

FINAL
Environmental Impact Report
North Entry Area Plan
City of Healdsburg, Sonoma County, California
State Clearinghouse Number 2018062041

Prepared for:



City of Healdsburg
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Healdsburg, CA 65448
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Date: April 9, 2019

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Table of Contents

Chapter 1: Introduction	1-1
Section 1.1 - Purpose of This Responses to Comments Document.....	1-1
Section 1.2 - Environmental Review Process.....	1-1
Section 1.3 - Document Organization.....	1-2
Chapter 2: Commenters on the Draft EIR	2-1
Section 2.1 - Public Agency Commenters.....	2-1
Section 2.2 - Organization Commenters.....	2-1
Section 2.3 - Individual Person Commenters	2-2
Chapter 3: Comment Letters and Responses to Comments	3-1
Chapter 4: Draft EIR Revisions	4-1
Section 4.1—Staff-initiated Draft EIR Text Changes	4-1
Section 4.2—RTC-driven Text Changes.....	4-10
Appendix A: Initial City Email Responses to Comments on DEIR	

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CHAPTER 1: INTRODUCTION

Section 1.1 - Purpose of This Responses to Comments Document

The purpose of this Responses to Comments (RTC) document is to present comments submitted on the Draft Environmental Impact Report (EIR) for the proposed North Entry Area Plan, to respond in writing to comments on physical environmental issues, and to revise the Draft EIR as necessary to provide clarity.

Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21091 (d)(2)(A) and (B), the City has considered the comments received, evaluated the issues raised, and herein provides written responses that fully address the comments on physical environmental issues raised by the commenters. In accordance with CEQA, the responses to comments focus on addressing physical environmental issues associated with the proposed North Entry Area Plan rather than social or financial implications of the plan. Where appropriate, this RTC document also identifies EIR text changes made in response to comments.

No significant new information that warrants recirculation of the Draft EIR is identified in the comments received on the Draft EIR. The comments do not identify, nor do the revisions to the Draft EIR result in, any new significant environmental impacts, or substantial increase in the severity of previously identified environmental impacts, or feasible project alternatives or mitigation measures that are considerably different from those analyzed in the Draft EIR that would clearly lessen the significant environmental impacts of the plan.

The Draft EIR and this RTC document constitute the Final Environmental Impact Report (Final EIR) for the proposed North Entry Area Plan, in fulfillment of CEQA requirements and consistent with CEQA Guidelines Section 15132. The Final EIR has been prepared in compliance with the CEQA Guidelines and the City of Healdsburg CEQA Implementation Procedures. This EIR is an informational document for use by governmental agencies and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the project and identifying possible ways of reducing or avoiding the potentially significant impacts. The document will be reviewed by the City Planning Commission and the City Council prior to their decision to approve, disapprove, or modify the plan. If the City Council approves the proposed plan, they would be required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP) to ensure that mitigation measures identified in the Final EIR are implemented.

Section 1.2 - Environmental Review Process

1.2.1 - EIR Public Scoping Period and EIR Public Scoping Meeting

In accordance with Sections 15063 and 15082 of the CEQA Guidelines, the City of Healdsburg, as lead agency, sent the EIR Notice of Preparation (NOP) to responsible and trustee agencies, and interested entities and individuals on June 21, 2018, thus beginning the formal CEQA scoping process. The purpose of the scoping process is to allow the public and government agencies to comment on the issues and provide input on the scope of the EIR. The EIR NOP mailing list included

federal, State, and local agencies, regional and local interest groups, and property owners within 300 feet of the plan area. The scoping period began on June 21, 2018, and ended on July 20, 2018, representing the statutory 30-day public review period. The EIR NOP is contained in Draft EIR Appendix A.

Pursuant to Section 15083 of the CEQA Guidelines, the City of Healdsburg held a public scoping meeting on June 28, 2018, starting at 6:00 p.m. at 401 Grove Street, Healdsburg, CA 95448. Attendees were given an opportunity to provide comments and express concerns about the potential effects of the plan. No individuals provided verbal comments on the content of the EIR at the scoping meeting; however, environmental concerns were raised in comment letters and during the scoping period. Draft EIR Appendix A contains a copy of the one written comment letter that was received in response to the NOP.

1.2.1 - Draft EIR Public Comment Period and Draft EIR Public Hearing

Upon completion of the Draft EIR, the City of Healdsburg filed a Notice of Completion (NOC) with the State Office of Planning and Research to begin the public review period (Public Resources Code, Section 21161). Concurrent with the NOC, the Draft EIR was distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as all parties requesting a copy of the Draft EIR in accordance with Public Resources Code 21092(b)(3). During the public review period, the Draft EIR, including the technical appendices, was available for review at the City of Healdsburg offices located at 401 Grove Street, Healdsburg, CA 95448 and on the City's website. Agencies, organizations, and interested parties had the opportunity to comment on the Draft EIR during the 45-day public review period from November 30, 2018 through January 14, 2019.

The City of Healdsburg Planning Commission held a public hearing on the Draft EIR on December 11, 2018, starting at 6:00 p.m. at City Council Chambers located at 401 Grove Street, Healdsburg, CA 95448. Attendees were given an opportunity to provide comments about the Draft EIR. Four individuals (one member of the public and three commissioners) provided verbal comments on the Draft EIR during the public meeting. In addition, fifteen written comment letters (hardcopy and email) were received on the Draft EIR; these include letters from five agencies, two organizations, and two individuals. Appendix A contains a copy of the Draft EIR public meeting minutes, and Appendix B contains the fifteen written comment letters that were received in response to the Draft EIR.

Section 1.3 - Document Organization

This RTC document consists of the following chapters:

- **Chapter 1: Introduction**
- **Chapter 2: Commenters on the Draft EIR**
- **Chapter 3: Comment Letters and Responses to Comments**
- **Chapter 4: Draft EIR Revisions**
- **Appendices**
 - Appendix A: Initial City Email Responses to Comments on the Draft EIR

CHAPTER 2: COMMENTERS ON THE DRAFT EIR

Public agencies, non-governmental organizations, and individual persons submitted written comments (letters and emails) on the North Entry Area Plan Draft EIR during the Draft EIR public comment period, which ran from November 30, 2018 to January 14, 2019. In addition, the Planning Commission held a public hearing on the Draft EIR on December 11, 2018, and individual persons and Commissioners made oral comments at that hearing. Sections 2.1 through 2.3 and corresponding Tables 2-1 through 2-3 list the commenters’ names, along with corresponding commenter codes used in Chapter 3, Comments and Responses, to denote each set of comments, the comment format, and the comment date.

Section 2.1 - Public Agency Commenters

Six comment letters on the Draft EIR were received from State, regional, and county agencies. Table 2-1 lists the public agency comment letters and corresponding commenter details.

Table 2-1: Public Agencies that Provided Comments on the Draft EIR

Comment Letter Code	Name of Agency (name, title of author)	Comment Format	Comment Date	Responses to Comments Topic
CDTSC-1	California Department of Toxic Substances Control (Isabella Roman, Environmental Scientist)	email	12/21/18	HAZ
CDTSC-2	California Department of Toxic Substances Control (Isabella Roman, Environmental Scientist)	email	12/27/18	HAZ
CDOT	California Department of Transportation (Patricia Maurice, District Branch Chief)	letter	1/14/19	TRANS
SMART	Sonoma Marin Area Rail Transit (Elizabeth Payan, Assistant Planner)	letter	1/14/19	TRANS
SCCP	Sonoma County Comprehensive Planning (Eric Gage, Planner III)	email	12/24/18	TRANS
SCPRM	Sonoma County Permit and Resources Management Department (Tennis Wick, Director)	letter	1/3/19	LAND, TRANS

Section 2.2 - Organization Commenters

Two comment letters on the Draft EIR were received from regional and local organizations. Table 2-2 lists the organization comment letters and corresponding commenter details.

Table 2-2: Organizations that Provided Comments on the Draft EIR

Comment Letter Code	Name of Organization (name, title of author)	Comment Format	Comment Date	Responses to Comments Topic
DCRBPI	Dry Creek Rancheria Band of Pomo Indians (Reg Elgin)	letter	12/11/18	CUL
CRW	California River Watch (Jerry Bernhaut)	letter	1/14/19	GHG

Section 2.3 - Individual Person Commenters

Three comment letters on the Draft EIR were received from individual persons. In addition, one oral comment on the Draft EIR was received during the Draft EIR public hearing from an individual person. Additional oral comments on the Draft EIR were received during the Draft EIR public hearing from three City planning commissioners. Table 2-3 lists the individual person comment letters/oral comments and corresponding commenter details. For individual commenters that provided oral comments at the Draft EIR Planning Commission (PC) Hearing, note that the corresponding comment letter code is PC.

Table 2-3: Individual Persons who Provided Comments on the Draft EIR

Comment Letter Code	Name of Individual Person	Comment Format	Comment Date	Responses to Comments Topic
Campbell	Christine Campbell	email	12/3/18	NOI
Grassi-1	Ron Grassi	email	12/2/18	POP, TRANS
Grassi-2	Ron Grassi	email	12/12/18	GEN
PC	Irene Kiff	hearing	12/11/18	TRANS
PC	Commissioner Eddinger	hearing	12/11/18	TRANS
PC	Commissioner Civian	hearing	12/11/18	TRANS
PC	Commissioner Luks	hearing	12/11/18	TRANS, POP, GEN

CHAPTER 3: COMMENT LETTERS AND RESPONSES TO COMMENTS

This chapter is organized by comment letters received and contains both bracketed/coded comment letters and corresponding responses to comments related to contents of the Draft EIR. Comment letters and corresponding responses to comments are provided in the following order, which also reflects the order of commenters shown in Chapter 2. The comment letters in this chapter are coded with the codes shown in parentheses after each of the following comment letters.

Author **Author Code**

State Agencies

California Department of Toxic Substances Control Letter 1..... CDTSC-1
California Department of Toxic Substances Control Letter 2..... CDTSC-2
California Department of Transportation CDOT

Local Agencies

Sonoma Marin Area Rail Transit SMART
Sonoma County Comprehensive Planning..... SCCP
Sonoma County Permit and Resources Management SCPRM

Organizations

Dry Creek Rancheria Band of Pomo Indians DCRBPI
California River Watch CRW

Individuals

Christine Campbell CAMPBELL
Ron Grassi Letter 1 GRASSI-1
Ron Grassi Letter 2..... GRASSI-2

Planning Commission Meeting

City of Healdsburg Planning Commission Meeting Minutes PC

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From: Roman, Isabella@DTSC <Isabella.Roman@dtsc.ca.gov>
Sent: Friday, December 21, 2018 10:45 AM
To: Maya DeRosa <mderosa@ci.healdsburg.ca.us>
Subject: North Entry Area Plan Draft Environmental Impact Report

Hello,

I am representing a responsible agency reviewing the Draft Environmental Impact Report for the project referenced above.

I'm writing to inquire if a Phase I Environmental Site Assessment and/or any other environmental sampling has previously been conducted for the project area? If so, I would like a copy of the documentation. Past land uses could have resulted in hazardous materials releases within the project area that should be investigated prior to the proposed development project for public health protection. The proposed plan is located on a site that was previously used as a lumber mill. Lumber yards generally have contamination with wood preservatives and other semi-volatiles, and it isn't uncommon for these sites to have contamination of heavier petroleum hydrocarbons, metals and volatile organics. According to the DEIR the site has been remediated. I would like to see documentation regarding the cleanup activities. I understand that some of the future uses of the sites include family and senior housing. Because the future site is intended to be used for residential purposes, it is necessary to evaluate the current levels post-remediation to prevent potential future exposure to residents.

1

Please advise.

Thanks,

Isabella Roman
Environmental Scientist
Site Mitigation and Restoration Program
Department of Toxic Substances Control
700 Heinz Avenue Suite 200
Berkeley, CA 94710
(510)-540-3879

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State Agencies

California Department of Toxic Substances Control Letter 1 (CDTSC-1)

Response to Comment CDTSC-1-1

The commenter inquires as to the whether a Phase I Environmental Site Assessment (ESA) or other environmental sampling has been conducted for the plan area. The environmental remediation of the former RJW Lumber Company property within the plan area was performed under the oversight of the North Coast Regional Water Quality Control Board (NCRWQCB) in the early- to mid-1990's with a Closure Letter issued on April 8, 1996. In addition, a Phase 1 (ESA was prepared for the plan area in 2016, and on December the City forwarded the 2016 Phase I ESA to the commenter (per the commenter's request). That 2016 Phase I ESA provides the following summary of reports and remediation activities that have occurred within the plan area:

- Phase I ESA (Hallenbeck & Associates, March 1990)
- Phase II ESA (Hallenbeck & Associates, June 1990)
- Hydrologic Investigation (Hallenbeck & Associates, February 1991)
- Soil Remediation and Groundwater Assessment (LOK Environmental, February 1993)
- Disposal of Stockpiled Soils (AIG Consultants, September 1994)

Additional clean-up activities were performed from April through August 2004 under Work Plans submitted to NCRWQCB prior to the demolition/removal of structures and regrading of the former lumber mill property. These reports were prepared by George Goobanoff Associates (GGA) and include the following:

- Work Plan for Oil Separator Removal (GGA, April 2004)
- Work Plan for Structural Demolition and Site Cleanup (GGA, April 2004)
- Work Plan for Removal of Scale and Scale Shack Foundation (GGA, April 2004)
- Work Plan for Former Log Pond Excavation (GGA, April 2004)
- Quaker Hill Site Remediation Report (GGA, December 2004)

The Draft EIR Appendix A (Initial Study) Section 2.8 used an environmental baseline of June 21, 2018, when the EIR Notice of Preparation (NOP) was issued. At the time of the EIR NOP, the plan area had already been remediated (as summarized above) and subsequently graded for redevelopment. The majority of the plan area is covered with engineered fill that was placed during remedial grading operations in 2004 within the plan area. As such, Draft EIR Appendix A (Initial Study) Section 2.8 (b) concludes that, with implementation of Mitigation Measure HAZ-1, the proposed plan would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Mitigation Measure HAZ-1 requires that a construction asbestos dust mitigation plan be prepared and submitted for approval by BAAQMD.

Furthermore, Draft EIR Appendix A (Initial Study) Section 2.8 (d) states that the plan area is included in the State Water Resources Control Board GeoTracker database as a cleanup site. The GeoTracker database indicates cleanup activities were completed and the case file closed in April 1996. All other

sites listed in the database within one mile of the plan area indicate cleanup or remedial activities were completed and cases files have been closed.

Finally, Draft EIR Appendix A (Initial Study) Section 2.8 (d) states that the plan area nor any site within one mile of the plan area is not listed on the Department of Toxic Substance Control (DTSC) EnviroStor database that lists hazardous sites throughout California. Therefore, Draft EIR Appendix A (Initial Study) Section 2.8 (d) concludes that impacts from a known hazard that could potentially create a significant hazard to the public or the environment would be less than significant.

The City also provided the commenter with the April 8, 1996 Closure Letter, April 2004 Work Plans, and December 2004 Site Remediation Report confirming the cleanup activities as the commenter requested.

From: Roman, Isabella@DTSC [mailto:Isabella.Roman@dtsc.ca.gov]
Sent: Thursday, December 27, 2018 8:23 AM
To: Linda Ruffing <linda@nccplanning.com>
Subject: RE: North Entry Area Plan Draft Environmental Impact Report

Good morning,

Thank you for the additional information. DTSC has no further comments at this time.

1

Sincerely,

Isabella Roman
Environmental Scientist
Site Mitigation and Restoration Program
Department of Toxic Substances Control
700 Heinz Avenue Suite 200
Berkeley, CA 94710
(510)-540-3879

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California Department of Toxic Substances Control Letter 2 (CDTSC-2)

Response to Comment CDTSC-2-1

The commenter confirms the City's compliance with its December 21, 2018, request for documentation and states that CDTSC has no further comments related to environmental sampling within the plan area. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of the physical environmental impacts presented in the Draft EIR.

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DEPARTMENT OF TRANSPORTATION

DISTRICT 4
 P.O. BOX 23660
 OAKLAND, CA 94623-0660
 PHONE (510) 286-5528
 FAX (510) 286-5559
 TTY 711
 www.dot.ca.gov



*Making Conservation
 a California Way of Life.*

CDOT
 PAGE 1 OF 5

January 14, 2019

Ms. Maya DeRosa
 Director of Planning & Building Department
 City of Healdsburg
 Planning & Building Department
 401 Grove Street
 Healdsburg, CA 95448

SCH# 2018062041
 04-SON-2018-00351
 SON – 101 – 37.528
 GTS ID 11213

North Entry Area Plan – Draft Environmental Impact Report (DEIR)

Dear Ms. DeRosa:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach in evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR. Additional comments may be forthcoming pending final review.

Project Understanding

The North Entry Area Plan (Plan) would establish specific guiding principles and a design framework for development of the Comstock property, as an amendment of the Healdsburg 2030 General Plan Land Use Element. The Comstock property is designated Mixed-Use in the Healdsburg 2030 General Plan and Mixed-Use zoning district in the Healdsburg Municipal Code. The Plan would permit a mix of land uses on the property's 18 developable acres that is consistent with the maximum build-out of 290 residential units and/or 200,000 gross square feet (gsf) of Retail/Services/Restaurant/Lodging space. An average of 1,500 gsf is assumed for the proposed residential units to account for a range of unit sizes. Thus, total planned building area of up to 435,000 gsf of residential and 200,000 gsf of nonresidential would constitute a total anticipated building area of 635,000 gsf. The Plan would allow for approximately 12 acres of open and undeveloped land within the site. City development standards would allow buildings in the Plan area up to a maximum height of 50 feet. The Plan would encourage stepping of heights, from lower building heights along Healdsburg Avenue to taller buildings toward the hillside portions of the Plan area.

1

Ms. Maya DeRosa, Director of Planning & Building Department
City of Healdsburg
January 14, 2019
Page 2

The Plan area is bounded by the city limit of Healdsburg to the north, the center line of the Healdsburg Avenue right-of-way (ROW) to the east, Simi Winery to the south, and U.S. 101 to the west. The Plan area contains 32.17 acres of privately owned land including three contiguous lots, a portion of the North Coast Railroad Authority (NCRA) ROW, private- and State-owned landscaped parcels between the NCRA ROW and Healdsburg Avenue, and a portion of Healdsburg Avenue. Regional access to the site is provided approximately 1.3 miles north of the site at the US 101/ Lytton Springs Road interchange and approximately 1.6 miles south of the site at the US 101/ Dry Creek Road interchange.

1
CONT.

Vehicle Trip Reduction

In Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, this project falls under **Place Type 5 Rural and Agricultural Lands – Rural Towns**, which includes settlement patterns with widely-spaced towns separated by farms, vineyards, orchard, or grazing lands, which can significantly affect land uses, character and mobility needs. This place type has a mix of housing, services and public institutions in compact form to serve surrounding rural areas. Given this Place Type and intensification of use, which typically leads to high levels of VMT and corresponding low levels of active transportation, we encourage the City to establish Travel Demand Management (TDM) policies in the Circulation Element of the North Entry Area Plan and Transportation Management Association (TMA) in partnership with other developments in the area to pursue aggressive trip reduction targets with Lead Agency monitoring and enforcement. The TDM program should include the elements described below to promote smart mobility and reduce regional VMT and traffic impacts to the STN.

2

- Commuter subsidy for transit, carpool, and vanpool for employees and residents on an ongoing basis;
- Ten percent vehicle parking reduction;
- Electric vehicle (EV) charging stations and designated parking spaces for EVs and clean fuel vehicles;
- Carpooling incentives and dedicated parking spaces for carpooling employees;
- Transit and trip planning resources;
- Carpool and vanpool ride-matching support;
- Transportation and commute information kiosk;
- Nearby walkable amenities;
- Kick-off commuter event at full occupancy;
- Employee transportation coordinator;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- On-site showers and lockers for employees;
- Emergency ride home program;

Ms. Maya DeRosa, Director of Planning & Building Department
City of Healdsburg
January 14, 2019
Page 3

- Bicycle route mapping resources and bicycle parking incentives; and
- Decrease headway times and improve way-finding on bus lines by working with Sonoma County Transit to provide a better connection between the project, nearby transit stations and the planned Sonoma-Marín Area Rail Transit station.

For additional TDM options, please refer to Chapter 8 of the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference, regarding TDM at the local planning level*. The reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

For information about parking ratios, see the MTC report, *Reforming Parking Policies to Support Smart Growth* or visit the MTC parking webpage: http://www.mtc.ca.gov/planning/smart_growth/parking.

2
CONT

Operations Analysis

The Lead Agency shall be responsible for the construction costs and improvements at the US 101/ Dry Creek Road interchange and US 101/ Lytton Springs Road, if the requirements for the installation of traffic signal warrants is met.

3

Post Senate Bill 743, Vehicle Mile Traveled is the new metric of analyzing transportation impacts on the STN; accordingly, please delete the third paragraph on page 3.2-14. Please clarify the following:

4

- Why were the US 101 northbound and southbound ramps at Lytton Springs Road not included in the Cumulative scenario (page 3.2-5)?
- Identify other proposed and/or existing development within the project study area which could have a potential alternative access to and from US 101, hence having potential impact on STN.
- Does the existing queue length reflected on page 3.2-29 of the DEIR accurately reflect the existing queue length from field observation, especially at the US 101 northbound and southbound off-ramps at Dry Creek Boulevard?
- Please submit the queue length summary for the Cumulative section, as well as supporting documentation and methodology. All mitigation involving modifications to the ramp terminal intersection controls or any facilities within the State right of way must be coordinated in advance with Caltrans for review and approval.

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Ms. Maya DeRosa, Director of Planning & Building Department
City of Healdsburg
January 14, 2019
Page 4

Multimodal Planning

The project should be conditioned to implement Mitigation Measure TRANS-5, a proportional share allocation towards widening Dry Creek Road to accommodate a westbound left-turn lane the entire length between the northbound and southbound U.S. 101 ramps. This improvement will accommodate a proposed Class II bike lane, as identified in the Caltrans District 4 Bicycle Plan (2018).

9

In addition, the project should be conditioned to construct the proposed Class I multi-use path and bus stops, including shelters, etc. along the project frontage as well as provide connection to recently completed Class II bike lanes on Healdsburg Avenue. The fair share information should also be presented in the Mitigation Monitoring and Reporting Plan of the Final Environmental Impact Report (FEIR). Required improvements should be completed prior to the issuance of the Certificate of Occupancy.

10

The City should estimate the cost of needed improvements, expansion, and maintenance for the Plan area, as well as identify viable sources of funding, correlated with the pace of improvements, and a scheduled plan for implementation along with the FEIR.

11

Encroachment Permit

Please be advised that any sign or work within Caltrans ROW will require an encroachment permit prior to construction. To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits>.

12

Lead Agency

As the Lead Agency, the City of Healdsburg is responsible for all project mitigation, including any needed improvements to the STN. The project's financing, scheduling, implementation responsibilities and monitoring should be fully discussed for all proposed mitigation measures.

13

Ms. Maya DeRosa, Director of Planning & Building Department
City of Healdsburg
January 14, 2019
Page 5

Should you have any questions regarding this letter, please contact Stephen Conteh at (510) 286-5534 or stephen.conteh@dot.ca.gov.

13
CONT

Sincerely,



for PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

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California Department of Transportation (CDOT)

Response to Comment CDOT-1

The commenter states the goal of reducing vehicle miles traveled by increasing transit, bicycle, and pedestrian travel by 2020. The commenter also summarizes the proposed plan description, including in terms of the local roadway network. As part of the summary, the commenter states that the eastern plan area boundary is the centerline of Healdsburg Avenue. However, as shown on Draft EIR Project Description Exhibit 2.2 (Plan Area Boundary) on page 2-5, the eastern plan area boundary is actually slightly east of Healdsburg Avenue and, therefore, includes the entirety of the Healdsburg Avenue right-of-way. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of the physical environmental impacts presented in the Draft EIR.

Response to Comment CDOT-2

The commenter encourages the City to establish travel demand management (TDM) policies as part of the proposed plan to pursue trip reduction targets. Though a specific project has not been proposed for the plan area, to ensure that its traffic impacts are minimized, it would be desirable to have TDM measures included as part of the proposed plan. Such TDM measures would be dependent upon the specific land uses included in the future projects, but many of the TDM measures suggested in by the commenter would be appropriate for a mixed-use development such as is anticipated. The following changes to text on Draft EIR page 3.2-25 are made in response to this comment:

Implementation of MM TRANS-1b, which requires restriping and phasing modifications to the northbound approach at Dry Creek Road/Grove Street, would reduce the operational impact of plan-related traffic at that intersection to less than significant with mitigation. As discussed under the response to Comment CDOT-8, MM TRANS-1b is modified in the Final EIR to indicate that the left-turn lane should have a length of at least 275 feet.

Implementation of MM TRANS-1c, which requires implementation of Transportation Demand Management (TDM) Plans for individual developments within the plan area, would reduce the overall volume of traffic generated by these developments and thereby their individual impacts on traffic operation.

Level of Significance Before Mitigation

Potentially significant

Mitigation Measures

MM TRANS-1a To address anticipated deficient roadway operations, the City has planned for roadway improvements to Dry Creek Road/U.S. 101 South Ramps (study intersection 1) that include signalization. New development within the plan area shall be required to contribute a proportional share allocation towards the cost of installation of a traffic signal at Dry Creek Road/U.S. 101 South.

MM TRANS-1b New development within the plan area shall be required to improve ~~contribute a proportional share allocation towards the cost of improvements~~

to the northbound approach to Dry Creek Road/Grove Street (study intersection 3). The approach shall be restriped to include a separate left-turn lane with a length of at least 275 feet, and the signal modified to provide protected left-turn phasing, with the existing right-turn lane converted to use for through/right-turn movements.

MM TRANS-1c New developments within the plan area shall be required to prepare and implement a Transportation Demand Management (TDM) Plan to minimize traffic as much as is reasonably feasible. Such Plans may include measures such as ride-sharing, transit passes, unbundled parking, directing traffic to the Lytton Springs Road interchange, guaranteed rides home, and other impact-reducing measures and shall be submitted to and approved by the City as part of any individual development approvals.

Level of Significance After Mitigation

Significant and Unavoidable with Mitigation

Response to Comment CDOT-3

The commenter states that the City would be responsible for construction costs and improvements at the U.S. 101/Dry Creek Road and U.S. 101/Lytton Springs Road interchanges. The City of Healdsburg is currently in the implementation phase of minor improvements (four-way stop signs) at the U.S. 101 South Ramps/Dry Creek Road intersection that will achieve acceptable operation in the short term and has identified in its General Plan the long-term need for signalization of both ramp intersections at this interchange. Development projects in Healdsburg are conditioned to pay into a fund for this future signalization project. Although the City has recently released a Request for Proposals (RFP) to enter a contract to prepare the Project Study Report (PSR) that is the first step toward implementation of improvements to the interchange, since the timing for implementation of this signalization project is not yet known, the DEIR considers the effect of plan-related traffic at the U.S. 101 South/Dry Creek Road intersection to be a significant and unavoidable adverse impact.

Although the Lytton Springs interchange was not included in the study area for this analysis, no improvements have been identified for the Lytton Springs Road interchange with U.S. 101 by the County of Sonoma or the California Department of Transportation (CDOT) to which the project could be expected to contribute.

Response to Comment CDOT-4

The commenter states that vehicles miles traveled (VMT) is the new metric for analyzing transportation impacts. As noted on page 3.2-17 of the DEIR, which was circulated before OPR adopted new CEQA guidelines on VMT, “[I]n the OPR guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The current deadline for adopting policies to implement SB 743 is January 2020; the change to VMT is anticipated to be formally adopted as part of updates to the CEQA guidelines in 2018.”

The application of CDOT’s level of service standard was stated as understood based on coordination with CDOT staff, and the first sentence of this paragraph comes from the guidelines for traffic studies published by CDOT. However, as the text ultimately does not affect the findings or resulting recommendations, a portion of it can be stricken, as indicated below. The following changes to text on Draft EIR page 3.2-14 are made in response to this comment:

~~Pursuant to agency standards, Caltrans strives to maintain operation at the transition from LOS C to LOS D, which translates to an allowable delay of approximately 25 seconds for unsignalized intersections. Based on previous discussions with Caltrans staff, it is understood that the standard is to be applied to the overall average intersection delay, not a delay associated with any single movement or approach. Under this approach, if one movement experiences very high delay and has moderate to high traffic volumes, the overall delay and LOS should reflect the critical nature of the condition. However, if one movement is expected to experience high delay, but has very low traffic volumes, the overall intersection operation will likely still meet Caltrans standards.~~

Response to Comment CDOT-5

The commenter asks why U.S. 101 ramps at Lytton Springs Road were not included in the Draft EIR cumulative impact discussion. The study area established by the proposed plan transportation consultant, W-Trans, together with City staff, includes those streets and roadways that are expected to serve most of the project traffic. Further, the current volumes on roadways and the potential for added project traffic to result in an impact were considered. Volume data available from the County of Sonoma indicates that Lytton Springs Road carries fewer than 1,000 vehicles per day^{1,2} near U.S. 101 while Dry Creek Road carries more than 5,300 vehicles per day near the interchange with U.S. 101. Similarly, Caltrans publishes volume data that shows a differential of 9,500 vehicles per day on U.S. 101 south of Dry Creek Road versus north of the interchange, while the differential on either side of the Lytton Springs Road interchange is only 1,100 vehicles per day. Given the low volume of traffic on Lytton Springs Road, and therefore the limited conflicting through traffic that could cause delays to drivers turning from the off-ramps to Lytton Springs Road, together with the low demand on the off-ramps as indicated by the mainline freeway volumes it was determined that the off-ramps at the U.S. 101/Lytton Springs Road interchange can reasonably be assumed to operate acceptably at LOS C or better during peak periods and would be expected to continue doing so under long-range volumes developed for planning purposes, which included a base amount of traffic anticipated to be generated by the NEAP area. Given the nominal additional volume of traffic expected to be added to those conditions by development within the NEAP Area, such conditions are projected to remain above the threshold for acceptability. It, therefore, was determined that plan- and cumulative-level operations analyses of this interchange is not justified.

¹ Sonoma County. 2019. Sonoma Map Traffic Volume (Aggregated). Available at: <https://sonomamap.maps.arcgis.com/apps/webappviewer/index.html?id=d7d74af9e42c4218891eb0ddbfeae292>. Accessed: March 14, 2019.

² California Department of Transportation. 2019. 2017 Traffic Volumes for all vehicles on California State Highways. Available at: <http://www.dot.ca.gov/trafficops/census/volumes2017/Route101.html>. Accessed: March 14, 2019.

Response to Comment CDOT-6

The commenter inquires as to what other development in the study area could have potential alternative access to/from U.S. 101. It is unclear as to what is meant by “alternative access,” however recent development proposals in north Healdsburg that will utilize U.S. 101 interchanges, as they were assessed as part of the evaluation, include The Oaks at Foss Creek (29 single-family homes), 25 multi-family rental units at 1201 Grove Street, and Farmstand (30 single-family homes and 12,000 square feet of retail space). Traffic studies have been prepared for all these projects, and project sponsors have been conditioned to pay into the fund for future traffic improvements. This growth was all accounted for in the Healdsburg 2030 General Plan and the traffic studies for the General Plan EIR and taken into account in the existing/cumulative analysis (as relevant) for the proposed plan. The City is currently undertaking a study to prepare conceptual design and cost estimates for the improvements to the U.S. 101/Dry Creek Road interchange and to develop a proportional share formula for developer contributions. There are no other planned future improvements to the State transportation network near Healdsburg.

Response to Comment CDOT-7

The commenter asks for confirmation that the queue lengths reflected on Draft EIR page 3.2-19 are consistent with field observations. The preparer of the traffic analysis, who is a Healdsburg resident and uses the Dry Creek Road interchange on her daily commute, has indicated that in her professional opinion the queue lengths as identified in the Draft EIR are consistent with field observations, including at the U.S. 101 ramps at Dry Creek Road.³

Response to Comment CDOT-8

The commenter requests cumulative queue length information. The following changes to text on Draft EIR pages 3.2-36 and 3.2-37 are made in response to this comment:

Traffic Safety Hazards

Implementation of planned future improvements as previously identified by the City for the Dry Creek Road corridor (Intersections 1, 2, and 4) would address the deficient operation at the interchange with U.S. 101, as shown in underlined text in Table 3.2-9.

Upon adding plan-generated traffic to the cumulative volumes, and with the improvements identified as being needed to accommodate anticipated future growth, anticipated cumulative queuing in the westbound left-turn lane at Dry Creek Road/U.S. 101 South Ramps, on the northbound off-ramp at Dry Creek Road/US 101 North Ramps, and in the northbound and eastbound left-turn lanes at Dry Creek Road/Grove Street represents a potentially significant cumulative traffic safety hazard impact. While cumulative queue lengths are expected to exceed the dedicated storage length at other locations, because the turn lane is connected to a two-way left-turn lane or travel lane with room to accommodate the queue, these cumulative queues were not identified as exceeding storage space. Therefore, at these locations, cumulative queuing impacts were considered less than significant. Table 3.2-10 summarizes the cumulative queue at each intersection without and with implementation of the proposed plan.

³ Whitlock, Dalene. 2019. Personal communication with Dalene Whitlock, PE, PTOE, Senior Principal of W-Trans, a transportation consulting firm. March 7, 2019.

Table 3.2-10: Peak Hour 95th Percentile Queues

Intersection	Storage Length/Number of Lanes	Cumulative		Cumulative plus Plan	
		AM	PM	AM	PM
1. Dry Creek Road/U.S. 101 South Ramps					
SB Off-Ramp	440/1	68	101	68	104
WB Left-Turn Lane	250/1	308	425	337	468
2. Dry Creek Road/U.S. 101 North Ramps					
NB Off-Ramp	650/1	483	621	531	894
With MM TRANS-6				289	485
EB Left-Turn Lane	50	12	23	12	23
3. Dry Creek Road/Grove Street					
NB Left-Turn Lane	100/1	90	262	90	262
EB Left-Turn Lane	*65/1	170	310	217	446
WB Left-Turn Lane	*55/1	68	135	68	144
4. Healdsburg Avenue/Dry Creek Road-March Avenue					
NB Left-Turn Lane	*160/1	505	239	505	284
EB Left-Turn Lane	*115/1	170	213	170	214
EB Right-Turn Lane	**115/1	75	146	75	146
SB Left-Turn Lane	*90/1	58	81	70	96
5. Healdsburg Avenue/Grove Street					
NB Left-Turn Lane	*150/1	39	55	39	55
EB Left-Turn Lane	140/1	27	69	66	113
EB Right-Turn Lane	70/1	20	31	20	30
6. Healdsburg Avenue/Parkland Farms Boulevard					
SB Left-Turn Lane	*150/1	3	13	4	15
WB Left-Turn Lane	**90/1	11	9	12	11
Notes: All distances are measured in feet; NB = Northbound; SB = Southbound; EB = Eastbound; WB = Westbound Bold text = queue lengths exceeding available storage Shaded cells reflect mitigated conditions * Turn-lane is connected to a two-way left-turn lane ** Turn-lane is connected to a through lane Source: W-Trans, 2019.					

Payment of a proportional share of the cost of these improvements to increase the length of the left-turn lane on the westbound approach to Dry Creek Road/U.S. 101 South is required per MM TRANS-5. However, the significant impacts to this intersection as a result of plan-

related development would remain significant until the improvements identified in MM TRANS 5 are implemented. This represents a significant and unavoidable cumulative impact related to traffic safety hazards (queueing exceeding lane storage and intersection conditions).

Implementation of planned future improvements at Dry Creek Road/U.S. 101 North Ramps, including signalization, are insufficient to avoid a potential queueing impact on the off-ramp. When the City proceeds with the signalization project, the phasing should include an overlap phase between the westbound through movement and the northbound right turn to reduce the queue to an acceptable level and a proportional share of these planned improvements should be paid per Cumulative MM TRANS-1. These improvements per Cumulative MM TRANS-1 would reduce queues on the off-ramp to acceptable lengths. However, until the intersection is signalized, the queueing, and thus traffic safety, cumulative impact would remain significant and unavoidable with mitigation.

MM TRANS-1b includes the provision of the left-turn lane on the northbound Grove Street approach to Dry Creek Road. MM TRANS-1b indicates that the left-turn lane should have a length of at least 275 feet, which would reduce the impact of cumulative projects on queueing, and thus traffic safety, however, impacts would remain significant even after mitigation.

While excessive queueing is theoretically identified for the eastbound left turn from Dry Creek Road to Grove Street, it is noted that the volume feeding into this left-turn lane comes primarily from the U.S. 101 North off-ramp. If the queue extended to the off-ramp, drivers would be unable to enter the left-turn queue, and those familiar with the area would choose alternate routes, including continuing straight west to Healdsburg Avenue and turning left there or staying on U.S. 101 North and exiting at Lytton Springs Road instead. MM TRANS-1c would support an alternative routing by requiring developers to suggest use of the Lytton Springs Road route in their TDM Plans. Excess queueing would generally be expected to resolve itself through normal human behavior, but implementation of MM TRANS-1c would contribute to reducing this cumulative impact at this location.

The overall queueing, and thus traffic safety, cumulative impact would remain significant and unavoidable with mitigation. The proposed plan's contribution to the cumulative queueing and, thus, traffic safety hazards related to lane storage and intersection conditions at the U.S. 101/Dry Creek Road intersection is considered to be cumulatively considerable.

Cumulative Level of Significance Before Mitigation

Significant and Unavoidable

Mitigation Measures

None available.

Cumulative MM TRANS-1 New development within the plan area shall be required to contribute a proportional share allocation towards the cost of

signalizing Dry Creek Road/U.S. 101 North Ramps. The design for the traffic signal shall include provision of an overlap phase between the westbound through movement and the right turn from the off-ramp.

Cumulative Level of Significance After Mitigation

Significant and Unavoidable with Mitigation

In addition, the following change to text on Draft EIR page 3.2-25 is also made in response to this comment:

MM TRANS-1b New development within the plan area shall be required to improve the northbound approach to Dry Creek Road/Grove Street (study intersection 3). The approach shall be restriped to include a separate left-turn lane with a minimum length of 275 feet and the signal modified to provide protected left-turn phasing, with the existing right-turn lane converted to use for through/right-turn movements.

Response to Comment CDOT-9

The commenter reiterates that new development within the plan area should contribute a proportional share allocation towards the cost of widening Dry Creek Road to accommodate a westbound turn-lane the entire length between the northbound and southbound U.S. 101 ramps. As stated in Draft Mitigation Measure TRANS-5 on page 3.2-30, when a specific development proposal within the plan area is conditioned, it will be required to pay a proportional share of the cost of planned future improvements at the Dry Creek Road interchange with U.S. 101, including bike lanes.

Response to Comment CDOT-10

The commenter reiterates that new development within the plan area should be conditioned to construct the proposed creek trail and transit stops to provide connection to the recently completed bicycle lanes on Healdsburg Avenue. As stated on Page 2-10 of the Draft EIR, the Class II bicycle lanes along both sides of Healdsburg Avenue between Parkland Farms Boulevard and the northern city limits have been implemented as part of the Healdsburg Avenue Improvement Project. The proposed plan includes the extension of the Foss Creek Pathway, into the plan area via a multi-use trail along the west side of Healdsburg Avenue. It should be noted (and as stated on Draft EIR page 2-10) that the proximate transit stops have been implemented by a development proposal (Montage Healdsburg) that is separate from the proposed plan. However, individual developments within the proposed plan would be required to construct any remaining transit, bicycle, and pedestrian improvements needed in order to connect to these transit stops and other local circulation and alternative transportation components.

Response to Comment CDOT-11

The commenter states that the City should estimate the cost of needed improvements, expansion, and maintenance for the plan area, as well as identify sources of funding and a schedule plan for implementation along with the Final EIR. The exact scope of improvements and maintenance is

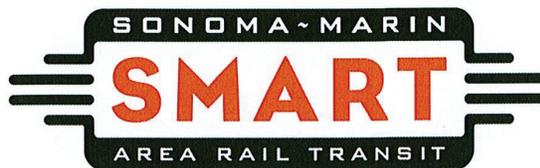
speculative, as it will depend on the types of projects brought forward. This information will be generated as specific projects within the plan area are submitted for approval.

Response to Comment CDOT-12

The commenter advises the need to obtain an encroachment permit from CDOT for any sign or work within the CDOT right-of-way. Although specific development projects within the plan area may be conditioned to contribute funds to independent City projects within the CDOT right-of-way, no work in the State's right-of-way is currently anticipated as part of the proposed plan, so an encroachment permit is not expected to be needed. Should any such work be identified as part of future site-specific development, the project applicant would be directed to obtain the appropriate permit(s).

Response to Comment CDOT-13

The commenter reiterates that the City is responsible for all EIR mitigation, including any needed improvement to the State transportation network. The City of Healdsburg understands that it is the lead agency and will take responsibility in accordance with the MMRP prepared for the project.



Debora Fudge, Chair
Sonoma County Mayors' and
Councilmembers Association

Judy Arnold, Vice Chair
Marin County Board of Supervisors

Damon Connolly
Marin County Board of Supervisors

Jim Eddie
Golden Gate Bridge,
Highway/Transportation District

Dan Hillmer
Marin County Council of Mayors and
Councilmembers

Eric Lucan
Transportation Authority of Marin

Jake Mackenzie
Sonoma County Mayors' and
Councilmembers Association

Barbara Pahre
Golden Gate Bridge,
Highway/Transportation District

Gary Phillips
Transportation Authority of Marin

David Rabbitt
Sonoma County Board of Supervisors

Carol Russell
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Fax: 707-794-3037
www.sonomamarintrain.org

January 14, 2019

Maya DeRosa, Planning & Building Director
401 Grove Street
Healdsburg, CA 95448

Dear Ms. DeRosa,

Thank you for giving SMART the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the North Entry Area Plan (NEAP). We have completed our review and offer the following comments.

SMART holds the property rights of a passenger rail operating easement over the North Coast Railroad Authority (NCRA) tracks adjacent to the NEAP area. In addition, recent State legislation (SB 1029) has been adopted outlining a process for the transfer of NCRA assets in the Healdsburg area to SMART. As Healdsburg's NEAP project progresses through the development process, SMART will require any plans that directly affect the railroad tracks to be reviewed by us and any other necessary regulatory agencies early in the process.

SMART prioritizes the safety of our tracks, future riders and the public and has the following specific comments on the DEIR:

- The design of the crossings of the tracks has to meet SMART's standards and be approved by SMART
- Depending on the development proposal, set-backs from SMART's property will be established
- Any utilities installed in the ROW will need to be approved by SMART or not allowed
- No storm drain runoff will be permitted into the ROW
- Vegetation will not be permitted on the ROW
- The SMART Board has an adopted policy against the establishment of new at-grade private crossings
- Fencing will be required between the development and the tracks
- Any easements, licenses or rights of occupancy or crossing on the railroad right of way must not unreasonably interfere with SMART's current or future operations.

We appreciate the opportunity to review and comment on the DEIR and urge the developer and City of Healdsburg to work with SMART early on in the process regarding these critical issues. If you have any questions about any of the comments above please do not hesitate to contact me. I can be reached at: lpayan@sonomamarintrain.org or (707) 794-3079.

Sincerely,

Elizabeth "Libby" Payan, Assistant Planner

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Local Agencies

Sonoma Marin Area Rail Transit (SMART)

Response to Comment SMART-1

The commenter states that SMART holds the property rights of a passenger rail operating easement over the North Coast Railroad Authority (NCRA) tracks within the plan area and that recent State legislation (SB 1029) outlines a process for transfer of NCRA assets in the Healdsburg area to SMART. In addition, the commenter requests to review site-specific plans that directly affect the railroad tracks as part of the proposed plan. Approval was previously provided by the California Public Utilities Commission for construction of an at grade public crossing from Healdsburg Avenue into the project site. The grade crossing construction plans were approved in the Fall of 2018 and construction of the grade crossing is currently underway. The construction plans for the grade crossing were coordinated through the Sonoma Marin Area Rail Transit Agency (SMART) as well as the North Coast Rail Authority (NCRA). Any future modifications to the grade crossing made as part of the development project would be coordinated through SMART and the necessary rail entities.

Response to Comment SMART-2

The commenter provides design requirements with regard to the safety of the railroad tracks, future riders, and the public within the plan area. Design of construction plans for the project will be coordinated through SMART and other rail entities as necessary.

Response to Comment SMART-3

The commenter urges the City and any site-specific developers of the proposed plan to work with SMART early in the process regarding right-of-way permits and design requirements related to the railroad track within the plan area. The City of Healdsburg has already engaged SMART on the design and construction of the at-grade crossing at the project entrance and will continue to coordinate with SMART throughout the project review process.

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From: Eric Gage <Eric.Gage@sonoma-county.org>
Sent: Monday, December 24, 2018 3:41 PM
To: Maya DeRosa <mderosa@ci.healdsburg.ca.us>
Subject: Healdsburg North Entry Area Plan

Good Afternoon Maya,

I'm in the process of reviewing the draft EIR for the North Entry Area Plan and had a question on the traffic study. It appears that the vast majority of trips to the 101 from the site are directed through the city to the Dry Creek Road onramp, and very few to the Lytton Springs Drive onramp, which is closer and a faster approach. Can Healdsburg staff elaborate on the reasoning for this trip distribution?

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Thanks,

Eric Gage

Planner III

Comprehensive Planning

www.PermitSonoma.org

County of Sonoma

2550 Ventura Avenue, Santa Rosa, CA 95403

Direct: 707-565-1391 | Office: 707-565-1900

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OFFICE HOURS: Permit Sonoma's public lobby is open Monday through Friday from 8:00 AM to 4:00 PM, except Wednesdays, open from 10:30 AM to 4:00 PM.

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Sonoma County Comprehensive Planning (SCCP)

Response to Comment SCCP-1

The commenter asks why U.S. 101 ramps at Lytton Springs Road were not included in the Draft EIR impact discussion. See Response to Comment CDOT-5 on page 3-19 for a discussion of why a plan- and cumulative-level operations analysis of the U.S. 101/Lytton Springs Road interchange was not justified.

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County of Sonoma
Permit & Resource Management Department

03 January 2019

Maya DeRosa, AICP
Planning and Building Director
401 Grove Street
Healdsburg, CA 95448
mderosa@ci.healdsburg.ca.us

**RE: HEALDSBURG NORTH ENTRY AREA PLAN & DEIR, SCH#2018062041
APNS 091-060-022, 091-060-019, and 091-060-009**

Dear Director DeRosa:

Thank you for the opportunity to review and comment on the Healdsburg North Entry Area Plan and Draft Environmental Impact Report for the Healdsburg North Entry Area Plan. I have determined the project to be consistent with the Sonoma County General Plan. Please see the attached General Plan Consistency Determination.

Please accept my best wishes in your practice and enjoy project implementation.

If you have any questions, please feel free to contact Eric Gage at 707-565-1391 or email at eric.gage@sonoma-county.org.

Sincerely,

A handwritten signature in blue ink that reads "Tennis Wick". The signature is fluid and cursive.

Tennis Wick, AICP
Director

Enclosure: General Plan Consistency Determination

cc: File No. PPR18-002





County of Sonoma
Permit & Resource Management Department

GENERAL PLAN CONSISTENCY DETERMINATION

To: Maya DeRosa, Planning and Building Director

From: Eric Gage, Planner III

Date: 03 January 2018

Project Applicant/Owner: City of Healdsburg

Project Name and File Number(s): Healdsburg North Entry Area Plan & DEIR, SCH# 2018062041

Project Location/APN #: APNS 091-060-022, 091-060-019, and 091-060-009

Project Description: Public Review of Healdsburg North Entry Area Plan and Draft EIR. The plan evaluates three parcels totaling 30 acres between Highway 101 and Healdsburg Avenue at the northern city boundary. Maximum buildout evaluated 290 multifamily units, 130-room hotel, 40,000 s.f. Commercial/Professional Services, and 30,000 s.f. of Retail Uses.

General Plan Land Use: MU (10-16 UPA)

Zoning: Mixed Use

General Plan Consistency Determination: Consistent

Analysis: The compact and contiguous development depicted in the North Entry Area Plan is consistent with the County General Plan Policy goals of compact, mixed use development in urban service areas. The planned development is consistent with General Plan Policies LU-11e, LU-14.2. General Plan Policies CT-1k, CT-1o encourage an integrated street design in close proximity to mixed use residential and commercial service providers. The proposed creek trail, Class 2 bike lanes, sidewalk segment, and transit stops in the vicinity of the planned development support these policies.

Conclusion: The proposed North Entry Area Plan is consistent with the Sonoma County General Plan goals and policies of city centered growth and transit oriented development.

Staff Comment: The trip distribution of the traffic analysis allocates the majority of hotel trips southbound to 101. Please provide reasoning for why northbound trips from the proposed hotel use are not anticipated.

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CONT

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Sonoma County Permit and Resources Management (SCPRM)

Response to Comment SCPRM-1

The commenter affirms that the proposed plan is consistent with the Sonoma County General Plan. Specifically, the commenter goes on to affirm that the proposed plan is consistent with the Sonoma County General Plan goals and policies (LU-11e, LU014.2, CT-1k, and CT-1o) of city-centered growth and transit-oriented development related to integrated street design in close proximity to mixed-use residential and commercial service providers. The commenter states that this is achieved via provision of the proposed creek trail, Class 2 bicycle lanes, sidewalk segments, and transit stops in the vicinity of the plan area. As stated on Page 2-10 of the Draft EIR, the proposed plan would extend Class II bicycle lanes along both sides of Healdsburg Avenue between Parkland Farms Boulevard and the northern city limits as well as extend the Foss Creek Pathway into the plan area via a Class I bicycle and pedestrian trail along the west side of Healdsburg Avenue. It should be noted (and as stated on Draft EIR page 2-10) that the proximate transit stops have been or would be implemented by a development proposal (Montage Healdsburg) that is separate from the proposed plan. However, the proposed plan would connect to these transit stops and other local circulation and alternative transportation components via plan-related provision of sidewalks and roadways where vehicles and bicycles share roadways space.

Response to Comment SCPRM-2

The commenter states that the Draft EIR traffic analysis allocates the majority of hotel trip southbound to U.S. 101 and asks for the reasoning as to why northbound trips from the proposed hotel are not anticipated. See Response to Comment CDOT-5 on page 3-19 for a discussion of how plan- and cumulative-level operational analyses of the U.S. 101/Lytton Springs Road interchange (located north of the plan area) were not undertaken due to the low volume of conflicting traffic on Lytton Springs Road. The potential for the impact to be significant was much greater with the assumptions applied wherein most traffic was assigned to and from the south. Should more of the plan-generated traffic use the Lytton Springs Road interchange, the project's overall impacts would be less as the impact at the Dry Creek Road interchange would be reduced and the Lytton Springs Road interchange would still be expected to operate acceptably, which would be a less than significant impact.

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DRY CREEK RANCHERIA
BAND OF POMO INDIANS

RECEIVED

DEC 13 2018

PLANNING & BUILDING DEPT.
CITY OF HEALDSBURG

December 11, 2018

**Maya DeRosa, Planning and Building Director
401 Grove Street
Healdsburg, CA 95448**

Re: North Entry Plan Healdsburg, CA

Dear Maya DeRosa,

Thank you for your letter dated 11/30/18 seeking information regarding historic/sacred sites on the above-named sites. We appreciate your efforts to protect archaeological and historic sites and places that may have cultural significance to our tribe.

At this time the Dry Creek Rancheria is not aware of any "historic properties" on this site. However, as the project progresses, if any new information or historic remains are found, we do have a process to protect such important and sacred artifacts. Upon such a discovery, please contact me. Thank you for your commitment to preserving our cultural heritage.

1

**Reg Elgin, Tribal Historic Preservation Officer
Dry Creek Rancheria**

RECEIVED

DEC 13 2018

PLANNING & BUILDING DEPT.
CITY OF HEALDSBURG

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Local Organizations

Dry Creek Rancheria Band of Pomo Indians (DCRBPI)

Response to DCRBPI-1

The commenter affirms that there are no known historic resources within the plan area. As stated in Draft EIR Appendix A (Initial Study) Section 2.5 (a), an April 4, 2018, NWIC records search did not identify cultural resources within the plan area. In addition, the plan area was previously graded resulting in a low likelihood of encountering undiscovered historic resources. While unlikely, subsurface construction activities always have the potential to damage or destroy previously undiscovered cultural resources. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. However, implementation of Mitigation Measure CUL-1 (identified and included in the Initial Study) would reduce potential impacts to historic resources to less than significant. Mitigation Measure CUL-1 requires that, in the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers shall avoid altering the materials until a qualified archaeologist who meets the Secretary of Interior’s Professional Qualification Standards for archaeology has evaluated the situation. The commenter requests to also be contacted upon the discovery of any new historic remains or new information related to historicity of the site. The City will abide by this request during earthwork activities within the plan area.

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Law Office Of Jerry Bernhaut

23 Woodgreen Street

Santa Rosa, CA 95476

Phone: 707-595-1852

Email: j3bernhaut@gmail.com

Comments On Healdsburg North Entry Area Plan EIR

I am submitting the following comments on behalf of California River Watch (CRW), an Internal Revenue Service Code § 501(c)(3) non-profit, public benefit corporation organized under the laws of the State of California. Its headquarters and main office are located in Sebastopol. Its mailing address is 708 Gravenstein Hwy North, Suite 407, Sebastopol, CA 95472.

CRW has the following concerns regarding the City Of Healdsburg North Entry Area Plan (“NEAP”) Environmental Impact Report (“EIR”):

1. Failure To Provide an Accurate Assessment Of Greenhouse Gas (GHG) Emissions That Would Be Generated By The Project

A. Transportation Related Emissions

According to **Table 2-2: Specific Development Summary**, the NEAP includes a hotel with 130 guest rooms (EIR 2-9). However, there is no accounting in the EIR for greenhouse gas (GHG) emissions resulting from tourists, reasonably expected to be staying at the hotel, traveling from their point of origin to Healdsburg and returning to their point of origin. The failure of the EIR to account for these emissions constitutes a failure to present a reasonably complete accounting of the proposed project’s GHG impacts as required by CEQA. The EIR completely disregards the thousands of metric tons of GHG emissions which would be generated by hotel guests traveling by air from global points of origin. The GHG emissions from global air travel to the hotel are a reasonably foreseeable, intended consequence of the hotel’s operation. It is the commercial purpose of the hotel to attract global as well as regional patronage. The CEQA Guidelines and case law are clear that such readily foreseeable indirect consequences of a project must be accounted for and mitigated if significant.

When preparing the EIR for a project, the EIR must consider all sources of GHG emissions resulting from the activities associated with the project. GHG emissions that must be acknowledged, addressed and mitigated include indirect, long-term and long-range emissions such as tourist travel. These emissions are part of the project the EIR is analyzing and are appropriate for inclusion in the EIR. Under CEQA, a “project” is defined as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment” (Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora (2007) 155 Cal.App.4th 1214, 1222 (citing CEQA Guidelines § 15378, subd. (a).)

“An agency shall consider both primary or direct and secondary or indirect consequences. Secondary consequences may be several steps removed from the project in a chain of cause and effect.” Cal. Code Regs. Tit. 14, § 15064(d).

“An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project.” Cal. Code Regs. Tit. 14, § 15064(d)(2).

“An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project.” Code Regs. Tit. 14, § 15064(d)(3).

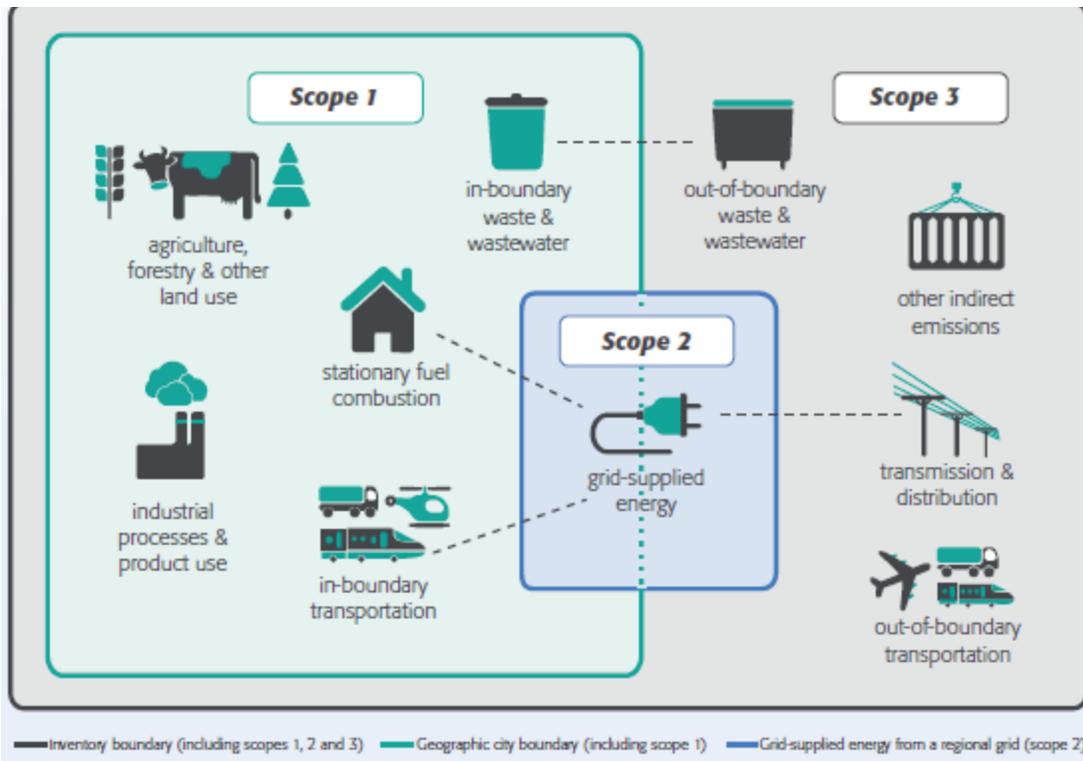
The principle that GHG emissions from global tourist travel and wine distribution must be accounted for in EIRs for new hotels, vineyards, and wineries has been well established locally in the ruling in *California River Watch v. County of Sonoma*, SCV-259242, Sonoma County Superior Court (2017), which found that the Respondent in that case “had a feasible ability to include the additional GHG data” (p.16) related to air-travel and other travel induced emissions.

While the burden of impact assessment remains entirely with the applicant, we offer the following methodological overview of the kind of GHG calculations we believe applicants must provide at a minimum.

First, the principle behind this approach comes from the well-known “Scopes Framework” which informs nearly all modern GHG impact assessment protocols. The figure below comes from the ICLEI Global Protocol for Communities (GPC). The idea that a complete emissions assessment must include “out of boundary transportation” and other “Scope 3” impacts has become well established over the past five years.

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Next, we offer the following transportation-focused definitions (again based on the GPC):

Scope 1: Emissions from all local transportation resulting from the project, including all GHG emissions from the transport of people and freight occurring within the city boundary.

Scope 2: Emissions from grid-supplied electricity used for transportation resulting from the project, including all GHG emissions from the generation of grid-supplied electricity used for electric-powered vehicles. The amount of electricity used should be assessed at the point of consumption within the city boundary.

Scope 3: Emissions from the portion of transboundary journeys occurring outside the city resulting from the project. **This includes the out-of-city portion of all transboundary GHG emissions from trips that either originate or terminate within the city boundaries. This includes the out-of-city portion of any on-road, air, or sea transit that burns fuel, or any out-of-city travel by an electric railway. Also includes any transmission and distribution losses from grid-supplied energy from local electric vehicle use. (emphasis added)**

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The omission of accounting for long range emissions from tourist travel and wine distribution was the primary ground on which The Sonoma County Climate Action Plan and Programmatic EIR were overturned in Sonoma County Superior Court. Local governments have the ability through their permitting authority to limit the unsustainable growth in projects which generate long range travel to tourist destinations. Feasible protocols exist to track and attribute such emissions to single and multiple destinations. The above cited case established firm precedent in Sonoma County for holding local governments and developers accountable for the true carbon footprint of proposed projects.

Despite that precedent, the NEAP EIR explicitly declined to include scope 3, transboundary air travel induced emissions from global clients to the proposed hotel in the EIR's assessment of GHG emissions resulting from the proposed project, as indicated below.

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“The City of Healdsburg CEQA Implementation Procedures establish that a significant impact to transportation and traffic would occur if the plan:

- Increases air traffic or changes the location of air traffic that results in substantial safety risks.” (NEAP EIR 3.2-18) (We read the first “of” as “or”)

“As discussed in the Initial Study for the proposed plan, there would be no changes in air traffic patterns. Therefore, no impact would occur with regard to air traffic, and this topic will not be further evaluated in this section.” (NEAP EIR 3.2-19)

B. Adopting Invalid Standards For Evaluating The GHG Emissions Impacts Of The Proposed Plan

The NEAP EIR acknowledges that the EIR for the Sonoma County Regional Climate Action Plan (Cap)) was invalidated by the above referenced lawsuit and thus cannot serve as a programmatic document under CEQA from which to tier for evaluating the GHG impacts of a specific project. Despite that, the NEAP EIR simply asserts, with no legal foundation, that “The ideas contained in the Climate Action Plan to advance smart land use and resource efficiency are still valid and aligned with the climate action strategies stated in the Scoping Plan to reach the

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State’s overall GHG reduction goals. As a result, the City of Healdsburg adopted a resolution in March 2018 to address GHG emissions consistent with the Climate Action Plan. Therefore, in order to comprehensively evaluate the GHG emissions implications of the proposed plan, the plan is assessed for its consistency with the GHG emission reduction measures included in the Sonoma County Regional Climate Action Plan that were adopted by the City of Healdsburg in March 2018.” (NEAP EIR 3.4-36)

The assertion that the ideas in the CAP are still valid and aligned with strategies to reach the State’s climate goals defies logic. In its Summary Of Ruling, the court in *California River Watch v. County of Sonoma* stated that the Programmatic EIR and the County’s approval of the CAP violated CEQA in that “the inventory of greenhouse gas emissions is based on insufficient information...the PEIR fails to include clearly defined performance standards for the mitigation measures regarding greenhouse gas (GHG) emissions, identified as ‘GHG reduction measures’; and fails to develop and fully analyze a reasonable range of alternatives”. Based on those findings the court concluded: “The Court finds there is insufficient information in the administrative record to support the factual conclusion that the CAP will achieve its fundamental purpose of reducing Respondent’s countywide GHG emissions to the stated target of 25% below 1990 levels by 2020”. (id. at p. 1-2).

Arguably the general ideas in the CAP regarding smart land use and resource efficiency have value as broadly defined strategies, but the court found unequivocally that, for most of the GHG reduction measures, their specific formulations in the CAP were too vague and unacceptably deferred to be enforceable. Most fundamentally, the court found that the CAP and EIR lacked sufficient information to support the conclusion that the Cap would achieve its stated target of reducing countywide emissions to 25% below 1990 levels by 2020, primarily because of the omission of the transboundary travel induced emissions. Yet, inexplicably, the NEAP EIR adopts as its standard for evaluating the GHG impacts of the proposed project consistency with GHG emission reduction measures in the CAP that were adopted by the City of Healdsburg in March 2018.

The NEAP EIR further relies on the alleged validity of the updated GHG inventory by the Regional Climate Protection Authority (“RCPA”), the Sonoma County agency that developed the invalidated CAP.

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“In July 2018, the RCPA updated the community-wide GHG inventory for Sonoma County. The RCPA established a baseline communitywide GHG inventory for calendar year 2010 and a backcast inventory for 1990 as part of the Climate Action 2020 and Beyond development process. The RCPA completed a 2015 inventory update to help track progress towards achieving the short and long term emissions reduction goals established in Climate Action 2020 and Beyond.²⁴ As shown in Figure 3.4-4, Countywide emissions have decreased overall primarily due to a decrease in GHG emissions due to building energy usage. Compared with 2010, GHG emissions due to building energy use were approximately 34 percent lower. On-road transportation is the largest GHG emissions section in Sonoma County, followed by building energy use, and livestock and fertilizer.

On March 5, 2018, the Healdsburg City Council adopted a Resolution that reaffirmed the City’s intent to reduce GHG emissions as part of a coordinated effort with Sonoma County’s RCPA and to approve local implementation measures identified in Climate Action 2020 and Beyond. Through this Resolution, the Council has agreed to the following items related to GHG reduction efforts:

1. Agree to support the efforts of the State and RCPA in reducing GHGs.
2. Adopts the following focus areas to reduce GHG emissions and intends to implement local measures identified in the Climate Action 2020 and Beyond Plan.
 - a) Low-carbon/No-carbon transportation
 - b) Increased renewable energy
 - c) Lowering of water-related GHG emissions
 - d) City planning and land use
3. Plans to work toward increasing the health and resilience of social, natural, and built resources to withstand the impacts of climate change.
4. Supports the goals of the Climate Action Plan through positive action of the City and through collaboration with other local agencies and the RCPA.” (NEAP EIR 3.4-32)

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The RCPA's updated GHG inventory uses the same methodology for calculating GHG emissions, not counting transboundary travel induced emissions, that the court found inadequate and on that finding invalidated the CAP. The measures identified in the City's resolution are defined in terms the court found inadequate to ensure enforceable mitigations. In effect, the NEAP EIR is tiering from the invalid CAP exactly as it would have if the CAP had not been invalidated. This is a clear violation of CEQA.

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The NEAP EIR asserts that "As shown in Table 3.4-2 the proposed plan is consistent with the ARB Scoping Plan's applicable GHG emissions reduction strategies and, thus, would not conflict with the recommendations of AB 32 in achieving a statewide reduction in GHG" (NEAP EIR 3.4-41) Table 3.4-2 lists the ARB reduction measures, most of which were found not applicable to the project. Regarding the measures with which the project was found to be consistent, some were formulated in terms too vague to be enforceable; e.g. "Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California."

The NEAP EIR concludes in the section on GHG emissions of the project as follows: "In summary, although the proposed plan would not conflict with the GHG reduction measures included in the Regional Climate Action Plan, the Climate Action Plan would not be considered a qualified GHG reduction plan for the purposes of CEQA. Therefore, since the Climate Action Plan was adopted to meet the goals of AB 32, the proposed plan is also evaluated for consistency with the State plans to determine whether it would conflict with any other applicable plan, policy, or regulation adopted by the City for the purpose of reducing GHG emissions. As discussed in Impact GHG-1, GHG emissions would exceed the BAAQMD CEQA Guidelines recommended thresholds of significance. As a result, the proposed plan could conflict with applicable plan, policy or regulation adopted by the City to reduce the emissions of GHGs. The impact would be potentially significant. However, the GHG emissions during operation would not exceed BAAQMD's threshold of significance with implementation of MM GHG-1

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(see Table 3.4-6). The impact would be less than significant with mitigation incorporated.” (NEAP EIR 3.4-58)

Mitigation Measures MM GHG-1

“ Prior to the final discretionary approval for each development project in the plan area, each developer shall provide documentation to the City of Healdsburg demonstrating that the proposed development would meet the BAAQMD recommended threshold of significance for individual projects or would achieve additional GHG emissions reductions sufficient to meet the recommended threshold through a combination of one or more of the following measures and/or other comparable measures approved by the City:

- Commit to 100 percent renewable energy use through a combination of use of on-site renewable energy and Healdsburg Electric’s “Green Rate” program.
- Install on-site solar panels to generate electricity for on-site electricity consumption.
- Provide documentation how a ride-sharing program or other transportation demand management program for hotel, office, and retail employees would be implemented starting no later than 60 days after operations begin. Use of electric vehicles for ride-share program would further reduce GHG emissions.
- Install electric vehicle charging stations at workplaces and multi-family residences to promote the use of electric vehicles.
- Use heat-pumps (rather than natural gas) for heating of residential and commercial spaces.
- Purchase voluntary carbon credits from a verified GHG emissions credit broker in an amount sufficient to offset operational GHG emissions that exceed the recommended significance threshold over the lifetime of the proposed development (or a reduced amount estimated based on implementation of other measures listed above). Copies of the contract(s) shall be provided to the City.” (NEAP EIR 3.4-46-47)

The above mitigation measures, whereby each project developer within the plan area is required to document how it would meet BAAQMD thresholds, is a prime

example of invalid deferred mitigation under CEQA. The lack of specificity in the language- “through a combination of one or more of the following measures and/or other comparable measures approved by the City” where the exact measures are to be defined in the future, is a clear CEQA violation.

As the above analysis clearly demonstrates, the evaluation in the NEAP EIR of the GHG impacts of the proposed project, The North Area Entry Plan, completely fails to provide a clear analytical route from the evidence in the record to the conclusion that the GHG impacts of the proposed project would be less than significant. *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, 40 Cal. 4th 412 Supreme Court of California (2007).

The dispositive issue here is that, because of the omission of transboundary travel induced emissions from assessment of the project’s impacts, there is not sufficient information to determine whether the GHG impacts of the project would conflict with achieving the statewide reductions required by AB 32. In all likelihood, if those transboundary emissions were estimated and included, the project would conflict with meeting state goals.

For the above reasons, California River Watch recommends that the City of Healdsburg decline to certify the EIR for the North Area Entry Plan and therefore decline to approve the project.

Respectfully submitted on behalf of California River Watch by,

Jerry Bernhaut

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California River Watch (CRW)

Response to Comment CRW-1

The commenter states that the Draft EIR did not account for GHG emissions from tourists and indicates that the “EIR disregards the thousands of metric tons of GHG emissions which would be generated by hotel guests traveling by air from global points of origin.” The commenter further references the trial court decision in *California River Watch vs. County of Sonoma* (2017) Sonoma County Superior Court Case No. SCV-259242 as a legal reference for including such air travel/global tourism information.

While the commenter is correct that the proposed plan includes a hotel, the commenter provides no evidence that the plan or its hotel would increase global air travel or tourism as a result of the plan or even that such increased global air travel is a reasonably foreseeable consequence of the plan’s proposed hotel. Indeed, the commenter did not provide any evidence showing that a certain number/percent of local hotel guests have traditionally been tourists and where those tourists originated from and how they traveled to the local hotel in question. The referenced court case does not provide this missing evidence nor is it an appropriate foundation for the argument as that case involved an EIR for a Climate Action Plan and not an area plan as proposed here. The court in that case found that “had the EIR explained that it was unable to obtain the necessary information...Respondent’s would have been justified in failing to obtain this data.”

Moreover, the EIR does reasonably assume hotel-related travel. The CalEEMod model used to estimate GHG emissions is based, in part, on trip generation estimates provided in the Traffic Impact Analysis for all land uses. Each trip has a primary trip length based on the location and urbanization (e.g., urban or rural setting) of the areas surrounding the proposed project site. These trip generation estimates and trip lengths are used to estimate total vehicle miles traveled and associated GHG emissions.

CEQA does not require a lead agency to engage in speculation with regard to plan impacts. It is not possible for a proposed project or plan to estimate or collect data on anticipated future tourist or air travel plans for a specific hotel project that has yet to be proposed, constructed and operated. The origin of travelers to the hotel could vary substantially, and there is no way to accurately determine either that origin or whether the hotel would induce additional global travel to the area. Rather, it is perhaps more likely that tourists would be traveling to the area for other local attractions, and this hotel component of the propose plan would provide an alternative for lodging those tourists that are already traveling to the area. Therefore, it is more appropriate that such emissions be addressed on a regional level through a Climate Action Plan or similar document.’ In addition, trips generated by the hotel would not solely be tourists. Local residents and employees would also be traveling to the project site and would not generate substantially longer trips than the local or county average. No revisions to the modeling are recommended, as the trip generation estimates and GHG emissions estimates are consistent with standardized models and practices for the proposed land uses.

Response to Comment CRW-2

See Response to Comment CRW-1 on page 3-53. The commenter refers to the ICLEI Global Protocol for Communities as the basis for suggesting a methodology for estimating GHG emissions associated

with the project. However, the referenced methodology was developed for community-wide analyses. As indicated in the discussion of the Scope 1, 2, and 3 emissions, the suggested approach relates to transboundary journeys outside of the community boundary. A review of the ICLEI Protocol provides additional support for this interpretation, as “civil aviation, or air travel, includes emissions from airborne trips occurring within the geographic boundary (e.g., helicopters operating within the city) and emissions from flights departing airports that serve the city. A significant amount of emissions associated with air travel occur outside the city boundary. Airports located within a city, or under local jurisdiction, typically service the greater region in which the city exists. These complexities make it challenging to properly account for and attribute aviation emissions. For simplicity, scope 3 includes all emissions from departing flights. Cities may report just the portion of scope 3 aviation emissions produced by travelers departing the city. This is in line with the origin and destination model described with the induced activity method in Section 7.3.1.”

Although these emissions could be included in a regional assessment or community-wide Climate Action Plan, estimating and allocating aviation emissions would not be practical or reasonable for a specific plan or project that does not directly involve air travel. As mentioned above, the complexities of estimating aviation emissions are “challenging” for communities, and the commenter provides no recommendations on the methodology for allocating emissions at a project- or plan-level.

Response to Comment CRW-3

See Responses to Comments CRW-1 and CRW-2 on pages 3-53 and 3-54 for a discussion of tourist travel in terms of the proposed plan land uses and associated travel impacts. In addition, the proposed plan would not result in a change in flight traffic, given the proposed permanent residences and the proposed hotel assumed to serve visitors that were already traveling to the greater Healdsburg area. As such, the proposed land uses themselves would not generate air traffic trips. Furthermore, Draft EIR Appendix A (Initial Study) Sections 2.8 (e) and (f) conclude that the proposed plan would have no safety hazard impact for people residing or working in the project area in terms of operation of a public airport or private airstrip. Nevertheless, the CEQA significance criteria related to air traffic safety hazards lends to a separate CEQA impact discussion than the CEQA significance criteria related to GHG emissions generation and GHG emissions reduction plan consistency.

Response to Comment CRW-4

The commenter asserts that there is no legal foundation for using the County CAP to evaluate the impacts of the proposed plan, and that the EIR adopts invalid standards for evaluating GHG emissions. The commenter further states that the County CAP “cannot serve as a programmatic document under CEQA from which to tier for evaluating the GHG impacts of a specific project.” The commenter incorrectly assumes that the Draft EIR uses the CAP as a qualified GHG reduction plan for the purposes of tiering. The EIR is consistent throughout the approach, and on page 3.4-36 states that “the EIR for the Climate Action Plan was invalidated in 2017, and the Climate Action Plan would not be considered a qualified GHG reduction plan for the purposes of CEQA.” Rather, as indicated under “Approach to Analysis” on pages 3.4-34 through 3.4-39 of Section 3.4, Greenhouse Gas Emissions and Energy, the Draft EIR states “this analysis considers whether the proposed plan would (1) be consistent with specific measures listed in the Scoping Plan and Scoping Plan Update, and (2)

exceed quantitative thresholds used to determine whether a project will meet the overall State goals to reduce GHG emissions.”

Both the qualitative and quantitative analyses in Draft EIR Section 3.4, Greenhouse Gas Emissions and Energy, rely on State policies and BAAQMD recommended thresholds and are not based solely on consistency with the County CAP. As clearly stated in the Draft EIR page 3.4-36, “[a]lthough the Climate Action Plan no longer serves as a CEQA tool, the document does still serve to advise and coordinate countywide climate protection efforts.” And as indicated by the commenter, “arguably the general ideas in the CAP regarding smart land use and resource efficiency have value as broadly defined strategies.” Therefore, to further address whether the proposed plan would conflict with any other applicable plan, policy, or regulation adopted by the City for the purpose of reducing the emissions of greenhouse gases, the analysis included a discussion of the measures in the County CAP that had been adopted by the City of Healdsburg in March 2018. If the EIR did not consider those measures, then there would also arguably be no additional “applicable plan or policy” to evaluate under Impact GHG-2, as the EIR had already evaluated consistency with State policies contained in the Scoping Plan under Impact GHG-1. Therefore, the discussion presented in the Draft EIR with regard to those policies is conservative and provided to further inform regarding the impacts of the proposed plan. In sum, while the CAP was used as an additional component of the analysis within the Draft EIR’s discussion of the Plan’s consistency with applicable plans and policies, it did not use the CAP solely as a threshold of significance to analyze the Plan’s potential GHG emission impacts.

Response to Comment CRW-5

See Response to Comment CRW-4 on pages 3-54 and 3-55. The commenter restates information in Draft EIR Section 3.4.2, Environmental Setting, and Section 3.4.3, Regulatory Framework. The Draft EIR is consistent throughout the approach and on page 3.4-36 states that “the EIR for the Climate Action Plan was invalidated in 2017, and the Climate Action Plan would not be considered a qualified GHG reduction plan for the purposes of CEQA.” The court action did not invalidate the measures that were adopted by the City of Healdsburg in March 2018, and the Draft EIR appropriately includes a summary of the project’s consistency with those measures in Table 3.4-7 (Draft EIR pages 3.4-48 through 3.4-57) under Impact GHG-2.

Response to Comment CRW-6

The commenter restates the summary of impacts and the Mitigation Measure GHG-1 included in the Draft EIR. The commenter then goes on to state that Mitigation Measure GHG-1 is “invalid deferred mitigation” because of the lack of specificity in the measure. The commenter concludes by stating that if transboundary emissions were included, the proposed plan would conflict with meeting State GHG emissions reduction goals.

Deferring the specific or exact formulation of mitigation measures is common and is not necessarily “invalid” under CEQA. Indeed, the courts have long-recognized that an agency may legally defer development of a specific mitigation measure’s components when it approves a project if the components that will be considered subsequently are described and performance standards/criteria are identified and committed to. And now the recently amended CEQA Guidelines Section 15126.4(a)(1)(B) expressly acknowledges and allows this for mitigation measures like Mitigation Measure GHG-1 included in the Draft EIR that are fully committed to, adopt specific performance

standards and identify the types of potential actions that can feasibly achieve that performance standard. Mitigation Measure GHG-1 included in Draft EIR Section 3.4, Greenhouse Gas Emissions and Energy, on pages 3.4-46 and 3.4-47, fully complies with that case law and with CEQA Guidelines Section 15126.4 in that it requires that each future developer within the Plan area demonstrate “that the proposed development would meet the BAAQMD recommended threshold of significance” through implementation of one or more of the specific suggested measures. Suggested emission reduction measures are included in the Mitigation Measures GHG-1, but it would be up to the lead agency to determine the combination that would be most effective in achieving the levels required by the GHG emission thresholds. As further stated in Mitigation Measures GHG-1, the developer would be required to demonstrate (through emission estimates or other methodology approved by the lead agency) that any measures would meet the recommended thresholds.

The commenter makes assumptions regarding the impacts that would result if additional emissions were included in the analysis. As discussed under Impact GHG-1 on Draft EIR page 3.4-45, the plan-related emissions exceed the quantitative threshold of significance. Therefore, Mitigation Measure GHG-1 is required to reduce emissions. The commenter provides no evidence that any change to the GHG emission estimate would change the conclusions or findings in the Draft EIR.

Response to Comment CRW-7

The commenter asserts that the City should not certify the EIR nor approve the proposed plan. The City believes the Draft EIR is adequate, accurate, and complete in terms of the analysis of the physical environmental impacts, including impacts related to GHG emissions. See Responses to Comments CRW-1, CRW-2, CRW-3, CRW-4, CRW-5, and CRW-6 on pages 3-53 through 3-56 for further discussion specific to adequacy of the Draft EIR GHG emissions impact analysis.

From: Christine Bella Campbell <cbtokyo@gmail.com>
Sent: Monday, December 3, 2018 4:40 PM
To: Maya DeRosa <mderosa@ci.healdsburg.ca.us>
Cc: William D. Campbell <william.campbell@hoteiwines.com>
Subject: North Entry Area Plan - environmental impact.

Dear City of Healdsburg

Thank you for your letter about the development of the North Entry Area.

I am writing to request that you consider to install noise-mitigating sound barriers alongside Hwy 101 as part of this project.

As a resident in Parkland Farms, I noticed that, as soon as 101 was repaved with a concrete barrier down the middle, we suffered a lot more noise pollution from the traffic. It seems that the sound is echoing off the center divider towards the residential areas. The sound definitely is much noisier than before the barrier was erected.

For the quality of life of all the residents in Saggio Hills/Montage, Parkland Farms and future residents of North Entry, I would urge you to consider including a sound wall in the development project of the North Entry.

Thank you.

Kind regards
Christine Campbell
1723 Canyon Run, Healdsburg, CA 95448

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Individuals

Christine Campbell (Campbell)

Response to Comment CAMPBELL-1

The commenter requests that the City consider installing noise-mitigating sound barriers alongside Highway 101 as part of the project for the benefit of the quality of life of all residents in Saggio Hills/Montage, Parkland Farms and future residents of the North Entry development. The commenter further indicates that they have perceived an increase in traffic noise levels experienced in the Parkland Farms neighborhood since Highway 101 was “repaved with a concrete barrier down the middle.”

In regard to potential increases in traffic noise levels experienced at existing land uses in the vicinity of U.S 101 as a result of Caltrans’s improvements to that roadway facility, such noise level increases are not a result of the proposed plan that is not yet implemented. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the noise analysis presented in the Draft EIR. Therefore, the Draft EIR did not analyze such potential impacts.

However, the potential land use compatibility noise impacts from traffic on U.S. 101 and proposed development associated with implementation of the plan are analyzed in the Draft EIR Noise section, beginning on Draft EIR page 3.5-24. Traffic noise levels within the plan area are documented in the analysis by the ambient noise monitoring results and by traffic noise modeling. Draft EIR Table 3.5-10 summarizes the traffic noise modeling results for both existing and future traffic conditions. The analysis identifies on Draft EIR page 3.5-25, that, traffic noise levels from U.S. 101 west of the plan area range up to 74.3 dBA L_{dn} at the plan area’s western boundary. The analysis identifies that these traffic noise levels are in excess of the City’s “Normally Acceptable” range of below 65 dBA L_{dn} for new multi-family residential and transient lodging (hotel) land use developments. Therefore, Mitigation Measure NOI-1b was identified in the Draft EIR (pages 3.5-29 and 3.5-30) that requires that additional site-specific noise analysis be performed to ensure the design of future development within the plan area would meet the City’s land use compatibility standards. Mitigation Measure (MM) NOI-1b also requires that design improvements be identified, as needed, to maintain interior noise levels at or below 45 dBA L_{dn} . Such site-specific design measures will be identified at the time that a site plan is identified. Therefore, the Draft EIR analysis shows that, with implementation of Mitigation Measure NOI-1b, U.S. 101 traffic noise impacts to on-site receptors would be less than significant.

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From: Ron Grassi <ronsallygrassi@mac.com>
Sent: Sunday, December 2, 2018 10:05 AM
To: Maya DeRosa <mderosa@ci.healdsburg.ca.us>
Cc: Dan Petrik (forwarding) <dan.petrik@gmail.com>
Subject: North Entry Area Plan

Hello Maya: I had a few preliminary comments about the North Entry Area Plan. The Draft EIR is very general and attractive in nature so it's hard for me to be specific at this point. However, could you address the following:

1. **Population:** What is the added maximum population for this Area legally permissible under the current zoning? I note in one part of the Plan a projection of 290 units is depicted. Is that the max. number of units. And in any case what increase in resident population is possible?
2. **Traffic:** what is the specific projected increase in traffic count? What formula/assumption are you using, like 3 people to each car?
3. **Evacuation:** in the event of an emergency, what is the plan for this development? and then specifically what is the plan if a fire breaks out at the north end of the North Entry Area? Are we left with say 1,000 people in cars trying to head south on Healdsburg Ave. and competing with the Saggio people, and yes the Parkland Farms people? Can you please tell me the projected #s for the North Area (600?) and Saggio (500?) and Parkland Farms (800?)? This would be important to all of us in evaluating the current Area Plan. Thank you.
4. **Carrying capacity:** I realize this partly goes to the Healdsburg general plan, but, that said, has the planning department sat down and looked at all the projects underway both in construction or planning? What I'm getting at: let's say the current population of Healdsburg is 12,000. So, to exaggerate, I assume you and I would agree that if we increased the housing in the future to allow the City to reach a population of 40,000 that you and I would clearly agree that would tax the City's capacity to provide the quality life we currently enjoy in Healdsburg as we know it. So, then we ratchet the 40,000 example down, and say we admit to 25,000 in this exercise. Is that our limit? or is there some other analysis you could share with me? Maya: what is our City's resident limit and how was it determined? (Note: this letter does not attempt to factor in the added tourist population at this time)
5. **A reminder:** I suggested to you in an earlier email, that your department add the # of units to your project Healdsburg map re presently proposed or under construction projects. I can think of several, apart from those in #4 above, that would collectively add several hundred and maybe a 1000 more people using Healdsburg Ave. at the same time in an evacuation. We, the public, need that input (and CEQA expressly requires developers and planning departments to divulge nearby projects because they're quite relevant.).

Sincerely

Ron Grassi
Parkland Farms resident.

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Ron Grassi Letter 1 (Grassi-1)

Response to Comment Grassi-1-1

The commenter inquires as to a maximum population allowed within the plan area. The General Plan sets maximum allowances for development density within the City. Within the plan area, the land use designation of MU (Mixed Use) allows for up to 16 units/acre. In the City's discussions with the Planning Commission about the future development within the plan area, the recommendation was to allow more residential than what the General Plan alternative analyzed (150 units). Using a generation factor of 2.54 persons per household (an American Community Survey 2008-1012 assumption), 290 units could potentially result in up to accommodate approximately 736 residents. If the proposed plan is adopted with 290 units as the project description, that number (290 units) would become the maximum number of residential units allowed within the plan area, subject to any increases pursuant to state or local density bonus law.

Response to Comment Grassi-1-2

The commenter inquires as to the vehicle trip generation associated with the proposed plan. The commenter also asks what methodology was used to determine the plan-related traffic trip generation. Table 2-2 (Specific Development Summary) on Draft EIR page 2-9 presents the development buildout assumptions utilized to conduct plan-related modeling and analysis, and Table 3.2-4 on Draft EIR page 3.2-19 presents the associated plan-related trip generation rates and traffic counts. As explained in greater detail on Page 3.2-19 of the Draft EIR, the traffic that would potentially be generated by development of the proposed plan was estimated using standard trip generation rates for multifamily housing, a hotel, office space, and retail land uses and associated gross square footage, rather than population. Development of the land uses assumed for purposes of evaluating the proposed plan would be expected to generate 4,930 trips per week day, including 259 trips during the morning peak hour (129 inbound and 130 outbound) and 351 p.m. peak hour trips (164 inbound and 187 outbound).

Response to Comment Grassi-1-3

The commenter asks what the emergency evacuation plan is for development within the plan area. Healdsburg Avenue near the project site currently carries approximately 600 vehicles per hour during the peak hour of the day based on counts performed in April 2018. The volume assumed for development of the Plan area would add about 350 peak hour trips. As residences typically generate about one trip per household during peak hours and many employee trips are made during that same hour, the highest volume hour would reasonably be expected to represent at least half the volume of traffic that might occur in a single hour during an evacuation. The resulting 950 peak hour trips on Healdsburg Avenue is well within the carrying capacity of 1,700 vehicles per hour per lane⁴ for this roadway for normal conditions. Under evacuation conditions it would be likely that the roadway would be temporarily converted for use one-way outbound; this would essentially double its capacity to 3,400 versus a potential demand of 1,900 vehicles. It should be noted that emergency response and evacuation plans are as variable as the types of events and disasters requiring emergency response and evacuation. At present, the City does not have projections of potential congestion related to emergency evacuations in any given area.

⁴ Transportation Research Board. 2010. *Highway Capacity Manual 2010*, page 15-5.

Response to Comment Grassi-1-4

The commenter asks if the City has a resident limit. The City does not have a resident limit. The 2010 Census population for Healdsburg was 11,254 according to the City’s Housing Element, Table 31, Population Projections. Population projections through 2030 are provided by the Association of Bay Area Governments. These projections show a 2030 population for Healdsburg of 12,000. The U.S. Census Bureau’s “Quick Facts” tool estimates the July 1, 2017 population for Healdsburg at 11,840.

The City’s General Plan is the policy document that guides and constrains new development in Healdsburg. The General Plan EIR evaluated the potential impacts associated with future development on various facilities and services with finite capacity (i.e., streets, sewer, water, schools, fire, police, etc.). While these metrics do not address “quality of life,” they can serve as a proxy. See Draft EIR Appendix A (Initial Study) Section 2.13 (Population and Housing) for information and projections from 2009.

Response to Comment Grassi-1-5

This commenter makes a suggestion to add the number of units to the Healdsburg map in terms of presently proposed or under construction projects in order to understand the expected cumulative projects additional population. Since the associated land uses types, densities, and populations of projects currently proposed and under construction in the City are taken into account by the Healdsburg 2030 General Plan and as stated on Draft EIR page 3-4 “the 2030 General Plan buildout is the cumulative projects scenario for the EIR,” the cumulative analyses in the EIR takes such projects into account. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of the physical environmental impacts presented in the Draft EIR.

From: Ron Grassi [mailto:ronsallygrassi@mac.com]
Sent: Wednesday, December 12, 2018 11:50 AM
To: Linda Ruffing <linda@nccplanning.com>
Cc: Maya DeRosa <mderosa@ci.healdsburg.ca.us>
Subject: Re: North Entry Area Plan

Thank you Maya and Linda for this information which I need to study. However, with respect to the population and census information at the end of my letter and your response, I have a question. If the 2010 Census shows 11,254 do you know the current population for 2018? Whatever that number is, let's say for sample purposes the City has added 750 soles, so we're up to 12,000 but I would suspect a lot more. Given the size of all the current projects together with all projects that should be complete by 2030, how can the projection to 2030 show 12,000 if we're already there ie no growth at all? Said differently, don't we add to our population figure every year? and if so maybe 1,000/yr? And if 1,000 from 2010, then aren't we already at around 20,000 and moving to say 30,000 by 2030? I realize there are no doubt a dozen other factors not considered in what I'm getting at, but still: aren't we growing esp. given all the projects already finished from 2010 to the present and those projected over the next 10 years?

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Ron

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Ron Grassi Letter 2 (Grassi-2)

Response to Comment Grassi-2-1

The commenter inquires as to the current 2018 population of the City of Healdsburg and whether the City is still growing. Draft EIR Appendix A (Initial Study) Section 2.13 (a) states that the City's current General Plan projects population at full City buildout to be 11,600 in 2020, and 12,300 in 2030. An exact 2018 population number is not available. The next Census in 2020 will be the next time an updated City population number (rather than a projection) is available. The City is growing physically in a manner that is generally consistent with the development contemplated in the General Plan. Consistent with the General Plan and anticipated buildout in the Healdsburg Housing Element 2015–2023, the proposed plan would accommodate population growth with new residential units. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of the physical environmental impacts presented in the Draft EIR.

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**Planning Commission
Meeting Minutes
December 11, 2018
6:00 PM**

6:30 PM – Regular Meeting called to order following the workshop.

1. ROLL CALL

Commissioners present: Civian, Breznikar, Eddinger, Luks, Petrik, Tracy
Commissioners absent: Bottarini

City Staff present: Planning and Building Director Maya DeRosa, Public Works Director Larry Zimmer, Community Services Director Mark Themig, Senior Planner Joel Galbraith, Contract Planner Linda Ruffing, Principal Engineer Curt Bates, City Attorney's Office Samantha Zutler, City Attorney's Office Debora Kartiganer, Administrative Specialist Shawn Sumpter.

2. ADMINISTRATIVE ACTIONS

- A. On a motion by Commissioner Luks, seconded by Commissioner Tracy, the Commission voted 6-0-1 (Bottarini absent) to approve the December 11, 2018 agenda.
- B. On a motion by Commissioner Luks, seconded by Commissioner Tracy, the Commission voted 6-0-1 (Bottarini absent) to approve the minutes for October 23 and October 30, 2018.
- C. Acceptance of Communications and Correspondence
 - Letter from Ron Brassy
- D. Declarations of Conflicts of Interest: None
- E. Disclosures of Ex Parte Communications: None

3. PUBLIC COMMENTS

None

4. PUBLIC HEARINGS

A. Item

Description: North Area Entry Plan (NEAP) and Draft EIR

Project

Description: Area Plan for the future development of a 32.48 site. The Draft EIR evaluates the potential impacts of 290 residential units and 200,000 sq. ft. of non-residential use.

Location: 16977 Healdsburg Avenue and the adjacent Healdsburg Avenue roadway area.

Applicant: City of Healdsburg

Environmental

Determination: Environmental Impact Report

Contract Planner Linda Ruffing presented the staff report. Kelsey Bennett of First Carbon Solutions provided an overview of the Environmental issues. Dalene Whitlock of W-Trans presented the traffic component.

Commissioner Eddinger asked about the costs sharing of the traffic impact mitigation measures. | 1

Whitlock explained that the City of Healdsburg is acting as the lead agency, coordinating with the County of Sonoma and Caltrans.

Ruffing stated that the City is beginning a study of the costs and how to assess proportional shares. The improvements will be phased with the first phase consisting of a 4-way stop at the southbound off-ramp. This will improve conditions but not completely resolve the issues.

Commissioner Eddinger noted that it was not likely that the funding would be in place before the EIR is complete.	2
Chair Civian asked about the timing for the proposed improvements at the intersection of Grove Street and Dry Creek Road.	3
Whitlock stated that proposed improvements can be done within the existing right-of-way and noted that the southbound approach has a known right-of-way issues.	
Whitlock confirmed for Chair Civian that phase one has been designed and is funded for the spring.	
Commissioner Luks asked if the right-of-way issue at the southbound approach of the Grove/Dry Creek intersection could be solved by condemnation.	4
Ruffing confirmed that condemnation to widen the intersection is an option. She noted that this is identified as significant in the EIR because the mitigation measures are outside of the control of the developer.	
Whitlock noted that it could be included in the conditions of approval for development of the adjacent property. She further explained that the improvements at the 101 interchange are considered significant and unavoidable because they require coordination with and approval by other agencies, outside of the City's purview. .	
In response to an earlier question Bennett stated that the anticipated 2030 buildout population is 14,469.	
Commissioner Luks asked for a clarification of the wording on page ES.3 regarding the project alternatives.	5
After discussion Ruffing agreed to modify the wording.	
Commissioner Luks pointed out that the last time the Commission provided a statement of overriding consideration was with the Montage/Saggio project which included a laundry list of benefits that the project provided to the community including lands for parks, affordable housing and a fire station. He reminded the Commission of the magnitude of those considerations.	6
Chair Civian opened the public input portion of the hearing.	
Irene Kiff, Alexander Valley Road, asked about the impacts at "Alexander Valley Road and Lytton Station Road" [sic]. She noted that if she were involved with either project (Montage or NEAP) she would go north to get on the freeway not south.	7
There being no further speakers, Chair Civian closed the public input portion of the hearing.	
Commissioner Luks expressed his concern that the project used to generate the EIR assumes that there would be 290 residential units which would include any units for a proposed senior living facility, a 130 room hotel. He expressed concerns that the area plan has not been finalized and the land uses that are not firm. He opined that the hotel is too large and the residential areas too small. Any plan for a hotel and senior living should also provide for the employees at the very least and should be housing impact neutral. He stated that he could not vote to approve a project that does not provide a meaningful amount of additional housing. He questioned how the Commission can approve the EIR if the final scope of the project is substantially different from the assumptions used.	8 9
Chair Civian asked for and received clarification that hotels are not considered residential, they are considered commercial.	10
Commissioner Luks stated that the hotel and residential are addressed separately in the assumptions.	

Commissioner Eddinger addressed the traffic impacts and affirmed Ms. Kiff's comment that if you are in area at the north end of Healdsburg it is quicker to use the Lytton Springs interchange to access the freeway rather than go south. He opined that he EIR could go farther north and look at the Lytton intersection.

Luks stated that if the city wanted the project to be staged in conjunction with the proposed phased improvements at the Dry Creek interchange this project would never get off the ground.

Commissioner Eddinger opined that the issues regarding right-of-way width at Grove Street at Dry Creek need to be addressed.

Commissioner Breznikar asked for clarification of the chart showing the proposed uses noting that it did not seem to be what the Commission was working with for the plan.

Ruffing explained that in order to do the analysis it was necessary to develop numbers that reflect total buildout as a "worse case" scenario.

Breznikar opined that the numbers seem large for a neighborhood.

Commissioner Luks stated that the senior living facility would have large square footages devoted to business uses ancillary to actual private living spaces. He stated that close coordination between staff and the developer needs to occur to make sure assumptions are as close as possible for the EIR.

Commissioner Eddinger gave an example of a building footprint that would accommodate a 3 story 30,000 square foot general office and opined that it was not very big.

Chair Civan commented on the circulation plan, stating that the Draft Area Plan does not reflect the level of detail that would reflect the Commission's preference for streets arranged in a grid like pattern. The idea of having to wait for Caltrans to address the interchange issues concerns him.

Commissioner Petrik asked for a clarification of the certification process.

Kartiganer stated that he EIR would eventually be certified and then applied to a project. If a project were approved the EIR would be evaluated for its consistency and to make sure it adequately addressed the impacts of the project. Mitigations would be applied to the project and if necessary, and in this case it would be, a statement of overriding considerations would also need to be adopted. She then confirmed for Commissioner Petrik that if the actual project was smaller than the assumed maximums the mitigation measures could be scaled back.

Chair Civan asked for a review of the changes made to the NEAP since the last workshop.

Ruffing explained that comments provided on the plan now will help staff prepare for the January workshop. She then provided an overview of the modifications.

In response to a question from Commissioner Tracy, Ruffing explained that the January workshop will provide direction to staff leading to a final plan.

Chair Tracy asked about using the term boutique hotel, wouldn't it be better to describe a range of rooms to express size rather than a name.

Ruffing agreed noting that at this time the plan has a cap of 120 rooms.

Civan opined that it is better to be clear.

Commissioner Luks commented that to summarize; we need to deal with the size of the hotel, the nature of the assisted living facility and whether that is a must for the developer and if so is the Commission in agreement with that, he agreed that the circulation needs to be addressed, where is the center of the community, the location of the park, parking in general, and the integration rather than segregation of the senior living facility into the community. He expressed

concerns about the process and the level of approvals. He suggested that the developer address these issues at the next workshop so that the Commission can look at the proposal and better formulate their response. He compared the process followed with the Montage and Replay developments and advocated for an area plan that is more specific than what they have been working on.

Chair Civian asked staff if there are issues with developing a plan with a specific developer in advance of the approval of an EIR.

Kartiganer responded that she does not see that as a being huge problem. There are ways in the implementation to be specific while giving the discretion to decide and have flexibility between land uses. She stated that staff is planning a Zoning Ordinance amendment that may help with this.

Ruffing spoke about the possibility of the developer making a presentation at the next workshop. She opined that it might be a good time for this to happen.

Commissioner Tracy expressed concerns about mixing processes.

Commissioner Luks described his experience and his opinion that having a more specific plan critique gives a basis for a better discussion of what the community does and does not want to have happen.

Chair Civian noted that the flexibility of the plan can be retained in order to accommodate a new property owner should that happen.

Commissioner Petrik noted the January deadline for comments and asked if written comments had been received.

Ruffing stated that the one letter provided to the Commission is the only comment received so far. The comment period for the on the Draft EIR goes through January 14, 2018 and the comments on the area plan are due January 14th as well.

Ruffing noted that the workshop is likely to be held before the second meeting in January.

B. Item

Description: Property Development Code Amendment MISC 2018-05 (Subdivision Ordinance – Park and Recreational Land)

Project

Description: Amendments to the City of Healdsburg Property Development Code, Title 17, Article VIII, Park and Recreational Land, Sections 17.04.600 through 17.04.720 to amend standards regulating the dedication of land and payment of in-lieu fees regarding the provision of park and recreational facilities as a condition of residential subdivision approval pursuant to the authority granted by Section 66477 of the State Government Code (the “Quimby Act”).

Location: City-Wide

Applicant: City of Healdsburg

Environmental

Determination: The project is exempt from the provisions of the California Environmental Quality Act (CEQA) Pursuant to CEQA Guidelines Section 15061(b)(3).

Senior Planner Joel Galbraith and Mark Themig presented the staff report.

Commissioner Luks said his understanding that there was a schedule of fees but now it is based on fair market value and asked for an explanation.

Director Themig stated that there were different options possible to determine the fee. He said this method was chosen to give more certainty to the fee. He clarified that park impact fees are a set fee and they still exist.

City Attorney Zutler explained that the State statute does not specify how in-lieu fees are calculated. Most cities are using fair market value. After some discussion the city has decided to follow this trend.

Commissioner Petrik asked if trails and pathways can benefit from these fees.

Themig stated that yes pathways and trails established as a part of the park system can benefit from these fees.

A discussion ensued regarding the difference between these in-lieu fees and development fees.

Commissioner Eddinger asked about the fees charged with a building permit and noted that fees that are required at the time of subdivision put a burden on projects that may not be able to get a building allocation for years in the future.

Themig explained that the development fees are charged at the time a building permit is issued to offset the impact of adding a new resident. The park dedication and in-lieu fee is for new facilities to serve the expanded population. He noted that there is an ability to defer fees. He further explained that this is a continuation of an existing ordinance.

A discussion ensued regarding the burden of paying fees at the time of land division rather than at building permit issuance.

Themig pointed out that tracking unpaid fees could be a challenge but could be done. He noted that it would make it more challenging to project spending and project planning but stated that the Commission has the ability to suggest that the fees be due at building permit issuance.

Luks commented that requiring larger projects to pay up front may incentivize land dedication.

Zutler asked if the Commission would like to request a change to the timing of the payment of the fees.

Chair Civian stated that he would open the public input portion of the hearing first.

Chair Civian opened the hearing for public input.

Alan Cohen Center Street, stated that land designated as private open space should not be exempt. If it has public access then the credit makes sense.

Kathy Birdsong, Park and Recreation Commission, stated that the Park and Recreation Commission feels that space within development that should be used as public not just private.

There being no further speakers, Chair Civian closed the public input portion of the hearing.

Commissioner Eddinger opined that private is private so the fees should apply. The City has done a good job in the past 20 years taking care of park needs. He stated that he would like to see that continue.

Commissioner Luks some areas may be exceptions like the area around the redwood grove at Replay. He stated that he hopes the developer will maintain it but allow the public to use it. The general rule should be private is private and public is private.

Chair Civian asked for and received a consensus from the Commission to support staff's recommendation.

Chair Civian asked for and received consensus on the recommendation to charge the fee at the time of building permit issuance.

On a motion by Commissioner Eddinger, seconded by Commissioner Luks, the Commission voted 6-0 (Bottarini absent) to approve Property Development Code Amendment MISC 2018-05

(Subdivision Ordinance – Park and Recreational Land) with the amendment requiring payment to occur at the time of building permit issuance regardless of project size.

5. **NEW BUSINESS**
None
6. **COMMISSIONER AND SUBCOMMITTEE REPORTS**
None
7. **DIRECTOR'S REPORT**
None

The meeting adjourned at approximately 8:30 PM.

Maya DeRosa, Secretary

Jeffrey D. Civian, Chair

Planning Commission Hearing

City of Healdsburg Planning Commission Hearing Minutes (PC Hearing)

Response to Comment PC-1

The commenter inquires as to the cost-sharing of the transportation mitigation measures identified in the Draft EIR. The City is establishing a methodology for allocating a proportional share of the cost of planned improvements at the Dry Creek Road interchange with U.S. 101 to the various development projects currently under consideration as well as those that may come forth in the future.

Response to Comment PC-2

The commenter noted it was not likely that transportation improvement funding would be in place prior to EIR certification. Transportation improvements funding need not be in place prior to EIR certification. The planned installation of all-way stop controls at the southbound ramp intersection with Dry Creek Road is expected to be complete in 2019 and would provide acceptable operation in the short term. Longer-term improvements planned for the U.S. 101/Dry Creek Road interchange, including the addition of turn lanes and traffic signals, may not be constructed prior to occupation of the plan area, though any specific project within the plan area would be conditioned to pay into the fund for these future improvements. Because the timing of these projects is not yet known, the DEIR considers the significant adverse impacts related to plan-related traffic at the U.S. 101/Dry Creek Road intersection to be unavoidable.

Response to Comment PC-3

The commenter asked about the timing for the proposed improvements at the intersection of Grove Street and Dry Creek Road. The lane configuration modification to the northbound Grove Street approach to Dry Creek Road together with the modification of the traffic signal to include a protected left-turn phase could be constructed at any time, as no additional right-of-way would be necessary to complete these improvements. Any project(s) proposed within the plan area would be conditioned to pay a proportional share of the costs of this roadway improvement project.

Response to Comment PC-4

The commenter asked if the right-of-way issue at the southbound approach of the Grove Street/Dry Creek Road intersection could be solved by condemnation. Through condemnation, the City might be able to obtain the land necessary to widen the southbound Grove Street approach to Dry Creek Road as necessary to achieve acceptable traffic operation. Conversely, the City might be able to obtain the land needed from the property owner as a condition of approval for any future development proposed on the northeast corner of the intersection. However, the outcome of any such condemnation action is speculative due to timing and cost considerations, and the outcome of any future project conditions is similarly speculative. Therefore, the cumulative impacts at this intersection were identified as being significant and unavoidable.

Response to Comment PC-5

The commenter inquired as to whether there were indeed four EIR Alternatives that were assessed and analyzed. As stated on Draft EIR page ES-3, the City identified and considered four alternatives to the proposed plan: No Project, General Plan Quaker Hills, North Village Project, and Reduced

Commercial. Under the No Project Alternative, no development would occur in accordance with existing Healdsburg 2030 General Plan land use designations or land uses contemplated by the proposed plan. Under the General Plan Quaker Hills Alternative, the plan area would be developed but modified per the assumed Healdsburg 2030 General Plan mixed use alternative. Under the North Village Project Alternative, the plan area would be developed with a range of land uses as proposed by the property owner of the North Village site. Under the Reduced Commercial Alternative, the plan area would be developed with residential use permitted under the proposed plan but include substantially less commercial development. Impacts associated with the proposed plan are compared with each alternative. Table 4-5 (Summary of Alternatives' Impacts Significance Conclusions) on Draft EIR pages 4-18 and 4-19 provides a comparison of impacts.

Response to Comment PC-6

The commenter provided a reminder regarding the magnitude of public benefits offered in connection with the Montage/Saggio project, for which a Statement of Overriding Considerations was adopted pursuant to CEQA. Note that, since the EIR identifies significant and unavoidable impacts, if the City were to proceed with certifying the EIR, the City would also be required to evaluate public benefits offered by this project in the context of a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of the physical environmental impacts presented in the Draft EIR.

Response to Comment PC-7

The commenter states that they would travel north from the plan area to get to U.S. 101. Traffic to and from the north was assumed to use the interchange with U.S. 101 at Lytton Springs Road. See also Responses to Comments CDOT-5 and SCPRM-2 on pages 3-19 and 3-37 for discussions of why plan- and cumulative-level operations analyses of the U.S. 101/Lytton Springs Road interchange were not justified.

Response to Comment PC-8

The commenter expressed concern about the land use assumptions used in the Draft EIR. The commenter also expressed concern about the land uses not being firm within the proposed plan and corresponding EIR analysis. Table 2-2 (Specific Development Summary) on Draft EIR page 2-9 presents the development buildout assumptions utilized to conduct plan-related modeling and analysis. The assumptions used in the EIR represent the most environmentally intense scope of development that reasonably could be assumed to be constructed and operated under the proposed plan within the plan area. As such, the Draft EIR adequately modeled and analyzed the totality of land uses that could be developed under the proposed plan.

Response to Comment PC-9

The commenter expresses concern related to the amount of housing included in the proposed plan, including that for employees of the proposed development. The proposed plan contemplates redevelopment of the plan area with new residential and commercial land uses, as discussed in Draft EIR Chapter 2 (Project Description). This mix of uses is consistent with mixed use land use designations, mixed use zoning, and the 290 residential units and 200,000 square feet of commercial

development anticipated within the proposed North Entry Area Plan. Draft EIR Appendix A (Initial Study) Section 2.13 (Population and Housing) states that the General Plan projects population at full City buildout to be 11,600 in 2020 and 12,300 in 2030. Consistent with the General Plan and anticipated buildout in the Healdsburg Housing Element 2015–2023, the proposed plan would accommodate population growth, including that for employees of the proposed development, with new residential units and commercial development consistent with the land use designation and within anticipated buildout under the General Plan. Therefore, Draft EIR Appendix A (Initial Study) Section 2.13 concludes that the impact related to growth and provision of associated housing would be less than significant.

Response to Comment PC-10

The commenter asked for confirmation that hotels are not considered residential. Hotels are not considered a residential land use. Rather they are considered a visitor-serving commercial land use.

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CHAPTER 4: DRAFT EIR REVISIONS

This chapter is organized by staff-initiated Draft EIR text changes and RTC-driven Draft EIR text changes. It is further organized by environmental topic and contains edits to the Draft EIR that are incorporated into the Final EIR. Draft EIR edits are shown in underline text for additions and in ~~strikeout~~ text for deletions.

Section 4.1—Staff-initiated Draft EIR Text Changes

Executive Summary

The following change to text on Draft EIR page ES-4 is made:

Impacts associated with the proposed plan are compared with each alternative. Table 4-45 (Summary of Alternatives' Impacts Significance Conclusions) provides a comparison of impacts.

The following changes to text with the Draft EIR Executive Summary Table (on pages ES-7 through ES-14) is made:

Table ES-1: Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
Section 3.1—Aesthetics		
Impact AES-1: The proposed plan would not result in visually-obtrusive development on scenic ridgelines designated in the Healdsburg General Plan.	None	No Impact
Impact AES-2: The proposed plan would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings, within the viewshed of a State scenic highway or a scenic highway designated in the Healdsburg General Plan.	None	Less than significant
Impact AES-3: The proposed plan would not substantially degrade the existing visual character or quality of the plan area and its surroundings.	None	Less than significant
Impact AES-4: The proposed plan would not create a new source of substantial light or glare that would adversely affect nighttime or daytime views in the area.	None	Less than significant
Cumulative Impact	None	Less than significant
Section 3.2—Transportation/Traffic		
Impact TRANS-1: The proposed plan could conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all transportation modes, including public transit and non-motorized travel and relevant components of the circulation system.	<p>MM TRANS-1a: To address anticipated deficient roadway operations, the City has planned for roadway improvements to Dry Creek Road/U.S. 101 South Ramps (study intersection 1) <u>that</u> include signalization. New development within the plan area shall be required to contribute a proportional share allocation towards the cost of installation of a traffic signal at Dry Creek Road/U.S. 101 South.</p> <p>MM TRANS-1b: New development within the plan area shall be required to improve contribute a proportional share allocation towards the cost of improvements to the northbound approach to Dry Creek Road/Grove Street (study intersection 3). The approach shall be restriped to include a separate left-turn lane <u>with a length of at least 275 feet</u> and the signal modified to provide protected left-turn phasing, with the existing right-turn lane converted to use for through/right-turn movements.</p>	Significant and unavoidable with mitigation

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	<p>MM TRANS-1c: <u>New developments within the plan area shall be required to prepare and implement a Transportation Demand Management (TDM) Plan to minimize traffic as much as is reasonably feasible. Such Plans may include measures such as ride-sharing, transit passes, unbundled parking, directing traffic to the Lytton Springs Road interchange, guaranteed rides home, and other impact-reducing measures and shall be submitted to and approved by the City as part of any individual development approvals.</u></p>	
<p>Impact TRANS-2: The proposed plan would not conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.</p>	<p>None</p>	<p>No impact</p>
<p>Impact TRANS-3: The proposed plan could result in inadequate emergency access.</p>	<p>Implement Mitigation Measures HAZ-2 and the following: MM TRANS-3: Prior to development of the plan area, an emergency vehicle only access point shall be established such that access and egress can be maintained during a train pre-emption at the at-grade railroad crossing at the site entry.</p>	<p>Less than significant with mitigation</p>
<p>Impact TRANS-4: The proposed plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycling, or walking facilities, or otherwise decrease the performance or safety of such facilities.</p>	<p>None</p>	<p>Less than significant</p>
<p>Impact TRANS-5: The proposed plan could increase hazards due to a design feature (e.g., sharp curves or dangerous intersections or lane storage) or incompatible uses (e.g., farm equipment).</p>	<p>MM TRANS-5: New development within the plan area shall be required to contribute a proportional share allocation towards the cost of widening Dry Creek Road to accommodate a westbound left-turn lane the entire length between the U.S. 101 South and North Ramps. The amount paid shall include a proportional share of the cost to widen the westbound approach to Dry Creek Road/U.S. 101 North Ramps to include a second lane; the left lane would feed into the left-turn lane at the U.S. 101 South Ramps and the right lane would be a shared through/right-turn lane serving through traffic</p>	<p>Significant and unavoidable with mitigation</p>

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	and right turns onto the U.S. 101 North on-ramp. These improvements would allow queues in the westbound left-turn lane at the U.S. 101 South Ramps to stack beyond the Dry Creek Road/U.S. 101 North Ramps intersection, if needed, without impacting through traffic.	
Cumulative Impact	None available Cumulative MM TRANS-1: <u>New development within the plan area shall be required to contribute a proportional share allocation towards the cost of signaling Dry Creek Road/U.S. 101 North Ramps. The design for the traffic signal shall include provision of an overlap phase between the westbound through movement and the right turn from the off-ramp.</u>	Significant and Unavoidable with Mitigation
Section 3.3—Air Quality		
Impact AIR-1: The proposed plan would not violate an applicable federal or state <u>State</u> ambient air quality standard or contribute substantially to an existing or projected air quality violation.	None	Less than significant
Impact AIR-2: The proposed plan would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under an applicable federal or state <u>State</u> ambient air quality standard (including releasing emissions which, exceed quantitative thresholds for ozone precursors).	None	Less than significant
Impact AIR-3: The proposed plan would not <u>could</u> expose sensitive receptors to substantial pollutant concentrations.	Implement MM HAZ-1 and the following: MM AIR-3: Prior to occupancy of any residential components of the proposed plan that would occur while construction within the plan area is still underway, the applicant shall retain a qualified air quality consultant to prepare a health risk assessment (HRA) in accordance with the ARB and the Office of Environmental Health and Hazard Assessment requirements to determine the exposure of plan residents to TACs. The HRA shall be submitted to the Planning Division for review and approval. If the HRA concludes that the air quality risks from ongoing or future construction activities will <u>would</u> result in health risks for on-site receptors that are	Less than significant with mitigation

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	<p>above BAAQMD recommended thresholds that are in place at the time of the analysis (Section 2.3 of the 2017 BAAQMD CEQA Guidelines), then additional measures, such as the requirement for construction equipment to meet certain Tier-tier engine standards for off-road equipment, will <u>shall</u> be required for all subsequent phases of construction. Alternatively, this mitigation measure can be satisfied by delaying occupancy of any on-site residential components until construction of the entirety of the proposed plan area is complete.</p>	
<p>Cumulative Impact</p>	<p>Implement MM AIR-3, and MM HAZ-1</p>	<p>Less than significant with mitigation</p>
<p>Section 3.4—Greenhouse Gas Emissions and Energy</p>		
<p>Impact GHG-1: Implementation of the proposed plan could conflict with applicable measures of the Scoping Plan adopted by the State of California to reduce GHG emissions to 1990 levels by 2020.</p>	<p>MM GHG-1: Prior to the final discretionary approval for each development project in the plan area, each developer shall provide documentation to the City of Healdsburg demonstrating that the proposed development would meet the BAAQMD recommended threshold of significance for individual projects or would achieve additional GHG emissions reductions sufficient to meet <u>the</u> recommended threshold through a combination <u>of</u> one of <u>or</u> more of the following measures and/or other comparable measures approved by the City:</p> <ul style="list-style-type: none"> • Commit to 100 percent renewable energy use through a combination of use of on-site renewable energy and Healdsburg Electric’s “Green Rate” program. • Install onsite solar panels to generate electricity on-site electricity consumption. • Provide documentation of how a ride sharing program or other transportation demand management program for hotel, office, and retail employees would be implemented starting no later than 60 days after operations begin. Use of electric vehicles for ride-share program would further reduce GHG emissions. • Install electric vehicle charging stations at workplaces<u>u</u> and multi-family residences to promote the use of electric vehicles. • Use heat-pumps (rather than natural gas) for heating of residential and 	<p>Less than significant with mitigation</p>

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	commercial spaces. <ul style="list-style-type: none"> • Purchase voluntary carbon credits from a verified GHG emissions credit broker in an amount sufficient to offset operational GHG emissions that exceed the recommended significance threshold over the lifetime of the proposed development (or a reduced amount estimated based on implementation of other measures listed above). Copies of the contract(s) shall be provided to the City. 	
Impact GHG-2: Implementation of the proposed plan could conflict with an applicable plan, policy, or regulation adopted by the City for the purpose of reducing GHG emissions.	Implement MM GHG-1	Less than significant with mitigation
Impact GHG-3: Implementation of the proposed plan would not encourage activities that result in the use of large amounts of energy, or use of energy in a wasteful manner.	None	Less than significant
Cumulative Impact	Implement MM GHG-1	Less than significant with mitigation
Section 3.5—Noise		
Impact NOI-1: The proposed plan could result in a substantial temporary, periodic or permanent increase in ambient noise levels in the project <u>plan</u> vicinity that would conflict with the Healdsburg 2030 General Plan’s Land Use Compatibility for Community Noise Environments guidelines of the City of Healdsburg Noise Ordinance or applicable standards of other agencies.	MM NOI-1a: To reduce the occurrence of potentially-significant construction noise impacts to noise-sensitive receptors in the plan area vicinity (or sensitive receptors within the plan area during future buildout), the construction contractor for each development project within the plan area shall comply with the following: <ul style="list-style-type: none"> • Equip internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and are appropriate for the equipment. • Locate stationary noise-generating equipment as far as possible from sensitive receptors in the vicinity. • Locate staging areas and construction material areas as far away as possible from adjacent land uses. • Prohibit all unnecessary idling of internal combustion engines. 	Less than significant with mitigation

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	<ul style="list-style-type: none"> • Utilize “quiet” air compressors and other stationary noise sources where technology exists. • Erect temporary noise control blanket barriers in a manner to shield noise-sensitive uses. • Control noise levels from workers’ amplified music so that sounds are not audible to sensitive receptors in the vicinity. • If impact pile driving is proposed, multiple-pile drivers shall be considered to expedite construction. Although noise levels generated by multiple pile drivers would be higher than the noise generated by a single pile driver, the total duration of pile driving activities would be reduced. • If impact pile driving is proposed, temporary noise control blanket barriers shall shroud pile drivers or be erected in a manner to shield the adjacent land uses. Such noise control blanket barriers can be rented and quickly erected. • If impact pile driving is proposed, foundation pile holes shall be pre-drilled to minimize the number of impacts required to seat the pile. Pre-drilling foundation pile holes is a standard construction noise control technique. Pre-drilling reduces the number of blows required to seat the pile. Notify all adjacent land uses of the construction schedule in writing. • Designate a “disturbance coordinator” responsible for responding to complaints about each project development’s construction noise and taking reasonable measures to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in any notice sent to neighbors regarding the construction schedule. • The construction contract shall prohibit noise producing construction activities between the hours of 6:00 p.m. and 7:30 a.m. Monday through Saturday, or at any time on a Sunday or legal holiday. <p>MM NOI-1b: Prior to the issuance of building permits for each development project within the plan area, the following requirements shall be implemented:</p> <ul style="list-style-type: none"> • For multi-family residential or motel/hotel projects proposed in areas where exterior day/night average noise levels are, or are projected to 	

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	<p>exceed, 65 dBA L_{dn} (i.e., within 290-feet of the centerline of U.S. 101), an acoustic analysis shall be prepared that recommends project improvements, as needed, to maintain interior noise levels at or below 45 dBA L_{dn}. This can typically be accomplished with the incorporation of an adequate forced air mechanical ventilation system in the residential units to allow residents the option of controlling noise by keeping the windows closed. The City shall confirm that the recommendations will reduce noise levels below the threshold levels and require compliance with the recommendations of the acoustic analysis.</p> <ul style="list-style-type: none"> For school, library, church, hospital, nursing home, neighborhood park, or commercial projects proposed in areas where exterior day-night average noise levels are, or are projected to exceed 70 dBA L_{dn} (i.e., within 140-feet of the centerline of U.S. 101) an acoustic analysis shall be prepared that recommends project improvements, as needed, to maintain interior noise levels at or below 45 dBA L_{dn}, if needed. Standard office construction methods typically provide about 25 to 30 decibels of noise reduction in interior spaces. The City shall confirm that the recommendations will reduce noise levels below the threshold levels and require compliance with the recommendations of the acoustic analysis. <p>MM NOI-1c: Prior to the issuance of building permits for each development project within the plan area, the following requirement, if applicable, shall be met :</p> <ul style="list-style-type: none"> For any noise-sensitive land uses proposed within 50-feet of the railroad centerline, the City shall ensure that an acoustic analysis be prepared that recommends project improvements, as needed, to maintain interior noise levels at or below 45 dBA L_{dn}. The City shall confirm that the recommendations will reduce noise levels below the threshold levels and require compliance with the recommendations of the acoustic analysis. 	
<p>Impact NOI-2: The proposed plan could expose persons to, or generate excessive groundborne vibration or groundborne noise.</p>	<p>MM NOI-2: Prior to the issuance of building permits for each development project within the plan area, an acoustic analysis is conducted by a qualified noise specialist shall be prepared for structures in the plan area that are located within 100 feet of the centerline of the railroad. The analysis shall</p>	<p>Less than significant with mitigation</p>

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	specify measures including, but not limited to, setbacks and structural design features that will reduce vibration levels at or below the guidelines of the FTA Groundborne Vibration Impact Criteria shown in Table 3.5-7. The City shall confirm that the recommendations will reduce vibration levels below the threshold levels and require compliance with the recommendations of the acoustic analysis.	
Impact NOI-3: The proposed plan would not cause a substantial permanent increase in ambient noise levels in the vicinity of the plan area above levels existing without the <u>project plan</u> .	None	Less than significant
Impact NOI-4: The proposed plan could result in a substantial temporary or periodic increase in ambient noise levels in the vicinity of the site above levels existing without the <u>project plan</u> .	Implement MM NOI-1a	Less than significant with mitigation
Cumulative Impact	None	Less than significant

Environmental Setting and Impacts

The following change to text on Draft EIR page 3-2 is made:

Both ~~plan~~-project-level and cumulative-level impacts are analyzed in this EIR. Plan-~~Project~~-level impacts could result from actions related to development under the proposed plan. Cumulative impacts could from implementation of the proposed plan in combination with other cumulative projects in the study area. As discussed in “Cumulative Impacts,” the buildout of the Healdsburg 2030 General Plan is considered the cumulative scenario for the analysis of cumulative impacts.

Transportation/Traffic

The following change to text on Draft EIR page 3.2-36 is made:

Implementation of planned future improvements as previously identified by the City for the Dry Creek Road corridor (Intersections 1, 2, and 4) would address the deficient operation at the interchange with U.S. 101, as shown in underlined text in Table 3.2-9. Payment of a proportional share of the cost of these improvements is required per MM TRANS-1a and MM TRANS-5. However, the significant impacts to this intersection as a result of plan-related development would remain significant until the improvements identified in MM TRANS 1a and MM TRANS-5 are implemented. For the purposes of this analysis, the plan’s contribution to the cumulative effect of plan-related traffic on the U.S. 101/Dry Creek Road intersection is considered to be a significant and unavoidable cumulative impact.

Section 4.2—RTC-driven Text Changes

Executive Summary

The following change to text on Draft EIR page ES-3 is made:

As discussed in Section 3.2, Transportation and Traffic, the City mitigates impacts of the proposed plan to the greatest extent feasible as required by CEQA. However, mitigation is economically infeasible, because the City cannot guarantee the funding of needed roadway improvements to ensure adequate right-of-way to accommodate vehicular traffic and the planned bike lane. The City cannot ensure mitigation would be implemented to reduce potential plan- and cumulative-level impacts to less than significant. Therefore, if the City proceeds with certifying this EIR, the City ~~will~~ would also be required to prepare a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

Executive Summary

The Draft EIR mitigation measures text changes shown below under “Transportation/Traffic” are also made to the Executive Summary Table (on pages ES-7 through ES-14) of the Draft EIR. See the updated Executive Summary Table under “Executive Summary” in Section 4.1 for the final updated version of this table.

Transportation/Traffic

The following changes to text on Draft EIR page 3.2-25 are made:

Implementation of MM TRANS-1b, which requires restriping and phasing modifications to the northbound approach at Dry Creek Road/Grove Street, would reduce the operational impact of plan-related traffic at that intersection to less than significant with mitigation.

Implementation of MM TRANS-1c, which requires implementation of Transportation Demand Management (TDM) Plans for individual developments within the plan area, would reduce the overall volume of traffic generated by these developments and, thereby, their individual impacts on traffic operation.

Level of Significance Before Mitigation

Potentially significant

Mitigation Measures

MM TRANS-1a To address anticipated deficient roadway operations, the City has planned for roadway improvements to Dry Creek Road/U.S. 101 South Ramps (study intersection 1) that include signalization. New development within the plan area shall be required to contribute a proportional share allocation towards the cost of installation of a traffic signal at Dry Creek Road/U.S. 101 South.

MM TRANS-1b New development within the plan area shall be required to improve the northbound approach to Dry Creek Road/Grove Street (study intersection 3). The approach shall be restriped to include a separate left-turn lane with a length of at least 275 feet, and the signal modified to provide protected left-turn phasing, with the existing right-turn lane converted to use for through/right-turn movements.

MM TRANS-1c New developments within the plan area shall be required to prepare and implement a Transportation Demand Management (TDM) Plan to minimize traffic as much as is reasonably feasible. Such Plans may include measures such as ride-sharing, transit passes, unbundled parking, directing traffic to the Lytton Springs Road interchange, guaranteed rides home, and other impact-reducing measures and shall be submitted to and approved by the City as part of any individual development approvals.

Level of Significance After Mitigation

Significant and Unavoidable with Mitigation

The following changes to text on Draft EIR page 3.2-14 are made:

Pursuant to agency standards, Caltrans strives to maintain operation at the transition from LOS C to LOS D, which translates to an allowable delay of approximately 25 seconds for unsignalized intersections. ~~Based on previous discussions with Caltrans staff, it is understood~~

~~that the standard is to be applied to the overall average intersection delay, not a delay associated with any single movement or approach. Under this approach, if one movement experiences very high delay and has moderate to high traffic volumes, the overall delay and LOS should reflect the critical nature of the condition. However, if one movement is expected to experience high delay, but has very low traffic volumes, the overall intersection operation will likely still meet Caltrans standards.~~

The following changes to text on Draft EIR pages 3.2-36 and 3.2-37 are made:

Traffic Safety Hazards

Implementation of planned future improvements as previously identified by the City for the Dry Creek Road corridor (Intersections 1, 2, and 4) would address the deficient operation at the interchange with U.S. 101, as shown in underlined text in Table 3.2-9.

Upon adding plan-generated traffic to the cumulative volumes, and with the improvements identified as being needed to accommodate anticipated future growth, anticipated cumulative queuing in the westbound left-turn lane at Dry Creek Road/U.S. 101 South Ramps, on the northbound off-ramp at Dry Creek Road/US 101 North Ramps, and in the northbound and eastbound left-turn lanes at Dry Creek Road/Grove Street represents a potentially significant cumulative traffic safety hazard impact. While cumulative queue lengths are expected to exceed the dedicated storage length at other locations, because the turn lane is connected to a two-way left-turn lane or travel lane with room to accommodate the queue, these cumulative queues were not identified as exceeding storage space. Therefore, at these locations, cumulative queuing impacts were considered less than significant. Table 3.2-10 summarizes the cumulative queue at each intersection without and with implementation of the proposed plan.

Table 3.2-10: Peak Hour 95th Percentile Queues

Intersection	Storage Length/Number of Lanes	Cumulative		Cumulative plus Plan	
		AM	PM	AM	PM
1. Dry Creek Road/U.S. 101 South Ramps					
SB Off-Ramp	440/1	68	101	68	104
WB Left-Turn Lane	250/1	308	425	337	468
2. Dry Creek Road/U.S. 101 North Ramps					
NB Off-Ramp	650/1	483	621	531	894
With MM TRANS-6				289	485
EB Left-Turn Lane	50	12	23	12	23
3. Dry Creek Road/Grove Street					
NB Left-Turn Lane	100/1	90	262	90	262
EB Left-Turn Lane	*65/1	170	310	217	446

Table 3.2-10 (cont.): Peak Hour 95th Percentile Queues

Intersection	Storage Length/Number of Lanes	Cumulative		Cumulative plus Plan	
		AM	PM	AM	PM
WB Left-Turn Lane	*55/1	68	135	68	144
4. Healdsburg Avenue/Dry Creek Road-March Avenue					
NB Left-Turn Lane	*160/1	505	239	505	284
EB Left-Turn Lane	*115/1	170	213	170	214
EB Right-Turn Lane	**115/1	75	146	75	146
SB Left-Turn Lane	*90/1	58	81	70	96
5. Healdsburg Avenue/Grove Street					
NB Left-Turn Lane	*150/1	39	55	39	55
EB Left-Turn Lane	140/1	27	69	66	113
EB Right-Turn Lane	70/1	20	31	20	30
6. Healdsburg Avenue/Parkland Farms Boulevard					
SB Left-Turn Lane	*150/1	3	13	4	15
WB Left-Turn Lane	**90/1	11	9	12	11
Notes: All distances are measured in feet; NB = Northbound; SB = Southbound; EB = Eastbound; WB = Westbound Bold text = queue lengths exceeding available storage Shaded cells reflect mitigated conditions * Turn-lane is connected to a two-way left-turn lane ** Turn-lane is connected to a through lane Source: W-Trans, 2019.					

Payment of a proportional share of the cost of these improvements to increase the length of the left-turn lane on the westbound approach to Dry Creek Road/U.S. 101 South is required per MM TRANS-5. However, the significant impacts to this intersection as a result of plan-related development would remain significant until the improvements identified in MM TRANS 5 are implemented. This represents a significant and unavoidable cumulative impact related to traffic safety hazards (queueing exceeding lane storage and intersection conditions).

Implementation of planned future improvements at Dry Creek Road/U.S. 101 North Ramps, including signalization, are insufficient to avoid a potential queuing impact on the off-ramp. When the City proceeds with the signalization project, the phasing should include an overlap phase between the westbound through movement and the northbound right turn to reduce the queue to an acceptable level and a proportional share of these planned improvements should be paid per Cumulative MM TRANS-1. These improvements per Cumulative MM TRANS-1 would reduce queues on the off-ramp to acceptable lengths. However, until the

intersection is signalized, the queuing, and thus traffic safety, cumulative impact would remain significant and unavoidable with mitigation.

MM TRANS-1b includes the provision of the left-turn lane on the northbound Grove Street approach to Dry Creek Road. MM TRANS-1b indicates that the left-turn lane should have a length of at least 275 feet, which would reduce the impact of cumulative projects on queuing, and thus traffic safety, however, the impact would remain significant even after mitigation.

While excessive queuing is theoretically identified for the eastbound left turn from Dry Creek Road to Grove Street, it is noted that the volume feeding into this left-turn lane comes primarily from the U.S. 101 North off-ramp. If the queue extended to the off-ramp drivers would be unable to enter the left-turn queue, and those familiar with the area would choose alternate routes, including continuing straight west to Healdsburg Avenue and turning left there or staying on U.S. 101 North and exiting at Lytton Springs Road instead. MM TRANS-1c would support an alternative routing by requiring developers to suggest use of the Lytton Springs Road route in their TDM Plans. Excess queuing would generally be expected to resolve itself through normal human behavior, but implementation of MM TRANS-1c would contribute to reducing this cumulative impact at this location.

The overall queuing, and thus traffic safety, cumulative impact would remain significant and unavoidable with mitigation. The proposed plan's contribution to the cumulative queuing and, thus, traffic safety hazards related to lane storage and intersection conditions at the U.S. 101/Dry Creek Road intersection is considered to be cumulatively considerable.

Cumulative Level of Significance Before Mitigation

Significant and Unavoidable

Mitigation Measures

None available.

Cumulative MM TRANS-1 New development within the plan area shall be required to contribute a proportional share allocation towards the cost of signalizing Dry Creek Road/U.S. 101 North Ramps. The design for the traffic signal shall include provision of an overlap phase between the westbound through movement and the right turn from the off-ramp.

Cumulative Level of Significance After Mitigation

Significant and Unavoidable with Mitigation

The following change to text on Draft EIR page 3.2-25 is also made:

MM TRANS-1b New development within the plan area shall be required to improve the northbound approach to Dry Creek Road/Grove Street (study intersection 3).

The approach shall be restriped to include a separate left-turn lane with a minimum length of 275 feet and the signal modified to provide protected left-turn phasing, with the existing right-turn lane converted to use for through/right-turn movements.

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