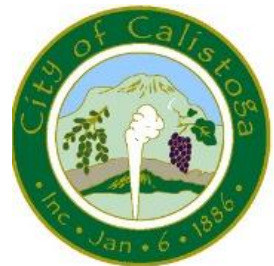


ADDENDUM TO PALISADES RESORT AND SPA EIR
SCH #2012032022
SOLAGE RESORT RENOVATION AND EXPANSION PROJECT
755 Silverado Trail, Calistoga, CA 94515



May 2018

Lead Agency/Preparer:

City of Calistoga Planning and Building Department
Planning Division
1232 Washington Street
Calistoga, CA 94515
(707) 942-2830 phone
(707) 942-2831 fax

1.0 INTRODUCTION

This Addendum was prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. This document has been prepared to serve as an Addendum to the previously-certified EIR (State Clearinghouse [SCH] #2012032022) for the Palisades Resort and Spa (Original Project). The Original Project is now called Solage.

The City of Calistoga is the lead agency for the environmental review of the proposed project modifications (Modified Project). This Addendum addresses the proposed modifications in relation to the previous environmental review prepared for the Palisades Resort and Spa.

1.1 Background and Purpose of the EIR Addendum

The Palisades Resort and Spa EIR was certified on December 7, 2004, by the Calistoga City Council. The Original Project involved the construction of a resort and spa on an approximately 26-acre site at the northeastern edge of Calistoga. Located at the southeastern corner of Silverado Trail and Brannan Street, the resort consists of 89 guest units in 38 guest cottages, clustered throughout the site. The resort also includes surface parking; spa facilities; recreational facilities, including a public pedestrian path along portions of the perimeter and pool facilities; a maintenance/ housekeeping building; and a main house with a restaurant and bar, private dining areas, meeting room and a special event facility. The project installed all-new infrastructure, including an internal roadway, and a bridge crossing the creek that bisects the western portion of the site.

Primary access to the project site is provided via a driveway at the main entrance, located across from the intersection of Rosedale Road with Silverado Trail; a secondary driveway on Brannan Street provides emergency access.

The resort's design borrowed from the architecture typical to farm buildings and farmhouses throughout Napa Valley, including pitched roofs and board-and-batten siding. The project included grading, removal of approximately nine mature oak trees, and fill of small wetland areas.

In 2004 the City approved the Palisades Resort and Spa, which included planning entitlements for the construction of a resort as described above. This was the project analyzed in the original EIR.

1.2 Basis for Decision to Prepare an Addendum

When an environmental impact report has been certified for a project, Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining whether a subsequent EIR, subsequent negative declaration, addendum, or no further documentation be prepared in support of further agency action on the project.

The CEQA analysis approach to the Modified Project is to prepare an Addendum to the Palisades Resort and Spa EIR which will focus on proposed changes to the project site and operational characteristics of the project compared to the analysis contained in the original EIR.

CEQA Guidelines Section 15164 defines the appropriate circumstances for preparing an Addendum as follows:

The lead agency or responsible agency shall prepare an addendum to a previously-certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record.

As addressed in the analysis below, the proposed modifications to the Original Project are not substantial changes to the approved project. The proposed modifications to the Original Project would not cause a new significant impact, or substantially increase the severity of a previously-identified significant impact from the EIR (CEQA Guidelines Section 15162[a][1]) that would require major revisions to the EIR.

All impacts would be nearly equivalent to the impacts previously analyzed in the EIR. In general, impacts related to traffic, noise, air quality, etc., would not increase under the proposed project when compared to the project previously analyzed in the EIR. There have been no changes in the environmental conditions on the property not contemplated and analyzed in the EIR that would result in new or substantially more-severe environmental impacts. An addendum is appropriate here because, as explained above, none of the conditions calling for preparation of a subsequent EIR have occurred.

The City Council adopted CEQA Findings of Fact relative to each impact at the time the EIR was certified for the Palisades Resort and Spa project (Resolution No. 2004-107). Additionally, the City adopted a Statement of Overriding Considerations relative to each significant and unavoidable impact at the time the EIR was certified. Mitigation measures that were identified in the EIR to lessen an impact to the extent feasible are embodied in a Mitigation Monitoring and Reporting Program that the City adopted at the time the EIR was certified.

Information and technical analyses from the Palisades Resort and Spa EIR are utilized throughout this Addendum.

There is no new information of substantial importance (which was not known or could not have been known at the time of the application) that identifies:

- A new significant impact (condition “A” under CEQA Guidelines Section 15162[a][3]);
- A substantial increase in the severity of a previously-identified significant impact (condition “B” CEQA Guidelines Section 15162[a][3]);
- Mitigation measures or alternatives previously found infeasible that would now be feasible and would substantially reduce one or more significant effects; or
- Mitigation measures or alternatives which are considerably different from those analyzed in the EIR which would substantially reduce one or more significant effects on the environment (conditions “C” and “D” CEQA Guidelines Section 15162[a][3]).

None of the “new information” conditions listed in the CEQA Guidelines Section 15162[a][3] are present to trigger the need for a Subsequent or Supplemental EIR.

2.0 PROJECT DESCRIPTION

This section provides a detailed description of the proposed project. Refer to Section 3.0 (Environmental Analysis) for an analysis of environmental effects of the proposed project modifications in relation to the analysis contained in the Palisades Resort and Spa EIR.

The proposed project involves a number of renovations and upgrades to the existing facility, as described below and shown in Figure 1:

1. **Resort Entry and Arrival Courtyard:** The entrance will remain in the same location along Silverado Trail, but the guest arrival will be modified to provide a new arrival courtyard where guests can more easily enter the reception area. New accent trees will line the drive and direct the arriving guest to the reception area. A new porte-cochere will create a focal point at the entry and provide coverage for inclement weather.

2. **Reception Building:** A portion of the entry redesign will include construction of a new stand-alone, 1,263-square foot reception building. This building will be simple, with an open floor plan to provide a space for guests as they check into the resort.
3. **Administration Building:** Another component of the redesigned entry will be a new stand-alone building that will be used predominantly for administrative functions. This 1,858-square foot building will include a board room that will serve as a bridal area as needed. Storage for luggage, offices and restrooms are also housed in this building. The design of both the reception building and administration building will be low-profile structures designed to match the architecture of the existing resort.
4. **Meeting Room:** The existing administration/reception building will be renovated to serve as additional meeting space. The interior will be designed for the flexible use of the space as one large or two smaller meeting rooms. The existing building is 2,195 square feet and will be increased by 874 square feet for this renovation.
5. **Pool Area Renovations:** The existing kid's pool will be removed and relocated to the south-east corner of the main pool. The existing pool bar will also be demolished. This will open up the north end of the main pool to create a space for a new pool bar building (1,370 square feet). The new pool bar will include a kitchen that will be used for serving food and drinks to pool guests and for events. The pool restrooms and shower facilities will be expanded and included in this building. The existing pool area footprint will be upgraded with new hardscape, decks, lawn and cabanas in order to repair and replace the aging surfaces.
6. **Guest rooms:** Ten additional guest rooms (king suites) will be added in five locations. One unit will be added on the northwest side of the resort between units 79 and 80, five units will be added south of the main Solbar/Solstice building, one unit will be added between units 3 and 4 (just east of the new pool bar/grill), one unit will be added on the east side between units 12 and 13 and two units will be added at the southeast corner. The design of the new units will be in keeping with the color palette and design of the existing units to ensure that the new units blend in harmoniously.
7. **Parking:** The 2004 Parking Management Plan required 268 parking spaces and a plan to accommodate 315 cars with a combination of self-parking and valet. The parking area will be amended to add 10 new spaces for a total of 325. Parking spaces will be removed in two of the new guest room locations but will be replaced by adding parking to the east corner. The parking improvements will be constructed in a manner that ensures there is always adequate parking for the resort during construction.

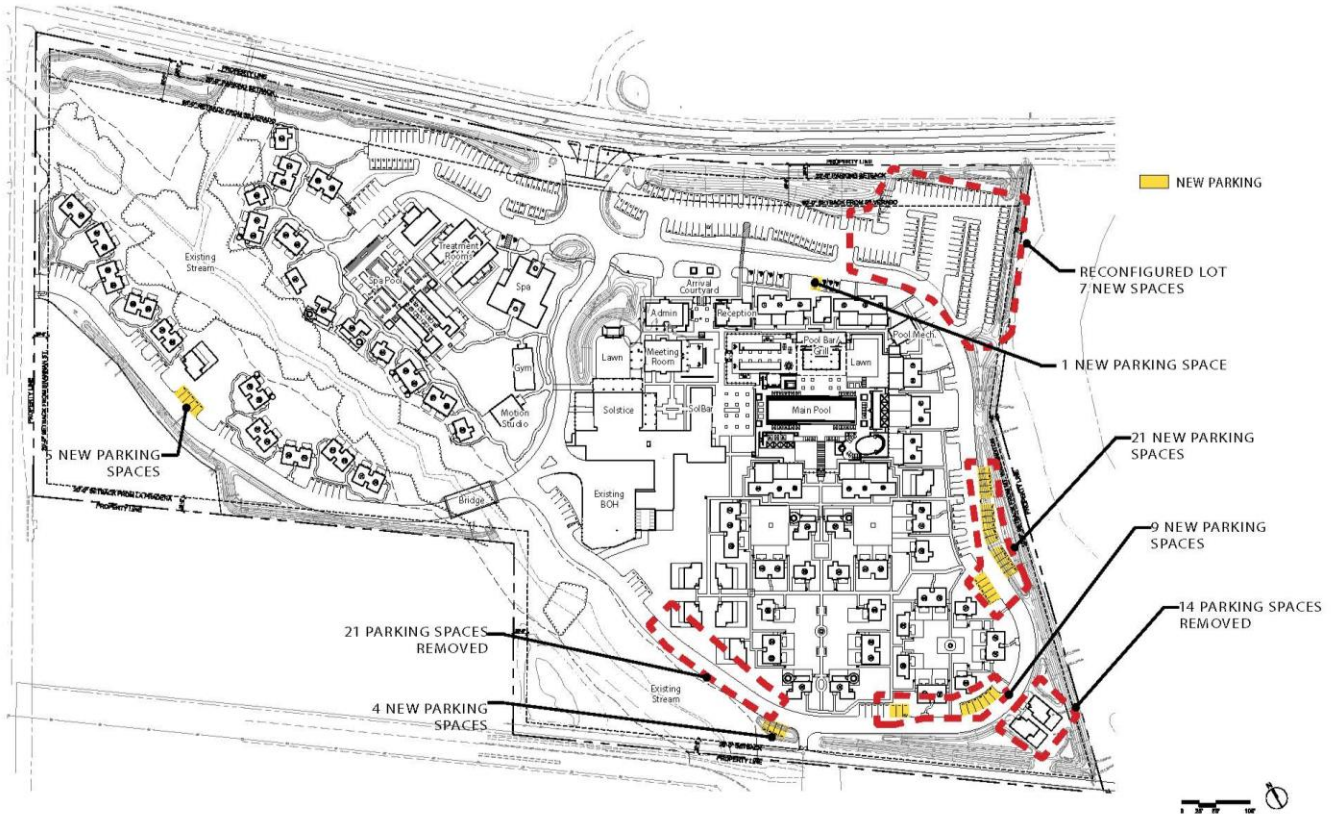
Figure 1: ILLUSTRATIVE SITE PLAN



SOLAGE CALISTOGA
USE PERMIT MODIFICATION
FEBRUARY 01, 2018

ILLUSTRATIVE PLAN





PARKING PLAN - EXISTING & NEW

SOLAGE CALISTOGA
USE PERMIT MODIFICATION
MARCH 13, 2018

3.0 ENVIRONMENTAL ANALYSIS

This section of the Addendum provides analysis and cites substantial evidence that supports the City’s determination that the proposed modifications to the Palisades Resort and Spa Project do not meet the criteria for preparing a subsequent or supplemental EIR under CEQA Guidelines Section 15162.

The section below identifies the environmental topics addressed in the EIR, provides a summary of impacts associated with the Original Project, as described in the EIR, and includes an analysis of the potential impacts associated with the Modified Project when compared to the Original Project.

3.1 Land Use, Plans and Policies

Impact A.1: The project would result in the conversion of existing farmland to a non-agricultural use.

Level of Significance: Less than significant

Mitigation Adopted by the City: None

Impact A.2: The project would result in a change in land use on the project site.

Level of Significance: Less than significant

Mitigation Adopted by the City: None

Impact A.3: The proposed project, together with other development in the immediate vicinity and elsewhere in Calistoga would contribute to potential cumulative land use incompatibilities and

associated impacts on hydrology and water quality, noise, traffic, air quality, and population and housing.

Level of Significance: Less than significant

Mitigation Adopted by the City: None

Discussion

Potential Land Use impacts were identified and discussed in Section A, Land Use of the Draft EIR (pages IV.A-1/A20).

The proposed modifications to the Original Project are not substantial changes to the approved project relating to Land Use.

The Modified Project would not result in changes to development patterns and does not designate any new sites for development or result in any substantial changes to the construction methods, location, or footprint of development that would change the potential for development to increase the significance of impacts related to Land Use Planning.

Although the Modified Project would slightly increase development in the City, it will be required to comply with applicable land use policies and the requirements of the City General Plan and Zoning Code to avoid or mitigate environmental effects. Furthermore, the Modified Project would not physically divide an established community, nor would it conflict with the City’s current General Plan land use regulations.

The Modified Project would not result in land use impacts to adjacent uses, as described in greater detail throughout this Addendum. The Modified Project supports the underlying goals of the City’s General Plan to promote the development of visitor-serving uses in the Resort Character Overlay area. The General Plan calls for a low-intensity pattern with generously-landscaped setbacks. The Modified Project does not propose the reduction of setbacks or an increase in building height from the previous approval as demonstrated below:

Standard	Regulation	Proposed	Meets Standard
Building Height	30 ft.	22 ft. maximum	Yes
Front Setback from Silverado Trail	60 ft.	No change	Yes
Street Side Yard (Brennan Street)	20 ft.	No change	Yes
Interior side yard	10-20 ft.	No change	Yes
Rear Yard	20 ft.	No change	Yes
Lot Coverage	25%	10.5%	Yes

Additionally, there are no new impacts beyond what was addressed in the Final EIR, and there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

3.2 Population and Housing

Impact B.1: The project would result in new jobs, which could induce population growth in Calistoga or the vicinity, either directly or indirectly.

Level of Significance: Less than significant

Mitigation Adopted by the City: None

Impact B.2: The project would result in infrastructure improvements to serve the project site, as well as the project site vicinity.

Level of Significance: Less than significant

Mitigation Adopted by the City: None

Impact B.3: The project would result in new jobs, which cumulatively could induce population growth in Calistoga or the vicinity, either directly or indirectly.

Level of Significance: Less than significant

Mitigation Adopted by the City: None

Discussion

Potential Population and Housing impacts were identified and discussed in Section B, Population and Housing of the Draft EIR (pages IV.B-1/B11).

As noted in the EIR, the Original Project would increase the number of jobs by 151, with a corresponding population increase of 70. The resort would serve a transient population, most of which is likely to reside outside of Calistoga. The EIR concluded that the project would therefore not, by itself, substantially induce growth in Calistoga. The Modified Project is not estimated to increase the number of jobs substantially.

Additionally, there are no new impacts beyond what was addressed in the Final EIR, and there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

3.3 Visual Quality

Impact C.1: Construction of the proposed project would create temporary aesthetic nuisances associated with project construction and grading activities for adjacent land uses. This would be considered a short-term significant impact.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure C.1a: During construction, the project applicant and the City shall work together to identify an appropriate temporary security fence (i.e., chain wire mesh, panel fencing, fabric woven cyclone fence, etc.) to be placed and maintained around some portions of the site to secure construction equipment and materials.

Mitigation Measure C.1b: The project applicant shall ensure that the construction staging area shall be kept clear of all trash, weeds, and debris.

Impact C.2: The project would alter the existing visual character of the project site. This would be a less than significant impact.

Level of Significance: Less than significant

Mitigation Adopted by the City: None

Impact C.3: Development of the project would partially obstruct views of surrounding hillsides from selected short-range public vantage points. This would be a less than significant impact.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact C.4: The project would result in an increase in the production of light and glare at the project site.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure C.4: The City of Calistoga shall require the project sponsor to incorporate the following design measure into project plans:

- Design and direct outdoor lighting to minimize off-site disturbance. Where feasible, low-intensity lighting should be employed that would sufficiently illuminate on-site facilities without creating excessive glare off-site. Use hooded, downward-directed lights and low elevation standards for lighting throughout the project site, including parking lots and the moderate-income and/or affordable housing.
- Minimize use of highly reflective surface materials for proposed structures. Exterior building materials should be treated or painted with non-reflective colors.

Discussion

Potential Visual Quality impacts were identified and discussed in Section C Visual Quality of the Draft EIR (pages IV.C-1/C21).

The proposed modifications to the project are not substantial changes to the original project relating to Visual Quality. The Modified Project does not designate any new sites for development that were not contemplated and analyzed for development in the EIR, and would not result in any changes to the location or footprint of development.

The Modified Project would not result in any new potential visual impacts and would not increase the significance of any visual impacts. The proposed buildings will maintain the same look, scale and height of the original project approval. The mitigation measures identified in Section C 4, Aesthetics, for the Original Project (see above) would be sufficient in addressing the potential impacts of the Modified Project. Additionally, the Modified Project is subject to the design requirements of the PD 2003-01 Palisades Resort and Spa Planned Development District, which would ensure that the exterior facades of the proposed structures, landscaping, and exterior lighting improvements are compatible with the surrounding land uses. Therefore, the proposed project does not change or increase the severity of the impacts beyond what was addressed in the EIR. There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

3.4 Traffic and Circulation

Impact D.1: The project would add vehicle trips to study intersections during the Friday and Saturday peak hours under Project Conditions.

Level of Significance: Potentially significant without mitigation

Mitigation Adopted by the City: No mitigation measure is available to completely mitigate this impact without altering the character of the downtown.

Impact D.2: The project would add vehicle trips to study intersections during the Friday and Saturday peak hours under Cumulative plus Project Conditions.

Level of Significance: Potentially significant without mitigation

Mitigation Adopted by the City: No mitigation measure is available to completely mitigate this impact without altering the character of the downtown.

Impact D.3. Project construction would result in temporary increases in truck traffic and construction worker traffic.

Level of Significance: Potentially significant without mitigation

Mitigation Adopted by the City: **Mitigation Measure D.3:** The project sponsor and construction contractor shall develop a construction management plan for review and approval by the City Public Works Department. The plan shall include at least the following items and requirements to reduce, to the maximum extent feasible, traffic congestion during construction of this project and other nearby projects that could be simultaneously under construction:

- A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes.
- Identification of haul routes for movement of construction vehicles that would minimize impacts on motor vehicular, bicycle and pedestrian traffic, circulation and safety, and specifically to minimize impacts to the greatest extent possible on downtown Calistoga.
- Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur.
- Provisions for accommodation of bicycle flow, particularly along Silverado Trail.
- Provisions for monitoring surface streets used for haul routes so that any damage and debris attributable to the haul trucks can be identified and corrected by the project sponsor.

Impact D.4: The project would generate the need for on-site parking.

Level of Significance: Potentially significant without mitigation

Mitigation Adopted by the City:

Mitigation Measure D.4: The project sponsor shall prepare a Parking Management Plan, which subject to City approval would establish strategies to accommodate unmet parking demand generated when events are held in the Events Barn. Among the strategies to be included in the Parking Management Plan would be valet parking, wherein parking attendants would park the event attendees' vehicles in designated areas (as identified by the Parking Management Plan), while allowing the other on-site parking spaces to function normally.

Impact D.5: The project would increase interaction between motorists, bicyclists and pedestrians.

Level of Significance: Potentially significant without mitigation

Mitigation Adopted by the City:

Mitigation Measure D.5a: The project sponsor shall design crossings of the pedestrian paths at the access driveways so approaching pedestrians and vehicles are aware of the others presence.

Mitigation Measure D.5b: The project sponsor shall maintain landscaping at access driveways to provide clear sight distance of oncoming vehicles, pedestrians, and bicyclists on Silverado Trail and Brannan Street.

Impact D.6: The project would provide adequate emergency access to the site.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Discussion

Potential Traffic and Circulation impacts were identified and discussed in Section D, Traffic and Circulation of the Draft EIR (pages IV. D-1/ D27).

The Modified Project is expected to marginally increase the number of motor vehicle daily trips over that which was studied in the EIR. The four intersections surrounding the site are currently operating at levels of service (LOS) of within the General Plan guidelines as summarized below¹.

Intersection	Current LOS	Future LOS
Lincoln Ave. / Lake St-Silverado Trail	B	D
Brannan Street / Silverado Trail	A	A
Lake Street / Grant Street	A	A
Lincoln Ave./Brennan Street	A	A

Therefore, additional traffic-related impacts beyond those identified in the EIR would not be expected to occur as a result of the Modified Project.

The EIR analyzed 268 parking spaces. That amount was determined to be adequate to accommodate all the parking demand associated with typical day to day activities at the site, including that generated by hotel guests, restaurant and spa users, and those attending functions in the smaller hotel meeting rooms. A maximum of 194 spaces were needed during peak parking times on a typical weekend when there was not a special event.

The updated parking management plan evaluated special events separately, and consideration was given to events where all attendees were not guests of the resort. Under this circumstance, it was determined that 325 spaces are required. The modified project proposes 325 spaces.

Mitigation Measures identified in Section 3.14, Transportation and Circulation, in the EIR would be sufficient in addressing the requirements for the Modified Project. These modifications would not increase the severity of the impacts beyond what was addressed in the Final EIR. There are no new impacts beyond what was addressed in the Final EIR. Lastly, there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

¹ City of Calistoga General Plan 2014 Circulation Element

3.5 Air Quality

Impact E.1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact E.2: Would the project violate any air quality standard or contribute to an existing or projected air quality violation?

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact E.3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under any applicable federal or state ambient air quality standard?

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact E.4: Would the project expose sensitive receptors to pollutants?

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact E.5: Would the project create objectionable odors?

Level of Significance: Less than significant

Mitigation adopted by the City: None

Discussion

Potential Air Quality impacts were identified and discussed in the Air Quality Section, Section E of the Draft EIR (pages IV.E-1/E7).

According to the BAAQMD's CEQA Guidelines, for any project that does not individually have significant operational air quality impacts (such as the proposed project, as determined by the Initial Study), the determination of a significant cumulative impact should be based on consistency of the project with the local general plan and consistency of the general plan with the regional air quality plan. The appropriate regional air quality plan for the Bay Area is the most recently adopted Clean Air Plan, which is the 2001 Bay Area Clean Air Plan (CAP). The applicable general plan for the project is the Calistoga General Plan Update (adopted in October, 2003). The EIR for the 2003 Calistoga General Plan Update determined that the General Plan would be consistent with the assumptions in the Bay Area CAP (City of Calistoga, 2003). Since the project is consistent with the City's General Plan (i.e. it does not require a General Plan Amendment to accommodate the uses proposed at the site), this implies that the project would also be consistent with the CAP. Therefore, any emissions that would occur due to the project have already been accounted for in the CAP and the project would not conflict with the implementation of the CAP. Any cumulative air quality impact of the proposed project on air quality would therefore be less than significant.

The Modified Project does not designate any new sites for development and would not result in any substantial changes to the construction methods, location, or footprint of development. The Modified Project would not result in any changes to potential development that would change

potential impacts associated with construction emissions. Therefore, the construction emissions would not increase over the Original Project.

The Modified Project would not increase the severity of the impacts beyond what was addressed in the EIR. The mitigation measures identified in Section E, Air Quality, for the Original Project would be sufficient in addressing the requirements for the Modified Project. There are no new impacts beyond what was addressed in the EIR. Lastly, there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

3.6 Biological Resources

Impact F.1: Construction activities at the project site and off-site drainage modifications under Alternatives 1 and 1b could adversely affect special status plant species.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City: Mitigation Measure F.1 was completed through project construction

Impact F.2: Construction activities at the project site and off-site drainage modifications under Alternatives 1 and 1b could adversely affect special status aquatic species.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City: Mitigation Measures F.2a and F.2b were completed through project construction

Impact F.3: Construction activities could adversely affect non-listed special-status nesting raptors and other nesting birds during the breeding season.

Level of Significance: Potentially significant without mitigation

Mitigation Adopted by the City:

Mitigation Measure F.3: The City of Calistoga shall require the project developer to avoid disturbing nests of raptors or other special-status birds.

If construction activities (i.e., ground clearing and grading, including removal of trees or shrubs) are scheduled to occur during the nonbreeding season (September 1 through January 31), no mitigation is required.

If construction activities are scheduled to occur during the breeding season (February 1 through August 31), the following measures are required to avoid potential adverse effects to nesting special-status raptors and other birds:

A qualified wildlife biologist will conduct preconstruction surveys of all potential nesting habitat within 500 feet of project activities.

If active nests are found during preconstruction surveys, a no-disturbance buffer acceptable in size to CDFG will be created around active raptor nests and nests of other special-status birds during the breeding season or until it is determined that all young have fledged. Raptor or other bird nests initiated during construction are presumed to be unaffected and no buffer is necessary. However, the “take” of any individuals will be prohibited.

If preconstruction surveys indicate that nests are inactive or potential habitat is unoccupied during the construction period, no further mitigation is required. Trees and shrubs within the

construction footprint that have been determined to be unoccupied by special-status birds or that are located outside the no- disturbance buffer for active nests may be removed.

Impact F.4: Construction activities could adversely affect special-status bat species.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure F.4: The City of Calistoga shall require the project developer to avoid disturbance to the roosts of special- status bats.

Prior to the construction activities (i.e., ground clearing and grading, including removal of trees or shrubs) within 500 feet of trees potentially supporting special-status bats, a qualified bat biologist will survey for special- status bats. If no evidence of bats (i.e., direct observation, guano, staining, strong odors) is present, no further mitigation is required.

If evidence of bats is observed, the following measures are required to avoid potential adverse effects special-status bats:

A no-disturbance buffer acceptable in size to CDFG will be created around active bat roosts during the breeding season (March 1 through August 15). Bat roosts initiated during construction are presumed to be unaffected, and no buffer is necessary. However, the take of individuals will be prohibited.

Removal of trees showing evidence of bat activity will occur during the period least likely to impact the bats, as determined by a qualified bat biologist, generally between February 15 and October 15 for winter hibernacula and between August 15 and March 1 for maternity roosts. If exclusion is necessary to prevent indirect impacts to bats from construction noise and human activity adjacent to trees showing evidence of bat activity, these activities shall be conducted during these periods as well.

Impact F.5: Construction activities and development of the project site have the potential to adversely impact jurisdictional wetlands and other waters of the U.S.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure F.5a: Mitigation Measure F.5a was completed through project construction

Mitigation Measure F.5b: The project developer shall implement Mitigation Measures H.1 (Erosion Control Plan), and H.2 (Stormwater Pollution Prevention Plan), as presented in detail in Section H., *Hydrology/Water Quality* of the Draft EIR to avoid erosion and sedimentation impacts to water quality in the primary creek and its tributaries and the Napa River.

Mitigation Measure F.5c: Mitigation Measure F.5c was completed through project construction

Impact F.6: Project construction and grading activities could remove at least nine valley oak trees protected by the City of Calistoga Municipal Code.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure F.6a: Mitigation Measure F.6a was completed through project construction

Discussion

Potential Biological Resources impacts were identified and discussed in Section F, Biological Resources of the Draft EIR (pages IV.F-1/F25).

The proposed modifications to the Original Project are not substantial changes to the originally anticipated project relating to biological resources. An arborist report completed by Pacific Tree Care March 30, 2018, concluded 76 small trees are slated for removal, all of which were planted as part of the Original Project or subsequently added. All the trees projected for removal, except one, are less than 12 inches in diameter at breast height. Three valley oaks are considered protected trees and will be replaced per the requirements of the Calistoga Municipal Code.

Due to the site-specific nature of biological resources, the Modified Project would not result in new impacts or cause increases in the severity of previously-identified impacts to biological resources when compared to the Original Project. The Modified Project would not result in changes to development that would have an adverse effect on special-status species, resulting in impacts to sensitive habitats, including foraging areas, or wildlife movement corridors, and would not interfere to a greater extent with local policies, ordinances, or plans adopted relating to biological resources. Mitigation Measures identified in Section F, Biological Resources, for the Original Project would be sufficient in addressing the requirements for the Modified Project.

There are no new impacts beyond what was addressed in the Final EIR. Lastly, there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

3.7 Geology and Soils

Impact G.1: Construction of the proposed project, including earthmoving activities such as soil stockpiling and grading, and storm water drainage improvements could result in soil erosion.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact G.2: The proposed project could expose people or structures to seismic hazards such as ground shaking, liquefaction, and earthquake-induced settlement.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact G.3: The proposed project would expose people or structures to geologic hazards such as settlement and expansive soils.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Discussion

Potential Geology, Soils, and Minerals impacts were identified and discussed in Section G, Geology, Soils, and Minerals of the Draft EIR (pages VI.G-1/G-16).

The proposed modifications to the Original Project are not substantial changes to the originally-anticipated project relating to geology, soil, and minerals. Due to the site-specific nature of impacts to geology, soils, and minerals, the Modified Project would not result in new impacts or cause increases in the severity of previously-identified impacts to geology, soils, and minerals when compared to the Original Project. The Modified Project would not result in changes to development patterns and does

not designate any new sites for development or result in any substantial changes to the construction methods, location, or footprint of development that would change the potential for development to be exposed to geologic and soil hazards. Lastly, there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

3.8 Hydrology and Water Quality

Impact H.1: Construction of the proposed project, including earthmoving activities such as excavation, grading, and drainage improvements could result in soil erosion and subsequent sedimentation of stormwater runoff or surface waters. Similarly, construction of the proposed project could adversely impact water quality by increasing pollutant concentrations associated with the use of construction-related hazardous materials.

Level of Significance: Potentially significant without mitigation

Mitigation Adopted by the City:

Mitigation Measure H.1a: The project sponsor shall comply with the SWRCB General Construction NPDES Permit regulations and NCSWMP guidelines to minimize erosion and subsequent transport of sediments and contaminants to nearby surface water bodies. Construction-related grading and other activities would be required to comply NCSWMP guidelines by incorporating the Association of Bay Area Governments' (ABAG) Manual of Standards for Erosion and Sediment Control Measures (ABAG, 1995) and the California Stormwater Quality Association (CASQA), Stormwater Best Management Practice Handbook for Construction (CASQA, 2003a). The project sponsor is also required to apply for coverage under the SWRCB's General Construction NPDES permit and prepare a SWPPP. Implementation of the SWPPP starts with the commencement of construction and continues through the completion of the project. Upon completion of the project, the sponsor must submit a Notice of Termination to the SWRCB to indicate that construction is completed. At a minimum, the SWPPP will include the following requirements:

- Excavation and grading activities shall be scheduled for the dry season only (April 15 to October 15), to the extent possible. This will reduce the chance of severe erosion from intense rainfall and surface runoff, as well as the potential for soil saturation in swale areas.
- If excavation occurs during the rainy season, storm runoff from the construction area shall be regulated through a stormwater management/erosion control plan that may include temporary on-site silt traps and/or basins with multiple discharge points to natural drainages and energy dissipaters. Stockpiles of loose material shall be covered and runoff diverted away from exposed soil material. If work is stopped due to rain, a positive grading away from slopes shall be provided to carry the surface runoff to areas where flow can be controlled, such as the temporary silt basins. Sediment basin/traps shall be located and operated to minimize the amount of offsite sediment transport. Any trapped sediment shall be removed from the basin or trap and placed at a suitable location on-site, away from concentrated flows, or removed to an approved disposal site.
- Temporary erosion control measures shall be provided until perennial revegetation or landscaping is established and can minimize discharge of sediment into nearby waterways. For construction within 500 feet of a water body, fiber rolls and/or gravel bags shall be placed upstream adjacent to the water body.

- After completion of grading, erosion protection shall be provided on all cut-and-fill slopes. Revegetation shall be facilitated by mulching, hydroseeding, or other methods and should be initiated as soon as possible after completion of grading and prior to the onset of the rainy season (by October 15).
- Permanent revegetation/landscaping shall emphasize drought-tolerant perennial ground coverings, shrubs, and trees to improve the probability of slope and soil stabilization without adverse impacts to slope stability due to irrigation infiltration and long-term root development.
- BMPs selected and implemented for the project shall be in place and operational prior to the onset of major earthwork on the site. The construction phase facilities will be maintained regularly and cleared of accumulated sediment as necessary.
- Hazardous materials such as fuels and solvents used on the construction sites shall be stored in covered containers and protected from rainfall, runoff, and vandalism. A stockpile of spill cleanup materials shall be readily available at all construction sites. Employees will be trained in spill prevention and cleanup, and individuals will be designated as responsible for prevention and cleanup activities.

SWPPP(s) for project components immediately adjacent to or within drainages will incorporate the following additional erosion control minimum criteria:

- Construction equipment shall not be operated in flowing water, except as may be necessary to construct crossings or barriers.
- Stream diversion structures shall be designed to preclude accumulation of sediment. If this is not feasible, an operation plan shall be developed to prevent adverse downstream effects from sediment discharges.
- Where working areas are adjacent to or encroach on live streams, barriers shall be constructed that are adequate to prevent the discharge of turbid water in excess of specified limits. The discharged water shall not exceed 110 percent of the ambient stream turbidity of the receiving water, if the receiving water is a flowing stream with turbidity greater than 50 nephelometric turbidity unit (NTU), or 5 NTU above ambient turbidity for ambient turbidities that are less than or equal to 40 NTU. If the water is discharged to a dry streambed, the discharged water shall not exceed 50 NTU.
- Material from construction work shall not be deposited where it could be eroded and carried to the stream by surface runoff or high stream flows.
- Riparian vegetation shall be removed only when absolutely necessary.

Mitigation Measure H.1b: Mitigation Measure H.1b was completed through project construction

Impact H.2: Operation of the proposed resort and spa would adversely affect stormwater quality.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure H.2a: Existing pervious surfaces shall be preserved to minimize the amount of storm runoff to the greatest extent possible, in accordance with the recommendations provided in the Bay Area Stormwater Management Agencies Association's (BASMAA) *Start at the Source Design Guidance Manual for Stormwater Quality Protection* (BASMA, 1999). Additionally, the project sponsor shall incorporate appropriate source control measures as recommended in

the California Storm Water Best Management Practice Handbook for New Development and Redevelopment (CASQA, 2003b) and the NCSWMP to minimize the amount of pollutants entering the storm drain system. Facilities such as oil and sediment separators or absorbent filter systems shall be designed and installed within the storm drainage system to provide filtration of stormwater prior to discharge and reduce water quality impacts from the proposed project. For example, runoff from project parking lots shall be filtered through mechanical or natural filtration systems such as pre-manufactured oil water separators or through natural processes such as bioswales and settlement ponds to remove oil and grease prior to discharge.

Commonly used structural and treatment best management practices to reduce sediment and contaminant concentrations include the use of grass strips, high infiltration substrates, and grassy swales to reduce runoff and provide initial stormwater filtration, and the installation of detention basins to allow for infiltration and settling of sediments.

Mitigation Measure H.2b: The project shall use Integrated Pest Management techniques (methods that minimize the use of potentially hazardous chemicals for landscape pest control and vineyard operations), in accordance with NCSWMP stormwater pollutant reduction guidelines. The handling, storage, and application of potentially hazardous chemicals shall take place in accordance with all applicable laws and regulations. All landscaped and vineyard areas shall be contoured so that runoff is collected and filtered (see Mitigation Measure H.2, above) prior to discharge into the stormwater system.

Impact H.3: The proposed project would increase stormwater runoff rates and volumes, potentially resulting in downstream flooding.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact H.4: Groundwater pumping associated with the proposed project would adversely affect groundwater elevations.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation H.4a: Mitigation Measure H.4a was completed through project construction

Mitigation Measure H.4b: Mitigation Measure H.4b was deemed unnecessary subsequent to adoption of the EIR.

Discussion

Potential hydrology and water quality impacts were identified and discussed in Section H Hydrology and Water Quality of the Draft EIR (pages IV.H-1/20).

The proposed modifications to the Original Project are not substantial changes to the initially-anticipated project relating to hydrology and water quality. The Modified Project would not result in changes to development patterns and does not designate any new sites for development or result in any substantial changes to the construction methods, location, or footprint of development that would change the potential for development to increase the significance of impacts, or risks related to hydrology and water quality. A study completed by Adobe and Associates March 2018 concluded implementation of BASMAA-required facilities will provide the storage volume necessary to attenuate the increase in peak flow due to this development. The project site is not located within the 100-year floodplain, and as such, the Modified Project would not place housing within the 100-year floodplain. The Modified Project would not increase the demand for groundwater given that potable water

supplies in Calistoga come primarily from surface water sources, and the Modified Project would not substantially deplete groundwater supplies, as the City has sufficient water supplies that are not supplied by groundwater to serve the project and the City's other existing and projected future water demands.

Mitigation Measures identified in Section H, Hydrology and Water Quality, for the Original Project would be sufficient in addressing the requirements for the Modified Project. The proposed changes do not increase the severity of the impacts beyond what was addressed in the Final EIR. Further, there are no new impacts beyond what was addressed in the Final EIR, and there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

3.9 Public Services

Fire Protection

Impact I.1: The proposed project would increase the demand for fire protection and emergency medical services and could affect the City of Calistoga Fire Department's ability to provide adequate fire suppression and emergency medical services to the project site and the City of Calistoga.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure I.1a: Mitigation Measure I.1a was completed through project construction.

Mitigation Measure I.1b: Mitigation Measure I.1b was completed through project construction.

Police Services

Impact I.2: The proposed project would increase the demand for police protection services.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure I.2a: The project sponsor shall provide adequate night lighting along the network of internal access roads for security purposes, including lighted directional signage to guest units.

Mitigation Measure I.2b: The project sponsor shall coordinate with the Calistoga Police Department to establish on-site security protocol and to establish point persons at the project site that would notify the Police Department and coordinate handling of emergency situations. The project sponsor shall also submit a master plan of the site, which identifies all buildings, driveways, the bridge, and the internal roadway to the Calistoga Police Department, as part of the required design review application.

Mitigation Measure I.2c: The project sponsor shall coordinate with the Calistoga Police Department to establish on-site security to deter crime.

Impact I.3: The proposed project would require an increase in road maintenance.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Schools

Impact I.4: Implementation of the proposed project could affect whether the CJUSD to adequately provide educational services to residents of Calistoga.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure I.4: Pursuant to the Leroy F. Greene School Facilities Act of 1998, the project sponsor shall be required to contribute its fair-share in student impact fees

Recreational Facilities

Impact I.5: The proposed project could degrade the quality of existing park and recreation facilities or require the provision of new or expanded facilities.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Other Public Services or Facilities

Impact I.6: The proposed project could potentially affect other public facilities.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Discussion

Potential impacts on Public Services were identified and discussed in Section I, Public Services of the Draft EIR (pages IV.I-1/13). The proposed modifications to the Original Project are not substantial changes to the original project relating to public services and recreation. The Modified Project does not designate any new sites for development and would only result in minor changes to the location and footprint of development.

The estimated increase in water use associated with the Modified Project is between 2,210 and 3,071 gallons per day. According to a study completed by Adobe and Associates dated January 30, 2018, the increase in domestic water usage, due to the modified project, will have little to no hydraulic impact on the water system infrastructure.

The study also determined that the wastewater analysis contained in the Palisades Resort and Spa EIR appears to have accounted for the proposed expansion, and no additional wastewater generation will occur from an impact perspective. The project's population assumption of 414, from the EIR, is based on total acreage of the site.

The implementation of the Modified Project would not result in significant new demand for police services. Project implementation would not require the construction of new police facilities to serve the project site, nor would it result in impacts to the existing response times and existing police protection service levels beyond that which was discussed in the EIR.

Implementation of the Modified Project would not result in population growth within the City of Calistoga, thereby not increasing enrollment at schools within the Calistoga Joint Unified School District.

The Modified Project would not result in any new potential impacts to public services and recreation, and would not increase the significance of any impacts to public services and recreation. Compliance with City Requirements and the mitigation measures identified above would be sufficient in addressing the requirements for the Modified Project.

There are no new impacts beyond what was addressed in the Final EIR. Lastly, there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

3.10 Utilities and Service Systems

Impact J.1: The proposed project would increase demand for water in Calistoga.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure J.1: Mitigation Measure J.1 was deemed unnecessary subsequent to adoption of the EIR.

Impact J.2: The provision of water service to the project site would require modifications to the water delivery system in the project vicinity.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure J.2: Implement Mitigation Measures F.1 through F.6; H.1a and H.1b.

Impact J.3: The proposed project would not meet minimum fire flow requirements as specified in the Uniform Fire Code.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure J.3a: The project applicant shall consult with the City of Calistoga Fire Department regarding project design and minimum required fire flows. The City of Calistoga Fire Department shall review project plans and ensure that minimum fire standards are met, including adequate fire flows and emergency access, before final planning and building permits are authorized.

Mitigation Measure J.3b: Mitigation Measure J.3b was deemed unnecessary subsequent to adoption of the EIR.

Mitigation Measure J.3c: The project sponsor shall be required to provide fire sprinklers throughout all project buildings as required by the City of Calistoga.

Mitigation Measure J.3d: As required by the City of Calistoga Fire Chief, the project sponsor shall install an above-ground water tank for emergency water storage during project construction. The size of the tank shall be approved by the Fire Chief, while its location shall be approved by both the Fire Chief and the Community Development Director.

Impact J.4: The proposed project would require construction of onsite wastewater collection lines, the construction of which could result in adverse environmental effects.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure J.4: Mitigation Measure J.4 was completed through project construction.

Impact J.5: The proposed project would increase sewage generation to Calistoga's wastewater treatment plant.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact J.6: The proposed project would require modifications to the existing wastewater conveyance system.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure J.6a: Mitigation Measure J.6a was completed through project construction.

Mitigation Measure J.6b: Mitigation Measure J.6b was completed through project construction.

Impact J.7: The proposed project would generate solid waste.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure J.7a: Mitigation Measure J.7a was completed through project construction.

Mitigation Measure J.7b: Mitigation Measure J.7b was completed through project construction.

Mitigation Measure J.7c: Mitigation Measure J.7c was completed through project construction.

Impact J.8: The proposed project would increase energy usage and would require the relocation and expansion of some PG&E distribution and transmission lines and related facilities.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact J.9: The proposed project would require the extension of cable television and other data transmission lines to serve the site.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Impact J.10: The proposed project, together with other development in the immediate vicinity and elsewhere in Calistoga would contribute to potential cumulative impacts on water supply and wastewater treatment capacity.

Level of Significance: Less than significant

Mitigation adopted by the City: None

Discussion

Potential Utilities impacts were identified and discussed in Section J, Utilities of the Draft EIR (pages VI.J-1/26). The proposed changes would not significantly affect utilities, as described in greater detail below.

Wastewater

Wastewater generated by the Modified Project would be conveyed to the City's wastewater treatment plant for treatment and disposal. A Solage Resort Expansion Utility Study completed in January 2018 concluded the analysis in the EIR was calculated using estimated population method according to zoning and use provided in the City of Santa Rosa Sanitary Sewer Standard Specifications, with zoning area type being C-1. The population assumption of 414, from the previous sewer study, is based on total acreage of the site. The site acreage is not increased as result of the revised project. This population assumption appears appropriate for the expanded total number of guest suites and added building area.

The previous sewer study appears to have accounted for this revised project, and no additional wastewater generation will occur from an impact perspective. Completion of new improvements will

fulfill the results of the 2006 report. No infrastructure improvements are warranted due to this expansion.

Water

The estimated increase in water use associated with the Modified Project is between 2,210 and 3,071 gallons per day. According to a study completed by Adobe and Associates dated January 30, 2018, the increase in domestic water usage will have little to no hydraulic impact on the water system infrastructure. No infrastructure improvements are warranted due to this expansion.

Solid Waste

The EIR concluded the project's contribution to Calistoga's overall waste stream in and of itself is not considered significant. However, without recycling, the proposed project could contribute to a significant cumulative impact on the city's waste diversion rate, which would conflict with the City's state-mandated Source Reduction and Recycling Element/Integrated Waste Management Plan.

These impacts were identified and discussed in Section I, Public Services of the Draft EIR (pages IV.I-1/13). Mitigation measures identified in Section J, Utilities and Service Systems, would be sufficient in addressing the requirements for the Modified Project. There are no new impacts beyond what were addressed in the Final EIR. Lastly, there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

3.11 Cultural Resources

Impact K.1: Implementation of the project could potentially cause a substantial adverse change in the significance of a historical resource or archaeological resource as defined in Section 15064.5.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure K.1a: Workers involved in ground-disturbing activities shall be trained by a professional archaeologist familiar with local archaeological resources and their locations in the recognition of archaeological resources (e.g., historic and prehistoric artifacts typical of the general area), procedures to report such discoveries, and other appropriate protocols to ensure that construction activities avoid or minimize impacts to potentially significant cultural resources.

Mitigation Measure K.1b: If any archaeological artifact is discovered on-site during construction, all construction activities would be halted and a qualified archaeologist would be summoned within 24 hours to conduct an independent review of the excavation. If the find is determined to be significant, and to merit formal recording or data collection, adequate time and funding would be devoted to salvage the material. Any archaeologically important data recovered during monitoring would be cleaned, catalogued and analyzed, with the results presented in a report of finding that satisfies professional standards.

Mitigation Measure K.1c: A qualified archaeologist, hired by the developer, shall monitor all off-site excavation throughout the excavation process.

Impact K.2: Implementation of the proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure K.2: The following mitigation methods shall be implemented to reduce potentially-adverse impacts of project construction on paleontological resources to a less than significant level:

- Recent alluvium and colluvium have a low paleontological sensitivity level and will be spot checked on a periodic basis to ensure that older underlying deposits are not being exposed. Paleontological monitoring will include inspection of exposed rock to determine if fossils are present. The exposure of fossils may require temporary diversion of grading away from the exposed fossils in order to recover and or document the fossil specimens.
- Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to allow analysis, and deposited in a designated repository such as the Geology Department at Sonoma State University or a Napa County facility, which shall have the first right of refusal of the collection.
- At each fossil discovery location, field data forms will record the locality, stratigraphic columns will be measured and appropriate scientific samples submitted for analysis.

Impact K.3: Implementation of the proposed project could potentially disturb human remains, including those interred outside of formal cemeteries.

Level of Significance: Potentially significant without mitigation

Mitigation adopted by the City:

Mitigation Measure K.3: In the event of an accidental discovery or recognition of any human remains, the following steps should be taken as per State CEQA Guidelines 15064.5(e): There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until (A) the coroner of the county is contacted to determine that no investigation of the cause of death is required, and (B) the coroner determines the remains to be Native American. The coroner shall contact the NAHC within 24 hours. The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of (with appropriate dignity) the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

Discussion

Potential Cultural Resources impacts were identified and discussed in Section K, Cultural Resources of the Draft EIR (pages IV.K-1/11).

The proposed modifications to the Original Project are not substantial changes to the original project relating to cultural resources. Due to the site-specific nature of cultural resources, the Modified Project would not result in new impacts or cause increases in the severity of previously-identified impacts to cultural resources when compared to the Original Project. The Modified Project does not designate any new sites for development and would not result in any substantial changes to the construction methods, location, or footprint of development. The Modified Project would not result in any changes to potential development that would change potential impacts associated with the disturbance of historical, archaeological, paleontological, or geologic resources. The Modified Project would also not result in any changes that would change the potential to disturb human remains. The Modified Project would not result in any new potential impacts to cultural resources and would not increase the significance of any potential impacts to Cultural Resources. Mitigation Measures

identified in Section K, Cultural Resources, for the Original Project would be sufficient in addressing the requirements for the Modified Project.

There are no new impacts beyond what was addressed in the Final EIR. Lastly, there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

REFERENCES:

Bay Area Air Quality Management District, BAAQMD CEQA Guidelines, December 2010 (Updated May 2011)

Calistoga General Plan, as amended

Calistoga Municipal Code, as amended

Adobe and Associates. "Solage Resort Expansion Utility Study" January 30, 2018

Adobe and Associates. "Solage Preliminary Stormwater and Hydrology Assessment" March 28, 2018