e.g., air quality, traffic, water quality) is provided in the relevant chapters of the GPU DEIR. The analysis determined that, as set forth by state law, the GPU serves as the primary planning document for the City and focuses on ensuring that the City's small-town quality of life is maintained, that

conservation uses and activities are maintained and enhanced, that the majority of growth remains focused within the City, and that growth outside of the City's current boundaries would remain within the adopted Urban Growth Boundary. The analysis determined that subsequent development projects would be required to be consistent with all applicable policies, standards, and regulations, including those land use plans, policies, and regulations adopted by the City to mitigate environmental effects as well as those adopted by agencies with jurisdiction over components of future development projects. The analysis determined that any potential environmental impact associated with conflicts with land use requirements would be less than significant. The analysis determined that implementation of the GPU could result in potential adverse environmental impacts, including to traffic, noise, water quality, biological resources, drainage and water quality, air quality, hazards, geology/soils, and cultural resources. The analysis determined that impacts to these resources, including consistency with applicable plans, policies, and regulations, are evaluated in the appropriate sections of the GPU Draft EIR.

Existing General Plan Land Use Designations and Zoning

The project site (both the hotel site and parking lot site) is designated as Light Industrial (LI) on the City of Sebastopol General Plan Land Use Map. The LI designation provides for a wide variety of commercial, wholesale, service, and processing uses (as further discussed below).

The hotel site is zoned Commercial Industrial (CM) in the City of Sebastopol Zoning Code (Title 17 of the City of Sebastopol Municipal Code). The CM District is intended to encourage local production, innovation, and sales of local art, textile, food, beverage, and other tangible goods by allowing a range of complementary, community-oriented building types and spaces that accommodate small- and mid-size makers, fabricators, producers, and manufacturers, as well as specified commercial, residential, and other uses. The City of Sebastopol Zoning Code defines hotels as residential uses.

The parking lot site is zoned Industrial (M) and Environmental and Scenic Open Space (ESOS) Combining District. The purpose of the M District is to implement the industrial land use category of the General Plan and to provide areas for the manufacture, assembly, packaging, or storage of products which are not harmful, injurious, or detrimental to property or the general welfare of the City and its residents; and other general commercial and residential uses that are compatible with the industrial uses. Parking facilities are allowed in the M district with the issuance of a conditional use permit. The purpose of the ESOS Combining District is to control land use within areas of great scenic or environmental value to the citizens of the Sebastopol General Plan area, to control any alteration of the natural environment and terrain in areas of special ecological and educational significance to the entire community as unique vegetative units or wildlife habitats or as unique geological or botanic specimens, and to enhance and maintain for the public welfare and well-being the public amenities accrued from the preservation of the scenic beauty and environmental quality of Sebastopol. The ESOS Combining District is applicable to areas of great natural beauty, high visibility, or ecological significance such as areas bordering Atascadero Creek or the Laguna de Santa Rosa. The ESOS Combining District was established to implement the goals, policies, and objectives of the Conservation, Open Space and Parks Element of the General Plan.

Proposed Barlow Hotel Development Agreement

Development Agreements are used throughout California to permit a range of development, including complex and phased development projects. Development Agreements allow applicants and local governments to tailor the approval to the unique circumstances of a particular site or project, and to mutually agree to special conditions and allowances. A Development Agreement must be consistent with the General Plan but need not follow the letter of the Zoning Ordinance. However, it must be 'compatible' with the uses authorized in, and the regulations prescribed for, the zoning district in which the property is located. A proposed Development Agreement requires review by the Planning Commission and approval by the City Council in a public hearing process. It is anticipated that the Development Agreement for the proposed project will allow an extended term for the project approval; allow the project components, including proposed variations from specific zoning standards or procedures; approve Design Review; provide some allowance and procedure for possible future modification of the project components; provide for streamlined plan checks; and modify the application or timing of some impact fee requirements. The specific content of the Development Agreement is subject to negotiation with the City and approval by the City Council. It is noted that in the Planning Commission, City Council, Design Review, and plan check processes, revisions to the proposed project may occur. Any such revisions would be reviewed to ensure continued compliance with CEQA and the General Plan.

General Plan Consistency

GPU Policy LU 1-4 specifies that the LI land use designation provides for a wide variety of commercial, wholesale, service, and processing uses that do not generate excessive adverse environmental impacts. Other uses allowed in this designation include office ancillary to industrial uses; warehousing and agricultural products sales and services; auto sales and repair; food and drink processing; construction yards; research and development, laboratories, light manufacturing; and similar uses. Residential uses are permitted as a secondary use to the primary light industrial uses allowed in this land use designation at a density of 12.1 to 25 units per acre. Maximum floor area ration (FAR) shall not exceed 0.75 (not including the residential use). The proposed project is consistent with Policy LU 1-4 in that it includes residential and ancillary uses (commercial uses in the hotel and required parking). Within the context of the Barlow development, including non-residential uses on the parcel where it would be developed, the residential uses are secondary to other uses. With regard to density, hotel rooms are not dwelling units in that they lack kitchens, which under the City's definition, must be present for the use to count as a residential unit.[15] Therefore, the residential unit density standards do not apply to the proposed project. As a residential use, the hotel is not subject to GPU FAR limits, and the parking lot has no FAR except for a small storage shed. The proposed project is consistent with the General Plan.

[15] As specified in Section 17.08.060 of the City of Sebastopol Zoning Code, "Dwelling" or "dwelling unit" means a room or group of internally connected, habitable rooms that have sleeping, cooking, and sanitation facilities, but not more than one kitchen occupied by or intended for one household on a long-term basis. A "dwelling" is the same as an independent housekeeping unit.

Consistency with Land Use Plans, Policies, or Regulations Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect

CEQA does not consider inconsistency with land use plans and policies to be a physical effect on the environment unless the plan or policy was adopted for the purpose of avoiding or mitigating a significant environmental effect. Adverse physical effects on the environment that could result from construction and operation of the proposed project are evaluated and disclosed in the appropriate topical sections of this document. As discussed in the analyses, the proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Conclusion

As discussed above, the proposed project would not result in effects related to land use and planning that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

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12. Mineral Resources

MINERAL RESOURCES — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☐

Discussion

a,b) Impacts related to the potential for implementation of the GPU to 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; or 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 were evaluated under Impact 3.6-6 on pages 3.6-29 to 3.6-30 of the GPU DEIR. The analysis determined that mineral resources are extremely valuable because of their limited supply and their usefulness in modern construction and industrial processes. The analysis determined that Sonoma County has many mineral resources that have been valuable enough to justify commercial extraction and processing. The analysis determined that if a use is proposed that might threaten the potential recovery of minerals from an area that has been classified as Mineral Resource Zone (MRZ)-2, the California Department of Conservation Surface Mining and Reclamation Act (SMARA) would require the

jurisdiction to prepare a statement specifying its reasons for permitting the proposed use, provide public notice of these reasons, and forward a copy of the statement to the State Geologist and the State Mining and Geology Board (PRC Section 2762).[16] The analysis determined that there are no major mineral deposits that are classified as MRZ-2 within Sebastopol. The analysis determined that the majority of lands within the City's Planning Area are classified as MRZ-1 (areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources). The analysis determined that small portions of eastern Sebastopol contain MRZ-3 designations (areas containing mineral occurrences of undetermined material resource significance). The analysis determined that the Planning Area (which includes the project site) is not mapped as having a known mineral resource of value to the region and is not designated as a locally important mineral resource recovery site, and this impact is considered less than significant.

Conclusion

As discussed above, the proposed project would not result in effects related to mineral resources that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

California Department of Conservation (DOC) Division of Mines and Geology, 2013. Update of Mineral Land Classification: Aggregate Materials in the North San Francisco Bay Production-Consumption Region, Sonoma, Napa, Marin, and Southwestern Solano Counties, California.

[16] The California Geological Survey (CGS), formerly the California Division of Mines and Geology (DMG), classifies the regional significance of mineral resources in accordance with the California Surface Mining and Reclamation Act (SMARA) of 1975 and assists the CGS in the designation of lands containing significant aggregate resources. Mineral Resource Zones (MRZs) have been designated to indicate the significance of mineral deposits.

13. Noise and Vibration

NOISE — Would the project result in:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GPU FEIR*	*Off-Site or Cumulative Impact not Identified by GPU FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR*
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐

Discussion

a) Impacts related to permanent increases in noise from vehicle traffic that would result from implementation of the GPU were evaluated under Impact 3.11-1 on pages 3.11-20 to 3.11-30 of the GPU DEIR. The analysis determined that upon full buildout of the GPU and with implementation of the noise- and traffic-related policies and reduction measures contained in the GPU, the impact of localized noise increases within the city's roadways would be significant and unavoidable as the result of increases exceeding 1.5 A-weighted decibels (dBA) along roadways where the existing noise levels already exceed 65 dBA, Ldn.[17]

b) The intersection level of service assessment prepared for the proposed project (Fehr & Peers, 2024) determined that the proposed project would be expected to generate approximately 39 trips during the peak hour. These trips would reasonably be expected to use Sebastopol Avenue (SR-12) to access the project site, and this roadway would experience the greatest increase in traffic volumes compared to all other roadways.

The intersection level of service assessment indicates that SR-12 has an existing peak-hour volume of 1,624 cars and trucks. The addition of 39 additional hourly trips to the existing traffic volume on SR-12 would increase noise levels by 0.1 dBA and would not result in a significant traffic noise impact.

Impacts related to permanent increases in noise from stationary noise sources[18] that would result from implementation of the GPU were evaluated under Impact 3.11-2 on pages 3.1-30 to 3.11-35 of the GPU DEIR. The analysis determined that upon full buildout of the GPU and with

[17] Ldn – The Day/Night Average Sound Level is the 24-hour day and night A-weighed noise exposure level, which accounts for the greater sensitivity of most people to nighttime noise by weighting noise levels at night. Noise between 10:00 p.m. and 7:00 a.m. is weighted (penalized) by adding 10 dBA to take into account the greater annoyance from nighttime noise (also referred to as "DNL").

[18] Stationary noise sources may include commercial area loading docks, equipment operations at industrial or agricultural uses, HVAC equipment, car washes, operations at auto repair facilities, as well as noises generated by recreational uses.

implementation of the noise-related policies and actions contained in the GPU, the impact of stationary source noise would be less than significant. Policies and actions that would contribute to this less than significant finding include policies N 1-1, N 1-3, N 1-4, N 1-5, N 1-6, N 1-7, N 1-11, N-13, N 1-14, N-15, N-16, N-17, N-18, N 2-1, N 2-3 and Actions N-1a, N-1b, N-1c, N-1d, N-2a, and N-2b.

Stationary noise sources that would be associated with the proposed project would include heating, ventilation, and air conditioning (HVAC) systems, and amplified music and human voices from the rooftop outdoor bar of the hotel.

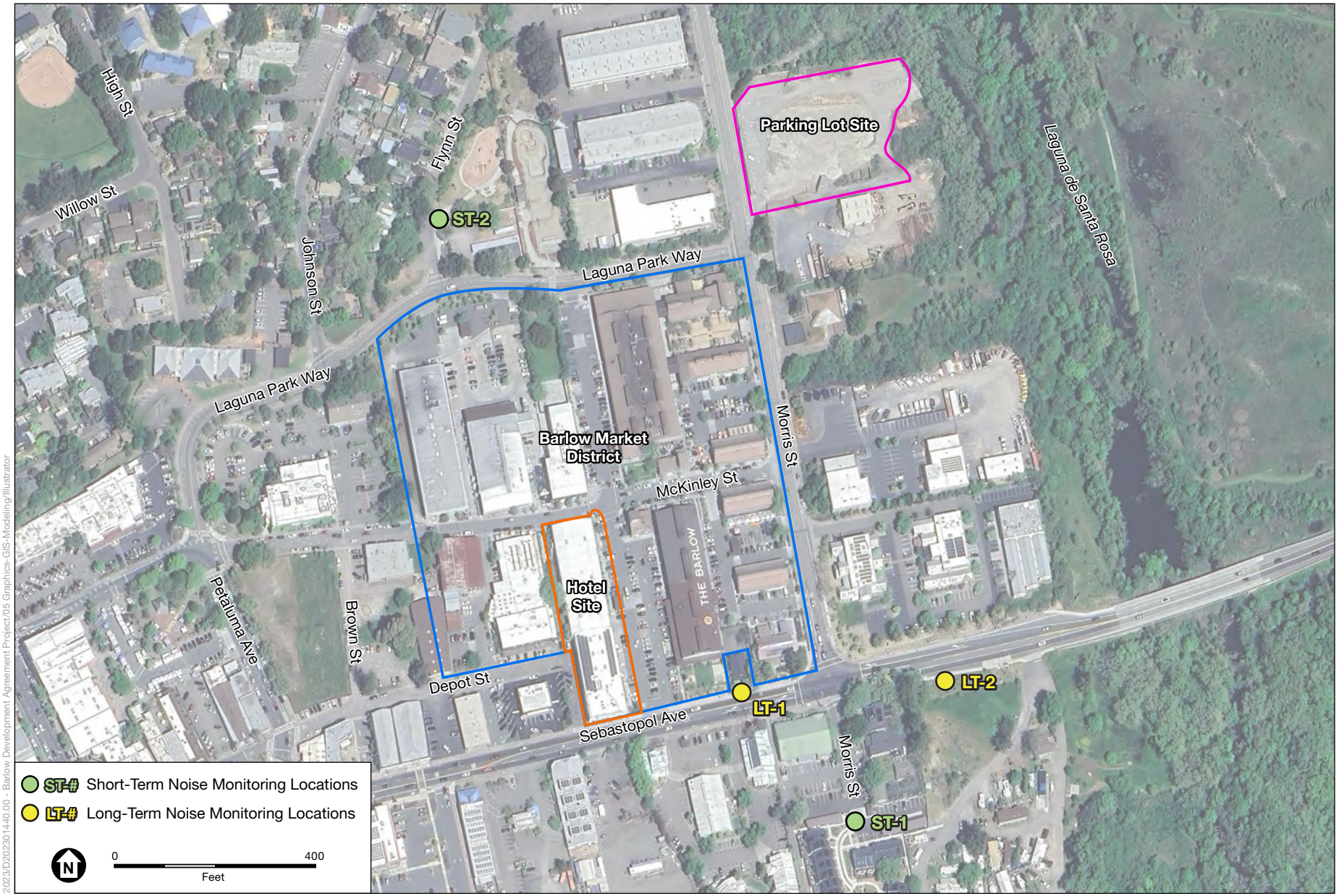
With respect to stationary noise sources, Policy N 1-7 states that a significant impact will occur if a project results in an exceedance of the noise level standards contained in the GPU noise element, or the project will result in an increase in ambient noise levels by more than 3 dB, whichever is greater. The analysis determined that compliance with the requirements outlined in Action N1-d shall be sufficient to reduce noise impacts to a less than significant level.

Action N1-d requires acoustical studies for all new discretionary projects, including those related to development and transportation, which have the potential to generate noise impacts which exceed the standards identified in the noise element. The studies shall include representative noise measurements, estimates of existing and projected noise levels, and mitigation measures necessary to ensure compliance with this element and relevant noise standards in the Sebastopol Municipal Code.

c) Table N-2 of the GPU as well as Section 8.25.060 of the Municipal Code establish a daytime (7 a.m. to 10 p.m.) noise standard of 55 dBA, Leq at residential uses and a nighttime standard (10 p.m. to 7 a.m.) of 45 dBA, Leq. These standards are to be reduced by 5 dBA for sources consisting of speech or music. However, the GPU clarifies that in no case shall mitigation be required to a level that is less than existing ambient noise levels, as determined through measurements conducted during the same operational period as the subject noise source.

The existing noise level in the project site vicinity was measured at two locations over a 24-hour period and two additional short-term measurements were collected at the nearest residential areas (**Figure NOI-1)**. The noise measurement data is presented in **Tables NOI-1** and **NOI-2** below. Based on these data, the noise level in the immediate vicinity of the project site already exceeds the standards of Table N-2 of the GPU as well as Section 8.25.060 of the Municipal Code, and the applicable noise impact standard is a 3 dBA increase above existing levels, consistent with Policy N 1-7.

Additionally, comparison of simultaneous noise monitoring data at locations LT-1 and ST-1 indicates that existing intervening commercial structures provide substantial noise attenuation of over 10 dBA between the noise sensitive receptors to the southeast and traffic on SR-12.



2023/D20230144000 - Barlow Development Agreement Project/05 Graphics-GIS-Modeling/Illustrator

SOURCE: Aldridge Development, 2024; ESA, 2024; Google Earth, 2024

Barlow Hotel Project

Figure NOI-1
Noise Measurement Locations

ESA

TABLE NOI-1
LONG-TERM AMBIENT NOISE LEVELS IN THE PROJECT SITE VICINITY

Measurement Location	Day-Night Noise level (Ldn)	Noise Levels in dBA	
		Daytime hourly average, L_{eq}	Nighttime hourly average, L_{eq}
LT-1 North side of Sebastopol Avenue at 6742 Sebastopol	76	71	69
LT-2 South side of Sebastopol Avenue at 6681 Sebastopol	73	73	65

NOTE: See Figure NOI-1 for noise measurement locations.
SOURCE: Environmental Science Associates, 2024

TABLE NOI-2
SHORT-TERM AMBIENT NOISE LEVELS IN THE PROJECT SITE VICINITY

Measurement Location	Time	Noise Levels in dBA	
		L_{eq}	L_{max}
ST-1 6737 Sebastopol Avenue Multi-family residences (275 feet south of Sebastopol Avenue)	9:16 a.m.	56	85
LT-1 (Comparison data point on Sebastopol Avenue)	9:00 a.m.	70	89
ST-2 Flynn Street Residences	9:43 p.m.	52	82

NOTES: See Figure NOI-1 for noise measurement locations.
L_{eq} represents the constant sound level; L_{max} is the maximum noise level.
SOURCE: Environmental Science Associates, 2024

With respect to noise from HVAC equipment, such equipment commonly is provided in packaged units that are located on the rooftop of hotels. Such equipment operates at a noise level of 72–78 dBA at 30 feet without acoustical treatments (Trane, 2002). The nearest noise sensitive receptor to the hotel are multifamily residences located approximately 450 feet to the southeast and approximately 700 feet from the screened mechanical area on the rooftop. At this distance and assuming a conservative 5 dBA reduction for rooftop parapets, HVAC noise would be attenuated to 46 dBA which would be below the existing ambient nighttime noise levels shown in Table NOI-1 and, therefore, less than significant.

With respect to noise from amplified (recorded) music from the rooftop bar, this bar would be located approximately 300 feet from the southern property line of the proposed project and approximately 750 feet from the nearest residences to the southeast. As stated earlier, noise monitoring indicates that existing structures provide substantial noise attenuation (more than 10 dBA) between the noise sensitive receptors to the southeast and traffic on SR-12.

It is noted that live amplified music performances are an existing regular occurrence at the existing Barlow. Therefore, the degree to which music from the rooftop bar would represent a new source of amplified noise is limited. As discussed in the Project Description, the rooftop bar would likely be open seven days a week from 12 p.m. up to 10 p.m., and amplified music at the rooftop bar would be limited to these hours daily. Additionally, the noise level of amplified music

from the bar would be within the immediate control of hotel staff, and as discussed in the Project Description, speakers at the rooftop bar would be directed inward to reduce the potential for off-site noise propagation.

With respect to noise from patron voices at the rooftop bar, the California Supreme Court published a decision in *Make UC A Good Neighbor v. Regents of the University of California* regarding a challenge to "social noise" or noise generated from human beings being social for a combined long-range plan and residential development project. In its decision, the court pointed to legislative history that minor and intermittent, unamplified human voices should be regulated through local noise ordinances, not through CEQA. As discussed above, pursuant to Section 8.25.060 of the Municipal Code, the applicable noise impact standard is a 3 dBA increase above existing levels. Given the intervening presence of traffic noise on SR-12 between the proposed bar and the nearest sensitive receptors, as well as the presence of intervening structures and given that human voices already occur during live amplified music performances at the existing Barlow, it is reasonable to expect that noise from patron voices at the rooftop bar would not result in a significant noise impact which, as found by the court, should not be regulated under CEQA.

Impacts related to temporary increases in noise that would result from construction activities from development under the GPU were evaluated under Impact 3.11-3 on pages 3.11-33 to 3.11-34 of the GPU DEIR. The analysis determined that upon full buildout of the GPU and with implementation of the noise-related policies and actions contained in the GPU, the impact of construction noise would be less than significant.

Construction of the proposed project would occur over a period of approximately 18 months starting in 2025. Project construction would result in temporary increases in ambient noise levels. Onsite construction activities would require the use of heavy construction equipment (e.g., excavator, loader, crane) that would generate varying noise levels. Offsite construction noise sources would consist of passing trucks and other construction-related vehicles. **Table NOI-3** shows typical noise levels produced by various types of construction equipment that would operate during the construction of the proposed project.

Consistent with the general assessment methodology of the FTA, the two noisiest pieces of construction equipment (grader and compactor) listed in Table NOI-3 were assumed to operate simultaneously. Using the Roadway Construction Noise Model of the Federal Highway Administration, the resultant noise level at the nearest campus receptor at a distance of 450 feet from the project site would be 64 dBA.

Section 8.25.060 of City's Noise Control Ordinance (Sebastopol Municipal Code, Title 8, Health and Safety, Chapter 8.25) provides an exemption for construction equipment which is operated during daytime hours, defined as from 7:00 a.m. to 8:00 p.m. Monday through Friday, 8:00 a.m. to 5:00 p.m. on Saturdays, and from 8:00 a.m. to 5:00 p.m. on Sundays. Project construction would be conducted during these daytime hours and would, therefore, be exempt from the

restrictions of the noise ordinance. Additionally, pursuant to Action N-1f of the GPU, the project would implement the following construction-related noise control measures:

- Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited as specified in the Noise Ordinance.
- All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.
- Unnecessary idling of internal combustion engines shall be prohibited.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction activities, to the extent feasible.

TABLE NOI-3
TYPICAL MAXIMUM NOISE LEVELS FROM CONSTRUCTION EQUIPMENT

Construction Equipment	Noise Level (dBA, L_{max} at 50 feet)
Backhoe	78
Excavator	81
Compactor	83
Air Compressor	78
Dozer	82
Grader	85
Paver	77
Roller	80
Front-End Loader	79
Truck	76

NOTES: dBA = A-weighted decibels; L_{max} = maximum, instantaneous noise level experienced during a given period of time

These are maximum field measured values at 50 feet as reported from multiple samples.

SOURCE: Federal Highway Administration, *Roadway Construction Noise Model User Guide*, 2006.

In light of the Sebastopol Noise Ordinance exemption for daytime construction noise and the construction-related noise control measures required by Action N-1f of the GPU, and consistent with the findings of the 2016 GPU FEIR, the construction-related noise impacts of the proposed project would be less than significant.

b) Impacts related to generation of vibration that would result from construction activities from development under the GPU were evaluated under Impact 3.11-4 on pages 3.11-35 to 3.11-36 of

the GPU DEIR. The analysis determined that upon full buildout of the GPU and with implementation of the noise-related policies and actions contained in the GPU, the impact of construction vibration would be less than significant.

Construction activities could occur under the proposed project which could have the potential to expose sensitive land uses within the city to groundborne vibration. Construction activities would occur which may require activities or use of off-road equipment known to generate some degree of vibration. Activities that would potentially generate excessive vibration, such as blasting or impact pile driving, would not be expected to occur from the proposed project. Receptors sensitive to vibration include structures (especially older masonry structures), people, and equipment (e.g., magnetic resonance imaging equipment, high resolution lithographic, optical and electron microscopes). Regarding the potential effects of groundborne vibration to people, except for long-term occupational exposure, vibration levels rarely affect human health.

The primary vibration-generating activities associated with the proposed project would occur during grading, placement of underground utilities, and construction of foundations. **Table NOI-4** shows the typical vibration levels produced by construction equipment at various distances. The most substantial source of groundborne vibrations associated with commercial development construction would be the use of drill rigs for foundation peers, if required.

TABLE NOI-4
VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV (in/sec)[a]	
	At 25 Feet (Reference)	At 50 feet
Large Bulldozer	0.089	0.35
Auger Drill Rig	0.089	0.35
Loaded Trucks	0.076	0.30
Jackhammer	0.035	0.14

NOTES:

a. Vibration amplitudes for construction equipment assume normal propagation conditions and were calculated using the following formula: PPV (equip) = PPV (ref) x (25/D)1.1 where:
PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in in/sec from pp. 31–33 and Table 18 of the Caltrans Vibration Guidance Manual, as well as Table 12-2 of the FTA's Noise and Vibration Guidance Manual
D = the distance from the equipment to the receiver

SOURCES: Caltrans, 2020. Transportation and Construction Vibration Guidance Manual, April 2020; U.S. Department of Transportation (U.S. DOT), 2018. Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, September 2018. Accessed May 6, 2024

According to the Caltrans Transportation and Construction Vibration Guidance Manual, the building damage threshold for historic and some older buildings is 0.25 PPV (in/sec) (Caltrans, 2020). As indicated in Table NOI-4, construction activities at distances of 25 feet or further from the nearest existing buildings would be well below the threshold of 0.25 PPV to avoid structural damage to historic and older buildings. For these reasons, project-related construction and operational groundborne vibration impacts would be less than significant.

c) Impacts related to exposure of people to excessive noise levels from airports or private air strips were not evaluated in the GPU DEIR because the city is not located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, similar to the findings of the GPU FEIR, this criterion is not applicable to the proposed project which would have no impact with regard to noise exposure from airports.

Conclusion

As discussed above, the proposed project would not result in effects related to noise and vibration that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

California Department of Transportation (Caltrans), 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

Caltrans, 2020. Transportation and Construction Vibration Guidance Manual, April 2020, pp. 29–34. Available at: http://www.dot.ca.gov/hq/env/noise/publications.htm. Accessed May 6, 2024

Federal Highway Administration, 2006. Roadway Construction Noise Model User Guide.

Fehr & Peers, 2024. Intersection Level of Service Assessment for Barlow Hotel Project, May 2024.

Trane. 2002. Engineering Bulletin, Sound Data and Application Guide for New and Quieter Air-Cooled Series R Chiller.

U.S. Department of Transportation (U.S. DOT), 2018. Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, September 2018.

14. Population and Housing

POPULATION AND HOUSING — Would the project:	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GPU FEIR*	*Off-Site or Cumulative Impact not Identified by GPU FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR*
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☐

Discussion

a) Impacts related to population growth that would result from implementation of the GPU were evaluated under Impact 3.10-3 on pages 3.10-14 to 3.10-16 of the GPU DEIR. The analysis determined that the GPU accommodates future growth in Sebastopol, including new businesses, expansion of existing businesses, and new residential uses. Infrastructure and services would need to be extended to accommodate future growth. Specifically, the analysis determined that buildout of the GPU could yield up to 750 new residential units, 341,159 square feet of new commercial space, 59,959 square feet of new industrial space, and 137,375 square feet of new office space within the city limits. The analysis determined that this new growth would increase the City's population by approximately 1,658 residents. The analysis determined that the full development of the new commercial, office, and industrial uses would increase the employment opportunities in Sebastopol by approximately 1,545 employees.

In addition, the analysis determined that cumulative buildout of the GPU within the city limits and the Sphere of Influence (SOI) and Urban Growth Boundary (UGB) could yield up to 1,185 new residential units, 341,159 square feet of new commercial space, 684,889 square feet of new industrial space, and 137,375 square feet of new office space. The analysis determined that this new cumulative growth would increase the City's population by approximately 2,619 residents and would increase the employment opportunities in Sebastopol by approximately 2,632 employees. The analysis determined that growth under the GPU would remain within the general growth levels projected statewide and would not be anticipated to exceed any applicable growth projections or limitations that have been adopted to avoid an environmental effect. The analysis determined that the GPU is intended to accommodate the City's fair share of statewide housing needs, which are allocated by the Association of Bay Area Governments, based on regional numbers provided by the California Department of Housing and Community Development. The analysis determined that the GPU includes policies and actions that mitigate environmental impacts associated with growth, such as air quality, noise, traffic, water supply, and water quality effects. The analysis determined that, with implementation of GPU policies and actions intended to guide growth to appropriate areas and provide services necessary to accommodate growth, the land uses allowed under the GPU, the infrastructure anticipated to accommodate proposed land uses, and the goal and policy framework would not induce growth that would exceed adopted

thresholds. Therefore, the analysis concluded that population and housing growth associated with the GPU would result in a less than significant impact related to population growth.

The proposed project would not add new residences or new residential population to the project area. The hotel is anticipated to add up to 50 new employees, and it is anticipated that there would be two employees for valet operations during the 12 staffed hours. It is likely that most of these employees would be existing residents of Sebastopol or Sonoma County. Even conservatively assuming that all project employees would relocate to the area from outside of the region, the increase of up to 52 employees represents 0.3 percent of the increase of 1,545 new employees in Sebastopol projected with implementation of the GPU and evaluated in the GPU FEIR. Finally, the proposed project is consistent with the GPU land use designation for the project site, and therefore the proposed project uses and associated employment growth were evaluated in the GPU FEIR and determined to result in a less-than-significant impact related to population growth.

b) There are no residential uses on the project site (both the hotel site and parking lot site). Therefore, the proposed project would not displace existing people or housing. There would be no impact under this significance criterion.

Conclusion

As discussed above, the proposed project would not result in effects related to population and housing that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

15. Public Services

PUBLIC SERVICES —	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GPU FEIR*	*Off-Site or Cumulative Impact not Identified by GPU FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR*
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
i) Fire protection?	☐	☐	☐	☐
ii) Police protection?	☐	☐	☐	☐
iii) Schools?	☐	☐	☐	☐
iv) Parks?	☐	☐	☐	☐
v) Other public facilities?	☐	☐	☐	☐

Discussion

a.i–v) The potential for implementation of the GPU to result in adverse physical impacts on the environment associated with governmental facilities and the provision of public services was evaluated under Impact 3.12-1 on pages 3.12-11 to 3.12-17 of the GPU DEIR. The analysis determined that development and growth in the city under the GPU would result in increased demand for public services, including fire protection, law enforcement, schools, parks, libraries, and other public and governmental services. The analysis determined that the GPU includes policies and actions to ensure that public services are provided at acceptable levels and to ensure that development and growth does not outpace the provision of public services. The analysis determined that, as future development and infrastructure projects, including new governmental facilities, are considered by the City, each project will be evaluated for conformance with the City's General Plan, Municipal Code, and other applicable regulations. The analysis determined that subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. The analysis determined that the GPU includes a range of policies and actions to ensure that public services are provided in a timely fashion, are adequately funded, are coordinated between the City and appropriate service agency, and that new development funds its fair share of services. The analysis determined that the GPU includes policies to ensure that fire protection and law enforcement services keep pace with new development and that school, library, and governmental services are adequately planned and provided. The analysis determined that the GPU DEIR addresses the potential impacts of development that may occur under the GPU, including residential, commercial, office, industrial, public facilities, and a range of other uses that are accommodated by the GPU. Where potentially significant or significant impacts are identified, the analysis determined that the GPU DEIR identifies mitigation measures to reduce the impact and discloses which impacts cannot be

reduced to a less than significant impact. The analysis determined that there are no additional environmental impacts, apart from those disclosed in the relevant chapters of the GPU DEIR that are anticipated to occur. Therefore, the analysis concluded that this impact is considered less than significant, and no additional mitigation is necessary.

The proposed project is consistent with the GPU land use designation for the project site, and therefore impacts related to the provision of public services (including fire protection, police protection, schools, and parks) associated with the proposed project were analyzed within the GPU EIR and the proposed project is generally not anticipated to require additional services. In addition, as discussed in Section 14, *Population and Housing*, of this document, the proposed project would not add new residences or new residential population to the project area that would generate increased demand for public services. The hotel would add up to 50 new employees, and it is anticipated that there would be two employees for valet operations during the 12 staffed hours. It is likely that most of these employees would be existing residents of Sebastopol or Sonoma County. Even conservatively assuming that all proposed project employees would relocate to the area from outside of the region, the increase of up to 52 employees represents 0.3 percent of the increase of 1,545 new employees in Sebastopol projected with implementation of the GPU and evaluated in the GPU FEIR. The proposed project's increase in employment or hotel guests would not result in a substantial increase in demand for public services.

In addition, the City of Sebastopol Planning Department produces an Annual Level of Service (LOS) Report to provide updates on a range of City services. The most recent LOS report was presented to the City Council on December 19, 2023, and covered the year 2022 (City of Sebastopol, 2023).

With regard to fire protection service, while the LOS report raised concerns with staffing, it indicates that the Sebastopol Fire Department met the National Response Standard for volunteer fire departments, and therefore fire protection service would be sufficient to serve the proposed project. The proposed project would not result in the need for new or physically altered fire protection facilities.

With regard to police protection, the GPU specifies an objective that the Sebastopol Police Department will respond to 70 percent of priority calls within 3 minutes. Due to staff vacancies and other factors, the LOS report noted that the response time under this standard was 3 minutes 33 seconds, thus not meeting the objective. The LOS report notes that this objective needs to be kept in perspective and should be used as a benchmark. The LOS report recommends that response time be monitored but does not recommend other actions. The proposed project would not create unusual demands on police services, and based on the above analysis, police protection service would be sufficient to serve the proposed project. The proposed project would not result in the need for new or physically altered police protection facilities.

With regard to parks, the LOS report indicates that the City has met the General Plan standard for the provision of park facilities.[19] As noted above, the proposed project would not add new

[19] As discussed in the LOS report, with 7,489 residents in the city in 2022, the total parkland ratio is 6.14 acres for each 1,000 residents, which means that the City has met the parkland General Plan standard.

residences or new residential population to the project area that would generate increased demand for parks. The proposed project's increase in employment or hotel guests would not result in a substantial increase in demand for parks. The proposed project would not result in the need for new or physically altered park facilities.

With regard to schools, the LOS report documents an overall trend of declining enrollment in Sebastopol schools. As noted above, the proposed project would not add new residences or new residential population to the project area that would generate increased demand for schools. The proposed project would not result in the need for new or physically altered school facilities.

Conclusion

As discussed above, the proposed project would not result in effects related to public services that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

City of Sebastopol, 2023. 2022 Annual Level of Service Report (LOS Report), December 19, 2023.

16. Recreation

RECREATION —	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☐

Discussion

a,b) The potential for implementation of the GPU to result in adverse physical impacts associated with the deterioration of existing parks and recreation facilities or the construction of new parks and recreation facilities was evaluated under Impact 3.12-2 on pages 3.12-18 to 3.12-23 of the GPU DEIR. The analysis determined that growth accommodated under the GPU would include a range of uses that would increase the population of the city and also attract additional workers and tourists to the city. The analysis determined that this growth would likely also result in increased demand for parks and recreation facilities. The analysis determined that the GPU includes

policies and actions that would ensure that existing parks and recreation districts are improved and maintained, by providing for a range of improvements appropriate to serve growth and ensure on-going improvement and maintenance of existing facilities and includes provisions to ensure that adequate parks and recreational facilities are provided at a pace adequate to serve new population growth. The analysis determined that the GPU DEIR addresses the potential impacts of development that may occur under the GPU, including residential, commercial, office, industrial, public facilities, and a range of other uses that are accommodated by the GPU. Where potentially significant or significant impacts are identified, the analysis determined that the GPU DEIR identifies mitigation measures to reduce the impact and discloses which impacts cannot be reduced to a less than significant impact. The analysis determined that there are no additional environmental impacts, apart from those disclosed in the relevant chapters of the GPU DEIR that are anticipated to occur. Therefore, the analysis concluded that this impact is considered less than significant, and no additional mitigation is necessary.

The proposed project is consistent with the GPU land use designation for the project site, and therefore impacts related to the provision of park and recreation facilities associated with the proposed project were analyzed within the GPU EIR and the proposed project is generally not anticipated to require additional park and recreation facilities. In addition, as discussed in Section 14, *Population and Housing*, of this document, the proposed project would not add new residences or new residential population to the project area that would generate increased demand for park and recreation facilities. The hotel would add up to 50 new employees, and it is anticipated that there would be two employees for valet operations during the 12 staffed hours. It is likely that most of these employees would be existing residents of Sebastopol or Sonoma County. Even conservatively assuming that all proposed project employees would relocate to the area from outside of the region, the increase of up to 52 employees represents 0.3 percent of the increase of 1,545 new employees in Sebastopol projected with implementation of the GPU and evaluated in the GPU FEIR. The proposed project's increase in employment or hotel guests would not result in a substantial increase in demand for park and recreation facilities.

In addition, the City of Sebastopol Planning Department produces an Annual Level of Service (LOS) Report to provide updates on a range of City services. The most recent LOS report was presented to the City Council on December 19, 2023, and covered the year 2022 (City of Sebastopol, 2023). With regard to parks, the LOS report indicates that the City has met the General Plan standard for the provision of park facilities.[20] As noted above, the proposed project would not add new residences or new residential population to the project area that would generate increased demand for park and recreation facilities. The proposed project's increase in employment or hotel guests would not result in a substantial increase in demand for park and recreation facilities. The proposed project does not include recreational facilities or require the construction or expansion of recreational facilities. Impacts related to recreation would be less than significant.

[20] As discussed in the LOS report, with 7,489 residents in the city in 2022, the total parkland ratio is 6.14 acres for each 1,000 residents, which means that the City has met the parkland General Plan standard.

Conclusion

As discussed above, the proposed project would not result in effects related to recreation that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

City of Sebastopol, 2023. 2022 Annual Level of Service Report (LOS Report), December 19, 2023.

17. Transportation

TRANSPORTATION — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☐
d) Result in inadequate emergency access?	☐	☐	☐	☐

Discussion

The following analysis is based on the *Barlow Hotel Project CEQA Transportation Assessment* prepared for the proposed project by Fehr & Peers (2024) and included as Appendix E. The transportation assessment was prepared in accordance with current CEQA requirements for evaluation of transportation effects, as described in the analysis below.

a) The potential for implementation of the GPU to conflict with a program plan, ordinance, or policy addressing bicycle and pedestrian facilities was evaluated under Impact 3.13-8 on pages 3.13-31 to 3.13-35 of the GPU DEIR. The analysis determined that implementation of the GPU would improve the existing bicycle and pedestrian circulation infrastructure and require future development to provide multimodal circulation improvements. The analysis determined that the GPU includes a comprehensive list of policies and actions aimed at prioritizing multimodal circulation. Examples include Policies CIR 2-1 through 2-4 and Actions 2a and 2g, which call for the City of Sebastopol to establish, maintain, and implement a network of pedestrian and bicycle facilities that are consistent with the City's Bicycle and Pedestrian Master Plan and its future updates. Policies CIR 2-4, CIR 2-5, and CIR 3-10, as well as Actions 1f and 2a, require

development projects to construct pedestrian and bicycle improvements on- and off-site, consistent with the Bicycle and Pedestrian Master Plan. Policy CIR 1-10 and Action CIR 1f indicate that the City shall assess circulation impact fees that support facilities shown in the Bicycle and Pedestrian Master Plan. The analysis concluded that, given the GPU's focus on enhancing Sebastopol's multimodal circulation system; consistency with the Bicycle and Pedestrian Master Plan and any future updates of that Plan; requirements for future development to construct multimodal improvements; and commitment to fund larger bicycle and pedestrian improvement projects through impact fees, the potential impacts to pedestrian and bicycle circulation are considered to be less than significant.

Pedestrian facilities in the project vicinity include sidewalks, crosswalks, and pedestrian signals. Crosswalks are provided at signalized and unsignalized intersections. Pedestrian push-button actuated signals are also provided at signalized intersections. Twelve-foot sidewalks are provided on both sides of Sebastopol Avenue, and eight- to nine-foot sidewalks are provided on both sides of McKinley Street. The proposed project would create a significant impact related to the pedestrian system if it would disrupt existing pedestrian facilities; interfere with planned pedestrian facilities; or create inconsistencies with adopted pedestrian system plans, guidelines, policies, or standards. Existing sidewalks would remain intact with implementation of the proposed project. The project proposes no features that would be hazardous to pedestrian travel and does not conflict with any pedestrian facilities plans or programs. Therefore, the proposed project's effect on the pedestrian system is less than significant.

With regard to bicycle facilities, Morris Street, Laguna Park Way, and Petaluma Avenue include Class II bicycle facilities while Sebastopol Avenue includes a Class III bike route. The proposed project would create a significant impact related to the bicycle system if it would disrupt existing bicycle facilities; interfere with planned bicycle facilities; or create inconsistencies with adopted bicycle system plans, guidelines, policies, or standards. While the proposed project does not propose any designated bicycle paths, bicycles would be permitted on site along with 12 bike parking spaces at the hotel and 20 bike parking spaces at the parking lot. The project proposes no features that would be hazardous to bicycle travel and does not conflict with any bicycle facilities plans or programs. The project's effect on the bicycle system is less than significant.

With regard to site access and circulation, vehicle access to the project site would be provided via McKinley Street and SR-12. The existing 87 parking spots in the existing lot on the project site will be reconfigured to accommodate 91 proposed parking spaces. The proposed project would also construct and operate a 242-space partially valet-operated parking lot on the 2.9-acre site of the former concrete batch plant at 385 Morris Street. The posted speed limit along McKinley Street in the vicinity of the project is 15 miles per hour, while the posted speed limit along SR-12 in the vicinity of the project is 25 miles per hour. According to Table 201.1 of the Caltrans Highway Design Manual, the stopping sight distance is 100 feet at 15 miles per hour and 150 feet at 25 miles per hour. The observed sight distance along both streets is greater than 100 and 150 feet in both directions. The posted speed limit along Morris Street is 25 miles per hour, and the observed stopping sight distance is also greater than 150 feet in both directions. Additionally, per Table 405.1A of the Caltrans Highway Design Manual, the corner sight distance is approximately 165 feet for left-turning vehicles at 15 miles per hour and 143 feet for right-turning vehicles. The

corner sight distance is approximately 275 feet for left-turning vehicles at 25 miles per hour and 238 feet for right-turning vehicles. Thus, the project site access points at the hotel site and the parking lot include sufficient stopping sight distance and corner sight distance so long as landscaping at the project site access intersections is maintained. It is recommended that the final site plan be reviewed prior to the issuance of building permits for potential sight distance impediments including new signs, above ground utility boxes, or landscaping proposed in the sight triangle.

Potential effects to transit systems resulting from implementation of the GPU were evaluated under Impact 3.13-7 on pages 3.13-29 to 3.13-31 of the GPU DEIR. The analysis determined that implementation of the GPU could lead to increases in the City's population and employment that would increase the demand for transit services offered by Sonoma County Transit (SCT). The analysis determined that, while established standards regarding transit levels of service have not been adopted by the City or transit agencies, the GPU includes policies that support transit-oriented development patterns, strengthen ties between the pedestrian and bicycle networks to transit, promote enhancements to transit facilities, and support increased transit coverage and frequencies in Sebastopol. For example, Policies CIR 2-17 and CIR 2-20 indicate that the City shall seek funding for bus shelters and ensure that adequate lighting is provided at bus stops. Policy CIR 2-19 calls for continued coordination with Sonoma County Transit to educate the public about using the transit system, and Policies CIR 2-21 through CIR 2-24 focus on improving park-and-ride facilities at major transit stops and continuing to monitor the need and locations for additional park-and-ride lots. Policy CIR 2-18 and Action CIR 2h state that the City of Sebastopol shall work with SCT to pursue improvements and funding to increase transit frequencies, hours of transit operation, and transit service areas in Sebastopol. Policy CIR-22 and Action CIR 2j call for the City to ensure that effective connections between Sebastopol and Sonoma–Marin Area Rail Transit (SMART) commuter rail stations in Santa Rosa and Cotati are in place. The analysis concluded that, given the GPU's emphasis on increasing transit usage, improving transit facilities, and desire to fund future improvements to transit service, any potential impacts to transit are considered to be less than significant.

SCT and Mendocino Transit Authority both provide transit service in Sonoma and Mendocino Counties. The following routes operate in the vicinity of the project site:

- Sonoma County Transit: Route 20 (Russian River Area, Forestville, Sebastopol, Santa Rosa)
- Sonoma County Transit: Route 24 (Sebastopol Shuttle)
- Sonoma County Transit: Route 26 (Sebastopol, Cotati, Rohnert Park)
- Mendocino Transit Authority: Route 95 (South Coast/Santa Rosa)

The SCT routes run along Sebastopol Avenue (SR-12), SR-116, Morris Street, McKinley Street, and Laguna Parkway, while the Mendocino Transit Authority route runs along Bodega Avenue and Sebastopol Avenue (SR-12). All transit stops are within one half-mile radius of the project site.

The proposed project would create a significant impact on transit if it would interfere with existing transit facilities or preclude the construction of planned transit facilities. The project proposes no features that would conflict with existing or planned transit services, and increases in ridership on local or regional transit facilities that would cause them to exceed their capacity are not expected to result with implementation of the proposed project. Therefore, the proposed project's effect on the public transit system is less than significant.

b) Senate Bill 743 (Steinberg 2013) instructed the State Office of Planning and Research (OPR) to update the CEQA Guidelines to eliminate congestion-based analysis (such as level of service analysis) from CEQA transportation analysis and replace it with a new metric (vehicle miles traveled, or VMT). The intent of SB 743 was to encourage infill development, promote healthier communities through active transportation (e.g., walking and bicycling), and align CEQA transportation analysis to aid California in meeting greenhouse gas reduction targets set by other pieces of legislation (i.e., AB 32). Ultimately, SB 743 shifted CEQA transportation analysis from measuring the effects of a project on drivers, to measuring the environmental effects of driving generated by a project. Adopted in December 2018, Section 15064.3 of the CEQA Guidelines notes that VMT is the most appropriate metric for the analysis of impacts in the Transportation section of CEQA documents.

VMT measures the amount of driving a project generates. For example, a project generating 100 total (inbound and outbound) vehicle trips per day which travel an average of 5 miles per trip results in 500 project-generated VMT per day. VMT has historically been used in CEQA as an input for the Air Quality and Greenhouse Gas sections, but VMT can also be used to show how efficient the connection between the transportation system and existing or proposed land uses is.

The State Office of Planning and Research provided guidance in its Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018) as to how the analysis of VMT could be performed and what CEQA thresholds of significance could be applied. The guidance in the Technical Advisory is non-binding. The City of Sebastopol requirements (adopted in 2024) tier from the Technical Advisory and use the Sonoma County Transportation Authority (SCTA) countywide travel demand model and metrics, methods, and thresholds provided in the Technical Advisory. Based on direction from the City in its capacity as a lead agency for CEQA purposes, the VMT analysis is based on net change in VMT.

The demand for hotel rooms in Sonoma County is independent of hotel room supply, as evidenced by the fact that hotel room vacancies generally exist throughout the year. Adding hotel rooms would thus redistribute the demand across available hotel rooms. Because Sebastopol is underserved by hotels, the new hotel rooms proposed as part of the Barlow Hotel project would shift demand away from other nearby hotels located along the U.S. 101 corridor. If the Barlow Hotel is located closer to the goods and services desired by the public, the resulting net change in VMT would be a negative number because the Barlow Hotel is closer to these destinations than the hotels along the U.S. 101 corridor.

The following analysis assesses the impacts of shifting hotel demand on VMT. The hotel is evaluated on a basis of net change for VMT under the assumption that Sebastopol is underserved

by hotels. Nearby hotels along the US 101 corridor in Santa Rosa and Rohnert Park were identified based on characteristics such as location and amenities, and data on their trip distribution and trip length were collected from StreetLight Data's database of "Big Data" location-based services. The analysis is conservative in that hotel data for similar hotels north of Santa Rosa, such as those in Healdsburg, were not used, which would have led to greater negative deltas in trip lengths, and consequently lower VMT calculations.

The "park-once" strategy for the Barlow also guides the analysis assumptions. Because the Barlow development (along with downtown Sebastopol as a whole) includes a diverse selection of land uses, including restaurants, stores, and parks, guests and visitors can park their vehicle once and easily walk or bike between their destinations. This contributes to a trip distribution pattern with reduced vehicle trips (and increased walk/bike trips) throughout the downtown area.

SCTA Model Regional VMT Analysis

Regional VMT by speed bin from the most recent version of the SCTA model were output for the Base Year (Year 2019), Base Year plus Project, Baseline Year (Year 2024, interpolated), Baseline Year plus Project (Year 2024, interpolated), Cumulative Year (Year 2040), and Cumulative Year plus Project scenarios. The traffic analysis zones of the selected hotels were adjusted to reflect current hotel capacities and changes in hotel demand resulting from the construction of the Barlow Hotel. The results of the analysis are summarized below in **Table TR-1**.

As noted in Table TR-1, the proposed project results in a net decrease in VMT in all scenarios. Therefore, the proposed project impact related to VMT is less-than-significant and no mitigation measures are required.

TABLE TR-1
NET CHANGE IN REGIONAL VMT USING SCTA MODEL

Scenario	Total Regional VMT	Difference due to Project	Impact?
Base Year (Year 2019)	14,016,050		
Base Year Plus Project	14,015,350	-700	No
Baseline Year (Year 2024)	14,534,400		
Baseline Year Plus Project	14,533,830	-570	No
Cumulative (Year 2040)	16,193,050		
Cumulative Plus Project	16,192,990	-60	No

Source: Fehr & Peers, 2024

GIS/Big Data-Based Regional VMT Analysis

The GIS/Big Data-based VMT analysis approach considers the locations of comparable hotels to establish a sample trip distribution pattern for the hotel.[21] Then, based on the relative distances

[21] Hotels analyzed include Hyatt Regency Sonoma Wine Country, Courtyard by Marriott Santa Rosa, AC Hotel by Marriott Santa Rosa Sonoma Wine Country, DoubleTree by Hilton Hotel Sonoma Wine Country, Oxford Suites Sonoma County – Rohnert Park, Graton Resort and Casino, and Fairfield Inn & Suites by Marriott Santa Rosa Sebastopol.

between the sample hotels/ hotel and common destinations, a delta in trip length is computed. For many west county destinations, the trip length delta is negative (indicating that the trips for the hotel are shorter), but for other destinations (like San Francisco), the trip length delta is positive (indicating that trips for the hotel are longer).

Sample trip data was collected at the Census block group level. The block groups of the selected sample hotels were used as origins and destinations for typical hotel guest trips in the area, including both access trips (traveling between one's home and the hotel) and tourist trips (traveling between the hotel and attractions in the area). The data included trip volumes and lengths in an origin-destination format, which were consolidated to create trip distributions for typical hotels in the area. Access and tourist trip distributions were developed and combined following the assumption that, on a typical average day, 20 percent of trips generated by the hotel would be access trips and 80 percent would be tourist trips. Following the "park once" strategy for the Barlow development, the analysis also assumed 25 percent of trips would remain within the Barlow area and would not directly contribute to VMT.

Project trip generation was calculated to be 664 daily weekday trips using ITE Land Use Code 310 from the 11th Edition of the ITE Trip Generation Manual, which reflects hotels with associated public uses interior to the hotel, such as meeting rooms and restaurants. This is in alignment with the SCTA model VMT assessment above, as the model also uses Code 310 for its hotel analysis. The ITE Trip Generation Manual includes additional codes for specific hotel types, but Code 310 contributes to a higher and more conservative trip generation calculation than other applicable codes such as Code 330 (Resort Hotel), so Code 310 is used in the Big Data analysis.

Shortest path trip lengths between block groups were calculated in GIS. As shown in **Table TR-2**, the final calculation was a reduction of 185 vehicle-miles, which suggests the addition of the hotel has the potential to reduce VMT in the area.

TABLE TR-2
NET CHANGE IN REGIONAL VMT

Scenario	Difference due to project	Impact?
Existing Plus Project	-185	No

Source: Fehr & Peers, 2024

The proposed project would result in a net decrease in VMT in the existing plus project scenario. Therefore, the proposed project's impacts to VMT would be less than significant and no mitigation measures are required.

c) The potential for implementation of the GPU to substantially increase hazards due to a geometric design feature was evaluated under Impact 3.13-5 on page 3.13-27 of the GPU DEIR. The analysis determined that the City maintains improvement standards that guide the construction of new transportation facilities to minimize design hazards for all users of the system. Through the environmental review process, land use proposals that would add traffic to streets not designed to

current standards are carefully evaluated. If needed, mitigations are identified, and the project is conditioned to construct or provide funding for an improvement that would minimize or eliminate the hazard. Typical improvements include shoulder widening, adding turn pockets, adding sidewalks or crosswalks, realigning sharp curves, prohibiting certain turning movements, and signalizing intersections. New and upgraded roadways needed to accommodate new development will be designed according to applicable federal, state, and local design standards.

The analysis identified that development and infrastructure projects in Sebastopol would be required to comply with the General Plan, Land Use Code, and applicable state and local regulations. The GPU also establishes several policies and actions that are intended to result in roadway designs that safely accommodate all users and reinforce lower driving speeds where appropriate to enhance safety. Specifically, GPU Policies CIR 1-11 and CIR 3-9 address the need to design circulation facilities to provide safe access for all users. Action CIR 1k requires the City to monitor collision reports and operation in order to prioritize implementation of safety improvements, and Action CIR 3c requires the City to review its adopted street standards and update as necessary to maintain safety for all users. Further, the analysis determined that GPU does not contain any provisions that would increase hazards due to design features of incompatible uses. Therefore, the analysis concluded that this impact is less than significant.

The project proposes no features that would increase hazards due to a geometric design feature, and this impact would be less than significant.

d) Emergency response within the City of Sebastopol is provided by the Sebastopol Fire Department. Emergency vehicle access to the site is provided by McKinley Street and Sebastopol Avenue (SR 12). As the project has multiple access points, and the width or access points and internal roadways appears to be sufficient to accommodate emergency vehicles, the proposed project's effect on emergency vehicle access is less-than-significant.

Conclusion

As discussed above, the proposed project would not result in effects related to transportation that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

Fehr & Peers, 2024. Barlow Hotel Project CEQA Transportation Assessment, June 2024.

18. Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES —	*Significant Project Impact (Peculiar to the Project or Parcel)*	*Project Impact not Identified by GPU FEIR*	*Off-Site or Cumulative Impact not Identified by GPU FEIR*	*Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR*
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources. Code Section 5020.1(k), or	☐	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☐

Discussion

a) Tribal cultural resources are: (1) sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR), or local register of historical resources, as defined in PRC Section 5020.1(k); or (2) a resource determined by the CEQA lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). For a cultural landscape to be considered a tribal cultural resource, it must be geographically defined in terms of the size and scope of the landscape (PRC Section 21074[b]). A historical resource, as defined in PRC Section 21084.1, unique archaeological resource, as defined in PRC Section 21083.2(g), or non-unique archaeological resource, as defined in PRC Section 21083.2(h), may also be a tribal cultural resource.

Through background research at the Northwest Information Center of the California Historical Resources Information System, no known archaeological resources that could be considered tribal cultural resources, are listed or determined eligible for listing in the CRHR or included in a local register of historical resources as defined in PRC Section 5020.1(k), pursuant to PRC Section 21074(a)(1), would be impacted by the proposed project.

On May 7, 2024, the Native American Heritage Commission was contacted to request a search of their Sacred Lands file and a list of California Native American tribes in the vicinity of the proposed project. On May 13, 2024, the NAHC responded that no Sacred Lands are on file in the immediate project vicinity and provided a list of 40 individual contacts from 25 tribes for the Sonoma County area.

Based on the above discussion, the City did not identify any tribal cultural resources listed or eligible for listing in the CRHR, nor did they determine any resources to be significant pursuant to criteria set forth in Subdivision (c) of PRC Section 5024.1.

Conclusion

The proposed project would not result in effects related to tribal cultural resources that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

19. Utilities and Service Systems

UTILITIES AND SERVICE SYSTEMS — Would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☐

Discussion

a) The potential for implementation of the GPU to require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects was evaluated under Impact 3.14-2 on pages 3.14-18 to 3.14-19 of the GPU DEIR. The analysis determined that development and growth in the city under the GPU would result in increased demand for water supplies, including water conveyance and treatment infrastructure. The analysis determined that the GPU includes policies and actions to ensure that water supplies are provided at acceptable levels and to ensure that development and

growth does not outpace the provision of available water supplies. The analysis determined that, as described under Impact 3.13-1 of the GPU DEIR, the projected water supplies are adequate to meet demand that would be generated by buildout of the GPU. As such, the analysis determined that implementation and buildout of the GPU would not result in the need to construct or expand water supply and treatment facilities that have not already been described and accounted for the in the City's relevant water master plans. The analysis determined that, as future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the City's General Plan and other applicable regulations. The analysis determined that subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. The analysis determined that future development in the Planning Area would be required to connect to existing water distribution infrastructure in the vicinity of each site, pay the applicable water system connection fees, and pay the applicable water usage rates. The analysis determined that future projects may be required to implement site specific and limited offsite improvements to the water distribution system in order to connect new project sites to the City's existing water infrastructure network. The analysis determined that any future improvements to the existing water distribution infrastructure would be primarily provided on sites with land use designations that allow for urbanized land uses, and the environmental impacts of constructing and operating the new water distribution infrastructure would likely be similar to those associated with new development, redevelopment, and infrastructure projects under the GPU. The analysis determined that these impacts are described in the relevant chapters of the GPU DEIR. The analysis determined that, where potentially significant or significant impacts are identified, the GPU DEIR identifies mitigation measures to reduce the impact and discloses which impacts cannot be reduced to a less than significant impact. The analysis concluded that there are no additional environmental impacts apart from those disclosed in the relevant chapters of the GPU DEIR that are anticipated to occur, and therefore, this impact is considered less than significant, and no additional mitigation is necessary.

As discussed in the Project Description, the City of Sebastopol would provide water service to the hotel building via an existing 8-inch water supply main in Sebastopol Avenue. No off-site improvements to the existing water mains are needed to serve the hotel building. No new water supply infrastructure is planned for the parking lot site. The water line to the hotel building would be slightly relocated as is shown on the project plans (included as Appendix A, Project Plans), but an 8-inch supply pipe would continue to serve the hotel building. As discussed below in item b), there are sufficient water supplies available to serve the project and reasonably foreseeable future development. In accordance with City requirements, the proposed project would connect to existing water distribution infrastructure, pay the applicable water system connection fees, and pay the applicable water usage rates. Consequently, the proposed project would not require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

The potential for implementation of the GPU to require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects was evaluated under Impact 3.14-4 on pages 3.14-30 to 3.14-32 of the GPU DEIR. The analysis determined that development under the GPU would

result in increased wastewater flows, resulting in the need for additional wastewater treatment facilities and conveyance infrastructure. The analysis determined that the infrastructure and facilities necessary to serve new growth would involve development of some facilities on-site, some facilities off-site on appropriately designated land, and may also involve improvements to existing facilities and disturbance of existing rights-of-way. The analysis determined that, as future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the City's General Plan, Municipal Code, and other applicable regulations. The analysis determined that subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. The analysis determined that the GPU includes policies and actions designed to ensure adequate wastewater treatment capacity is available to serve development, to minimize the potential adverse effects of wastewater treatment, and to ensure that development does not move forward until adequate wastewater capacity exists. GPU Policy CSF 4-2 ensures sewage system capacity is adequate to match the rate of development. Policy CSF 4-6 requires projects to demonstrate that existing services are adequate to accommodate the increased demand or that improvements to the capacity of the system to meet increased demand will be made prior to project implementation. Policy CSF 4-4 and CSF 4-7 ensures adequate funding is available for needed improvements to the wastewater conveyance infrastructure to provide necessary improvements and ensure coordination with wastewater treatment providers to plan for necessary improvements to accommodate growth. The analysis concluded impacts related to construction of new wastewater treatment facilities or expansion of existing facilities would be less than significant.

As discussed in the Project Description, wastewater generated by the hotel building would be collected by the City of Sebastopol's sewer system via an 8-inch main located in Sebastopol Avenue. No off-site improvements to the existing sewer mains are needed to serve the hotel building. The 8-inch main located in Sebastopol Avenue would be slightly relocated as is shown on the project plans (included as Appendix A, Project Plans), but an 8-inch main would continue to serve the hotel building. No new wastewater improvements are planned for the parking lot site.

With regard to wastewater treatment, the City of Sebastopol Planning Department produces an Annual Level of Service (LOS) Report to provide updates on a range of City services. The most recent LOS report was presented to the City Council on December 19, 2023, and covered the year 2022 (City of Sebastopol, 2023). As discussed in the LOS report, Sebastopol maintains a sanitary sewer collection system and pumping stations that transfer wastewater from Sebastopol to the Sub-regional Water Reclamation System Treatment Plant operated by the City of Santa Rosa on Llano Road. As a partner in the Sub-regional system, Sebastopol has an entitlement to treatment capacity up to 840,000 gallons, or 0.84 million gallons per day (mgd). Average dry weather sewer flow in 2022 was 0.393 mgd, or about 47 percent of treatment entitlement, and a reduction from the prior year. Accounting for this flow, a reserve factor, and approved and pending projects, there is an estimated 0.374 mgd of unused treatment capacity. According to the LOS report, this equates to 45 percent of treatment capacity and would support the development of 2,415 single family homes (a substantially higher sewer use than hotel rooms). Consequently, there would be adequate wastewater treatment capacity to serve the proposed project, and the proposed project

would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

With regard to storm water drainage, storm water drainage facilities that are owned and maintained by the City of Sebastopol would serve the hotel building (with facilities located in McKinley Street) and the parking lot site (with facilities located in Morris Street). Storm water on both the hotel building site and the parking lot site would be managed with a combination of Low Impact Development (LID), storm water quality treatment, and flood control measures. These measures would include, but are not limited to, planting new trees, handling roof downspouts, and installing bioretention areas. Storm water on the project site (i.e., the two locations that comprise the project site) would be directed to two on-site bioretention areas. One bioretention area will be in the center of the parking lot and the second bioretention area will be on the north side of the parking lot. No off-site improvements to the existing drainage infrastructure are needed to serve the proposed project.

Natural gas service to the project site would be provided by the Pacific Gas and Electric Company (PG&E) via the existing gas pipes on-site. No off-site improvements to existing natural gas infrastructure are needed to serve the proposed project and there would be no increase or change in pipe size to serve the proposed project.

Electrical service to the hotel and parking lot site would be provided by PG&E via existing infrastructure in the project area. No off-site improvements to existing electrical infrastructure are needed at this time.

b) The evaluation of whether sufficient water supplies would be available to serve implementation of the GPU was provided under Impact 3.14-1 on pages 3.14-14 to 3.14-17 of the GPU DEIR. The analysis determined that implementation of the GPU would result in increased population and employment growth within the City's Planning Area and a corresponding increase in the demand for additional water supplies. The analysis determined that the GPU includes a comprehensive set of goals, policies, and actions to ensure an adequate and reliable source of clean potable water, and impacts associated with water supplies are less than significant.

As discussed above, the City of Sebastopol Planning Department produces an Annual LOS report to provide updates on a range of City services. The most recent LOS report was presented to the City Council on December 19, 2023, and covered the year 2022 (City of Sebastopol, 2023). As discussed in the LOS report, Sebastopol is dependent on its municipal wells for water to supply customers. The City does not have a backup system, nor does it have a connection to other water systems in the area, which makes it critical that the City's water system is maintained and closely monitored. As discussed in the LOS report, the Sebastopol Public Works Department produces an annual report, which includes statistics for water production, usage, and wastewater flow. The report also contains information about groundwater levels in City wells. The report shows that in 2022 there was a decrease of approximately 7 percent in total annual water production, from 309 million gallons in 2021 to 286 million gallons in 2022. The LOS report determined that California had an extremely dry water year in 2022, which saw precipitation totals decrease below average for Sebastopol. The report identified that Sebastopol's water demand remains significantly lower

than when production peaked at 500 million gallons in 2004. The report determined that the estimated water demand from projects currently approved by the City but not yet constructed is 8.3 million gallons per year. This represents the equivalent of approximately 3 percent of total production in 2022. The report determined that the water demand for projects pending approval is estimated at an additional 10.6 million gallons per year. The LOS report determined that this is equivalent to an additional 4 percent of 2022 annual production. Based on actual production, historic production capability, and the scale of the proposed project, sufficient water supplies would be available to serve the proposed project.

c) As discussed above under item a), Sebastopol maintains a sanitary sewer collection system and pumping stations that transfer wastewater from Sebastopol to the Sub-regional Water Reclamation System Treatment Plant operated by the City of Santa Rosa on Llano Road. As a partner in the Sub-regional system, Sebastopol has an entitlement to treatment capacity up to 840,000 gallons, or 0.84 mgd. Average dry weather sewer flow in 2022 was 0.393 mgd, or about 47 percent of treatment entitlement, and a reduction from the prior year. Accounting for this flow, a reserve factor, and approved and pending projects, there is an estimated 0.374 mgd of unused treatment capacity. According to the LOS report, this equates to 45 percent of treatment capacity and would support the development of 2,415 single family homes (a substantially higher sewer use than hotel rooms). Consequently, there would be adequate wastewater treatment capacity to serve the proposed project.

d,e) The potential for implementation of the GPU to generate solid waste in excess of federal, state, or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals was evaluated under Impact 3.14-5 on pages 3.14-39 to 3.14-40 of the GPU DEIR. The analysis determined that development under the GPU will generate a population increase within the Sebastopol Planning Area of approximately 2,619 persons and an increase in employment of approximately 2,632 jobs upon cumulative GPU buildout. The analysis determined that the California Department of Resources Recycling and Recovery (CalRecycle) has established a per resident disposal target rate of 7.1 pounds per day (ppd) and a per employee disposal rate of 18.3 ppd for the Sonoma County Waste Management Agency (SCWMA). The analysis determined that cumulative growth under GPU buildout would result in an increase of approximately 34,169 pounds per day of solid waste (2,619 x 3.6) + (2,632 x 9.4), which equals 17.08 tons per day or 6,235.9 tons of solid waste per year. The analysis determined that the City's annual increase in solid waste generation is well within the permitted capacity of the Central Disposal Site serving the City and does not exceed the daily permitted capacity of the landfill. The proposed project is consistent with the GPU land use designation for the project site, and therefore the proposed project uses and associated solid waste generation were evaluated in the GPU FEIR and determined to result in a less-than-significant impact related to solid waste.

Conclusion

As discussed above, the proposed project would not result in effects related to utilities and service systems that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in

previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

City of Sebastopol, 2023. 2022 Annual Level of Service Report (LOS Report), December 19, 2023.

20. Wildfire

WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	***Significant Project Impact (Peculiar to the Project or Parcel)***	***Project Impact not Identified by GPU FEIR***	***Off-Site or Cumulative Impact not Identified by GPU FEIR***	***Substantial New Information Resulting in More Severe Adverse Impact than Identified in the GPU FEIR***
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☐

Discussion

a–d) Impacts related to the potential for implementation of the GPU to expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires were evaluated under Impact 3.8-6 on pages 3.8-26 to 3.8-29 of the GPU DEIR. The analysis determined that there are no Fire Hazard Severity Zones (FHSZs) within State Responsibility Areas (SRAs) or Very High Fire Hazard Severity Zones (VHFHSZs) within any Local Responsibility Areas (LRAs) in the City of Sebastopol.[22] The analysis concluded that implementation of the GPU would have a less than significant impact with regards to this issue.

The project site (both the hotel site and the parking lot site) are both urban infill areas and are not located in or near SRAs or lands classified as VHFHSZ. Construction and operation of the proposed project would adhere to all applicable state and local regulations, codes, and policies that address fire safety, ensuring that impacts related to wildfire would be less than significant.

[22] The state has charged CAL FIRE with the identification of Fire Hazard Severity Zones (FHSZ) within State Responsibility Areas. In addition, CAL FIRE must recommend Very High Fire Hazard Severity Zones (VHFHSZ) identified within any Local Responsibility Areas. The FHSZ maps are used by the state Fire Marshall as a basis for the adoption of applicable building code standards.

Conclusion

The proposed project would not result in effects related to wildfire that are peculiar to the project or the parcels on which the project would be located and were not analyzed as significant effects in the GPU FEIR; would not result in potentially significant off-site impacts or cumulative impacts that were not discussed in the GPU FEIR; and would not result in previously identified significant effects which, as a result of substantial new information that was not known at the time the GPU FEIR was certified, are determined to have a more severe adverse impact than discussed in the GPU FEIR.

References

California Department of Forestry and Fire Protection (CAL FIRE), 2024. Fire Hazard Severity Zones in State Responsibility Area. Available at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps-2022. Accessed May 26, 2024.