



# Sonoma County Planning Commission **STAFF REPORT**

## Sonoma County Permit and Resource Management Department

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**FILE:** DRH16-0006  
**DATE:** August 3, 2017  
**TIME:** 1:30 PM  
**STAFF:** Georgia McDaniel, Project Planner

**Appeal Period:** 10 calendar days

### SUMMARY

**Appellant:** Valley of the Moon Alliance (VOTMA)  
**Applicant:** Flora Li for Tohigh Investment  
**Owner:** Tohigh Investment SF LLC (Tohigh)  
**Location:** 900, 1200, 1202, and 1204 Campagna Lane, Kenwood  
APNs: 051-260-014 Supervisorial District No.: 1  
**Subject:** Appeal of Design Review approval for a new Inn, Spa, and Restaurant  
**PROPOSAL:** Request for final Design Review approval for an inn, spa, and restaurant on a 51.9 acre parcel.

The project is an inn, spa and restaurant that was approved in 2004 under PLP01-0006 (often referred to as the Sonoma Country Inn). The portion of the Sonoma Country Inn project under consideration is now called "The Resort at Sonoma Country Inn" by the applicant. The inn consists of 50 guest rooms located in 17 guest cottages and the main building includes a restaurant, retail shop, administrative offices, support services and swimming pool. The approved spa has gym facilities, retail space, treatment cottages and several hot tubs and pools for guest and public use. The restaurant in the main inn building is approved for guest and public use from 6 a.m. to midnight seven days a week, open to the public for breakfast, lunch and dinner. All uses have associated parking.

### **Environmental Determination:**

Environmental Impact Report (2004). See:

[http://www.sonoma-county.org/prmd/docs/eir/sonomacountryinn/sonoma\\_country\\_inn\\_deir.pdf](http://www.sonoma-county.org/prmd/docs/eir/sonomacountryinn/sonoma_country_inn_deir.pdf) and  
[http://www.sonoma-county.org/prmd/docs/eir/sonomacountryinn/sonoma\\_country\\_inn\\_feir.pdf](http://www.sonoma-county.org/prmd/docs/eir/sonomacountryinn/sonoma_country_inn_feir.pdf)

Addendum to the EIR, Exhibit X to this report.

**General Plan:** Diverse Agriculture 17 acres per dwelling unit / Recreation and Visitor Serving Commercial

**Specific/Area Plan:** None

**Land Use:****Ord. Reference:** N/A**Zoning:** DA (Diverse Agriculture) 17 acres per dwelling unit, K (Visitor Serving Commercial), LG/MTN (Local Guidelines/Sonoma/Taylor/Mayacamas Mountains), SR (Scenic Resources)**Land Conservation****Contract:** No**Application Complete  
for Processing:**

August 30, 2016

**RECOMMENDATION:** Uphold the October 19, 2016 Design Review Committee approval of the revised project design and site plan modifications with two minor changes required by the Open Space Conservation Easement.**EXECUTIVE SUMMARY:**

The project was approved in 2004. A Statement of Overriding Considerations (Exhibit A) was adopted by the Board as part of that approval, citing uncertainty regarding Caltrans approval of turn lanes at two intersections and possible increased night lighting. The Conditions of Approval are provided in Exhibit B. In October 2007, the County determined that the Use Permits for the Inn/Spa/Restaurant and Winery were vested. The property was purchased by Tohigh Investment SF LLC in December 2014. See the Proposal Statement for a description of design changes proposed by Tohigh Investment and presented to the Design Review Committee (Exhibit C). The proposed design changes were approved by the Design Review Committee on October 19, 2016. See Proposal Statement for a description of the proposed design changes (Exhibit B). The approval was appealed by the Valley of the Moon Alliance (Appellant).

The appeal was based upon the following key issues:

- 1) water use due to pool expansion;
- 2) lighting impacts from the roof terrace and reconfigured parking;
- 3) trip generation impacts from parking reconfiguration;
- 4) parking-related tree and habitat impacts;
- 5) new support building impacts;
- 6) guest cottage site changes affecting visibility and geologic impacts;
- 7) noise impacts;
- 8) employee parking;
- 9) Sonoma County Agricultural Preservation and Open Space District approval; and
- 10) scope of design review and environmental analysis.

See appeal letter, dated October 31, 2016 (Exhibit D).

Staff recommends the denial of the appeal and upholding the Design Review Committee's action because certain revisions to the plans were made to comply with conditions of approval to reduce impacts and other requested changes have either equal or reduced impacts compared to the approved project, as analyzed in the Addendum to the EIR prepared by County staff. Overall, potential negative environmental impacts have been reduced. The revised project remains within the original project footprint as previously analyzed.

**ANALYSIS****Background:**

In 2001 Graywood Ranch LLC c/o Mark Harmon filed an application based on a 1989 General Plan Policy LU-14r that allowed an RVSC (Recreation and Visitor Serving Commercial) land use designation. The application included a General Plan Amendment to relocate the RVSC and approve a 50-unit inn, spa and restaurant along with a winery and 11 residential lots.

After preparation and certification of an Environmental Impact Report (EIR), the Board of Supervisors approved the project and necessary land use changes in 2004. The project included rezoning and General Plan amendments, an 11 lot subdivision map and lot line adjustments plus use permits for the inn/spa/restaurant and for a winery and tasting room. (Only the inn, spa and restaurant is presented for design review at this time.) A CEQA challenge to the project approval and the EIR was decided in the County's favor in the Court of Appeal in 2006.

In October 2007, PRMD determined that the Use Permits for the Inn, Spa, and Restaurant plus the Winery were vested. The final subdivision map recorded in December 2011.

The property changed ownership to Tohigh Investment in December 2014.

In this report, 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 proposed design approved by the Design Review Committee in 2016 requested certain design and layout changes from the approved project which are shown in the table below. For this report, the project analyzed in the EIR is called the "approved project," and the 2004 approved project design is called the "conceptual design." The Inn, Spa and Restaurant portion of the approved project as modified by the requested design changes is called the "proposed design" or the "proposed project."

#### ORIGINAL CONCEPTUAL DESIGN AND PROPOSED DESIGN COMPARISON

DESIGN ELEMENT	CONCEPTUAL DESIGN	PROPOSED DESIGN
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
	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
		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. Tree removal was reduced.
		Forty-seven less trees would be removed with revised layout
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 and reduced tree removal.
		Full valet service to minimize vehicular circulation
	99 trees to be removed	54 trees to be removed
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.
		Added small hot tubs to 16 of the 17 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, Exhibit E). See Exhibit B for graphic representations of the comparison of the conceptual design and the proposed design (called the “current design” in the BGK Summary).

On October 19, 2016 the Design Review Committee (DRC) approved the modified Site Plan, Architectural Plans, Parking Plan, Grading Plan and Exterior Lighting Plan. The approval was appealed by the Valley of the Moon Alliance. (Appellant). The Appellant contends that the design revisions require additional environmental review and that the project EIR is not adequate to cover the changes.

The applicant submitted a number of technical reports to analyze the proposed design changes. Together with staff review and analysis, the information in these documents is discussed in an Addendum to the project EIR. See Issue #10, Scope of Design Review and Environment Analysis, below.

After the Design Review Committee approved the project on October 19, 2016, the proposed design was revised slightly so all structures and facilities are within the previously approved building envelope. One parking stall in the western parking area was relocated and a paved area near the easternmost cottage was revised. These revisions were made in response to concerns of the Sonoma County Agricultural Preservation and Open Space District that the revised site plans be consistent with the Conservation Easement. The revised plans are provided in Exhibit F.

**Project Description:**

The Applicant requests certain project modifications per the conditions of approval and to better implement its vision for the project. The changes from the conceptual design are generally described in the chart above. Graphic representations of the revisions are also provided in the *Summary of Reduced Impacts Due to Revisions to the Conceptual Design*, prepared by the applicant's architect, Backen Gillam Kroeger Architects (BGK Summary, Exhibit E).

**The Inn.**

The inn's 50 guest rooms would be located in 17 separate cottages instead of 19. The main inn building would be located as originally proposed and would house the reception area, administrative offices, public meeting rooms, retail shop, restaurant, lounge, garden terrace, and kitchen. The most significant architectural change would replace the former pitched slate roof of the inn with a roof top garden. French doors along the inn's front façade would be replaced with glazed sliding glass doors.

The table below shows the difference in the square footage of the Main House between the conceptual design and the proposed design. Originally there was 7,225 SF for service/staff function. It is unclear where this function was accommodated in the conceptual design. In the proposed design, 2,280 SF of operational support has been relocated to a new Support Building.

MAIN HOUSE	CONCEPTUAL DESIGN SF	PROPOSED DESIGN SF
Upper Level	11,696 SF	8,684 SF
Lower Level	7,990 /sf	7,904 SF
Roof Top		334 SF
Total Main House	19,686 SF	16,922 SF
Service /staff - support	7,225 SF	2,280 SF
Total	26,911 SF	19,202 SF

The mass of the proposed main house in the proposed plan would be terraced on the slope with each level stepping back with planted edges and trellised patios. The conceptual design presented a single uninterrupted vertical mass.

A roof garden would replace the solid mass of the pitched slate roof of the conceptual design to better blend the building into the landscape and reduce the visibility from the valley below. The roof garden would contain trees and plantings, softening the appearance of the building and obscuring the upper portion of the structure.

There are no proposed changes to the restaurant location, which remains incorporated into the main inn as originally proposed. However, the rooftop garden would have outdoor restaurant seating, relocating 31 of the 50 outdoor restaurant seats from the second floor terrace in the conceptual design to the rooftop garden.

The inn pool area would be increased in size by 101 square feet or 4.8%, and the main pool terrace area increased by 404 square feet or 7%. There would be no increase in seating at the pool. The terraces would be reoriented to more closely align with the topography.

**The Spa.**

The spa would be moved slightly away from wooded areas compared to its original location and 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 original plans and EIR Figure 3.0-10 showed an L-shaped interior pool, and Condition of Approval #83 says "The spa facility includes six hot tubs and several small pools." The large spa pool has been moved outside to the rear of the spa and reduced in size, next to two hot tubs. Additional hot tubs and cold plunge pools are located inside the spa.

### The Guest Cottages

The number of cottage units would be reduced from 19 to 17. The conceptual design for the western unit of cottages would be modified to limit grading on a steep slope and improve emergency vehicle access. More trees screening the cottages would be preserved. Two cottage units would be combined into one and relocated to preserve 7 large specimen coastal live oaks originally scheduled for removal. The locations of the cottages in the eastern unit area would be substantially similar to the conceptual design. These changes that would preserve more trees and reduce visibility. There would be a hot tub/spa added to existing terraces at 16 of the cottage units.

### Parking.

The parking layout would be reconfigured within the project, but still contains 102 parking spaces, as required by the conditions of approval. Thirty-six spaces would remain in the western portion of the project, with 28 of those spaces provided in-between the inn and the spa and 8 spaces closer to the spa. The eastern parking layout would still contain 66 spaces, but would be consolidated into one lot from the five smaller lots that were previously approved in the conceptual design. The overall amount of paving would be decreased by 27,000 square feet for the two lots and the overall number of trees removed for parking would be reduced.

### Support Building

The support building square footage for the proposed design would be separated from the main house. This operational support square footage, allowed for in the conditions of approvals, would be moved to a new building at the rear of the eastern parking lot. It would provide space for housekeeping, employee break area, and various operational support functions. The total project square footage is not increased by this relocation of the support functions. Removal of 13 trees would be required.

All proposed structures and improvements would still be located within the approved building envelope.

### **Site Characteristics:**

The Sonoma Country Inn project site is currently vacant with only the access roadway, Campagna Lane, plus the trailhead parking lot installed. The other existing roads, Brodiaea Road, Moon Watch Lane, Ten Oaks Way and Roads E, F and WT (E,F,WT not the official names, just the temporary labels on the subdivision map), are part of the internal roadway system for the other portion of the project. At the present time no areas of the project site are in active grape cultivation or in any other agricultural use (such as grazing). The Inn parcel includes an area on the valley floor where the leach fields 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 – Sonoma/Taylor/Mayacamas Mountains (LG-MTN), Exhibit G.

The portion of the parcel that is on the valley floor will remain undeveloped. 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 (Open Space District). The Open Space District also holds an easement over the entire 476± acre property controlling uses on all parts of the parcels outside the building envelopes approved in 2004.

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. There are many dead trees in this area as a result of the prolonged drought. A tree removal plan has been prepared for dead tree removal, thinning to encourage better growth for choice trees, and clearing for construction.

### **Surrounding Land Use and Zoning:**

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 - 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, Exhibit G) 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 planted in 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.

## **DISCUSSION OF ISSUES**

### **ISSUE #1: WATER USE – POOL EXPANSION**

The Appellant contends that the changes to the pools and hot tubs appear to use more water.

The main pool below the Inn is in a similar location to the conceptual design but the total main pool area has increased slightly by 101 square feet. The conceptual design consisted of 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 Sheet 5 of the BGK Summary for design drawings comparison and page 2 of the *Sonoma Country Inn: Water Use Information*, dated May 1, 2017, Adobe Associates, Inc. (Exhibit H).

The table below provides a pool and spa hot tubs comparison for the conceptual design and the proposed design. Information was taken from page 2 of the *Sonoma Country Inn: Water Use Information*, dated May 1, 2017, Adobe Associates, Inc. (Exhibit H). Also see Sheet 6 of the BGK Summary for design drawings comparison.

	Area – SF per each	Quantity	Total SF
<b>Pools &amp; Hot Tub 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 Tub per Proposed 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

Per the Adobe Associates' analysis, the annual evaporation for the pools and hot tubs per the conceptual design was 220,823 gallons/year and per the proposed design it would be 299,398 gallons/year. This is a difference of 78,875 gallons or 0.24 acre-foot per year.

#### **Staff Discussion:**

The EIR did not specifically estimate evaporation from the swimming pools and hot tubs in its summary of water demand for the project. Exhibit I to this report is an analysis by Adobe Associates, dated May 1, 2017. It compares water evaporation expected from the conceptual design to evaporation from the proposed design for all of the project pools and hot tubs/spas. It shows that the proposed design requires .24 acre feet more water than the conceptual design. Assuming that the EIR did not include the evaporative loss in its total water use estimate, there is an additional 0.92 acre feet more water used for the proposed design because of evaporative loss from all pools and hot tubs than was analyzed in the EIR. In another report, dated February 14, 2017 (Exhibit J), Adobe Associates also compared the overall water use for the approved project to the proposed design. Adobe's report determined that 0.9 acre feet per year estimated for on-site laundry in the conceptual design would not be needed because the laundry function would be moved off-site. This roughly compensates for the increased 0.92 acre feet of evaporation from the evaporative losses and the slight increase in square footage because of design changes to the pools and hot tubs. The project EIR estimated the total water use for the Inn, Spa and Restaurant at 16.3 acre feet per year. As revised, the project would require 16.32 acre feet per year, an insignificant increase.

In addition, Condition of Approval # 59 restricts total water use for the Inn, Spa and Restaurant to 19.4 acre feet annually and 16.32 acre feet is well below this amount. Even if on-site laundry were kept in the proposal, adding another 0.9 acre feet per year, the total would be 17.22 acre feet which is below 19.4 acre feet previously analyzed.



Therefore, staff does not recommend further analysis of water demand. For more information, see *Sonoma Country Inn: Water Use Information*, dated May 1, 2017 and *Sonoma Country Inn: Water Use Information*, dated February 14, 2017, both prepared by Adobe Associates, Inc. (Exhibits H and I, respectively).

**ISSUE #2: LIGHTING IMPACTS FROM ROOF TERRACE AND RECONFIGURED PARKING**

The Appellant states that the new roof garden will add to the overall nighttime lantern effect of the inn and the reconfigured parking spaces may result in impacts to adjacent wooded areas due to increased artificial night lighting caused by headlights of cars entering and exiting the parking spaces.

The skylights in the conceptual design for the main house would be removed to eliminate reflective rooftop glazing and minimize the night time lantern effect. The pitched slate roof would be replaced with a roof garden. To keep night time lighting in compliance with the conditions of approval, the proposed design would incorporate low, fully shielded and dark sky compliant lighting at the roof garden. See Sheets 3 and 4 of the BGK Summary for the main house design drawings comparison.

The total number of parking spaces would not change. The total spaces in the western parking location would remain 36 and the total spaces in the eastern parking location would remain 66. The reconfiguration of the western parking area would result in a deduction of nearly 10,000 square feet of paving and 47 fewer trees being removed. The reconfiguration of the eastern parking area would result in a deduction of nearly 17,000 square feet of paving and 45 fewer trees being removed. See Sheets 7 and 8 of the BGK Summary for western and eastern parking layout comparisons.

**Staff Discussion:**

For this review, whether the proposed changes create new or substantially more severe light pollution impacts than those studied in the EIR is analyzed.

Eric Johnson Associates Lighting Design prepared a photometric analysis for the redesigned roof terrace and courtyard areas in the main house. The photometric analysis shows that these areas would not cause a significant light impact to the surrounding area, the night sky and the view from the valley floor. The proposed project as a whole, including the roof garden, would be in full compliance with Conditions 101 and 102. The photometric analysis concludes that all light sources in the proposed design would quickly fade to a level of insignificance. For more information, see *Resort at Sonoma Country Inn Photometric Analysis* prepared by Eric Johnson Associates (Exhibit K).

While potential impacts due to the addition of outdoor hot tub/spas on 16 cottage terraces were not mentioned by Appellants, the potential impact was analyzed for the project. In a *Spa Lighting Design Comment* letter, dated May 11, 2017 (Exhibit L), Eric Johnson Associates concludes based on five factors that the spas would not negatively impact the project's overall light impact or the night sky glare effect. For more information, see Exhibit L.

WRA Ecological Consultants prepared an assessment of potential new light or glare impacts due to the reconfiguration of the parking and related tree removal. WRA concluded that the proposed design would not result in any potentially significant impacts to biological resources that have not already been addressed in the EIR. If a net increase in the illumination of adjacent wooded areas from artificial lighting should occur, it would not result in any significant impacts to biological resources. For more information, see letter to Flora Li, *Assessment of proposed parking adjustments, Resort at Sonoma Country Inn project, Kenwood, California*, dated March 23, 2017, prepared by WRA Environmental Consultants (Exhibit M). In addition, WRA prepared a Northern spotted owl assessment and concluded that the forest stands within and adjacent to the project area do not provide any typical habitat and Northern spotted owl presence was unlikely in the project area. See 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 (Exhibit N).

Therefore, staff does not recommend any further analysis or changes to the conditions.

**ISSUE #3: TRIP GENERATION IMPACTS FROM PARKING RECONFIGURATION**

The Appellants suggest that relocation of some parking closer to the main inn building would increase the number of customers for the inn/restaurant/spa because parking is more convenient or visible, requiring changes to trip generation calculations.

All of the changes in the proposed design are related to the siting of the specific uses. There would be no changes in uses and no change in the operating hours approved in 2004. In the proposed design, there would be no increase in the number of rooms or the seating capacity of the restaurant. A portion of the outdoor seating would be relocated to the roof garden, but the 50-seat total would remain the same. The trip generation rate is the same for outdoor or indoor dining. The guest occupancy and employee counts would also be unchanged. See the BGK Summary (Exhibit E).

The supply of 102 parking spaces would remain the same. There would be no new parking lots. The western and eastern parking areas would just be reconfigured. There is no evidence presented that relocating parking would increase the intensity of use on the site. The use is limited in scale by the use permit and conditions of approval. See Sheets 7 and 8 of the BGK Summary (Exhibit E).

**Staff Discussion:**

W-Trans analyzed this question and provided its *Review of Traffic Issues Relative to the Sonoma Country Inn Project*, dated May 25, 2017, (Exhibit O). The conclusion regarding the parking reconfiguration is that the primary effect of parking on trip generation would be reduction in trips if there was inadequate parking. Adding parking does not result in higher trip generation rates. In this case, W-Trans concluded that since there is no proposed change in the character of the uses for the project, which control the independent variables, trip generation would not be expected to change.

The number of parking spaces would remain the same at 102, slightly more than the 97 parking spaces estimated to be needed in the 2004 EIR. Parking supply is consistent with Condition of Approval 106 which requires a minimum of 102 parking spaces for the inn/restaurant /spa. For additional information, see *Review of Traffic Issues Relative to the Sonoma Country Inn Project*, dated May 25, 2017, prepared by W-Trans (Exhibit O).

**ISSUE #4: PARKING-RELATED TREE AND HABITAT IMPACTS**

Appellant contends that aggregation of parking into two new 66- and 36 -space parking lots will create tree removal and habitat impacts and questions whether the Open Space District was consulted on the new layouts.

The total number of parking spaces would be unchanged. Changes in parking lot layouts would be made to reduce tree removal, reduce circulation paving, and relocate parking in less-forested areas to limit the impact on the site. These changes are required by Conditions of Approval 97.1(a). The number of trees being removed for the western parking area would be reduced from 84 to 37. The number of trees being removed for the eastern parking area would be reduced from 99 to 54. See Sheets 7 and 8 of the BGK Summary for parking design drawing comparisons.

**Staff Discussion**

BGK Architects evaluated the concern and noted that there could be more light pollution from vehicles parking with headlights pointed outward, rather than head to head as in the previous design. However, they conclude that the greater possibility for headlight pollution is from vehicles circulating through the

site, not from parking. The proposed design would limit the distances cars travel through the site by placing internal circulation down a central spine and closer to the arrival areas. The use of valet parking would increase the efficiency of parking and reduce travel times. For more information, see email from Tom Spoja with BGK, to Flora Li with Tohigh, and Jason Yakich with WRA (Part of Exhibit M).

WRA responded to the issue of tree removal and automobile headlights illuminating adjacent wooded areas in Issue #2 above, finding no increased impact.

MacNair & Associates Consulting Arborists and Horticulturists have provided a summary of the tree protection procedures that will be implemented to protect trees designated for preservation and located near the future parking lots. For more information, see Memorandum to Flora Li from James MacNair regarding Parking Lot Tree Protection (Exhibit P).

The total number of parking spaces would be unchanged so there are no new parking lots with additional parking spaces. The revised layout for the western and eastern parking areas in the proposed design would reduce the removal of trees from 183 to 92 trees in those areas. An additional 13 trees would be removed for the support building near the eastern parking lot, resulting in 105 trees removed to construct the parking lots and support building. As discussed in Issue #9 below, the Open Space District has reviewed and approved the updated revised site plans and agrees that the proposed design is consistent with the applicant's contractual obligations under the Conservation Easement covering all portions of the property outside of the building envelopes.

#### **ISSUE #5: NEW SUPPORT BUILDING**

The Appellant claims that assessment of all environmental impacts associated with new support building at northeast edge of site, beyond the valet parking, is needed.

The support building square footage was originally located within the main inn building and included in project approval. This square footage would be relocated from the main inn to a separate structure at the northeast edge of the site next to the 67-space parking lot.

#### **Staff Discussion**

The new support building would be moved from square footage within the main inn building to a location next to the planned circulation path of the eastern parking lot. This would minimize any impervious coverage or tree removal for additional circulation routes. There would not be an increase in square footage. The square footage would just be relocated. See Sheet 11 of the BGK Summary for design drawing comparisons and additional information regarding the support building.

The new support building would require the removal of 13 trees but this location required the fewest amount of trees to be removed. In addition, this location is the most hidden since it is obscured from all sides by the surrounding trees and the eastern guest units. MacNair Landscape Architecture states in the Visual Impact Matrix on page P-2 of the Supplemental Visual Impact Analysis (Exhibit Q) that since the support building is located behind the back row of eastern units and is situated in a forested area, there is no visibility impact. Noise impacts are discussed under Issue #7 below.

#### **ISSUE #6: GUEST COTTAGE SITE CHANGES PLUS VISIBILITY AND GEOLOGIC IMPACTS**

The Appellant suggests that the relocation and associated tree removal increases visibility of the cottages as seen from Highway 12. The Appellant also suggested the possibility of slope stability impacts resulting from the cottage location changes.

The western and eastern cottages were relocated slightly, as shown in the BKG Summary, Exhibit E.

## Staff Discussion

The changes in the cottage locations are shown in the BKG Summary, Exhibit E, Sheets 9 and 10. The eastern unit site revisions would place the units closest to the pool about 30 feet downslope, lowering their overall height by about 10 feet. The easternmost unit would be shifted about 50 feet to the north, closer to the tree line. Two units would be combined into one, to increase space between buildings. The western unit site revisions would place four units upslope of where three had been located below the inn, to minimize grading in a steep area of the site and improve emergency vehicle access. Three upper units would be moved off a 35-50 foot ridge downslope to a similar area, reducing ridge heights of the units by about 12 feet. The western unit site changes would allow preservation of 7 large specimen coastal live oaks which would have been removed under the approved design.

Note that a stone paved area near the easternmost cottage was revised after DRC approval to place it entirely within the building envelope, to respond to a request from the Open Space District. See comments below regarding the Open Space District requested changes and when they were made.

MacNair Landscape Architecture's Supplemental Visual Impact Analysis documents that there would be no new visual impacts as a result of the modifications to the site plan evaluated in the 2004 EIR. Exhibit P-2 to that report, a Visual Impact Matrix, shows the site plan changes and the corresponding visual consequences.

Ten of the 21 structures would have reduced visual impacts. The remaining structures would have equal visual impact. For additional information, see Exhibit P-2, Visual Impact Matrix, the line of sight visual sections and the photo simulations within *The Resort at Sonoma Country Inn Supplemental Visual Impact Analysis*, prepared by MacNair Landscape Architecture (Exhibit Q).

Bauer Associates, Inc. Geotechnical Consultants prepared a supplemental geotechnical investigation reviewing the design changes in the proposed design which states that the level of subsurface exploration 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 project, and no additional subsurface exploration is required. For additional information, see *Addendum Geotechnical Consultation, Sonoma Country Inn, Kenwood, California*, prepared by Bauer Associates, Inc. Geotechnical Engineers (Exhibit R).

### **ISSUE #7: NOISE IMPACTS**

The Appellant suggests that potential noise impacts have been created by the reconfiguration of the east parking lot, the replacement of the pitched roof of the main house with an outdoor roof terrace, reconfiguration of the pool at the inn, and the addition of a new support building at the east parking lot. Noise impact issues are related to four main items where changes in design have occurred.

**Eastern Parking Lot:** The eastern parking lot reconfiguration includes the same number of spaces and would be located slightly farther away from the southern property line where the nearest residential receiver is located.

**Outdoor Roof Terrace:** The pitched roof would be replaced with an outdoor roof terrace. However, since the terrain slopes down towards the nearest adjacent receiver to the south, the exposure of the second and third floors to the southern property line would be similar.

**Inn Pool Reconfiguration:** Although the inn pool has been reconfigured, the overall seating would remain the same.

**New Support Building:** The equipment in the new support building has always been part of the project and would just be relocated. The acoustical mitigation to reduce noise levels to meet local requirements and

reduce them to a less than significant impact that was part of the original design would apply to the revised location inside the new support building.

### **Staff Discussion**

Charles M. Salter Associates, Inc. prepared a noise impact analysis for these four main items and concluded the following.

**Eastern Parking Lot:** Since the parking spaces flank the main drive aisle instead of smaller lots located off a main feeder road, this would likely decrease the speed of traffic through the lot as vehicles would need to be aware of cars pulling in and out of spaces. Parking lot noise levels would not be expected to increase as a result of the revised design and no new noise impact is anticipated.

**Outdoor Roof Terrace:** Since the exposure of the second and third floors to the southern property line would be similar, and the total number of outdoor seats remains the same, Salter does not anticipate any new noise impact would be created.

**Inn Pool Reconfiguration:** Since the overall seating would remain the same, Salter does not expect that the revised design would result in an increase in guests or associated noise generated at the pool and does not anticipate any new noise impacts would be created.

**New Support Building:** Noise mitigation as required by the conditions of approval would be incorporated for the new support building to reduce noise levels to a less than significant level. Salter does not anticipate that any new noise impacts would be created as a result of the new support building.

Salter also presented a response to the potential noise impacts from the outdoor hot tubs on the cottage terraces (Exhibit S). Since any mechanical equipment associated with the spas would be located inside the building and shielded from neighboring noise receivers, and since outdoor terrace areas at the cottages were part of the approved project design, no additional noise impacts are expected.

For additional information, see *Sonoma Country Inn – Kenwood, CA Noise Impact Analysis prepared by Charles M. Salter* (Exhibit T) and email from Alex Salter to Flora Li, dated May 18, 2017, regarding potential noise impacts from the outdoor spas (Exhibit S).

### **ISSUE #8:      EMPLOYEE PARKING**

The Appellant seems to suggest that a separate employee parking lot proposed as part of the winery portion of the larger project precludes design review approval of a parking layout that accounts for employee parking without the separate employee lot.

The number of parking spaces would remain the same at 102 spaces. The 102 parking spaces proposed for the inn/spa/restaurant exceed the project peak parking demand of 91 spaces for conditions between noon and 1 pm without a special event or a winery, including all employees of the inn/spa/restaurant, as indicated in Exhibit 5.2-40 in the 2004 EIR.

### **Staff Discussion**

The design review general development standards relate to parking layout, circulation, lighting, landscaping and surfaces. As evaluated in the EIR and applied to the project by Condition of Approval 106, the parking required for the inn/spa/restaurant is 102 spaces. According to the parking demand analysis at pages 5.2-68-71 of the EIR, the maximum parking demand for a peak period with all uses, including the winery and tasting room, without a special event would be 97 spaces. This includes guests, visitors and employees. There will be no special events until the winery and employee parking lot is constructed and no requirement that the separate employee lot be constructed at this time. The

proposed project as revised is consistent with the discussion of Impact 5.2-14, Parking Supply, in the 2004 EIR and Condition of Approval 106.

For additional information, see *Review of Traffic Issues Relative to the Sonoma Country Inn Project*, dated May 25, 2017, prepared by W-Trans (Exhibit O).

**ISSUE #9: SONOMA COUNTY AGRICULTURAL PRESERVATION AND OPEN SPACE DISTRICT ISSUES**

In an email from Monica Delmartini, Stewardship Planner at the Open Space District dated August 26, 2016 (Exhibit U), the Open Space District questioned a list of components of the revised project as initially presented. These issues were resolved in the revised plans submitted for the DRC.

After approval at the DRC meeting on October 19, 2016, the revised site plans were submitted to the District on March 23, 2017. The District expressed two concerns related to the location of uses slightly outside of the approved building envelope. In response to the two District concerns, further changes were made to the revised site plans. The stone paved area by the easternmost cottage in the east cottage area was relocated so it is entirely within the approved building envelope. The second revision was the relocation of a parking space in the western parking area so it is also entirely within the approved building envelope.

**Staff Discussion**

The Open Space District has determined that the updated revised site plans are consistent with the Applicant's contractual obligations under the Conservation Easement and has given its approval of the site plans, including the relocated stone paved area and relocated parking space. See letter from the District to Tohigh, dated April 13, 2017 (Exhibit V).

The proposed set of project drawings, dated March 21, 2017, includes these final two revisions made to address the District's concerns.

**ISSUE #10: SCOPE OF DESIGN REVIEW AND ENVIRONMENTAL ANALYSIS**

On this appeal, the Planning Commission considers design review using the same standards followed by the Design Review Committee (DRC). Generally, the purpose of design review as stated in County Code section 26-82-050 (b) is to consider the architecture and general appearance of buildings and grounds to ensure they are in keeping with the character of the neighborhood, are not detrimental to orderly and harmonious development and do not impair the desirability of investment or occupation in the neighborhood. The development standards specified in section 26.82.030 relate to orientation of building sites to maintain maximum natural topography and cover; building height, texture, color, roof characteristics and setback; vegetation and landscaping, screening, lighting, signage and parking layout and circulation. Streets are to be designed and located so as to maintain and preserve topography, cover, landmarks and trees; to necessitate minimum cut and fill; and to preserve and enhance views and vistas on and off-site.

While the scope of this review is limited to the design changes proposed based on the design review factors listed in the code, this Commission has discretionary authority in its evaluation of these elements. To the extent of that discretion, CEQA evaluation of the proposed changes is appropriate. The scope of this review and CEQA review does not include elements of the vested approved project other than the proposed design modifications.

In this case, in addition to the development standards, Conditions of Approval and EIR mitigation measures require that certain changes be made to the site plan proposed at the time of project approval in 2004. Condition #84 expressly says that the proposal statement and site plan will be modified by the Conditions and requires "conformance with" those plans as revised. Condition 97.1(a) expressly requires

that the Development Plan be revised, saying, “At a minimum, this shall include: “Adjust parking, roadway, building and leach field improvements for the inn/spa/restaurant to avoid additional tree resources...””) Specific Conditions require modification of the proposed development plan, such as Conditions #92 and 93, 95, 96 and 97 regarding protection of various natural resources on the site. Various mitigation measures adopted with the EIR expressly require revised site plans, building plans and grading plans. See e.g., Condition 99 and the mitigation measure made a part of that Condition. Discussions with the Open Space District resulted in removal of some project elements that were proposed as changes but found by the Open Space District to be incompatible with the Conservation Easement.

The BGK Summary (Exhibit E) also describes the major changes to the development plan and the project architect’s analysis of the net effect of those changes to reduce impacts.

Because of the appeal, this Commission considers the design modifications *de novo* (anew), but the scope of the review remains the same. The evaluation is whether the design and layout changes adequately satisfy the design review development standards, and in addition, whether they carry out direction in the Conditions of Approval and mitigation measures.

All proposed changes are evaluated for any related environmental consequences in technical reports provided as exhibits to this staff report. For the Commission’s information at this hearing, the changes and technical updates are also summarized in an EIR Addendum (Exhibit X).

### **Project Changes**

The proposed revisions are analyzed in more detail analysis in the foregoing sections and in the Addendum to the EIR. That analysis shows that there has not been a change in the scope of approved land uses. The inn as approved included public meeting spaces, as does the revised plan. As noted in Condition #84, the approved restaurant hours of operation are from 6:00 a.m. to midnight, seven days a week, open to the public for breakfast, lunch and dinner. No change has been made to the restaurant hours, seating capacity, or availability to the public. The number of guest rooms has not increased. The spa’s overall size, components, services offered and public availability have not changed in any significant way. The total number of parking spaces is the same.

All of the proposed development remains within the approved building envelope. Minor changes in location of the guest cottages and parking are supported by Condition 99, requiring the project to minimize visual impacts from Highway 12 and Condition 99c, to limit tree removal. Changes to the main inn façade and landscaping respond to Conditions 99a and 99d. The change to a flat roof from a pitched slate roof reduces the visual contrast between the inn/spa/restaurant with the immediately surrounding setting and thus reduces visibility from Highway 12 (Condition 99), provided that the lighting plan adequately shields any additional light sources on the roof top garden. The inn and cottages meet maximum height and elevation conditions. (Conditions 99b and 99d). Reconfiguration of swimming pools and hot tubs at the inn and spa and adding hot tubs to existing terraces at the guest cottages are minor design changes at most and do not change the use of those project elements. The relocated support building replaces square footage for that use previously at the main inn building and is screened from view by the eastern guest cottages and surrounding woodlands.

The project’s total on-site water use has not increased because of the revisions, and water supply remains adequate to serve the 16.3 acre feet required for the proposed design. This is less than the 19.4 acre feet set as the maximum groundwater use for the approved project in Condition of Approval #59.

With the proposed design, approximately 17% fewer trees will be removed for construction overall. Thirteen trees are newly proposed for removal at the relocated support building, but adjustments to the location of several guest cottages preserve more trees, and in the western cottage units, preserve 7 large specimen coastal live oaks that had been scheduled for removal. Specific tree removal locations are described throughout Exhibit E, BGK Summary.

Paving area for parking has been reduced overall by 27,000 square feet. Lighting, noise and biological consultants' reports show that there are no increased lighting, noise or habitat impacts from the changes.

Appellant's contention that relocation of some parking closer to the main inn building would increase the number of customers for the inn/restaurant/spa because parking is more convenient or visible is not supported by the updated traffic analysis. Also, a speculative increase in the number of customers who may use the approved project, even if it were to happen only because of the design changes, is not a change in the General Plan land use, zoning or approved and vested project uses.

### **New Information/Changed Circumstances.**

The Appellant also suggests 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 requires 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, even if qualifying new information or changed circumstances were to be shown, that new information would have to be relevant to the design changes, rather than the overall approved project.

So, for example, even if appellants were correct in the opinion that there is now in 2017 "an overconcentration of events," the proposed design changes do not involve, affect or allow any special events at the inn/restaurant/spa and therefore would not add to the cumulative number or concentration of special events. Special events were approved as part of the larger winery project located on a separate parcel with separate conditions related to that use, but the winery is not part of this design review application.

Increased Highway 12 traffic since 2004 is alleged new information and/or changed circumstances. To the extent the 2004 EIR analyzed levels of traffic projected for Highway 12 which exceeds current levels, that information was included in the EIR analysis. In addition, current traffic on Highway 12 and additional traffic projected through 2040 is further analyzed in the updated traffic study, and the consultant concludes that (a) use of existing current data and projected 2040 data shows less traffic than that projected in the EIR, not more; (b) the project's internal circulation and parking remain adequate; and (c) project trip generation will not change because of the design revisions.

Although not related to the design changes, additional trees have been identified for removal because they have become dead, diseased or in poor structural condition because of drought, disease or overcrowding. See supplemental memorandum prepared by James MacNair, MacNair and Associates, dated July 10, 2017, Exhibit W. More than two-thirds of these trees were smaller trees with trunk diameters less than 9 inches. The memorandum further assessed trees providing screening of the project site from Highway 12 and found those trees to be in moderate to good health with no significant structural defects and not substantially affected by drought. See discussion in the Addendum under Section 8.a. Visual and Aesthetic Quality, View Impacts. There are enough healthy trees to provide adequate screening of the proposed design from public viewpoints, despite removal of damaged or unhealthy trees.

### **STAFF RECOMMENDATION**

Conduct a public hearing on the appeal and uphold the Design Review Committee's approval of final Design Review for a previously approved inn, spa, and restaurant on a 51.9 acre parcel, located at 900, 1200, 1202, and 1204 Campagna Lane, Kenwood, as modified by two minor changes made after approval per request of the Open Space District. These two revisions are the relocation of the paved area



by the easternmost cottage in the east cottage area and the relocation of a parking space in the western parking area so both are within the previously approved building envelope.

### **FINDINGS FOR RECOMMENDED ACTION**

All proposed changes to the development plan have been evaluated for any related environmental consequences in this report, in the technical reports provided as exhibits to this staff report and in the Addendum. The evidence provided supports a finding that the design changes proposed do not cause new significant environmental effects or substantial increases in severity of an environmental effect identified in the EIR. There are no substantial changes in the circumstances affecting the design review for the project which would cause increased environmental impacts, such as increased traffic, overconcentration of events, drought, or cumulative development; 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 or new feasible mitigation measures or alternatives different from those in the EIR which would substantially reduce effects on the environment. The EIR and the Addendum have been considered by this Commission.

### **LIST OF ATTACHMENTS**

- EXHIBIT A: Statement of Overriding Considerations (Exhibit C of Resolution No. 04-1037)
- EXHIBIT B: Conditions of Approval for the Inn, Spa and Restaurant (Exhibit E of Resolution No. 04-1037)
- EXHIBIT C: Proposal Statement for Description of Proposed Design Changes for Design Review Committee
- EXHIBIT D: Appeal Letter Received from Valley of the Moon Alliance, dated October 31, 2016
- EXHIBIT E: *Summary of Reduced Impacts Due to Revisions to the Conceptual Design*, prepared by Backen Gillam Kroeger Architects
- EXHIBIT F: Plans (full-size) which include:
  - Site Plans
  - Elevations
  - Colors and Materials
  - Lighting Plan and Cut Sheets
  - Parking
  - Landscaping
  - Inventory from the Tree Removal and Retention Plan
- EXHIBIT G: Local Guidelines – Mountain
- EXHIBIT H: *Sonoma Country Inn: Water Use Information*, dated May 1, 2017, prepared by Adobe Associates, Inc.
- EXHIBIT I: *Sonoma Country Inn: Water Use Information*, dated February 14, 2017, prepared by Adobe Associates, Inc.
- EXHIBIT J: Significant Impacts That Could Not Be Fully Mitigated (Exhibit B of Resolution No. 04-1037)
- EXHIBIT K: *Resort at Sonoma Country Inn Photometric Analysis*, dated 02/14/2017, prepared by Eric Johnson Associates
- EXHIBIT L: *Sonoma Country Inn, Spa Lighting Design Comment*, dated May 11, 2017, prepared by Eric Johnson Associates.
- EXHIBIT M: *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, to Flora Li with Tohigh, and Jason Yakich with WRA, dated March 22, 2017

- EXHIBIT N: 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
- EXHIBIT O: *Review of Traffic Issues Relative to the Sonoma Country Inn Project*, dated May 25, 2017, prepared by W-Trans
- EXHIBIT P: Memorandum to Flora Li from James MacNair regarding Parking Lot Tree Protection, dated March 16, 2017
- EXHIBIT Q: *The Resort at Sonoma Country Inn Supplemental Visual Impact Analysis*, dated February 3, 2017, prepared by MacNair Landscape Architecture
- EXHIBIT R: *Addendum Geotechnical Consultation, Sonoma Country Inn, Kenwood, California*, dated January 30, 2017, prepared by Bauer Associates, Inc. Geotechnical Engineers
- EXHIBIT S: Email from Alex Salter to Flora Li, dated May 18, 2017, regarding potential noise impacts from the outdoor spas
- EXHIBIT T: *Sonoma Country Inn – Kenwood, CA Noise Impact Analysis*, dated February 2, 2017, prepared by Charles M. Salter
- EXHIBIT U: Comments Received from Sonoma County Agricultural Preservation and Open Space District, dated August 26, 2016
- EXHIBIT V: Letter from the Sonoma County Agricultural Preservation and Open Space District to Tohigh, dated April 13, 2017
- EXHIBIT W: Memorandum to Flora Li from James MacNair regarding PRMD Tree Removal Response, dated July 10, 2017
- EXHIBIT X: Addendum to the Sonoma Country Inn Environmental Impact Report, certified in 2004, prepared by Nichols Berman Environmental Planning
-