

## **ENVIRONMENTAL REVIEW**

After the Project was submitted, staff determined that an EIR would be required pursuant to the California Environmental Quality Act (CEQA). The Sand Canyon Resort Project Draft EIR has been completed and was initially circulated for public review for 60 days beginning on November 23, 2020. At the January 19, 2021 meeting, the Planning Commission voted unanimously to extend the initial public review period for an additional 60 days, for a total of 120 days. Therefore, a Notice of Availability of Extension of the Draft EIR was filed with a new closing date on March 23, 2021.

The Draft EIR has been made available for review by appointment, at the City of Santa Clarita (City) City Hall, City Clerk's Office, and is also available on the Planning Division webpage at the following web address: <http://www.santa-clarita.com/planning/environmental>. All comments on the Draft EIR must be submitted, or postmarked, by March 23, 2021. Upon close of the comment period, staff will compile all the comments, prepare responses, and make any corrections for the Final Draft EIR. A summary will be provided to the Planning Commission at the next meeting.

## **JANUARY 19, 2021 PLANNING COMMISSION MEETING FOLLOW-UP**

At the regular meeting of the Planning Commission on January 19, 2021, staff provided a staff report and presentation of the overview of the Draft EIR. The Planning Commission received the staff report, applicant's presentation, and testimony from the public. The Planning Commission requested clarification and information on a variety of topics, some of which require responses from the applicant, and some from staff. Below are responses organized by topic to the Planning Commission questions with responses provided accordingly from the applicant and/or staff. The responses from the applicant are also included as Attachment B of this report.

### *Evacuation, Secondary Access, and Wildfire*

- 1. The proposed secondary access is inadequate for evacuations in the area due to a route that circulates back to Sand Canyon Road. Applicant shall provide a revised secondary access plan. This plan will be reviewed by City staff and may require environmental analysis. A concept that was noted at the meeting included a bridge across the Santa Clara River to State Route 14.**

Applicant Response: It is important to note that the Draft EIR states that the wildfire impact is less than significant and does not require a secondary access in case of wildfires. However, in response to the request from the City Planning staff, the applicant has entered into an Easement Agreement with the Robinson Ranch Homeowners Association. The Easement Agreement has been recorded and gives the Sand Canyon Resort and Country Club the ability to access through the Association's private gate and access Placerita Canyon Road further south of our project.

Since the last Planning Commission meeting we have had further discussions with staff on this issue. It is clear that this project does not create the concerns by some members of the community regarding wildfire evacuation. We discussed the fact that the concerns

from some members of the community regarding the need for a better evacuation plan would be there without the project. The City staff as subsequent to the meeting provided us with their Sand Canyon Emergency Evacuation Guidelines prepared in 2019 by the City, Sheriff's Department and Fire Department. We assume this plan has been previously shared with the Planning Commission and was developed with input from the Sand Canyon community. The Plan shows four evacuation routes in case of an emergency. Three of those routes direct traffic to the south and west. The route that would be utilized by the Sand Canyon Resort is to head north on Sand Canyon to Lost Canyon Road then west.

In spite of the fact that there does not appear to be a connection to require that this project build a secondary access to the north, if the City or the public have feasible suggestions through property owned by other private property owners or the Angeles National Forest the applicant is willing to review them. However, it needs to be understood that the cost of building another bridge over the Santa Clara River to the North is not economically feasible.

Finally, the applicant is willing to agree to a wildfire evacuation plan and we have attached our proposed Wildfire Evacuation Plan as Attachment #1 (included as Attachment B of the staff report).

**2. The wildfire impact is less than significant in the Draft EIR. This doesn't make sense.**

Staff Response: The Wildfire section (beginning on page 4.17-1) of the Draft EIR discusses the potential impacts the Project could have with respect to wildfire hazards. When evaluated against the thresholds of significance, which are based on Appendix G of the CEQA Guidelines, the Project would have a less-than-significant impact with mitigation. The construction and operation of the Project does not preclude the fact that wildfires are inevitable in this region, as acknowledged by the Draft EIR. The Project alone cannot stop wildfires from occurring, but through design and mitigation, can ensure that the Project does not make conditions worse.

The Project would be required to be constructed using the newest and most current building code and standards. The Project would be required to meet the latest standards, such as fuel modification zones, and additional mitigation measures that the existing older homes and structures do not meet. The applicant has received initial comments from Los Angeles County Fire on the original designs for the Project and will be required to incorporate those requirements in the final design, if approved by the Planning Commission. In addition, mitigation measure MM-FIRE 2 requires that, concurrent with the issuance of building permits, the applicant shall participate in the Developer Fee Program to the satisfaction of the LA County Fire and City.

Regarding the evacuation routes, the analysis in the Draft EIR relied upon the Sand Canyon Evacuation Guidelines, as adopted by the City, LA County Fire, and LA County Sheriff. Mitigation measure MM-FIRE-1 is included to avoid impeding emergency vehicle and evacuation traffic around construction vehicles and equipment by requiring

that the applicant develop an Emergency Vehicle Access Plan in consultation with the City. LA County Fire has indicated that they cannot require a new means of secondary access; however, they would support one being considered. The Planning Commission has commented that the proposed secondary access for the Project is inadequate for evacuations. The applicant has provided a response on Item 1.

An initial analysis of the Project site beyond the thresholds established in the Draft EIR was conducted and found that the Project site and Robinson Ranch Road could serve as a central point for a unified defense against a fire. Some facilities of the Project site could serve as an adequate defensible space and become a location that people evacuate to. It is within the Planning Commission's purview to require that the applicant conduct an Evacuation Analysis that estimates approximate durations for a full evacuation with and without the Project within the Sand Canyon Community. A more in-depth Evacuation Analysis could also examine evacuation management, coordination, policies, procedures (through consultation with agencies), offer recommendations for improvement, and then quantify evacuation delay.

*Draft EIR, General Plan, and Unified Development Code Consistency*

**3. The mitigation measures seem arbitrary with language that includes "to the extent feasible" and "where possible."**

Staff Response: Staff will review all the mitigation measure language, in particular, where the phrases "to the extent feasible" and "where possible" are used. Any edits will be presented in the form of a Draft Final EIR to be provided to the Planning Commission during the next scheduled meeting.

**4. If Project Alternative 2 was selected, would any of the Significant impacts be reduced to Less-than-Significant?**

Staff Response: As described in Section 7.0, Project Alternatives, of the Draft EIR, the impacts of Alternative 2 (Reduced Project) would be reduced for nearly all issue areas; however, significant and unavoidable impacts would remain for: 1) construction noise and vibration, 2) cumulative operational noise, and 3) Vehicle Miles Traveled (VMT) under transportation. The applicant has proposed to revise the Project similar to Project Alternative 2. A summary of the proposed revisions is included in the below Project Revisions section.

**5. How is the Project consistent with the Conservation and Open Space Element of the General Plan?**

Staff Response: Table 4.10-1, General Plan Land Use Consistency Analysis, of the Draft EIR includes an evaluation of the Project's consistency with the goals outlined in the City's Conservation and Open Space Element of the General Plan. With the exception of Goal CO 10, the Project is consistent with the goals of the Conservation and Open Space Element. The Project is directly inconsistent with Goal CO 10: "Preservation of open space to meet the community's multiple objectives for resource preservation," due to the

permanent loss of 32.4 acres of open space land and would therefore directly conflict with this goal of preserving open space. The loss of 32.4 acres of open space land would be reduced to approximately 24 acres based on the applicant's proposed revision of the Project. See Table 4.10-1 on pages 4.10-28 through 4.10-30 for the consistency analysis specific to the Conservation and Open Space Element.

**6. Would the proposed changes to the Project need to be evaluated in the Draft EIR?**

Staff Response: Yes, the proposed changes to the Project presented by the applicant at the January 19, 2021 Planning Commission meeting and revised plans would need to be evaluated in the Draft EIR, as well as by the City's Development Review Committee (DRC). A summary of the proposed revisions is included in the below Project Revisions section. However, staff has not been provided a comprehensive resubmittal and cannot provide formal comments on the revisions. Should a comprehensive set of plans be received, staff will need to work with the applicant and the City's CEQA consultant to determine the extent of the impacts associated with the proposed revisions. Based on staff's initial review of the incomplete plans that have been provided, it is not anticipated that these revisions would result in additional significant impacts; however, significant and unavoidable impacts would remain for: 1) construction noise and vibration, 2) cumulative operational noise, and 3) VMT. In the event that the applicant revises the Project with a component that intensifies the Project description, Project area, land use, or building form (e.g. new secondary access that has yet to be analyzed), staff would review the revisions and determine what additional analyses need to be conducted.

**7. What if the current or future owners of the property propose to convert the villas into residential units? What if they propose other types of commercial development?**

Applicant Response: The applicant has agreed to accept Alternative 2 from the EIR and is removing the 5.4 acres of the Oak Villas development in the original application. This will reduce the development area to 33 acres. As further discussed below, the applicant will agree to donate the 42 acres to the west of the development as permanent Open Space to the City of Santa Clarita.

Regarding whether other type of commercial development could be proposed in the future, any such proposal would have to go through the rigorous City and Community Planning process. The applicant is committed to completing this hotel and resort and operating it as an important amenity to the City and Community.

Staff Response: If the Project is approved with the rezone in effect, and the current or future owners propose to convert the villas, or any portion of the Project, into residential units, then that project would require an environmental review pursuant to CEQA and an application for entitlements to be reviewed by the Planning Commission as the decision-maker. Single-family residential development would be prohibited in the CC zone; however, multifamily (i.e. apartments, townhomes, or condominiums) could be allowed with an approval of a CUP. In addition to a CUP, a revision to the Tentative Tract Map would be required. With both the CUP and Tentative Tract Map requirements and the

Project site located within the Planned Development (PD) overlay zone, the ultimate decision-maker would be the Planning Commission.

If the current or future owners propose other types of commercial development, the level of environmental review depends on the use proposed. Any commercial construction development would be subject to a Planning Commission approval pursuant to the PD overlay zone standards, as described in Section 17.38.060 of the Unified Development Code (UDC). Various commercial uses may be allowed, as described in Chapter 17.43 of the UDC, with the appropriate entitlement.

**8. Concerns that the rezone to commercial is "spot zoning" and inconsistent with neighboring uses.**

Applicant Response: If the City approves the General Plan Amendment and zone change this project will not be spot zoning. The resort will be adjacent to the Sand Canyon Country Club and complimentary to that use. There is a long list of mitigation measures in the EIR and there will be strong Conditions of Approval to lessen the impact on the community.

Staff Response: In order to approve a zone change request, the City Council would have to make findings listed in UDC Section 17.28.120. These findings include consideration of zoning consistency issues.

Spot zoning occurs where a small parcel is restricted and given lesser rights than the surrounding property, as where a lot in the center of a business or commercial district is limited to uses for residential purposes thereby creating an "island" in the middle of a larger area devoted to other uses. Usually spot zoning involves a small parcel of land, the larger the property the more difficult it is to sustain an allegation of spot zoning.

Likewise, where the "spot" is not an island but is connected on some sides to a like zone the allegation of spot zoning is more difficult to establish since lines must be drawn at some point. Even where a small island is created in the midst of less restrictive zoning, the zoning may be upheld where rational reason in the public benefit exists for such a classification. *See e.g. Viso v. State of California* (1979) 92 Cal.App.3d 15, 22, *Arcadia Development Co. v. City of Morgan Hill* (2011) 197 Cal.App.4th 1526, 1536.

*Noise*

**9. Limit outdoor noise hours for project operational events.**

Staff Response: The City's Municipal Code Section 11.44.040 Noise Limits, makes it "unlawful for any person within the City to produce or cause or allow to be produced noise which is received on property occupied by another person within the designated region, in excess of the following levels": residential uses (daytime at 65 dBA and nighttime at 55 dBA) and commercial uses (daytime at 80 dBA and nighttime at 70 dBA). When measured at the boundary line between a residential property and a commercial property, the noise level of the quieter zone shall be used. As previously

discussed on other projects, it is within the Planning Commission's purview to limit those operational hours of the Project.

**10. Construction noise timeframes are too long.**

Staff Response: Construction hours are typically limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday; between 8:00 a.m. to 6:00 p.m. on Saturdays; and no construction allowed on Sundays and holidays. The applicant shall comply with all applicable noise standards including, but not limited to Section 11.44 (Noise Limits) of the City's Municipal Code, for the construction of the proposed buildings. It is within the Planning Commission's purview to further limit those construction hours.

**11. The Noise study measured 99.5 dBA at a property line. What is generating that level of noise?**

Applicant Response: Please note this was not a "measured" noise level. This was a modeled/estimated noise level during construction - see Appendix C to Noise Study. For measured noise levels on and around the Project site, please refer to Table 6, Existing Noise Levels in the Vicinity of the Project Site. Footnote b in Table 9, Estimated Exterior Construction Noise at Sensitive Receptors, explains that the adjacent sensitive receptors (i.e. measured at property lines - not structures) could experience 99.5 dBA when heavy construction activities occur within 15 feet of the Project site boundaries. This estimate is conservative, as it assumes heavy activity would occur within 15 feet of the receptor during an approximate one-hour period, per use of Roadway Construction Noise Model (RCNM). Although this assumption is unlikely to occur "regularly," it represents what could occur under a worst-case scenario. As the Project will have significant temporary construction noise impacts (typical for a project of this size, type, and rural location with adjacent sensitive receptors), the assumptions are reasonable and defensible.

**12. Provide a map that indicates the nearest neighboring houses from the Project site.**

Staff Response: The applicant provided a map, included as Attachment C, that indicates the nearest neighboring houses from the Project site. Also attached, are simulations of the neighboring views.

*Trails*

**13. The proposed "trail" is too much like a golf cart path. The applicant shall revise the trail to be more consistent to a typical multi-use trail (i.e. walking, biking, and horse-riding) found around the City. As part of the site plan resubmittal, the applicant shall submit a revised trail plan that reflects the applicant's revised project.**

Applicant Response: We are using the existing hard concrete path previously used for golf carts for multi-use except for equestrians which will be a 2.5-mile public trail for biking and walking. The applicant has had numerous discussions with the Park and Recreation department about this and other proposed trails. The applicant is willing to

continue those discussions to determine how this project can improve the trail system in the Sand Canyon area.

Staff Response: In discussion regarding the use of the existing concrete cart path as the trail, a couple options were discussed: 1) concrete could be left if native soil trail was constructed right next to concrete path for horses, runners, etc., or 2) removal of the concrete path and leave the native soil trail in its place, either option would require a native soil path for horses and runners.

The City’s standard multi-use trail in the right-of-way (ROW) is six to 16 feet wide, with native soil and lodge pole fencing on downslope or dangerous locations. Signage includes: directional signage, mile markers, Emergency Location System signs. Staff will provide formal comments on the proposed trail design once a full review of the revised plans is complete.

*Traffic*

**14. Traffic conflicts with school drop-offs and pick-ups.**

Applicant Response: We are willing to establish a program which will limit any conflict between when Employees will arrive at and depart the Resort. We propose the following hours which should limit any conflicts with school drop-offs and pick-ups per the schedule we have received which shows that School drop-offs at around 8:45 a.m. and pick-ups around 3:15 p.m.

1. Time of Arrival and Departure of the Resort employees:
  - a. Arrival: 5:40 ~ 6:00 a.m. / 7:40 ~ 8:00 a.m. / 9:20 ~ 10:00 a.m. / 1:40 ~ 2:00 a.m. / 2:40 ~ 3:00 p.m.
  - b. Departure: 2:30 ~ 2:50 p.m. / 5:00 ~ 5:20 p.m. / 6:30 ~ 6:50 p.m. / 10:30 ~ 10:50 p.m. / 11:00 ~ 11:20 p.m.

2. The graph below shows the details:

Hours	AM											PM										
	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11			
School Drop-offs & Pick-ups																						
Arrival of Resort Employees		1			2					4	5											
Departure of Resort Employees											1			2		3					4	5

**15. Traffic study was not conducted during peak periods of Sand Canyon.**

Applicant Response: The Traffic Study was conducted during the AM and PM peak hours of Sand Canyon Road and looked at the following scenarios: Existing Conditions, Opening Day plus Project Conditions, Interim Year (2028) Cumulative plus Project Conditions, and Long Range (2040) General Plan Buildout plus Project Conditions.

Please review Section 4.15 Transportation in the Draft EIR.

**16. Traffic study stated that 25% of employees would use ridesharing. Where was this analysis derived?**

Applicant Response: Pursuant to the Traffic Study, this was calculated as per the California Air Pollution Control Officers Association Quantifying Greenhouse Gas Mitigation Measures report (CAPCOA 2010). Please see Section 4.15.6 Project Design Features and Mitigation Measures in the Draft EIR.

**17. Bicycle riders are more than two miles from the nearest bus stop.**

Applicant Response: It is 1.9 miles from the nearest bus stop (Soledad Canyon Rd and Kenroy Ave) to the hotel at the resort and it would take approximately 15 minutes to bicycle from this stop. The resort will have bicycle parking facilities and we have proposed a Rideshare and Shuttle program which is in Attachment #2 (included as Attachment B of the staff report).

**18. Is a shuttle to and from the proposed resort and Vista Canyon Transit Center possible?**

Applicant Response: Yes and it is in the proposed Rideshare and Shuttle program which is in Attachment #2 (included as Attachment B of the staff report).

**19. Rideshare program shall include a Guaranteed Ride Home Program.**

Applicant Response: This is included in Item 3D in the Rideshare and Shuttle program which is in Attachment #2 (included as Attachment B of the staff report).

**20. Driveway E is indicated as a gated driveway in the current plans. Since no gates are proposed for this Project, the applicant shall remove any references to gates and submit a site plan and tentative map to reflect this.**

Applicant Response: There is no gate on the revised plan submitted to the City.

**21. Is the South Coast Air Quality Management District (AQMD) Rule 2202 applicable to this Project?**

Staff Response: The purpose of AQMD Rule 2202 (On-Road Motor Vehicle Mitigation Options) is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code, and the federal Clean Air Act. This Rule can be applicable to the Project, as it applies to projects with more than 250 employees, and can be chosen as an option in a Greenhouse Gas (GHG) reduction plan required when obtaining permits from AQMD. Although programs like these may moderately reduce VMT, it is not quantifiable and would not likely reduce it to a less-than-significant level.



*Open Space*

**22. The resolution and conditions of approval for the Robinson Ranch Project include language that intend to preserve open space; however, the tract map language specifically restricts residential development.**

Staff Response: Staff has reviewed the file for the Robinson Ranch Project and has not determined why the language in the condition of approval, the final tract map note, and the findings supporting City Council Resolution 96-120 is different. Staff believes that at the time the opposition concern was against residential being built on the property. It is likely that any other commercial uses were not contemplated. Therefore, the deed restriction language limited residential development on the open space property.

By way of background, the original zoning designation for the property was Residential Very Low Density (RVL) zone. The RVL zone is comparable to the current Non-Urban 5 (NU5) zone and was “intended for large custom single-family homes with a maximum density of one dwelling unit per gross acre. The zone would permit the rural character of a number of existing neighborhoods to be maintained. The keeping of horses and related animals as an accessory use is generally found in this zone.”

As part of the Robinson Ranch Project approvals, the City Council approved Ordinance No. 96-29 in August 1996 for a Prezone and Zone Change that added the Planned Development overlay zone to the existing underlining zoning to make it Residential Very Low Density - Planned Development (RVL-PD). The property was rezoned to Open Space (OS) during the 2011 General Plan update to be consistent with other golf courses in the City.

A summary of the use designations applicable to the property are as follows:

- The prior RVL zone and the current OS zone prohibit commercial and industrial development.
- The Final Tract Map language dedicates to the City “the right to restrict residential construction.”
- The PD overlay zone requires any development project to be reviewed and approved by the Planning Commission.

The rezoning to the OS zone, Final Tract Map language, and the addition of the PD overlay zone were put in place to satisfy the City Council’s direction to preserve recreational/open space land.

As discussed at the previous meetings, the proposed Zoning and General Plan Designation of the Project site could be amended if approved by the City Council. In addition, prior action by a previous City Council could also be amended by a vote of the current City Council. Staff is required to process any request that is duly filed and deemed complete.

The relevant language of the condition of approval, final tract map note, and the findings

in support of City Council Resolution 96-120 is included below as a reference:

*Condition of Approval*

“83. The applicant shall record golf course/open space easements on all golf course/open space lots, restricting their use to those activities, prior to recordation of the first residential lot.”

*Final Tract Map Note*

“AND WE ALSO HEREBY DEDICATE TO THE CITY OF SANTA CLARITA THE RIGHT TO RESTRICT RESIDENTIAL CONSTRUCTION OVER ALL OPEN SPACE LOTS 74, 75, 76, 77, 78, 79, 80 AND 81.”

City Council Resolution 96-120 discusses the open space of the golf course as well. Excerpts from that resolution have been provided on pages 3-1 and 3-2 of the Draft EIR. Below is an excerpt from the resolution that discusses the “open space acreage in perpetuity” in bullet point c) below (bold emphasis added) also noted in the Draft EIR:

“The City Council finds that the unavoidable environmental impacts of the project are acceptable when based upon the following factors and public benefits. The factors and public benefits are as follows:

- a) The project provides a significant recreational facility in the Canyon Country area of the City. Significant economic benefits to the City and local business are anticipated with this project.
- b) The project includes the dedication of land for the construction of the Live Oak Springs Canyon debris basin and appurtenant facilities.
- c) The project would preserve approximately **300 acres of land into perpetuity as recreational/open space.**
- d) The annexation of a portion of the site will benefit the City of Santa Clarita by extending local government and control.
- e) The widening of Sand Canyon Road, over the Santa Clara River, and the installation of a traffic signal at Lost Canyon Road and Sand Canyon Road are requirements of the project, and substantial benefits to the Sand Canyon area.
- f) The project includes the realignment improvement and maintenance of Oak Spring Canyon Road on the project site.
- g) The project includes the dedication and construction of multi-purpose trails through the project site.
- h) The project includes the extension of a water mainline, including fire hydrants, from the project site west to Comet Way and east to the Angeles National Forest Boundary.”

**23. The approvals for the Robinson Ranch Project include different language relating to open space and restricting use of the property. Does one of the approvals carry more weight than the others, and what is the impact on this application?**

Staff Response: As was discussed in response to Item 22 above, the City Council issued three approvals discussing open space related to the Robinson Ranch Project. The

relevant language is contained in (1) a condition of approval for the Robinson Ranch Project, (2) findings in City Council Resolution 96-120 approving the Robinson Ranch Project, and (3) a final tract map note for a map associated with the Robinson Ranch Project. In addition, the City Council has imposed Open Space zoning on the property in question, which limits the currently allowed uses those authorized in the Open Space zone.

The current application before the Planning Commission asks the City Council to approve new entitlements and zoning for some of the property that was previously entitled with the Robinson Ranch Project. The City Council has the authority to impose new conditions of approval on the current project, evaluate environmental issues and make new findings, and process a new tract map for the property in question. In addition, the City Council has the discretion to approve or deny the requested zone change from OS to CC.

None of the previous approvals restrict the City Council's ability to consider the current application. The City Council can consider the prior restrictions it placed on the Robinson Ranch Project, but ultimately the City Council has the authority to change the allowed use of the property and to grant new entitlements.

**24. The "replacement" open space land (as described in MM-LU-1) should be in or near this area to benefit the neighboring community.**

Applicant Response: As indicated previously, the applicant is proposing to dedicate the 42 acres on the west of the property to the City of Santa Clarita which provides permanent protection of that Open Space and which is greater than the 32 acres which is being developed. We will be willing to explore other opportunities in this area.

*Architecture*

**25. The Project's architecture is inconsistent with the Community Character & Design Guidelines of Canyon Country/Sand Canyon. Submit revised architectural plans (i.e. elevations, renderings, color and materials board) for staff's review. Each building or component of the Project shall have a set of architectural plans.**

Staff Response: The applicant provided plans for the proposed revised Project architecture, included as Attachment D. Staff routed the proposed revised architectural plans to the City's architectural consultant, RRM Design Group. Their memo is included as Attachment E. A more in-depth discussion is included in the Architectural Revisions section below.

**26. A conceptual site plan and tentative map that reflects the applicant's proposed revised Project (i.e. omitting the Oak Villas Community) shall be submitted and distributed for DRC review. Plans shall include a landscape plan, zone change exhibit, trail map, park/garden/outdoor recreation plan, parking plan, and bike parking plan.**

Staff Response: The applicant provided a conceptual site plan for the revised Project, included as Attachment A. Staff is continuing to work with the applicant to get a complete revised project submittal. Once a complete submittal is made, staff will complete a detailed review of the revisions the applicant intends to propose with the Project. A more in-depth preliminary discussion of the plan staff has received to date is included in the Project Revisions section below.

### *Market Demand Study*

#### **27. Memo from the preparer of the Market Demand Study, CBRE.**

Staff Response: A memo, dated February 18, 2021, was provided by CBRE and included as Attachment F. CBRE acknowledges that the economic and hotel landscapes have changed significantly in the nearly two years since the issuance of the Market Demand Study. The performance declines experienced in 2020 were worse than that experienced in the 2001 and 2009 economic downturns combined. It is CBRE's recommendation that if a new study is requested, that it should be delayed until there is a better understanding of the vaccine roll out and the anticipation of the return to normalcy in regards to corporate and social group travel patterns likely to impact the viability of the subject resort in approximately three to six months' time.

### *Resort Management*

#### **28. Clarify the "public availability" of each of the following resort components: outdoor recreation (trails and park areas), function building (conference and ballrooms), spa and gym, and pools. Which of the following classifications of visitors would have access to each component: resort/hotel guests, members, and general public?**

Applicant Response: The outdoor recreation area, trails, and open space dedicated, will be open to the public at no charge. The resort will have restaurants and conference/ballrooms which are available to the public to use. The spa, gym, and pools will be limited for use for guests of the resort.

#### **29. The resort employee shift schedule should avoid the school schedule.**

Applicant Response: Please refer to the answer to Item 14 above.

#### **30. How would the resort manage the traffic, parking, and noise from concurrent events (i.e. conferences, multiple weddings, or other events) occurring at the same time/day/week?**

Applicant Response: The impact of these uses was studied in the EIR and the Traffic Study. We expect that during the week there will be corporate client uses while small weddings or community events will be focused on the weekends when there is no commuter traffic.

## *Construction*

### **31. The Draft EIR assumes the construction of the entire project. Is there a Phasing Plan, that would phase the construction of the View Villas Community or other buildings/components later, based on the success of the main resort?**

Applicant Response: As we have indicated at the beginning of this letter, the Oak Villas aspect of the project is being eliminated as the applicant has decided to proceed with Alternative 2. There is no plan to phase the construction of the remainder of the resort.

### **Draft EIR Responses**

Staff will be finalizing the responses to these issues and any comments received at the March 2, 2021, Planning Commission hearing regarding the Project and Draft EIR.

### **ARCHITECTURAL REVISIONS**

The Planning Commission has previously commented that the Project's architecture was inconsistent with the Community Character & Design Guidelines of Canyon Country/Sand Canyon. The applicant provided plans for the proposed revised Project architecture, included as Attachment D. The City's architectural consultant, RRM Design Group, reviewed the revised submittal and provided a memo, dated February 17, 2021, included as Attachment E. The applicant provided additional renderings of the exterior and interior of the Main Hotel included as Attachment G.

The architectural review determined that the Project's architecture is appropriate to the location and surrounding context of the site. However, there are a number of concerns that will have to be adequately addressed by the applicant to ensure that the Project appropriately addresses the vision for the community of Canyon Country, while also being consistent with City's desire for high-quality new developments. Comments are summarized as follows:

- Architectural style and enhancements: Pursue integration of consistent window patterns, structural bays, roof overhangs, colors/materials, awnings, moldings, fixtures, and/or other design interventions to enhance the human-level scale within the various building designs.
- Massing, proportions, and scale: Provide adequate balance of desired massing elements, which includes a combination of variation in wall planes (projecting and recessed), wall heights, and roof heights. For example, the Main Hotel Building could provide greater emphasis and/or expansion of "façade projections" to provide greater wall plane variation. This would deemphasize the horizontal aspects of the facades and breakdown larger massing appearance into more defined smaller building appearance. In addition, the primary entry could be enhanced with greater wall/roof height.
- Incorporate 360-architecture: Minimize large blank wall planes that are seen across proposed building types through integration of additional design interventions. For example, blank walls appear at Main Hotel Building ends, Function Building, Spa