

**ADDENDUM TO THE FINAL  
ENVIRONMENTAL IMPACT REPORT FOR  
THE SONOMA COUNTRY INN**

**State Clearinghouse No. 2002052011**

Adopted May 2004

Lead Agency: County of Sonoma

July 2017

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## **A. OVERVIEW**

The County of Sonoma (County) has prepared this Addendum for the Sonoma Country Inn Project Final Environmental Impact Report (State Clearinghouse Number: 2002052011) certified May 2004 (“EIR”). This Addendum analyzes design changes requested for the inn, spa and restaurant portion of the project originally approved in 2004 to determine whether the changes will result in new or more severe environmental impacts than those analyzed in the EIR. In this Addendum, the approved project is the project analyzed in the EIR and the "conceptual design" is the design associated with the approved project. The "proposed design" or the "proposed project" is the Inn, Spa and Restaurant portion of the approved project, as modified by the requested design changes. The Applicant has named the proposed project The Resort at the Sonoma Country Inn. All Conditions of Approval applicable to the approved project will continue to apply to the proposed project.

## **B. BACKGROUND**

The County approved the Sonoma Country Inn project in 2004. The 2004 application included rezoning and General Plan amendments, an 11-lot subdivision and lot line adjustments plus use permits for an inn, spa and restaurant and for a winery with an attached tasting room. The present design review application includes only the inn, spa and restaurant, but not the winery and subdivision portions of the approved project. Separate conditions of approval for the winery and the subdivision require design review for those portions of the development prior to construction.

The approved project proposed a main building with a lobby, restaurant, meeting rooms, retail shop, administrative offices, and pool. 19 individual guest cottages contain 50 guest rooms. Parking was located to the east and west of the main building. The spa was located northwest of the main building and included pools and hot tubs, gym facilities and a small retail shop. The approved project allows for guest and public use of the restaurant from 6 a.m. to midnight, seven days a week.

As the lead agency, the County prepared a full EIR analyzing the approved project under the California Environmental Quality Act (CEQA) (Public Resources Code §21000 et seq.). The EIR disclosed and analyzed the environmental impacts that would result from the construction and operation of the approved project and conceptual design, mitigating them to the maximum extent feasible. A CEQA lawsuit challenging project approval and certification of the EIR was decided in the County’s favor in the Court of Appeal in 2006.

In October 2007, the County determined that the Use Permits for the inn, spa and restaurant, winery and residential subdivision were vested. The final subdivision map

recorded in late 2011 after installation of parts of the internal roadway system, Brodiaea Road and Moon Watch Lane, and the Highway 12 intersection improvements, including center turn lanes on Highway 12 required as traffic mitigation measures.

Tohigh Investment purchased the property in December 2014.

This Addendum analyzes the design changes requested for the inn, spa and restaurant portion of the approved project and any differences those design changes cause to environmental impacts of the proposed design compared to the conceptual design. The changes are discussed in detail in the Project Description section of this Addendum, including the Summary Comparison of Conceptual and Proposed Design chart at page 6.

The changes include reducing the main inn in size and reorienting it slightly to the view; moving some service functions from the main inn to a new support building at the edge of the eastern parking lot; lowering the first level of the main inn by two feet; replacing the main inn pitched slate roof and skylights with a third floor roof garden; relocating 31 outdoor seats from the second floor terrace to the third floor roof garden; terracing back the main inn façade; replacing French doors on the main inn with glazed sliding doors; minor changes to the main inn pool and pool terrace; moving the spa farther away from wooded areas, reducing the number of trees removed; minor changes to the spa pools; adding individual hot tub/spas to 16 of the guest cottages; revising parking locations and layout; reducing parking lot paving by a total of 27,000 square feet; moving some of the western guest cottages slightly downslope and replacing a 20-foot retaining wall with stepped planters at a maximum height of 10-feet; combining 11 eastern guest cottage units into 9 units in the same area of the site; and reducing the overall number of trees removed for construction.

### **C. CEQA STANDARD**

The County of Sonoma has prepared this Addendum pursuant to CEQA and the CEQA Guidelines<sup>1</sup>. Specifically, CEQA Guidelines Section 15164, subdivision (a), provides that the County shall "prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." (CEQA Guidelines, §15164, subd. (a); see also Pub. Resources Code, §21166, providing that no new EIR is required unless substantial changes are proposed in the project which will require major revisions of the EIR.)

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<sup>1</sup> California Code of Regulations, title 14, §15000 et seq.

Section 15162, subdivision (a), of the CEQA Guidelines provides that:

When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

An Addendum need not be circulated for public review or comment, but must be considered by the agency before making its decision on the project. (CEQA Guidelines, §15164, subdivisions (c) and (d).) The Guidelines state that an agency should include a brief explanation of its decision not to prepare a subsequent EIR in the Addendum, the

agency's findings on the project, or elsewhere in the record. (CEQA Guidelines, § 15164, subd. (e).) The agency's explanation must be supported by substantial evidence. (*Ibid.*)

#### **D. ANALYSIS.**

The Addendum analyzes the EIR sections that could potentially be affected by the design changes and examines the difference in impacts that would result from the proposed design compared to the conceptual design analyzed in the EIR. The Addendum specifically evaluates whether County approval of the design changes would trigger the need for a subsequent EIR under Public Resources Code section 21166 and CEQA Guidelines, section 15162, subdivision (a).

Because the approval at issue is limited to design review, even if there were substantial changes in circumstances or new information of substantial importance that was not known and could not have been known at the time of EIR certification, those factors would have to be relevant to impacts resulting from the requested design changes.

This Addendum relies on the EIR, which is hereby incorporated by reference. For ease of reference, the Addendum follows the order of issues used in the EIR.

##### **1. Project Description**

The applicant requests approval of certain design modifications to the inn, spa and restaurant buildings and associated site improvements on a 51.9 acre parcel. The proposed design is based on the conceptual design, with modifications made to comply with certain conditions of approval and other minor changes.

The proposed design consists of an inn with 50 guest rooms in 17 separate cottages. The main building of the inn complex will be located as proposed in the approved project and will house the reception area, administrative offices, meeting rooms, retail, restaurant, lounge and kitchen with square footage reduced to 16,922 square feet of space from 19,686 square feet in the conceptual design. The most significant change in architecture is that the roof would be modified from a pitched slate roof to a flat roof with a 334 square foot roof top garden and outdoor seating.

The proposed design keeps the restaurant in the main inn building as originally proposed, but would relocate 31 of the 50 allowed outdoor restaurant seats to the roof garden from the outdoor terraces in the conceptual design. There is no increase in total restaurant seating.

The guest cottages would be reduced to 17 in number from 19 in the conceptual design by making two of the cottages duplex-type units. Minor changes in location of the

cottages are proposed to reduce the number of trees removed as required by conditions of approval for the conceptual design.

The spa would be located approximately where it was in the conceptual design, but moved slightly farther away from wooded areas. It will consist of a collection of small structures connected by covered outdoor walkways. There are eight treatment cottages, a gym, steam rooms, saunas, men’s and women’s locker rooms, and several pools and hot tubs.

The reconfigured parking layout still contains 102 spaces, as required by conditions of approval. The western parking lot would reduce the amount of paving by approximately 10,000 square feet and reduce healthy tree removal from 84 to 37 trees, or 47 fewer trees. The eastern parking lot would be consolidated from five smaller lots into one lot in approximately the same location but reduce the overall amount of paving by approximately 17,000 square feet. The proposed design would remove 54 healthy trees instead of 99, or 45 fewer trees.

The proposed project adds a 2280 square foot building at the northern edge of the eastern parking lot for housekeeping, employee break areas and other support functions. The square footage now in this building was previously provided in the main inn, which is now reduced in size by approximately 10,000 square feet, including removal of the area previously devoted to the relocated support functions. Thirteen additional trees will be removed to accommodate the new building.

All structures and improvements are located within the building envelope as originally designated for the conceptual design.

**SUMMARY COMPARISON OF CONCEPTUAL DESIGN AND PROPOSED DESIGN**

<b>DESIGN ELEMENT</b>	<b>CONCEPTUAL DESIGN</b>	<b>PROPOSED DESIGN</b>
Main House	26,911 Square Feet (SF)	16,922 Square Feet (SF) 2,280 SF of service/support function was relocated to new Support Building Minor rotation to orient view First floor is 2 feet lower
	Single uninterrupted vertical building mass	Building mass is terraced back
	Solid pitched slate roof	Flat roof – roof garden with trees and plantings

Main House	50 outdoor dining seats on restaurant terrace	31 of the 50 outdoor seats shifted to roof garden
	South façade – series of French doors	South façade – composed of glazed sliding doors
Main Pool	Total pool area – 2,181 SF	Total pool area – 2,282 SF Reoriented pool.
	Pool terrace area – 6,301 SF	Pool terrace area – 6,711 SF
	Retaining wall as high as 20-feet with guard rail	Stepped planters – maximum wall height is 10 feet
Spa	Total pool area – 1,308 SF	Total pool area – 1,252 SF Moved 50 feet into clearing to reduce removal of trees from 55 to 10 trees.
		Changed the location and size of the spa pools and hot tubs
Western Parking Area		Parking area reduced by nearly 10,000 SF with the same number of parking spaces. 37 trees would be removed compared to 84 in the conceptual design.
Eastern Parking Area	5 lots	Consolidated 5 lots into 1 lot with same number of parking spaces eliminating about 17,000 SF of impervious paving. 54-68 trees would be removed compared to 99 in the conceptual design.
Western Cottage Units	8 units. Extreme grading on a steep slope for emergency vehicle access and removal of 7 large specimen coastal live oaks.	8 units. Units were relocated to minimize grading in steep areas of the site and downslope to preserve 7 large specimen coast live oaks. Footprint of units is

		substantially similar and within the same area of the site.
Eastern Cottage Units	11 units.	9 units. Units were combined to increase spacing between buildings. Footprint of units is substantially similar and within the same area of the site.
Cottage Units		Added small hot tubs to 16 guest cottage terraces.
Support Building		Inn operations functions square footage was relocated to new building by eastern parking area.

Source of information: *Summary of Reduced Impacts Due to Revisions to the Conceptual Design*, prepared by Backen Gilliam Kroeger Architects (BGK Summary).

## 2. Site Characteristics

The Sonoma Country Inn project site is currently undeveloped other than with installation of the access roadway, some interior roadways and partial leveling in the area where part of the parking area will be located. At the present time no areas of the project site are in active grape cultivation or in other agricultural use such as grazing. The Inn parcel includes an area on the valley floor where the leachfields will be located.

The project site ranges from approximately 425 feet to approximately 720 feet elevation and is relatively flat at the southern end with moderately steep hills in the north. The property has two distinct areas:

**The South Area:** The southern portion of the project site is on the gently sloping valley bottom, at elevations ranging from approximately 425 feet along State Route 12 at the south boundary, to approximately 520 feet at the base of the steep, upland slopes located further north. This portion of the property is designated Community Separator by the General Plan. The Community Separator runs back on the subject property to approximately 3/4 of a mile from Highway 12 and is part of the Northeast Santa Rosa Community Separator.

**The Plateau Area:** From the north end of the south area the slopes ascend moderately steeply to a topographic bench at about elevation 720 to 760 feet. The portion located



below 600 to 700 foot elevation also lies within the Northeast Santa Rosa Community Separator. The remainder of the plateau area lies within the General Plan designated Scenic Landscape Unit – Local Guidelines - Mountain.

The portion of the parcel that is on the valley floor will remain undeveloped except for the leach fields. The Inn complex will be located entirely on the plateau area. The valley floor has Valley Oak and Riparian Corridor preserves that were defined in the EIR and which are controlled by the Sonoma County Agriculture Preservation and Open Space District. The District also holds an easement over the entire property that was previously known as the Graywood Ranch (476 +/- acres) controlling uses on all parts of the parcels outside the specified building envelopes.

On-site vegetation consists of grassland with scattered oak trees on the valley floor changing to conifers and assorted woodland on the slopes leading to and on the plateau; a mostly conifer woodland and scattered manzanita/chaparral dominate the plateau with dense manzanita/chaparral on the steeper northerly slopes. Many unhealthy trees are currently located in this area as a result of the prolonged drought, overcrowding and disease. A tree removal plan discussed below has been prepared for dead or damaged tree removal, thinning to encourage better growth for choice trees, and clearing for construction.

### **3. Surrounding Land Use and Zoning**

North: North of the project site is Hood Mountain Regional Park. The park is zoned PF (Public Facilities) and is undeveloped chaparral and mixed hardwood forest.

East: East of the project site is mixed residential and agricultural lands with vineyards on the valley floor and lower slopes of the hills, and forest and chaparral lands on the higher elevations. Zoning to the east is mixed and includes: LIA (Land Intensive Agriculture) B6 60 acres density, AR (Agriculture and Residential) B6 20 acre density, and RRD (Resources and Rural Development) B6 20 acre density, all with the LG/MTN (Local Guidelines/Mountain) and SR (Scenic Resources) combining districts. Some also include the RC (Riparian Corridor – setbacks vary) and F2 (Floodplain) combining districts on parcels with blue line streams.

South: Highway 12 forms the south boundary of the site. South of Highway 12 zoning is RR (Rural Residential) B6 5 acre density and DA (Diverse Agriculture) B6 17 acre density all with the SR combining designation and some with the RC combining designation. There are numerous large lot residential parcels and a cleared agricultural parcel that is being prepared for vineyard planting south of Highway 12.

West: Lands west of the project site are all either parcels created by the Sonoma Country Inn Subdivision or the Graywood Ranch Subdivision. They are zoned DA B7 with the SR and LG/MTN combining districts and some with the RC combining district where the blue line streams are located. Further, west, outside the subdivision, lands are zoned LIA B6 60 acre density with the SR and LG/MTN combining districts and many with the RC where blue line streams cross them. These lands are vineyards. There is also a cluster of AR B6 20 acre density lands with seven parcels from one to just under three acres in size and one 96.88 acre parcel in an area known as Shady Acres, a rural residential development. This area also has the SR, LG/MTN and RC combining Districts.

## **E. ENVIRONMENTAL ISSUES, IMPACTS AND MITIGATION MEASURES**

The following responses detail the design changes in the proposed project and potential new or increased adverse environmental effects of those changes. To the extent that there is a possibility of changes in circumstances under which the proposed project is undertaken and/or new information of substantial importance which was not known and could not have been known at the time of the EIR certification, and those factors relate to impacts created by the proposed design changes, they have also been evaluated for possible new or more severe impacts. Responses below are organized in the same order as in the EIR with the same environmental topic names.

### **1. Land Use**

The design changes for the proposed project do not affect land use or planning. Similarly, there are no changes in circumstances under which the project is undertaken or new information of substantial importance that would affect land use and planning. The land uses in the conceptual design have not changed. The design changes do not require changes to the County's existing General Plan Land Use designations or zoning. The proposed project is consistent with the EIR finding that the development would not physically divide an established community. All of the development in the proposed design remains within the original approved building envelope, and the land required to be placed under a Conservation Easement by conditions of approval remains the same. The Sonoma County Agricultural Preservation and Open Space District (SCAPOSD) has determined that none of the design changes creates a conflict with the Conservation Easement.

The proposed design would not result in a new significant environmental effect relating to land use or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect

to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

## **2. Traffic and Circulation.**

The EIR presented a conservative traffic analysis in which all project components were assumed completed and in full operation, with the 50-room inn occupancy at 100 percent on Friday, Saturday and Sunday evenings from 2004 to 2012. The proposed design includes no increase in the intensity of the uses, no increase in seating, hours of operation or number of rooms.

No special events were approved for the inn, spa and restaurant, and none are proposed as part of the design changes. Special events will occur, if at all, only in the winery portion of the approved project after separate design review of that component. Therefore, any potential new information and/or changed circumstances that relates to the current number of winery related special events in the County or concentration of those events in the Sonoma Valley is not relevant to the design changes, because the design changes will not add to the number of special events.

### *a. Cumulative traffic volume.*

Crane Transportation Group, the EIR traffic consultant, determined traffic impacts along Highway 12 east of Santa Rosa and west of the Lawndale Road intersection near Kenwood for summer Friday morning and evening peak commute hours as well as for summer Sunday afternoon peak traffic conditions. The studies measured impacts for an existing base year of 2002 and as projected for the years 2005 and 2012. The projected counts were based on a 2.4% growth factor from the 2002 counts.

W-Trans prepared an updated traffic study for the proposed project, *Review of Traffic Issues Related to the Sonoma Country Inn Project*, dated May 25, 2017 (W-Trans 2017 Report). This report compared traffic volumes on Highway 12 projected in the EIR to Caltrans website data for 2012. Caltrans showed approximately 1700 vehicles in the Friday peak hour. The EIR (Exhibit 5.2-16) future year 2012 cumulative volumes included 2060 vehicles per hour in the peak hour, which is more than 21 percent higher than the actual volumes shown by Caltrans. At a similar growth rate of two percent per year added to Caltrans 2012 data, the volumes projected in the EIR would not be achieved until 2022. The current Sonoma County Transportation Agency (SCTA) model projects traffic to the year 2040 and indicates that between 2010 and 2040, a total of 227 trips are expected to be added to Highway 12 near Adobe Canyon Road. The ten year

trip increase predicted in the EIR of 435 added trips is larger than SCTA's current traffic model increase through 2040.

Center left turn lanes that were identified to mitigate longer waiting times at two intersections with Highway 12 have been installed with Caltrans' approval.

*b. Trip Generation*

The EIR traffic consultant developed trip generation numbers specifically for the approved project by taking into account employees, visitors and guests. (EIR, Exhibit 5.2-19.)

The W-Trans 2017 Report also performed a trip generation cross check using the Institute of Transportation Engineers (ITE) Trip Generation Manual (12<sup>th</sup> Ed.) standard trip generation rates for a hotel. Although the ITE standard for a hotel includes ancillary uses such as a restaurant, spa and bar, the proposed project's restaurant use was added separately to be conservative, with an offset for hotel guests already on site who would use the restaurant. The net difference from the project-specific trip generation in the EIR using ITE numbers was seven fewer trips in the morning peak hour and 2 more net trips in the afternoon peak hour, an insubstantial change which would not change levels of service (LOS) reported in the EIR.

The design changes do not modify the character of any use and do not increase the number of guest rooms, the seating capacity of the restaurant/bar, the number of employees or the size of the spa. Trip generation is the same for indoor or outdoor dining. Parking is not increased.

Based on the lack of change in the independent variables, the trip generation would likewise not be expected to change (W-Trans 2017).

*c. Parking Lot Layout Impacts*

The parking layout for the proposed design would contain the same 102 spaces required by Condition of Approval No. 106 and responds to the requirement in Condition of Approval No. 97 to adjust parking to avoid tree resources as much as possible. More detail on tree removal is contained below in Section 6, Biological Resources. Changes in the layout of the parking lots also reduced paving by approximately 10,000 square feet for the western lot and approximately 17,000 square feet for the eastern lot. Although the western parking is moved slightly closer to the main inn and access road, the W-Trans 2017 Report concludes that the location of parking has no bearing on the project's potential off-site impacts and will not draw visitors to the site. The adequacy of parking can be relevant, in the case of inadequate parking discouraging visitors from returning, but that is not the case with the proposed project. (W-Trans 2017 Report.) The proposed

design does not include any change to the number of parking spaces evaluated and found adequate in the EIR (see Exhibit 5.2-40).

*d. Conclusion*

The proposed design was compared with the EIR analysis for cumulative traffic, trip generation and parking lot layout impacts. The EIR used a very conservative approach to model the future volumes of traffic that is consistent with current transportation models and actual increased traffic volumes. The numbers projected in the EIR for 2012 are significantly higher than Caltrans vehicle counts for 2012, and would not be exceeded until 2022, if carried forward at a 2% growth rate from Caltrans' 2012 counts. The ten year trip increase projection in the EIR is greater than SCTA's current traffic model increase through 2040. Therefore, in the context of current conditions and for the proposed design, the EIR traffic analysis is still valid, and adequately reflects "future" traffic conditions that have not yet been realized. Current and projected information relating to traffic on Highway 12 does not contradict the EIR's evaluation or create new or more severe environmental impacts. To the extent that the EIR's traffic modeling included traffic volumes for 2012 that are consistent with actual current and projected counts, current traffic volume is not new information or changed circumstances establishing new or more severe impacts.

Center left turn lanes that were identified to mitigate longer waiting times at two intersections with Highway 12 have been installed, with Caltrans' approval.

The proposed design will not result in an increased trip generation or associated traffic impacts that require modification of the EIR's conclusions on traffic impacts.

The proposed design would not result in a new significant environmental effect relating to traffic or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

### **3. Hydrology and Water Quality**

The EIR based its analysis of hydrology and water quality impacts on the preliminary plans and projected the impacts associated with those plans. It evaluated potentially significant effects related to grading, erosion, runoff and changes in drainage patterns that could contribute to water quality impacts in the short-term from construction, and from overall operation of the conceptual design. The EIR determined that all such impacts were sufficiently mitigated. All mitigation measures and conditions of approval relating

to grading, erosion, stormwater runoff and drainage patterns will continue to apply to the proposed design and the project.

Units B1 and E1 of the western cottage units in the conceptual design would be moved to Units C1 and E1 of the proposed design, respectively, to limit grading for emergency vehicle access on a steeper slope. These and other changes to the eastern cottages are outlined at page 9 of the “Summary of Reduced Impacts Due to Revisions to the Conceptual Design,” May 25, 2017, Backen, Gilliam and Kroeger Architects (BGK Summary of Impacts). The remaining design changes do not create new or more severe grading impacts that cannot be mitigated by the existing mitigation measures and conditions of approval.

The proposed design would not result in a new significant environmental effect relating to hydrology or water quality or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

#### **4. Wastewater Disposal**

The EIR analyzed three separate septic systems for wastewater treatment. The main system includes sewage from the inn, spa, and restaurant. A second system would treat and dispose of sewage and process wastewater from the winery. Another system would treat and dispose of only the graywater from the spa building. The proposed design is consistent with these septic systems, although the Applicant has removed the laundry facilities from the site, reducing the load on the septic systems.

The proposed design would not result in a new significant environmental effect relating to wastewater disposal or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

#### **5. Water Supply**

The EIR estimated that the project would maintain an average occupancy of 80 percent throughout the year for the water use calculations. Based on the water use calculations in the EIR, the final conditions of approval restrict the inn, spa, restaurant and associated landscaping to an annual water use of 19.4 acre-feet.

The main pool location below the Inn for the proposed project design is similar to the conceptual design, but the total pool area has increased by 101 square feet. The conceptual design showed two pools plus a hot tub totaling 2,181 square feet. The proposed design has one main pool (2,184 square feet) with a main pool spa/hot tub (98 square feet) totaling 2,282 square feet. See BGK Summary of Impacts, Sheet 5. Also see Sheet 6 of the BGK Summary for design drawings comparison.

Two supplemental water use studies were prepared to analyze the impact of the design changes on water use for the proposed project. The first is a letter report regarding *Sonoma Country Inn: Water Use Information*, dated February 14, 2017, from Adobe Associates, Inc. At page 2, the report compared the proposed design to the conceptual design, including water evaporation from the pool and hot tubs. After accounting for the removal of the on-site laundry from the proposed design, there was no increase in water use as shown in Table IV of that report, below.

<b>Table IV.</b>	<b>Total Water Demand of Sonoma Country Inn</b>	
	<b>Acre-Feet Per Year</b>	
	<b>EIR</b>	<b>Current Design Estimates</b>
Commercial Use	11.3	11.3
Spa/Laundry*	1.6	0.7
Evaporation Losses**	N/A	0.9
Landscape Irrigation	3.4	3.4
<b>Total</b>	<b>16.3</b>	<b>16.3</b>

\*EIR estimates included on-site laundry which is taken off-site in proposed design.

\*\* Additional water use due to evaporation losses (not clear if accounted for in the EIR.)

A supplemental report regarding water use was also done by Adobe Associates, dated May 1, 2017 and set out below. It includes a more detailed comparison of the square footage of all pools and hot tubs in the conceptual and proposed designs and provides updated detail on evaporative water loss. See the *Sonoma Country Inn: Water Use Information*, dated May 1, 2017, Adobe Associates, Inc.

	Area – SF per each	Quantity	Total SF
<b>Pools &amp; Hot Tubs per Conceptual Design</b>			
Pool 1	1,144	1	1,144
Pool 2	924	1	924
Spa Pool Irregular Share	1,380	1	1,380
Hot Tub	113	1	113
1 <sup>st</sup> Floor Hot Tub	58	5	290
Landscape Hot Tub	50	1	50
Total Area			3,901
<b>Pools &amp; Hot Tubs per Current Design</b>			
Main Pool	2,184	1	2,184
Spa Lap Pool	900	1	900
Spa Cold Plunge	40	4	160
Unit D Upper Level Spa	36	6	216
Unit D Lower Level Spa	51	6	306
Villa Spa B	41	2	82
Villa Spa A	41	2	82
Spa Hot Tub	96	2	192
Main Pool Spa	98	1	98
Total Area			4,218

The Adobe Associates May 1, 2017 report concludes that the annual water consumption from evaporation for the pools and hot tubs in the conceptual design would have been 220,823 gallons and in the proposed design it would be 299,398 gallons. If evaporation was included in the EIR water use estimates, the increase from the design changes would be 0.24 acre-foot. Assuming evaporation was not considered, the total increase from evaporation compared to the EIR analysis would be 0.92 acre-foot. As shown in Table IV of the February 14, 2017 Adobe report, that increase is off-set by removal of the on-site laundry, and there is no overall increase in project water use. In either scenario, the total proposed project water use of 16.3 acre feet per year is below the limitation on water use imposed by Condition of Approval No. 59 of 19.4 acre-feet per year.

Based on the 2002 Richard C. Slade hydrogeological report, which provided the basis for the water use data in the EIR, the two wells on the parcel will have enough capacity to support the project and not impact the neighboring wells water source in normal and drought years.



The proposed design would not result in a new significant environmental effect relating to water supply or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

## **6. Biological Resources**

### *a. Plants.*

The EIR identified potential significant effects on the two populations of special status plant species known to occur on the site, narrow-anthered California brodiaea (*Brodiaea leptandra*) and Sonoma ceanothus (*Ceanothus sonomensis*). The proposed design is consistent with the Mitigation Measure 5.6-1(a) and (b). A special biotic preserve has been created outside of the building envelopes, and the Sonoma ceanothus population would be avoided by the proposed design.

### *b. Northern Spotted Owl.*

The Applicant contracted a consultant, WRA Environmental Consultants, to re-survey the project site for the federal and state listed northern spotted owl (*Strix occidentalis caurina*). In its letter report dated March 6, 2017, WRA concluded the project site lacks the structural complexity (consisting of small statured young trees) and arboreal substrates that are characteristic of northern spotted owl habitat in Sonoma County. This finding is consistent with surveys performed in 2004 and 2007. The consultant states that the northern spotted owl is very likely absent at the project site. The prior project owner consulted with the US Fish and Wildlife Service (the Service) informally in 2007. The Service concluded the project was unlikely to adversely affect northern spotted owl.

### *c. Tree removal.*

The EIR's extensive evaluation of tree removal for the conceptual design resulted in the imposition of extremely detailed mitigation measures that are carried forward and will apply equally to the proposed design. EIR mitigation measure 5.6-4(a)(5) required an adjustment of the conceptual design parking to reduce the number of trees removed. This section of the Addendum evaluates whether the trees removed as the result of design changes for the proposed design are significantly increased in number or otherwise increase the severity of impacts compared to the conceptual design.

The BGK Summary of Impacts includes notations and descriptions of trees slated for removal for each structure or facility that proposes a change in location that affects tree removal. The main inn building and pool are in essentially the same location, and no

additional tree removal has been identified. The spa is proposed to be moved into a clearing, and would require the removal of just 10 trees compared to 55 trees identified for removal with the conceptual design. (BGK Summary of Impacts, Sheet 6.)

Changes to the western parking lot layout would require removal of 37 trees compared to 84 trees with the conceptual design. (BGK Summary of Impacts, Sheet 7.) The relocated eastern parking lot for the proposed design would remove 54 trees compared to 99 for the conceptual design. (BGK Summary of Impacts, Sheet 8.) Addition of the support building alongside the eastern parking lot would require removal of 13 trees not removed with the conceptual design. (BGK Summary of Impacts, Sheet 11.)

The western cottage units in the proposed project have substantially similar tree removal requirements within the building footprints. However, with the proposed design, seven large specimen oaks would not be removed, as required for the conceptual design. ((BGK Summary of Impacts, Sheet 9.)

In summary, approximately 17 percent fewer trees would be removed with the proposed project, including seven large specimen oaks. This is a reduction in the biological impacts of the proposed project compared to the conceptual design, a beneficial change.

Removal of trees damaged by drought, disease and overcrowding is analyzed under Visual and Aesthetic Impacts, Section 8 below, but is not related to the design changes.

*d. Effect of parking lot layout changes on habitat.*

In addition to the effects of tree removal from the proposed design parking lot layout, WRA Environmental Consultants prepared a letter report dated March 23, 2017 to assess any impacts to adjacent wooded areas from car headlights that would shine into the wooded areas while cars are being parked in the parking lots. After reviewing the layout of the two modified parking lots, WRA concluded that the number of parking spots that would result in direct illumination of adjacent wooded areas outside of the development footprint would decrease in the western parking areas by approximately 13 spots and increase in the eastern parking lot by approximately 12 spots. This is a less than significant change. (WRA, “*Assessment of parking adjustments, Resort at Sonoma Country Inn project, Kenwood, California,*” March 23, 2017.)

The WRA report notes that automobile headlights would illuminate adjacent wooded areas in any event as a result of cars transiting through the site due to road curves and vehicles turning. This would occur with the conceptual design as well as with the proposed design. The proposed parking alterations would place cars entering and exiting the site along a more central route in the western area compared to a peripheral scheme in

the conceptual design, providing a more efficient route through the project and possibly reducing driving time.

The WRA report concludes that even if there were a net increase in illumination of adjacent wooded areas from car headlights using parking spaces, it would be less than significant and would not result in any new or more severe significant impacts to biological resources.

*e. Conclusion.*

The proposed design would not result in a new significant environmental effect on biological resources or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

## **7. Geology and Soils**

The EIR based its analysis of geology, seismicity, and mineral resource impacts on the conceptual design site layout. To evaluate the possibility of slope stability impacts resulting from the cottage location changes, Bauer Associates, Inc. Geotechnical Consultants prepared a supplemental geotechnical investigation reviewing the proposed design. (*Addendum, Geotechnical Consultation, Sonoma Country Inn, Kenwood, California*, January 30, 2017.) The study concludes that the level of subsurface exploration originally performed (29 test pits and 13 test borings extending into the bedrock) adequately characterizes the site geologic conditions for the revised design. Bauer also concluded that the slightly modified locations of the various structures do not present any new or different geotechnical impacts for the proposed design, and no additional subsurface exploration is required. The proposed design would incorporate updated seismic design criteria to address ground shaking.

The proposed design would not result in a new significant environmental effect relating to geology and soils or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

## 8. Visual and Aesthetic Quality

This Addendum evaluates whether the proposed design creates visual or aesthetic impacts that are new or more severe than those resulting from the conceptual design, including impacts related to light pollution.

### *a. View Impacts.*

In the EIR, view impacts were evaluated from the two main roadways that provide views of the project site to passing motorists, bicyclists and pedestrians travelling along Highway 12 and Adobe Canyon Road. EIR Exhibits 5.8-4 through 5.8-10 show existing conditions and photosimulations of resulting conditions with the conceptual design.

The design changes that could affect visibility include modification of the main inn roofline and the roof garden; slight changes to the location of the spa and some guest cottages; reconfigured parking layouts; and the added support building on the north edge of the eastern parking lot. In all cases except for the support building, fewer trees will be removed because of the building relocations than would have been required for the conceptual design. Tree removal associated with design changes is discussed in detail under Biological Resources, Section 6 above.

All conditions of approval imposed on the approved project to limit visual and aesthetic impacts will be applied to the proposed design.

Overall changes to visual impacts from the proposed design are summarized in the BGK Summary of Impacts. As noted in that report, the main inn is terraced, with each level stepped back, breaking up the vertical mass of the façade. The rooftop garden has plantings in place of the solid mass pitched roof in the conceptual design. Lighting from the roof garden is discussed in subsection 8.b. below. The main inn pool was reoriented along a slope contour, using terraced planters in place of a 20 foot retaining wall required for the conceptual design. After modification, the guest cottages have either equal or reduced visual impacts. The added support structure is at the rear of the project and obscured from view on all sides by surrounding trees and the eastern guest cottages.

A further comparison of the conceptual and proposed designs was performed by MacNair Landscape Architecture, *The Resort at Sonoma Country Inn Supplemental Visual Analysis*, dated February 3, 2017. It details each change to the site plan and concludes that in each case, the visual impact is equal to or less than for the conceptual design. Photosimulations were done from each of the points used in the EIR, and show no increased visibility. In addition, the report includes elevation sight lines from each of the visual assessment points used in the EIR to the various components of the proposed design, and shows an equal or lesser visibility than for the conceptual design.

Although it is not related to design changes, and includes trees for all portions of the approved project, MacNair and Associates prepared a further supplemental memorandum dated July 10, 2017, to consider tree removal due to drought. The report states that 1,778 trees were “tagged” and then surveyed and assessed for probable construction impacts. Another 924 trees were “marked” as dead, in decline, diseased, in poor structural condition or overcrowded – not all due only to drought. Over two-thirds of the marked trees were smaller trees with trunk diameters less than 9 inches. A significant number of these marked trees are within the grading and construction limits for the approved project, and would be removed for construction in any event, but a substantial number of the marked trees are in addition to trees tagged to be removed for construction.

In the Responses to Comments, page 9.0-23, the EIR noted that there were approximately 21,000 trees on the site. For the total approved project, the Responses to Comments included a chart showed 842 trees potentially being removed for fire management and another 2348 trees potentially being removed for construction. (*Ibid.*) Compared to this number and assuming every marked and tagged tree will be removed, the current estimate of tree removal overall removes 2702 trees compared to 3190 for the conceptual design. Note that these totals for tree removal include other portions of the approved project.

The MacNair and Associates July 10, 2017 report also assessed trees providing screening of the project site from Highway 12 and found them to be in moderate to good health with no significant structural defects and not affected by drought, disease or overcrowding. These trees are primarily evergreens, in an area where slope draining is occurring, tree density is less and the age class is young mature. Therefore, there are enough healthy trees to provide adequate screening of the proposed design from public viewpoints, as assessed in the MacNair Landscape Associates February 3, 2017 and MacNair & Associates July 10, 2017 reports.

*b. Light Pollution.*

Placement of the structures in the proposed design does not increase their visibility compared to that of the conceptual design. The other visibility issue relates to the possibility of additional light pollution, either from the rooftop garden or the relocated parking lots. The lack of any new impact on biological resources from the car headlights using the revised parking layout is detailed in Section 6 above.

Eric Johnson Associates Lighting Design prepared a photometric analysis for the redesigned roof terrace and courtyard areas in the main house to evaluate whether the proposed design would create new impacts or increased the severity of the night lighting impacts. (*Resort at Sonoma Country Inn Photometric Analysis*, dated February 14, 2017.) A follow-up email comment considered whether lights from spa/hot tubs at the

guest cottages which were not specifically identified in the EIR would create new significant lighting impacts. (*Sonoma Country Inn, Spa Lighting Design Comment*, May 11, 2017, Eric Johnson Associates.)

Skylights for the main inn roof which were a source of light emanation in the conceptual design would be eliminated. The proposed design would incorporate low, fully shielded and dark sky compliant lighting throughout, including for the roof garden, which will also be partially screened by landscaping. The plans for the conceptual design contain a detailed lighting plan at pages L-S1 through LL6.

The February 14, 2017 Eric Johnson Associates Photometric Analysis measures the light being emitted from the actual lighting fixtures and specific locations proposed for the roof garden. The analysis used vertical and horizontal grids calibrated to measure foot candles of light (FC) to determine the luminance, range and impact of the proposed lighting. The brightest lighting is at the finished floor of the roof terrace, at the minimum levels recommended for safety of exterior areas, emanating from very low step lights in the terrace walls, measured at 5.84 FC. At 15 feet above the finished floor, the brightest areas are around 1.24 FC, equivalent to the light at early to middle twilight. A real world example of 1 FC would be the brightness of 1 square foot of space with a candle's flame 1 foot above its center.

At 30 feet above the roof terrace finished floor, the brightest points are directly above the bar, at approximately 0.4 FC. The light spreads as it travels up from the building and quickly fades to 0.1 FC and then zero. At 65 feet above the finished floor, the brightest points are around 0.1 FC and average 0.01 FC. According to the report, the perceptual equivalent of 0.1 FC is deep twilight, and a full moon on a clear night casts around .01 FC of light onto the earth's surface.

The photometric analysis also measured light bubbles at the edge of the roof terrace. The highest FC at the edge closest to the building is 0.32 FC. At 50 feet from the edge, the highest FC is 0.05 and averages less than 0.01 FC. The expanse of the light bubble does not travel more than 110 feet into the atmosphere.

The photometric analysis also evaluated courtyard walkway lighting. The highest reading was 14.09 FC at the floor of a section of the walkway when the lights are set at 100% of operating level, which is above normal operating level. However, this location is near the edges of the hallway and does not reflect into the night sky. At 30 feet above the roof of the courtyard walkway, the 'hot spots' from the walkway floor reflect only minimally and the highest FC levels are around 0.37 FC. This is the perceptual equivalent of deep twilight on an overcast day. The average is around 0.01 FC or less at

both 30 feet and 50 feet above the roof of the courtyard walkway. The study concludes that very little light escapes beyond the courtyard or into the night sky.

The inn is approximately 4350 feet, or about 3/4 of a mile distant from Highway 12 and largely screened by tall trees downslope of the site.

The cottage hot tub lights will be underwater, at 9 watts with a half-dome shield to direct light downward into the interior surfaces of the spa only. The spas' interior plaster finish will be medium to dark, to prevent refraction of light up and outward. Lights will dimmed to the minimum level required for safety and guests will not have the ability to raise the light level of the spa lights. Each of the hot tubs will be located beneath a vine-covered trellis that will block vertically escaping light from reaching the night sky and absorb light before it can be reflected back down onto the patios. Each hot tub will be far enough from the cottage wall will keep any horizontally leaking light from illuminating or refracting off the building wall.

The two photometric analyses conclude that the proposed design would not cause a new or more severe light impact to the surrounding areas, the night sky or the view from the valley floor. The proposed design as a whole, including the roof garden, would be in full compliance with Conditions of Approval 101 and 102.

The proposed design would not result in a new significant environmental effect relating to visual and aesthetic quality or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

## **9. Cultural Resources**

The EIR analyzed potential impacts to cultural resources on the entire 186 acre site after consultation with Native American tribal representatives. The Cultural Resources Manager and Monitor for the Mishewal Wappo Tribe of Alexander Valley participated in cultural resources field surveys April 24 through May 10, 2002. The surveys did not discover any resources of cultural significance. However, because the construction of both the conceptual design and the project with the proposed design will include ground disturbing activities, EIR Mitigation Measure 5.9-1 will be placed on all grading and building plans to further protect the integrity of the site. The proposed design does not include any areas that were not already field surveyed and included in the EIR evaluation of cultural resources.

The proposed design would not result in a new significant environmental effect relating to cultural resources or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

### **10. Air Quality**

The EIR analyzed the potential for air quality impacts from construction related activities for the conceptual design. The design changes do not increase required construction in any way that would significantly change dust generation from short-term construction activities, found in the EIR to be a short-term significant impact that can be mitigated through measures 5.10-1, 5.10.4, and 5.10-5. Those mitigation measures are incorporated into conditions of approval, which will be applied to the proposed design.

The proposed design would not result in a new significant environmental effect relating to air quality or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

### **11. Noise**

The EIR found that the only potential noise impact requiring mitigation was from noise associated with special events at the winery. That portion of the approved project is not part of the present design review. The EIR also adjusted maximum noise limits downward as required by the General Plan Noise Element to take into account the ambient quiet conditions and the fact that the noise in question would be primarily speech and music from the winery and events center portion of the overall project. The noise limits used were more stringent than usual.

The conceptual design included outdoor pools. Potential additional noise impacts resulting from the replacement of the pitched roof of the main house with an outdoor roof terrace, reconfiguration of the pool at the inn, the addition of a new support building at the east parking lot and the revised east parking lot were reviewed in a *Sonoma Country Inn – Kenwood CA Noise Impact Analysis*, February 2, 2017, by Charles M. Salter Associates, Inc. The proposed design also includes outdoor spas/hot tubs at the guest cottages. A subsequent email update by Charles M. Salter dated May 18, 2017, specifically evaluated noise from the guest cottage spas.



The February report finds no new noise impacts from the revised parking lot or the pool design changes. The support building will have a transformer and an emergency generator, located more than 600 feet from the nearest residential property line to the south. Salter's May 18, 2017 email notes that the guest cottage terraces were part of the conceptual design and outdoor use was anticipated at that time. Mechanical equipment for the spas would be located inside the buildings. Noise mitigation required in conditions of approval will apply equally to the proposed design. No new noise impacts are anticipated from the pool design changes, the support building, the cottage spas or the parking lot changes.

The conceptual design included an outdoor second floor terrace and bar with a total of 50 seats exposed to the down sloping southern property line. The proposed design moves the approved bar to the new third floor roof garden, and shifts 31 of the 50 outdoor seats to the third level. Outdoor seating has not been increased from the maximum of 50 outdoor seats allowed by conditions of approval. No special events will be permitted in the roof garden. The terrain slopes down toward the nearest adjacent receiver to the south, and the exposure of the second and third levels to the southern property line are similar. Therefore, no additional noise impacts are expected from the roof garden.

The proposed design would not result in a new significant environmental effect relating to noise or a substantial increase in the severity of a previously identified significant effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

## **12. Cumulative Impacts**

Questions have been raised suggesting that cumulative development, traffic, drought and overconcentration of events since 2004 constitutes a substantial change in circumstances and/or new information of substantial importance not known at the time of the EIR that require further environmental analysis of the project. CEQA requires this re-evaluation only if the alleged new conditions create new or more severe environmental impacts not adequately dealt with by the analysis and mitigation in the EIR. CEQA further requires that any new information also "could not have been known with the exercise of reasonable diligence" when the prior environmental document was certified. And finally, for this design review application, even if qualifying new information or changed circumstances were to be shown, that new information would have to be relevant to impacts created by the design changes. New information or changed circumstances could not now limit vested uses, absent some change in design that would create a new impact or increase the significance of an impact studied in the EIR.

As discussed above, the EIR adequately addressed levels of traffic on Highway 12, projecting volume increases which are consistent with 2012 volumes as reported by Caltrans and added vehicle trip rate growth that is higher than SCTA's current model projections through 2040. Any increase or concentration of special events does not affect the proposed design because it will not contribute to an increase or concentration of special events, as none are permitted for the inn, spa and restaurant. Drought conditions have not significantly changed the tree screening of the project from Highway 12 in any negative sense as analyzed above.

The proposed design would not result in new significant cumulative environmental effects or a substantial increase in the severity of a previously identified significant cumulative effect due to substantial changes proposed in the project, substantial changes with respect to project circumstances, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Board certified the EIR. No new mitigation measures are required.

#### **E. CONCLUSION**

The proposed design and all proposed changes have been evaluated for any related environmental consequences in this Addendum and in the technical reports referenced herein. All such reports are available for public inspection at Permit Sonoma, 2550 Ventura Avenue, Santa Rosa, CA.

On the basis of the analysis in this Addendum and the technical reports, the proposed design does not cause new significant environmental effects or substantial increases in the severity of a significant environmental effect identified in the EIR. There are no substantial changes in the circumstances affecting the proposed design which would cause increased environmental impacts; nor is there new information which was not known and could not have been known at the time of the EIR that shows new or more severe environmental effects, infeasibility of adopted mitigation measures, new feasible mitigation measures which the applicant declines to adopt, or alternatives different from those in the EIR which would substantially reduce effects on the environment.

Approval of the proposed design would not meet any of the requirements in Public Resources Code Section 21166 or in CEQA Guidelines Section 15162 for preparation of a subsequent EIR or a supplement to an EIR.

### **Information Used to Prepare the Addendum**

Copies of all documents referred to are available for inspection at Permit Sonoma, 2550 Ventura Avenue, Santa Rosa.

1. Proposal Statement and Description of Landscaping
2. *Summary of Reduced Impacts Due to Revisions to the Conceptual Design*, prepared by Backen Gillam Kroeger Architects
3. Proposed Project Plans
4. *Sonoma Country Inn: Water Use Information*, dated February 14, 2017, prepared by Adobe Associates, Inc.
5. *Sonoma Country Inn: Water Use Information*, dated May 1, 2017, prepared by Adobe Associates, Inc.
6. *Resort at Sonoma Country Inn Photometric Analysis*, dated February 14, 2017, prepared by Eric Johnson Associates
7. *Sonoma Country Inn, Spa Lighting Design Comment*, May 11, 2017, Eric Johnson Associates
8. *Assessment of proposed parking adjustments, Resort at Sonoma Country Inn project, Kenwood, California*, dated March 23, 2017, prepared by WRA Environmental Consultants with attached email from Tom Spoja with BGK, dated March 22, 2017
9. *Review of Traffic Issues Relative to the Sonoma Country Inn Project*, dated May 25, 2017, prepared by W-Trans
10. Memorandum to Flora Li from James MacNair regarding *Parking Lot Tree Protection*, dated March 16, 2017.
11. *The Resort at Sonoma Country Inn Supplemental Visual Impact Analysis*, dated February 3, 2017, prepared by MacNair Landscape Architecture
12. Memorandum from James Mac Nair, MacNair and Associates, dated July 10, 2017, regarding *PRMD Tree Removal Response*.
13. *Sonoma Country Inn – Kenwood, CA Noise Impact Analysis*, dated February 2, 2017, prepared by Charles M. Salter

14. Letter from WRA Environmental Consultants to Flora Li regarding *Northern spotted owl assessment for the Resort at Sonoma Country Inn project, Kenwood, California*, dated March 6, 2017
15. *Addendum Geotechnical Consultation, Sonoma Country Inn, Kenwood, California*, dated January 30, 2017, prepared by Bauer Associates, Inc. Geotechnical Engineers
16. Email from Alex Salter to Flora Li, dated May 18, 2017, regarding potential noise impacts from the outdoor spas
17. Comments Received from Sonoma County Agricultural Preservation and Open Space District, dated August 26, 2016
18. Letter from the Sonoma County Agricultural Preservation and Open Space District to Tohigh, dated April 13, 2017
19. Sonoma Country Inn Environmental Impact Report, certified May 2004, SCH No. 2002052011.
20. Sonoma County Board of Supervisors Resolution No. 04-1037, dated November 2, 2004, with exhibits.