

Memorandum

To: Scott Schellinger
From: Matthew Gerken
Date: June 27, 2022
Subject: Response to Comments on Hyatt Place Hotel Mitigated Negative Declaration

We have reviewed the comments on the subject document forwarded by Sonoma County from Jerry Bernhaut of River Watch. This Memo includes our assessment of those comments.

In summary, the comments criticize the MND's reliance on data from *Climate Action 2020 and Beyond* and speculate that air flights will be generated by an airport hotel. There is no reason to revise or correct any part of our analysis or our Air Quality and Greenhouse Gas Emissions Technical Report that was used to support the County's Initial Study/Mitigated Negative Declaration. Our prior conclusions and thresholds development relied upon a comprehensive analysis of statewide emission data, and only double-checked our results against the results of the recent study the County had undertaken for the Verano Hotel and Housing Project, which had itself relied upon the CAP data. Further, there is no evidence indicating that an airport hotel would attract trips that would not otherwise occur. The hotel itself is not a destination and the comments only speculate that the project will generate air travel.

SIGNIFICANCE THRESHOLD

The letter suggests that it is inappropriate to compare the project's emissions to an efficiency threshold of 2.7 metric tons of carbon dioxide (MT CO₂e) per service population in evaluating the cumulative significance of the proposed project, citing a Superior Court ruling, but does not provide any evidence or suggestion that a different methodology would be appropriate

Pages 3-8 through 3-12 of our Technical Report describe the development of an emissions rate that can be used to support the County's determination of cumulative significance. As noted, this emissions rate was designed to allow the County to evaluate whether the project's emissions would exceed a proportionate share of the emissions reductions needed for the State as a whole to achieve its legislative GHG reduction mandates. We divided emissions by the number of persons to arrive at a per-service-population emissions threshold. As noted, this emissions rate could include in the denominator in-state hotel guests, but instead only includes restaurant and hotel employees so that our analysis would provide conservative results (that would tend to overestimate impacts).

As explained in our Technical Report, and as referenced in item D of the commenter's letter, this emissions rate was derived to be specific for this location, tailored for this specific project, and appropriate for new development. Emissions sources not relevant to Sonoma County or to the project were removed from consideration in building the emissions rate. Since the efficiency target is a ratio, with emissions in the numerator and service population in the denominator, inapplicable employment

estimates were removed from the denominator to align with the tailored emissions sources related to the project. The emissions rate, when combined with the methodology for estimating project-related emissions is also designed to be appropriate for *new* development (as opposed to existing, on-the-ground development). All emissions sources related to the project are evaluated as if they are created by the project. In other words, while it is understood that the project will accommodate demand for lodging services, and will likely serve demand that would otherwise be served in another facility, the analysis does not attempt to estimate such displaced emissions. All emissions associated with the project's construction and operation are attributed to the project, and no displaced emissions are subtracted from this estimate, allowing existing development to be relatively less GHG-efficient, while still consistent with the State GHG legislative mandates.

The emissions rate derived through this analytical process, 2.8 MT CO₂e, represents the rate of emissions that is consistent with the State policy and regulatory framework, and that can be used to assess the cumulative significance of GHG emissions (GHG) impacts.

As noted in our Technical Report, we also compared the results of our analysis to the methodology the County had employed for the recent Verano Hotel and Housing Project. The initial study for that project included an analysis that relied upon data from the Climate Action Plan, and employed an efficiency threshold of 2.7 metric tons per year per service population. We applied that threshold to this Hyatt Hotel project to present an especially conservative analysis. The comment letter does cite any evidence that would contradict our analysis.

DATA TO SUPPORT THE MND

The commenter's contention that the "*MND's conclusions... are based on the inadequate data provided by the legally invalid CAP calculation of 1990 emissions*" is inaccurate. The emissions rate, 2.7 MT CO₂e per service population, was used as the more conservative choice for evaluating the project's cumulative effects, but as noted, the emissions rate of 2.88 MT CO₂e per service population was developed and described in our technical report, and relies on no information from the *Climate Action 2020 and Beyond* document.

Again, the comment does not cite any evidence contrary to our conclusions. Rather, it suggests only that the County should ignore any analysis that is based on the Climate Action Plan. If we had followed the commenter's suggestion, we would have ignored the 2.7-ton threshold from the Verano initial study, and instead used the *higher* 2.8-ton threshold resulting from our analysis of statewide data, making the Hyatt Hotel impacts even less significant than were identified in the MND. The fact that we reduced the threshold to make it consistent with the Verano initial study accordingly results in a more conservative threshold.

EMISSIONS ASSOCIATED WITH LONG-DISTANCE TOURIST TRAVEL

As detailed in our Technical Report, the emissions analysis includes all emissions sources related to the project. As is industry standard, this includes off-road construction equipment, material delivery trucks, and construction worker vehicles and mobile, area, and energy sources related to the operation of the project, along with solid waste disposal and water consumption. This is consistent with industry standard GHG estimating, and consistent with guidance from the Bay Area Air Quality Management District,

which recommends evaluating emissions associated with energy and water use; mobile sources associated with all road vehicles, public transportation, off-road vehicles/equipment; and solid waste.¹

The project would be part of the area's already strong attraction and recognition as a primary visitor destination, but would not, itself generate a substantial amount of tourism or long-distance travel. The Sonoma region has long been a destination for travel and the presence of this hotel is not an appreciable factor in the amount of tourism in the region, the origin of travelers, or the mode of their travel in reaching the proposed project site. The specific routes and modes of travel to the hotel for future hotel guests are unknown and the County cannot dictate the mode or route of travel to the future project site. Travel demand fluctuates with economic growth and contractions.² Economic activity relates to the amount of air travel in complex ways and the influence of future economic changes on air travel is unknown.³ In addition, would be speculative to include estimates of emissions related to air travel for a development project – the level of emissions would depend on whether this analysis is limited to the flight itself, or whether to include emissions associated with ground support equipment, travel to the airport, travel back home from the airport, energy-related emissions at each airport, emissions associated with shuttles within the airport, or other sources. For these reasons, air travel is not included in CEQA analysis for development projects.

The updated GHG analysis presented in this Final EIR uses industry standard assumptions and surveys of other hotels in the county to create emissions estimates for employee travel, as well as the travel of guests. The focus is on direct emissions (occurring at the project site) and reasonably foreseeable indirect emissions related to the project.

The methodology used in our technical report is consistent with industry standard evaluations of proposed residential projects. While it is true that future residents of proposed residential projects may chose air travel, emissions estimates for such residential projects do not include aircraft emissions as part of the analysis. Similarly, while it is true that there is manufacturing associated with proposed retail projects, emissions associated with manufacturing products sold at future retail establishments are not included in these analyses. Such emissions sources are sometimes characterized as “lifecycle emissions” – a term that was removed from the CEQA Guidelines since no workable definition exists and since analysis of lifecycle emissions may not be consistent with CEQA.

“CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration. In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be “caused by” the project under consideration. Similarly, in this scenario, a lead agency may not be able to require mitigation for emissions that result from the manufacturing process. Mitigation can only be required for emissions that are actually caused by the project” (California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, Amendments to

¹ The Air District also recommends including industrial process emissions, where relevant, but these emissions are not relevant for the proposed project. For more information, please see: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ghg-quantification-guidance_5_3_10.pdf and https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

² Federal Highway Administration. 2012. *Exploring the Relationship between Travel Demand and Economic Growth*.

³ International Civil Aviation Organization (ICAO). 2016. *On Board: A Sustainable Future*. Federal Aviation Administration. Office of Environment and Energy. 2005. *Aviation & Emissions: A Primer*.

*the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97).*⁴

The methodology used in our technical report is consistent also with CEQA Guidelines Section 15358, which characterizes “effects” for the purposes of CEQA analysis to include: (1) Direct or primary effects which are caused by the project and occur at the same time and place; and (2) Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. The project does not create tourist activity or long-distance travel, but rather accommodates such travel that exists and will exist in the future. The project is partly intended, in fact, to address unmet demand related to the 2017 wildfires, which damaged existing hotels in the area.⁵

There is no element of the project approvals related to the method of arrival to the proposed hotel project. It would be speculative to attempt to estimate the nature of long-distance travel to the county with and without the project, but there is no evidence that would suggest this individual proposed project would appreciably change the character of travel to the Sonoma region.

Rather, the proposed project will accommodate existing and future demand for lodging services that will occur regardless of this project. This means that the air travel emissions the commenter suggests be studied would not be caused by the project. While it may be appropriate to include such emissions in a study of a County-wide Climate Action Plan that addresses all activities in the county, there is no basis for attributing such emissions to the hotel.

Fortunately, the use of an efficiency-based threshold to support the County’s evaluation of cumulative GHG effects is helpful in this context. Since an efficiency-based threshold evaluates the relative GHG efficiency of a subject project, it is not necessary to speculate on how much demand would be displaced from other existing hotels and the emissions profile of those hotels. An efficiency-based threshold allows the County to evaluate whether *this* hotel accommodates its fair share of GHG reductions required for the State as a whole to meet its legislative mandates.

⁴ For more details, please see:

https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf.

⁵ *The Hyatt Place Sonoma Wine Country Hotel* project presentation [undated].