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October 30, 2024  
Project No: 24-16584

Jane Riley, Community Development Direct (Interim)  
City of Sebastopol  
714 Johnson Street  
Sebastopol, California 95472  
Via email: [jriley@cityofsebastopol.gov](mailto:jriley@cityofsebastopol.gov)

**Subject: Peer Review Results for the CEQA Section 15183 Statutory Exemption Checklist Documentation for the Barlow Hotel Project, Sebastopol, California**

Dear Ms. Riley:

Rincon is pleased to provide this letter report of the results of the peer review of the CEQA consistency checklist prepared in support of California Environmental Quality Act (CEQA) documentation for the proposed Barlow Hotel Project (“project”) in Sebastopol, California. The comments and recommendations provided herein are based on Rincon’s review of the document prepared in July 2024 by ESA Associates titled: *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)*. Our peer review also included the appendices to the ESA document, consisting of:

- Air Quality and Greenhouse Gas Model Outputs
- Historical Resources Evaluation Report
- DTSC EnviroStor SWRCB GeoTracker Database Search Results
- Barlow Hotel Project CEQA Transportation Assessment

Additionally, Rincon reviewed the project plans included in the ESA document to ensure that the project was accurately described and characterized in the ESA document and the applicable supporting appendices.

The remainder of this letter presents our comments and recommendations on the materials and documents that we peer reviewed.

## **15183 Statutory Exemption Checklist**

The title of the 15183 Statutory Exemption Checklist should be changed because the proposed project is not subject to a statutory exemption from CEQA. Additionally, Section 15183 of the CEQA Guidelines does not describe a statutory exemption. Instead, Section 15183 describes the additional environmental review that may or may not be required for projects consistent with a community plan or zoning. Considering this, Rincon suggests a title like “15183 Environmental Review Consistency Checklist.”

Page 5 states “The City of Sebastopol Zoning Code defines hotels as residential uses.” Rincon recommends that this sentence be revised to provide a direct reference or citation to the code section where hotels are defined as residential uses. Rincon found Section 17.08.100, which says a hotel means a residential building. If this is the code section the report is referring to, Rincon also



recommends revising the aforementioned sentence to say that the code says hotel means a residential building rather than the code defining hotels as a residential use.

Page 6, under the Project Objectives subheading, describes a 242-space parking lot as part of the project. However, the site plans included as Appendix A to the 15183 Statutory Exemption Checklist shows a total of 240 parking spaces in the parking lot site. Rincon recommends revising either page 6 or the site plans so that the number of proposed parking spaces is consistent.

Page 6, under the Project Objectives subheading, describes minimizing traffic impacts as an objective of the project. Rincon recommends removing the word “impacts” from this sentence because both “traffic” and “impacts” have a unique meaning or applicability to CEQA that may be best to avoid in the list of project objectives.

The bottom of page 6 and top of page 7 describe the gross square footage of the hotel as approximately 88,821 square feet with a net square footage of approximately 77,639 square feet. However, page 4 of site plans included as Appendix A to the 15183 Statutory Exemption Checklist describes the gross square footage as 77,200 square feet. Rincon recommends revising either pages 6 and 7 of the Exemption Checklist or the site plans so that the gross square footage of the hotel building is consistent.

Page 8 of the Exemption Checklist describes 242 parking spaces at the proposed parking lot on Morris Street. However, page 14 of site plans included as Appendix A to the 15183 Statutory Exemption Checklist describes 240 parking spaces at the parking lot. Rincon recommends revising either page 8 of the Exemption Checklist or the site plans so that the number of parking spaces proposed at Morris Street is consistent.

The first paragraph under the “Summary of Findings” heading on page 12 of the Statutory Exemption Checklist describes how the project is exempt from additional environmental review and also mentions a statutory exemption. Rincon recommends revising this paragraph to remove references to a statutory exemption and not describe the project as exempt from environmental review. The Statutory Exemption Checklist is documenting (or attempting to document) that adequate environmental review has already been completed for the project via the General Plan EIR. The second paragraph under this heading, consisting of a single sentence, also describes how the project qualifies for an exemption. This should be revised to instead suggest the project requires no additional environmental review.

The last paragraph on page 14 of the Statutory Exemption Checklist refers to a 15183 exemption. This should be removed, as there is no 15183 exemption.

## Aesthetics

The checklist grid or table on page 15 contains no markings or indications of which category is applicable. Please mark the applicable finding in the grid or table.

The discussion of impact ‘d.’ regarding light and glare on page 17 could be bolstered by briefly describing how the parking lot on Morris Street currently has no lighting but is adjacent to urban development to the west that does include external light sources. In this sense, the parking lot lighting would not be adding lights to an otherwise unlit area, thus would not result in new impacts or a substantial increase to any impact compared to existing conditions.

## Agriculture and Forestry Resources

The checklist grid or table on page 18 contains no markings or indications of which category is applicable. Please mark the applicable finding in the grid or table.



The second paragraph under the discussion of impact 'a.' on page 17 describes the project site as urban and built-up land. However, according to Figure 3.2-1 of the General Plan EIR, a portion of the parking lot site on Morris Street is mapped as Farmland of Local Importance. This portion of the site appears to be within the 50-foot setback of Laguna de Santa Rosa, and therefore would not be affected by the project. However, the project applicant should confirm that the Farmland of Local Importance would not be affected and update page 17 of the Statutory Exemption Checklist accordingly. Regardless, the General Plan EIR describes that locally important farmland could be converted to urban development, and so the proposed project would not result in a new or more severe agriculture impact than previously described in the General Plan EIR.

## Air Quality

The checklist grid or table on page 20 contains no markings or indications of which category is applicable. Please mark the applicable finding in the grid or table.

The discussion provided for impact 'a.' includes two tables presenting the estimated emissions of the project. However, impact 'a.' pertains to consistency with the Clean Air Plan and not exceedance of criteria pollutant emissions. Rincon suggests moving the tables and discussion of the tables under impact 'b.' Impact 'a.' should focus on how the project would have no new ways of obstructing the Clean Air Plan that was previously accounted for in the General Plan EIR, as applicable.

Impact discussion "b" on page 22 states that "... These emissions are summarized in Tables AQ-1 and AQ-2 below..." However, the tables are presented prior to this discussion. Please revise to indicate Tables AQ-1 and AQ-2 are prior to the discussion.

Impact discussion "c" on page 22 states that impacts related to health risk were determined in the General Plan EIR to be reduced to a less than significant level. However, it does not indicate if it is addressing construction emissions, operational emissions, or both.

The BAAQMD 2022 CEQA Guidelines are referenced under the discussion of impact 'c.' on page 23. Using the BAAQMD 2022 CEQA Guidelines in the air quality discussion may be problematic in the greenhouse gas section. The BAAQMD 2022 CEQA Guidelines state that projects including new natural gas plumbing will have significant and unavoidable greenhouse gas impacts, which would be a new significant impact not in the General Plan EIR. It may be difficult to justify why the BAAQMD 2022 CEQA Guidelines are used in the air quality section but not the greenhouse gas section. Generally, the Statutory Exemption Checklist should use the same guidelines and thresholds that were used in the General Plan EIR. For this reason, Rincon recommends not using or referring to the BAAQMD 2022 CEQA Guidelines in the Statutory Exemption Checklist.

Page 25 states that the project would not introduce new sources of odors other than temporary construction odors. However, the proposed hotel would have a restaurant. Often commercial-grade restaurants have a stack for cooking exhaust. If this is the case for the proposed restaurant, page 25 should be revised to discuss this potential odor source and whether or not it would result in new significant impacts not addressed in the General Plan EIR.

Page 24 states that the DPM concentrations were calculated using the PM10 and PM2.5 emissions from Table AQ-1. As noted below in the comments on the Air Quality and Greenhouse Gas Model Outputs, CalEEMod revisions are suggested to account for demolition emissions and emission reductions from an all Tier 4 emission standard equipment fleet. Please revise Table AQ-3 with the updated emissions estimates after CalEEMod is revised.

A cumulative TAC analysis is missing in Impact 'c'. According to the 2017 BAAQMD CEQA Guidelines, a Lead Agency must examine TAC and/or PM2.5 sources located within 1,000 feet of a proposed



project site. Sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. Please revise the Impact 'c' discussion to include a cumulative TAC analysis. See the following link to find BAAQMD's cumulative impact guidance and resources to obtain cumulative health risk data.

<https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/health-risk-screening-and-modeling>

## Biological Resources

The checklist grid or table on pages 25 and 26 contains no markings or indications of which category is applicable. Please mark the applicable finding in the grid or table.

The discussion of impact 'a.' relies upon a biological resources report described as being prepared by WRA in May 2024. However, the biological resources report is not included as an appendix to the Statutory Exemption Checklist. The biological resources report should be included as an appendix. Additionally, Rincon is unable to verify the discussion of impact 'a.' because it has not been provided with the biological resources report. This is also the case for other checklist questions in this section that reference the biological resources report.

The discussion of impact 'b.' references General Plan Policy COS 3-8 as one of several policies that were determined to reduce impacts to riparian habitat or other sensitive natural communities to less than significant in the General Plan EIR. 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. According to the site plans provided in Appendix A to the Exemption Checklist, project disturbance at the parking lot site would extend into the 50-foot buffer of Laguna de Santa Rosa. The discussion of impact 'b.' fails to discuss how this potential policy inconsistency would not result in new significant impacts. Rincon recommends either revising the site plans to avoid the buffer entirely or revising the discussion of impact 'b.' to sufficiently discuss unique impacts of working within the creek buffer.

The discussion of impact 'b.' on page 29 describes the parking lot site as fully disturbed. This is incorrect because the eastern portion of the site is not disturbed. Rincon recommends revising this discussion to state that the limits of disturbance for the parking lot is fully disturbed but that the parking lot site is not fully disturbed, as it contains undisturbed areas along Laguna de Santa Rosa.

The discussion of impact 'c.' on pages 29 and 30 describes how no wetlands occur on the project site based on the biological report. However, the biological report is not attached or included with the Statutory Exemption Checklist. Therefore, this information cannot be confirmed.

The discussion of impact 'c.' on page 30 describes the parking lot development area as set back greater than 50 feet from wetlands that occur east of the project site. Based on site plans included as Appendix A to the Statutory Exemption Checklist, this statement appears incorrect. The site plans show encroachment into the 50-foot setback by several feet. Please update page 30 or the site plans, as applicable, for consistency.

## Cultural Resources

See comments on the Historical Resources Evaluation Report, below. This section of the Statutory Exemption Checklist should be updated based on edits made to the Historical Resources Evaluation Report, as applicable.



## Geology and Soils

The discussion of impact 'a.' on pages 40 and 41 would be improved if it included site-specific information about the presence or absence of expansive soils. The discussion currently relies on conformance with the California Building Code to address geologic hazards, including expansive soil. However, the California Building Code alone does not necessarily mitigate impacts related to expansive soil. Due to the developed conditions of the project site, it is unlikely expansive soils are present. However, this is a site-specific condition or circumstance unique to the project that should be elaborated upon in the Statutory Exemption Checklist.

The discussion of impact 'f.' on page 43 suggests that impacts to paleontological resources would be unlikely because the site has been previously developed and project construction would only reach depths of up to 5 feet below ground surface. However, no supporting evidence or information is provided with the Statutory Exemption Checklist to demonstrate that the past or current development on the site disturbed soils to at least 5 feet below ground surface. Rincon recommends including such information in the Statutory Exemption Checklist.

## Greenhouse Gas Emissions

The discussion of impact 'a.' on page 46 discusses updated plans and regulations addressing greenhouse gas (GHG) emissions and climate impacts. Rincon recommends removing the discussion of the CARB 2022 Scoping Plan from the discussion. The rationale for this recommendation is based on the Bay Area Air Quality Management District's (BAAQMD) 2022 CEQA Guidelines, which align its significance thresholds with the CARB 2022 Scoping Plan goal of carbon neutrality in the future. The BAAQMD thresholds of significance for GHG emissions are no longer a quantified approach, like that used in the General Plan EIR. It is probably fine for the Statutory Exemption Checklist to discuss how the project would help achieve carbon neutrality, such as not including new natural gas hookups and reducing VMT, but generally, Rincon recommends removing mention of the CARB 2022 Scoping Plan. This comment is also applicable to impact 'b.' that also discusses consistency with the CARB Scoping Plan. Please note, the CalEEMod for the project indicates there are natural gas emissions. If natural gas is included in the project, it becomes more critical to remove references to the BAAQMD 2022 CEQA Guidelines.

In general, the description of natural gas use in the Statutory Exemption Checklist needs to be updated throughout for consistency. The description of the project indicates no natural gas hookups would be provided, but natural gas use was included in project CalEEMod, for example.

## Hazards and Hazardous Materials

The discussion of impact 'd.' on page 53 states that the project site is not on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. However, this statement appears to be incorrect or an inaccurate description of site conditions. According to the State Water Resources Control Board, the parking lot site is a known hazardous site. Although the hazardous case at the parking lot site was closed in 1998, it remains on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 (i.e., Geotracker). Rincon recommends revising the discussion page 53 to explain that the site is on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, but that the hazardous risk is no longer present.

## Noise and Vibration

The discussion of impact 'a.' on page 68 provides no analysis of the proposed project. The discussion summarizes the General Plan EIR, but never describes the proposed project. Rincon recommends



revising the discussion of impact 'a.' to discuss how the proposed project is either consistent or not consistent with the impact as determined in the General Plan EIR.

The discussion of impact 'b.' on page 68 says the addition of 39 additional hourly trips to the existing traffic volume on SR-12 would increase noise levels by 0.1 dBA. However, the 15183 Statutory Exemption Checklist provides no explanation of how this noise level was determined or calculated. Rincon recommends revising the discussion to explain or demonstrate how the anticipated noise increase of 0.1 dBA was calculated.

The discussion of impact 'b.' on page 69 concludes by explaining how General Plan Action N1-d requires an acoustical study for discretionary projects. The proposed project appears inconsistent with this General Plan action because no acoustical study has been prepared for the proposed project. Rincon recommends preparation of an acoustical study for the proposed project and incorporation of all recommendations and measures identified in the study to reduce noise levels to acceptable standards.

The discussion of ambient noise measurements on pages 69 and 70 do not describe what time of day the measurements were collected. The General Plan says noise measurements should be collected during the same operational period as the subject noise source, which in this case is the hotel operations. Please provide clarification if noise measurements were collected during quieter parts of the day but when hotel activities might be loud, such as evening hours when amplified music from the rooftop might occur.

The discussion of impact 'c.' on pages 71 and 72 describes how amplified music from the hotel rooftop would attenuate before reaching noise sensitive receptors to the southeast. The discussion relies on either measurements or observations that highway traffic noise attenuates before reaching these receptors. However, roadway noise is different from amplified music noise. Additionally, soundwaves travel differently from rooftops. Rincon recommends preparation of a project-specific acoustical study to determine if hotel noise, especially amplified music from the rooftop, would attenuate to acceptable levels at the nearest noise sensitive receptors.

The conclusion discussion on page 75 cannot be substantiated without additional analysis. Rincon recommends preparation of an acoustical study for the proposed project.

## Population and Housing

The discussion of impact 'a.' on pages 76 and 77 describe how the hotel would add no new residences to Sebastopol. Rincon agrees with this assertion. However, the language could be confusing because page 5 of the Statutory Exemption Checklist describes how hotels are considered residential. Rincon recommends providing additional clarification on pages 76 and 77 to explain that while the hotel is considered residential, it would not add permanent residential units.

## Utilities and Service Systems

The discussion of impact 'b.' on pages 93 and 94 concludes that water supplies would be sufficient for the proposed project. However, the discussion provides no details on the water demands of the project. Without this information, it is difficult to substantiate the conclusion that water supply would be sufficient. Rincon recommends providing more details on the water demands of the project and demonstrating how this demand would be accommodated by the City's supply and consistent with the findings in the General Plan EIR.



## **Air Quality and Greenhouse Gas Model Outputs**

The building square footage was entered as 70,000 square feet. This appears inconsistent with both site plans and the project description in the Statutory Exemption Checklist. It is unclear why 70,000 square feet was used for CalEEMod.

The lot acreage was entered as 2.77 acres. However, based on the City's GIS website, the combined acreage of the project site is approximately 4.1 acres. It is unclear why 2.77 acres is entered into CalEEMod.

As prepared, CalEEMod does not appear to account for demolition or haul emissions related to the removal of the existing Guayaki organic beverage company warehouse and parking lot, suggesting that the demolition input may have been overlooked. Furthermore, the parking lot model was set for 241 spaces, which is one fewer than the proposed 242 parking spaces. Additionally, page 7 of the Statutory Exemption Checklist indicates that the project would result in a net increase in parking spaces, with the existing 87 spaces increasing to 91 spaces for the hotel component. Please revise the hotel modeling in CalEEMod to reflect the demolition of the existing 87 parking spaces and the construction of a new 91 space parking lot.

As prepared, CalEEMod shows a peak of 40 one-way daily worker trips during hotel construction. This is inconsistent with the description on page 10 of the Statutory Exemption Checklist, which says construction would involve 75 peak daily trips. Please update CalEEMod to reflect 150 one-way daily worker trips.

CalEEMod shows that an average engine tier would be utilized for construction of the hotel and parking lot. This is inconsistent with the description on page 11 of the Statutory Exemption Checklist, which describes equipment meeting Tier 4 emission standards. Rincon recommends updating CalEEMod to reflect Tier 4 engines for all construction equipment and revise the HRA calculations accordingly.

Vehicle trips entered in CalEEMod do not appear to match the trip generation rates described in the Project CEQA Transportation Assessment. For example, the Project CEQA Transportation Assessment states that project trip generation was calculated to be 664 daily weekday trips. However, weekday trips were entered into CalEEMod as 70.9 trips.

CalEEMod does not appear to reflect the daily weekday trips and the final calculation of a 185 VMT reduction as indicated on page 87 of the transportation analysis. Additionally, page 21 of the Statutory Exemption Checklist states that the project would result in a decrease in VMT from existing conditions. Rincon recommends updating the CalEEMod to reflect the decrease in VMT, which will result in new model outputs requiring updates to Table AQ-2 in the Statutory Exemption Checklist.

Page 23 of the Statutory Exemption Checklist states that rectangular area sources would cover the hotel and parking lot. However, project construction involves demolishing the existing building and hauling demolition debris offsite. Therefore, a line volume source is required to reflect the emissions from hauling activities and their impact on nearby receptors. Please revise the air dispersion modeling to include hauling source emissions or provide an explanation in the text for why hauling emissions are not included in the analysis.

## **Historical Resources Evaluation Report**

The list of sources on page 11 appears to be inconclusive when compared against citations throughout the report. Rincon recommends including a full list of archives, collections, and source types that were reviewed (i.e. Western Sonoma County Historical Society, historical newspaper articles, etc.).



The introduction to the “Property History” section on page 23 does not provide the reader with a clear understanding of what was physically present within the project site during the historic period, nor what is the present extant. Rincon recommends including a transition paragraph introducing/summarizing the historical property within the project site that is to be evaluated. At a minimum, this introductory paragraph should identify the construction date(s) of the extant historic-age buildings subject to evaluation.

The “Property History” section on pages 23 through 31 does not identify the builder(s) and architect(s) associated with the subject warehouses. If the builder(s) and architect(s) are undetermined, the report should clearly state this and reference the sources reviewed. This information is required to support the Criterion C/3 analysis.

The “Property History” section on pages 23 through 31 requires additional historical analysis of the businesses and individuals associated with both properties to support the Criterion B/2 analysis.

The historic context section on page 32 does not appear to be directly relevant to the evaluation of the subject warehouse buildings. The subsequent “Physical Description” section indicates that the buildings are wood-frame, aside from their concrete foundations. This information is required to support the Criterion C/3 analysis. To support the Criterion C/3 analysis, this section of the report should address the architectural and industrial property type context(s) specific to these warehouses (i.e. railroad warehouse).

Figure 15 on page 34 of the report does not depict boundaries of the project site and/or evaluated properties. The figure should be updated to depict the relevant property boundaries and project footprint.

The built date of the building at 6780 Depot Street is not included in the discussion on page 43. The report should be revised to identify the approximate date of construction in the first paragraph of this section.

Page 52 states “To qualify for listing under Criterion A/1 of the NRHP/CRHR, a resource must be identified with an important event in history.” However, in addition to being associated with a singular important event, a property eligible under Criterion A/1 may also be significantly associated with an important pattern of events or period of development. The evaluation on page 52 does not assess whether or not the warehouse at 6782 Sebastopol Avenue is reflective of an important agricultural or industrial period of development in Sebastopol’s history. The report should be revised to assess whether or not the warehouse at 6782 Sebastopol Avenue is reflective of an important agricultural or industrial period of development in Sebastopol’s history.

Page 52 of the report lists several people associated with the Sebastopol Coop Cannery in the NRHP Criterion B/CRHR Criterion 2 analysis for 6782 Sebastopol Avenue, stating that they do not appear to be significant individuals. However, the preceding “Property History” does not discuss the background or contributions of these individuals in relation to the subject property or broader community. Thus, the Criterion B/2 evaluation of the subject property is unsupported. The “Property History” section of the report should be updated to provide additional information about the lives of relevant individuals. The Consultant must use that specific information to make an argument as to whether or not they are significant within the context of Sebastopol’s history.

In addition to the eligibility factors listed on page 52, a property may also be eligible under Criterion C/3 if it possesses high artistic value. This has not been addressed in the analysis. To support the Criterion C/3 analysis, the report should be revised to address eligibility in regard to artistic value and association with a builder and/or architect



Page 52 of the report states that the resource is illustrative of the “railroad warehouse” property type but does not include an appropriate property type context in the preceding “Property History” section. The report does not employ any comparative analysis to support the claim that the building is not a significant example of its style, property type, or method of construction. Therefore, the Criterion C/3 analysis is unsupported. To support the Criterion C/3 analysis, the report should be revised to add a “railroad warehouse” property type context to the “Property History” section, as well as a comparative analysis of similar property types.

Page 54 relies heavily on the findings of the *Western Sonoma County Historic Resources Survey* to make the claim that 6780 Depot Street is not significantly associated with the pattern of industrial development in Sebastopol. The report simply states that the previous survey report did not include the subject property in its list of historical properties associated with this theme. However, no information is provided as to why the previous report determined that the property was not significantly associated with the community’s industrial development; and therefore, the Criterion A/1 analysis is unsupported. To support the Criterion A/1 analysis, the report should be revised to include additional information as to why the previous report determined that property was not significantly associated with the community’s industrial development. If the previous report did not include this specific analysis, the report must provide its own analysis demonstrating how the subject property is or is not significantly associated with Sebastopol’s industrial development.

Page 54 relies heavily on the findings of the *Western Sonoma County Historic Resources Survey* to make the claim that 6780 Depot Street is not significantly associated with an important individual, group, or business. However, no information is provided as to why the previous report determined that property is not associated with an important individual, group, or business, and therefore the Criterion B/2 analysis is unsupported. To support the Criterion B/2 analysis, the report should be revised to provide additional analysis regarding the specific people and companies historically linked to the subject property and clearly demonstrate why they do or do not qualify as significant associations under Criterion B/2. This will also require adding supplemental information about relevant individuals and the Enterprise Bottling Works to the preceding “Property History” section.

In addition to the Criterion C/3 eligibility factors listed on page 54 of the report, a property may also be eligible under Criterion C/3 if it possesses high artistic value. This has not been addressed in the analysis. Further, the Criterion C/3 analysis provided in the report does not address any association (or lack thereof) to a builder or architect. Therefore, the Criterion C/3 analysis is unsupported. To support the Criterion C/3 analysis, the report should be revised to address eligibility in regard to artistic value and association with a builder and/or architect.

Page 54 of the report states that the resource is illustrative of the “railroad warehouse” property type but does not include an appropriate property type context in the preceding “Property History” section. Additionally, the report does not employ any comparative analysis to support the claim that the building is not a significant example of its style, property type, or method of construction. Therefore, the Criterion C/3 analysis is unsupported. To support the Criterion C/3 analysis, the report should be revised to add a “railroad warehouse” property type context to the “Property History” section, as well as a comparative analysis of similar property types.

The DPR forms should be revised throughout, as applicable, to reflect edits to the report made in response to these peer review comments.

The wrong address is listed on the DPR form for 6870 Depot Street. The address is incorrectly listed as 6782 Sebastopol Avenue.

The DPR form for 6870 Depot Street includes the wrong historical property name (lists Former Sebastopol Coop Cannery Company Warehouse instead of Enterprise Bottling Works Warehouse



Building). Rincon recommends revising the DPR form to include the correct property name of Enterprise Bottling Works Warehouse Building

The “Date Constructed/Age and Source” entered on the DPR form for 6870 Depot Street is not consistent with what is presented in the report. The DPR form lists 1903-1911 while the report describes 1905-1911. Rincon recommends making the DPR form and report consistent.

## **DTSC EnviroStor SWRCB GeoTracker Database Search Results**

Rincon has no comments on the database search results. Rincon queried these two databases and there appears to be no new or more current records of hazardous sites proximate to the project site.

## **Barlow Hotel Project CEQA Transportation Assessment**

Rincon has no comments on the Barlow Hotel Project CEQA Transportation Assessment.

Rincon is available to discuss the contents of this peer review letter report and provide more details or instruction to the City, as needed. Please do not hesitate to contact us if there are questions about the peer review process or comments provided in this letter report.

Sincerely,

**Rincon Consultants, Inc.**

A handwritten signature in black ink that reads 'George Dix'.

George Dix  
Project Manager

A handwritten signature in blue ink that reads 'Matt Maddox'.

Matt Maddox  
Principal