

**Subject:** Sonoma Cheese Factory testimony

**Date:** Thursday, March 22, 2018 at 11:54:24 AM Pacific Daylight Time

**From:** gia baiocchi

**To:** David Goodison

Greetings David,

I am writing to provide testimony in support of the proposed Sonoma Cheese Factory. I would definitely prefer to be at the hearing in person, but happen to be out of town on business at this time, so I would appreciate it if you could please forward my comments to the Planning Commission.

Dear Planning Commission,

I am a local business owner in Sebastopol and Healdsburg. Having grown up in Sonoma County, I feel very fortunate to be able to make a living here and create jobs for our local economy. I am currently nominated for SBA Small Business Woman of the Year and have received acknowledgment and awards from local organizations for my efforts in created an innovative work culture for Sonoma County residents. My work force has grown from 5 to 40+ in less than 4 years.

I opened my first business at The Barlow in Sebastopol in July, 2014 and my second location this past July, 2017 in Healdsburg. I have been in touch with Steve Carlin about his proposed Cheese Factory since early last year when I began scouting locations for my second brick and mortar juice shop. Customers have been expressing a specific need for my products and service in the town of Sonoma, and I really enjoy being a part of a marketplace business community at The Barlow, so this project feels like a perfect fit for my third brick and mortar location.

My understanding is that there are some objections / issues being raised against the project that essentially include the following:

- 1) Don't change anything on the plaza.
- 2) Don't remove any portion of the existing decrepit building.
- 3) Don't bring regional chains to Sonoma, even local companies like Hog Island, Three Twins Ice Cream, and Gotts, who are major advocates for local sustainable foods and businesses.

My response to hearing these concerns if the following, and I will address them each respectively:

- 1) As a Sebastopol native, I must admit that when I first moved back to the area in 2011 and was introduced to The Barlow, I wasn't quite sure how I felt about it, as it was such different look and feel than our existing "downtown" which was essentially Main Street. However, once I really explored the Barlow, met with the designer, learned about the vision and spoke with existing tenants, I was clearly inspired to become a part of something new and innovative that I didn't see so much as a "change", rather something that enhances our existing downtown, provides opportunity for entrepreneurs (like myself) and creates diverse job opportunities in our community. In this regard, change is for the better... things are going to change and ARE changing, and in my humble opinion, the best thing to do here is to be the force in that change and inform it, not resist it. This is what I feel the Cheese Factory is doing in it's approach, from concept, to design and building.
- 2) Again, I will use the Barlow as an example. Just 5 years ago, this thriving outdoor marketplace was and abandoned apple cannery covering more than 12 acres in our downtown area and is now a destination for locals and tourists alike. The existing building in Sonoma is not serving any purpose, and has the potential to be transformed into new possibilities that will greatly benefit not only the look and feel of the downtown plaza in Sonoma, but increase economic vitality in the community, which benefits everyone.
- 3) I suppose you could classify The Nectary as a "regional chain" at this point, since we are planning on opening another 2 locations in the next 2 years. I am a locally grown, locally operated, locally sourced and locally

supported business that has managed to build a trustworthy reputation in Sonoma County and beyond in less than 4 years. My question to you here would be this... is it not just as desirable to have pre-established brands and businesses enter the marketplace who have a strong local following that would not only provide revenue and jobs for the Sonoma economy, but a strong foothold that would essentially guarantee to make those sales and jobs last longer than most start-ups ? A good mix of these successful local businesses with new local start-ups would create a more diversified marketplace with a greater chance of success overall.

I became acquainted with Steve through The Oxbow Marketplace, which I originally approached as a potential second location for my business. As a Sonoma County native, I am very discerning in my locale and positioning within the marketplace. Based on his success with creating a space that is designed for local businesses to thrive by supporting their local clientele while still appealing to the transient tourist economy, I approached Steve to consider The Nectary as a tenant. While he didn't have room for me at Oxbow, I was informed about the developing Cheese Factory in Sonoma and have been in dialogue with him about ever since because it is exactly the type of locally-centered business community I desire to be affiliated with.

He has shared with me some of the key elements of the position of the project, which I would like to emphasize and express my sincere support for:

1. Our mission is to build community gathering places centered on traditional public markets that reconnect local agricultural producers with their natural consumer base. That is what we are attempting to create at the Sonoma Cheese Factory.
2. Page and Turnbull, the Bay Area's most prominent historic preservation architects have deemed our project consistent with the historic characteristics of the site.
3. The project is supported by the Sonoma League for Historic Preservation.
4. Our previous projects have been at the forefront of local artisan foods for decades.
5. At Oxbow, we pioneered the original composting food waste program in Napa and still compost almost all of our waste 10 years later.
6. The tenant base at both The ferry building and Oxbow primarily consist of owner-operated local businesses who support local agriculture.
7. At Oxbow, we pioneered Locals Night for Napa and still maintain the popular Tuesday night event 10 years later.
8. The merchants in our projects are first rate nationally recognized local companies who have set the standard for quality, sustainability, and flavor in just about all aspects of food.

In my opinion, the proposed Cheese Factory has a better use and design that locals will embrace, support, and enjoy. As a local business owner, Sonoma County resident and discerning consumer this is exactly the type of project I feel inspired to support because it is a visionary concept that takes an innovative approach to developing an engaging gathering place and thriving public market that will serve the local economy, community and visitors from around the world.

I ask you to please consider the vitality and well-being of your community by welcoming this project and the amazing list of benefits it will bring to Sonoma.

Thank you,

Gia Baiocchi  
"Queen Bee"  
[thenectary.net](http://thenectary.net)  
c. 808.652.4414  
SEB 707.829.2697  
HBG 707.473.0677

**Subject:** Cheese Factory Parking and Traffic Issues

**Date:** Thursday, March 22, 2018 at 11:41:21 AM Pacific Daylight Time

**From:** Victor Conforti

**To:** David Goodison

**CC:** Victor Conforti - Architect, Johanna Patri, David Eicher, Fred Allebach

David,

Please include this in the public comments:

Dear Planning Commissioners,

The Dev. Code parking standards require that any increase in SF requires on-site parking for the increased SF, plus any change of USE in an existing building that has a parking requirement exceeding 1 space/300 SF, requires additional on-site parking to accommodate the additional parking load. This includes restaurants and food service businesses. Therefore the 3,538 SF of additional floor area requires additional parking for added retail SF, plus the food service seating at one space per 4 seats or stools. I understand that the previous Use Permit approvals have expired. If this is so the parking credits that were based on a Use Permit that no longer exist, are no longer valid. The project should meet the same requirements that any other Plaza business has to comply with.

The parking spaces in the Casa Grande parking lot, which currently is a general use public parking lot, should not be used to meet the parking requirement increases for any property with parcel frontage on the Plaza. The Casa Grande lot is owned by the State and currently jointly used by the City and State. But this arrangement is only for a specific period of time. The "Tragedy of the Commons" is upon us now. The Plaza, neighboring public street parking, and the Casa Grande lot represent a "common" resource supply, which is currently at capacity demand during peak periods. Any further parking demand (or traffic demands on the existing public streets) on these public parking supplies, simply diminish the supply for all the other users of these limited resources. These are some of those other users:

State Park historic sites: The Mission and courtyard, the Barracks and courtyard, the Toscano Hotel / Kitchen / rear Dining Room, plus State Park staff parking.

Visitor and local customers going to Plaza merchants, offices and tasting rooms

Plaza Farmer Markets attendees

Owners and employees of all of the above

Plaza and Depot Park picnickers and family & children visitors to the playgrounds

Regular Depot Park bocce ball and petanque clubs users

Locals and visitor users attending festivals and Plaza events

Given these facts, no parking credits should be given.

Also, there is no guarantee that the State will renew the shared use agreement. Once they they realize the parking demand has exceeded supply, they may rethink their options. It's not a case of "If there is a problem", but "when they become concerned about the problem". Because the parking lot is already at capacity during peak periods, it won't be long before they realize that the "Tragedy of the Commons" (TOC) has caught up with them, and they are experiencing seriously diminished use of their own parking lot. They could easily use smart phone parking control methods to limit access to their visitors.

Also, if the federal government continues to punish California through reduced funding, requiring more and more cuts to services, the State could be forced to cut back small local district State Parks, just as was done during the last fiscal crisis. This could ultimately lead to disposal of the properties, just as it is now being done to the State's Development Center in Glen Ellen. These are all possibilities under the "new normal" economic and political conditions we now have to prepare for.

Also, even if a parking credit were given, this would require a Variance under State law. This is because an increase parking demand of even a modest number of parking spaces, based on the additional floor area, and the new high parking demand food and restaurant use, would be more than the 30% maximum deviation, under an Exception. The applicant could not likely provide even a few parking space on-site., unless they removed a

significant area of the existing buildings. The findings required for a Variance are very difficult to make, and I believe that they could not be made in this situation.

These same TOC arguments apply to the vehicular traffic issues in relation to the public streets (an existing supply), that has been exceeded by the traffic (demand). As you know, the parking a traffic studies that were performed during a severely depressed demand period after the wild fire disasters. We all know that, regarding parking a traffic, demand has overtaken supply during peak periods. The "Tragedy of the Commons" is upon us.

Thank You,

Victor Conforti - Architect





APD Preservation LLC

22 March 2018

David Goodison  
Planning Director, City of Sonoma  
1 The Plaza  
Sonoma, CA 95476  
[davidg@sonomacity.org](mailto:davidg@sonomacity.org)  
707-938-3681

**Subject: Alternative Interpretation of Historic Character of Cheese Factory  
and CEQA Consistency**

Dear Mr. Goodison:

Of my own volition, and in my capacity as a professional cultural resource consultant, I have reviewed Page & Turnbull's November 2014 "Historic Resource Evaluation" for the Cheese Factory and have reached a different conclusion regarding the historic character of the building.

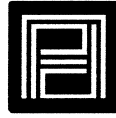
Page & Turnbull concluded that the building is eligible for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) because of its association with the cheese industry in Sonoma (criterion A: association with significant event) (HRE, page 31-32). I argue, however, that the cheese industry was not particularly significant to the social and economic development of Sonoma. The building does, however, represent Sonoma's Post-World War II commercial boom and is historically significant under that context.

Regarding its architectural distinction, Page & Turnbull, argues that the building is not the work of a master architect and does not embody distinctive characteristics of either the Streamline Moderne or the International architectural style (HRE, page 33). Therefore, they argue, the Cheese Factory is not eligible for the California Register under criterion C.

I assert that the building is primarily eligible for the California Register because of its architectural distinction (criterion C), and secondarily because of its association with a significant event (criterion A, Post World War II commercial development of Sonoma). The building is **architecturally distinctive at the local level** as one of Sonoma's few examples of modern architecture. While it is not a pristine example of one particular style, it represents a vernacular interpretation of several modern styles not otherwise used in the rural outpost of Sonoma. It stands as a visual reminder of Sonoma's bold, mid-century declaration that it was evolving into a modern town.

Under this new interpretation, I assert that the building's **character defining features** are based on the commercial store front that expresses both the modern aesthetic and the retail nature of the structure. Specifically:

- Orange tile
- Windows and doors
- Awnings



APD Preservation LLC

- Stucco-clad metal ribs
- Projecting vertical perimeters
- White stucco overhang and up-pitched roof

Using this interpretation of the historic character of the structure, the proposed project is consistent with the Secretary's Standards. The project retains the historic commercial storefront, and all of its character defining features. The proposed demolition of the rear of the building, which is not a character defining feature under this analysis, has no impact on a character defining feature, and therefore **does not constitute a "substantial adverse change" to the significance of the historic resource under CEQA.**

*Archaeology*

Even without the basement, the project still requires an archeological survey and an action plan to mitigate ("to below the level of significant") potential impacts to previously unidentified resources.

*Indirect Effects on Servants' Quarters*

The project as proposed may also have indirect visual effects on the NHL-contributing Servants' Quarters. Specifically, the mass of the proposed rear addition is significantly larger than the modest, 1.5-story adobe structure. Whether this mass looms over the Servants' Quarters or provides a visual backdrop to enhance the public's experience of the building is debatable.

After visiting the site and viewing the Servants' Quarters from all public-right-of-way vistas, I conclude that the proposed project enhances the setting of both historic resources. The proposed pedestrian walkway along the east side of the Cheese Factory provides greater separation between the Cheese Factory and the Servants' Quarters, thereby improving the setting of both historic resources. At the same time, the proposed visual de-cluttering of the rear of the Cheese Factory allows the Servants' Quarters to stand out as a unique historic resource.

In applying CEQA's definition of "adverse effect" to the potential visual impact on the Servants quarters, I conclude that the project as proposed **does not materially impair** the building's immediate surroundings or impact the building's ability to convey the reasons for which it is historically significant. (15604.5(b)(1) and (2)).

Please feel free to call me at 415-806-4549 if you have any questions or comments.

Sincerely,

Alice P. Duffee  
APD Preservation LLC

**Subject:** Sonoma Cheese Factory

**Date:** Wednesday, March 21, 2018 at 7:14:11 PM Pacific Daylight Time

**From:** Becky Chiurco

**To:** David Goodison

Dear David,

I've been following the Cheese Factory project since the beginning.

I was born and raised in Sonoma and love our town. The Cheese Factory has always been a staple for my family as well as my husband's (also a Sonoma native.) As kids we got to watch cheese making, got sandwiches while growing up and taking out of town guests there in our adulthood. Coming to the square with guests these days isn't the same. We need more to offer. Looking at this project, it's just what we need. We tend to take guests out of town, mainly Napa. There's so much more to offer. I think Sonoma could hugely benefit from the "Oxbow style" market. This would bring multiple local vendors and boost the revenue in OUR town not our neighboring towns.

In reading the specs of the project, it's wanting to preserve the historic characteristics and values. The leader of this project has been very successful in their previous endeavors. It won't only be a place to bring guests but meet as locals midweek. I can see more farm to table, supporting local farm and artisan food.

Please consider this project as it will boost our economy and I would like nothing more to see it thrive.

Nothing is constant but change, and this looks like a quality project.

Thank you for your time,

Becky Chiurco

Live life to the fullest



**Subject:** Sonoma Cheese Factory Project

**Date:** Wednesday, March 21, 2018 at 3:20:49 PM Pacific Daylight Time

**From:** Renee Loustalot

**To:** David Goodison

Greetings,

I grew up in Sonoma and live in Fairbanks, AK. I come back for extended stays.

I like the tenant based idea and making some needed improvements to the building. The building improvements can be made along with the Historical Society. I think it would improve that part of the Plaza. There was a major historical project between the Tuscano Hotel and Sonoma Cheese. The improvements can blend in nicely with the historical part.

Thank you,

Renee Loustalot

**Subject:** Proposed Changes - Sonoma Cheese Factory

**Date:** Wednesday, March 21, 2018 at 3:19:23 PM Pacific Daylight Time

**From:** sabina cesar

**To:** David Goodison

Hello Mr. Goodison,

I have had a chance to look at the proposed changes for the Sonoma Cheese Factory and I am happy to see that upgrades and enlargement, long over-due, are finally on the table. The Cheese Factory has been a much beloved, venerable asset to Sonoma, but it seemed to be fraying around the edges, especially the side facing the barracks. It need modernization, some planting, more outdoor seating, especially during our beautiful Sonoma summers.

The Tommasi family has lived in Sonoma for over 100 years. Andrew was born here and lived here all his life. His mother Anita Tommasi recently passed away at 101 years of age. Andrew has seen many changes sweeping over our beautiful little town, some very unwise, some more beneficial.

Beautifying, upgrading and modernizing the iconic Cheese Factory would be most welcome and enhance that whole section

between the Toscana Hotel and the "Factory".

Sincerely,

Sabina Cesar and Andrew Tommasi

**Subject:** Support of the Sonoma Chesse Factory Market project.

**Date:** Wednesday, March 21, 2018 at 1:52:51 PM Pacific Daylight Time

**From:** Liliana Uleia

**To:** David Goodison

Dear David,

I'm writing in support of the Market project proposed for the Sonoma Cheese Factory

I'd like to add several more comments. As a new resident of Sonoma, only few years, we find there are very few places for locals to go and relax in and around downtown Sonoma. As we noticed, locals don't hang out in the wine bars (in my opinion, far too many). We do very much enjoy the farmers markets and the seasonal Tuesday night market, and there are several restaurants that appeal to us , " the locals". but if we're just looking for a place to have a café experience - coffee, glass of wine, small bite - that just doesn't exist.

As former residents of a bigger town, we can attest to the positive impact that a Public Market had on the community. Having spent many hours there with friends and family and visitors from overseas, we realized that it adds charm and comfort to the community. it will be nice to have places ( besides wineries ) to sit and relax, buy local products knowing we could depend on the quality of the merchants.

Please consider this communication on behalf of our Sonoma friends who share our feelings.

Thank you,  
Liliana Uleia  
Sonoma resident.

**Subject:** Re: Sonoma Cheese Factory traffic memo

**Date:** Wednesday, March 21, 2018 at 12:29:34 PM Pacific Daylight Time

**From:** David Eichar

**To:** David Eichar, Cristina Morris

**CC:** David Goodison

Christina,

Please forward to the Planning Commissioners:

Planning Commissioners, I have received updated lodging occupancy (TOT) numbers from the city. Cumulatively, hotel occupancy (room nights rented) is 22% higher in the peak month from 2015 through 2017 than in November of the 2015 through 2017.

	room nights rented		room nights rented
Peak Month 2015	14,448	Nov 2015	11,200
Peak Month 2016	13,944	Nov 2016	11,599
Peak Month 2017	13,639	Nov 2017	11,647
total	42,031		34,446

Regards,

Dave

On 3/20/2018 7:36 PM, David Eichar wrote:

Cristina, please forward to the Planning Commission.

Planning Commissioners;

I have just read the memo by Fehr and Peers dated March 20, 2018 in regards to the traffic study for the Sonoma Cheese Factory project. I absolutely cannot believe that Fehr and Peers can defend the November traffic studies reasonableness. This has got to be a joke!

For traffic volume, they compare the November dates to the Hotel Project Sonoma spring 2015 date. The Hotel Napa project traffic study was also flawed. Here is my comment on the Hotel Project Sonoma a year ago:

"According to the DEIR the base traffic measurements were taking during spring 2015. Not only are the measurements 2 years old (now 3 years old), autumn, not spring is the peak tourist season. Hotel room occupancy (room nights rented) was 15% higher in October 2015 versus May 2015 and 23% higher in October 2015 versus June 2015 according to TOT statistics received from the City of Sonoma Finance Department."

Hotel occupancy was 22.5% higher in October 2015 than November 2015. (I am awaiting for TOT statistics from they city for 2017.)

This flaw of using off peak dates for traffic studies carries over to the study of available parking spaces around the Plaza. As you all should know, parking around the Plaza on the streets and in the parking lots fills up on weekend, way beyond the 85% calculated in the study.

The second flaw in both traffic studies in regards to future impact, is the absence of analysis of increased pedestrian traffic on vehicle traffic. As you know, much of the vehicle traffic delay is caused

by vehicles waiting for pedestrians to cross the street.

Another additional flaw comparing the Sonoma Cheese Factory traffic study with the Hotel Project Sonoma study is that pedestrian traffic is greater at the north end of the Plaza than the south end; so equating traffic counts with traffic delays, again ignores the pedestrian impact on vehicular traffic.

We must have a traffic study performed in September or October in order to be accurate.

Regards,  
David Eichar



**Subject:** Sonoma Cheese Factory Market project  
**Date:** Wednesday, March 21, 2018 at 10:10:58 AM Pacific Daylight Time  
**From:** Kathleen Iudice  
**To:** David Goodison  
**Attachments:** image001.png

Dear David,

I'm writing in support of the Market project proposed for the Sonoma Cheese Factory (see my below letter to the editor that was published in the Sonoma Index Tribune).

I'd like to add several more observations. As a resident of Sonoma, we find there are few places for locals to go and relax around the Plaza. The Sonoma Cheese Factory in its current state is NOT that and, as you know, locals don't hang out in the wine bars (in my opinion, far too many). We do very much enjoy the farmers markets and the seasonal Tuesday night market, and there are several restaurants that appeal to locals, but if we're just looking for a place to have a café experience - coffee, glass of wine, small bite - that just doesn't exist (Basque Boulangerie is great, but can't accommodate everyone).

As former residents of Napa, we can attest to the positive impact that Oxbow Public Market had on the community. Finally, a casual and affordable place for locals to gather. Having spent many hours there with friends and family, we became familiar with the ease and comfort of the interior and exterior spaces, and knew we could depend on the quality of the merchants and restaurants (local/sustainable/organic). Even though tourists were drawn to it, it still felt like our community haven.

Please consider this communication on behalf of our Sonoma friends who share our feelings.

Thank you,

Kathleen Iudice

# Sonoma Index-Tribune

March 6, 2018

## **To market, to market – jiggity jig!**

EDITOR: I was happy to read about the progress of the proposed market for the Cheese Factory ("Cheese Factory Plans Oxbow-Style Market," March 2).

Before we became Sonoma residents, we lived in Napa for 15 years where we saw Oxbow Public Market evolve from its opening year as a curiosity to what it is today: a lively community gathering spot where everyone gets what they want.

The high quality of food and beverages and attention to details, like recycling and mostly locally-sourced products, make them an ideal business to have in the neighborhood.

Oxbow is first and foremost about the community, but it also attracts visitors who come to enjoy a wine-country experience while blending in like a local. For those of us who want to retain the unique charm of Sonoma and the Plaza, a market like this will enhance our lives and local business without disrupting the

beauty and balance.

Bravo for their careful efforts, developers with a conscience is a rare thing to find today!

**Kathleen Iudice**

Sonoma

**kathleen iudice & associates**

[kiudice@comcast.net](mailto:kiudice@comcast.net) | 707.225.2354

*"The intuitive mind is a sacred gift..." Albert Einstein*

**Subject:** Sonoma Cheese Factory Proposal

**Date:** Wednesday, March 21, 2018 at 7:58:00 AM Pacific Daylight Time

**From:** Andrew Simms

**To:** David Goodison

Hello,

Please be sure our support for the Sonoma Cheese Factory Proposal is taken to your March 22<sup>nd</sup> meeting. We support Pete Viviani's vision for the future of the Sonoma Cheese Factory. We have been in business in Sonoma Valley since 1981 and have seen many changes. This change would be beneficial to our community, especially the Plaza. We reviewed the revision concerning removal of a basement & height of building. The revised proposal will protect the side of the Barracks along the side of the proposed walkway from the back parking lot to the Plaza. As a long-time residents, we want to honor Sonoma's historic past while still bringing new, vibrant business that will only make our Plaza better.

Thank you.

Valerie Simms  
Simms Custom Construction, Inc  
674 Mariano Court  
Sonoma, CA 95476  
707-996-6957  
*Think Before You Print*

**Subject:** Sonoma Cheese Factory  
**Date:** Wednesday, March 21, 2018 at 12:18:40 AM Pacific Daylight Time  
**From:** Suzanne Brangham  
**To:** David Goodison  
**Attachments:** Pasted Graphic.tiff

David Goodison  
March 20, 2018  
Sonoma Planning Department  
#1 City Hall - The Plaza  
Sonoma, Ca. 95476

Re: Sonoma Cheese Factory

Dear David and Sonoma Commissioners,

This is one of the most exciting new projects that has come to Sonoma in a long time.

It's a well designed renovation of a building that needs a facelift, while respecting the Plaza's integrity and mixed use.

It's attractive.  
It's well laid out.  
It's user friendly.  
It's welcoming.  
It's unique with its vendors.  
It's exciting for our town and our guests.

I hope the vote will move in favor of approving this true gift to Sonoma.

[Pasted Graphic.tiff](#)  
Suzanne Brangham  
473 Second St. East  
Sonoma, Ca. 95476

**Subject:** Sonoma Cheese Factory traffic memo

**Date:** Tuesday, March 20, 2018 at 7:36:48 PM Pacific Daylight Time

**From:** David Eichar

**To:** Cristina Morris

**CC:** David Goodison

Cristina, please forward to the Planning Commission.

Planning Commissioners;

I have just read the memo by Fehr and Peers dated March 20, 2018 in regards to the traffic study for the Sonoma Cheese Factory project. I absolutely cannot believe that Fehr and Peers can defend the November traffic studies reasonableness. This has got to be a joke!

For traffic volume, they compare the November dates to the Hotel Project Sonoma spring 2015 date. The Hotel Napa project traffic study was also flawed. Here is my comment on the Hotel Project Sonoma a year ago:

"According to the DEIR the base traffic measurements were taking during spring 2015. Not only are the measurements 2 years old (now 3 years old), autumn, not spring is the peak tourist season. Hotel room occupancy (room nights rented) was 15% higher in October 2015 versus May 2015 and 23% higher in October 2015 versus June 2015 according to TOT statistics received from the City of Sonoma Finance Department."

Hotel occupancy was 22.5% higher in October 2015 than November 2015. (I am awaiting for TOT statistics from they city for 2017.)

This flaw of using off peak dates for traffic studies carries over to the study of available parking spaces around the Plaza. As you all should know, parking around the Plaza on the streets and in the parking lots fills up on weekend, way beyond the 85% calculated in the study.

The second flaw in both traffic studies in regards to future impact, is the absence of analysis of increased pedestrian traffic on vehicle traffic. As you know, much of the vehicle traffic delay is caused by vehicles waiting for pedestrians to cross the street.

Another additional flaw comparing the Sonoma Cheese Factory traffic study with the Hotel Project Sonoma study is that pedestrian traffic is greater at the north end of the Plaza than the south end; so equating traffic counts with traffic delays, again ignores the pedestrian impact on vehicular traffic.

We must have a traffic study performed in September or October in order to be accurate.

Regards,  
David Eichar

**Subject:** Sonoma Cheese Factory Project

**Date:** Tuesday, March 20, 2018 at 4:22:31 PM Pacific Daylight Time

**From:** John Story

**To:** David Goodison

Hi David,

I was reading about the "new" Sonoma Cheese Factory project and I hope the Planning Commission will give it serious consideration. It would be a shame to see that building and business continue to deteriorate. Instead we could have a fun and enjoyable public "market" to go to, while supporting the local merchants.

Respectfully,

*John Story*

From David Eichar, March 19, 2018

Planning Commission:

Please accept my comments below on the Sonoma Cheese Factory project.

A Mitigated Negative Declaration (MND) is insufficient. An Environmental Impact Report (EIR) is required. A full EIR must be prepared when there is substantial evidence in the record that supports a fair argument that significant effects may occur.

In the case of *Keep Our Mountains Quiet v. County of Santa Clara*, the Sixth District Court of Appeal found “

“...factual testimony about existing environmental conditions can *form the basis for* substantial evidence supporting a *fair argument* that significant impacts or effects *may* occur.”

“In reviewing the adoption of an MND, our task is to determine whether there is substantial evidence in the record supporting a fair argument that the Project will significantly impact the environment; if there is, it was an abuse of discretion not to require an EIR.”

<http://www.courts.ca.gov/opinions/archive/H039707.PDF>

Note that the court ordered the County of Santa Clara to pay the plaintiff's legal fees in the above cited case.

As 15 year resident of Sonoma Valley, please consider my fact-based testimony and observations below as a “fair argument” that compels the preparation of an EIR.

The following may have potentially significant impacts that have not been adequately mitigated in the MND; thus requiring a full, independent review in an EIR:

- Aesthetics
- Cultural Resources
- Land Use / Planning
- Transportation & Traffic

#### AESTHETICS

CEQA Aesthetic Issue “C” – “substantially degrade the existing visual character or quality of the site and its surroundings” may have significant impact:

- A large building adjacent to the Historic Servant's Quarters in the State Park requires compatibility with the Secretary of Interior's Standards. Please read Alice Duffee's comments concerning this.
- All the elements of the authentic Cheese Factory, other than the façade, are being demolished and replaced with a different building design. This effects authentic aesthetics.
- A reasonable case can be made that the design and materials of the new building will take away from the authenticity of the site.

The project is NOT in compliance with the Design Guidelines, including:

- 5.1.1. “Additions should be subordinate to the main building”. Subordinate includes both height and mass. The Secretary of Interior’s Standards state, “The new addition should be smaller than the historic building—it should be subordinate in both size and design to the historic building.” The new building is not smaller than the historic building; thus it is most definitely not subordinate to the historic building.
- The Downtown Design Guidelines state: “compatible additions, and sensitive new construction that is subservient to the adjacent historic buildings.” The new building is neither compatible, nor subservient to the Historic Servant’s Quarters.
- 5.1.2. “Locate additions where they will be least visible from the public right of way and do not distract from the main building” – the addition is very visible from the public right of way, both Spain Street and the Casa Grande parking lot, and the design, distracts from the main building.
- The issue is with demolishing everything on the site, except the historic element on Spain Street, and building anew. This means the project must be deemed an addition to a historic building, and as such, they are violating the Secretary of Interior’s Standards.
- An architectural peer review is required of the analysis of compliance with the Downtown Sonoma Historic Preservation Design Guidelines, but was not done.

This above “fair argument” requires Aesthetic Analysis in a full EIR.

### CULTURAL RESOURCES

The question of impact of this project on cultural resources is too important to get it wrong. Peer review and further study is required:

- Historians often disagree. Initially, the Maysonnave Cottage was once slated for demolition because a historic report stated it was insignificant, was saved because another report deemed it historically significant.
- The Historic Resource Evaluation does say the Spain St. element of the Cheese Factory is historically significant, but also says that because it was constructed outside the period of significance that the project does not contribute to the National Landmark and Register District, which is debatable:
  - The existing building is said to have been built in 1945. The period of significance ends in 1944. But was construction started in 1944, designed in 1944? Because the dates are so close, further investigation and analysis is required to know for sure.
  - Even if the building is not contributing to the district, there may still be potentially negative impact to the district from redevelopment.
- An independent, peer review of the engineering/soils report must also be conducted. The Engineering Report was commissioned by the developer and submitted to the city; as with other reports, this must be independent and peer reviewed and included in a full EIR. With the Servant’s Quarters at stake, we must make sure this is done right.

### LAND USE/PLANNING



This project has a potentially significant impact with regard to CEQA Issue (B): “Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, etc.) adopted for the purpose of avoiding or mitigating an environmental impact.”

This project does not comply with the following elements of our General Plan:

- CD-5.1: “Preserve and enhance the scale and heritage of the community without imposing rigid stylistic restrictions.” A large food-court/mini-mall on the Plaza does not reflect the scale of the Plaza or the heritage of the community. There is no guarantee in conditions of approval that the retail portion of the building will continue to be operated “featuring locally-sourced artisan foods, cheeses, baked goods, wine, coffee, and other related food and non-food product.” Any form of retail, from tourist tchotchkes to GMO packages food products could be sold.”
- CD-5.8 “Encourage the designation and preservation of local historic structures and landmarks, and protect cultural resources.” As discussed above, further evaluation is necessary to make sure cultural resources are protected.
- LE-1.1 “Focus on the retention and attraction of businesses that reinforce Sonoma’s distinctive qualities – such as agriculture, food and wine, history and art, and that offer high paying jobs.” I strongly disagree with the MND’s conclusion on this element.
  - We have no idea whether the businesses will reinforce Sonoma’s distinctive qualities. In fact, using Oxbow as an example, many of the places will be “small chains” – Fieldwork Brewery, Hog Oyster Island, Gott’s Roadside. These are regional chains are anything but distinctive.
  - A “Formula Retail” analysis of the Oxbow Public Market is included below; we can assume the make-up of the tenants of the Sonoma Cheese Factory will be similar; 50% of the Oxbow Market have outlets with more than one location.
  - Some of these local chains work in Sonoma at different locations, but these types of places are anything but unique or distinctive and would threaten the authentic charm of the Plaza.

We must have a comprehensive economic analysis on what a large project like this on the Plaza could do to existing businesses.

- LE-1.4 “Encourage the continued production of agricultural commodities within the city and local-serving agricultural marketing opportunities.”
  - The Cheese Factory is a grandfathered food production building on the Plaza and it would be foolish to change that use; not only does that help support the General Plan, but would preserve our Plaza’s authenticity.
  - There’s no reason why some other sort of “agricultural production” that showcases our diversity and authenticity (cheese, baked goods, etc.)
- LE 1.8 “Preserve and enhance the historic Plaza area as a unique, retail-oriented commercial and cultural center that attracts both residents and visitors.”
  - Again, a large “mini-mall / food court” that already exists at various places throughout the Bay Area (San Francisco, Napa, SFO Airport, etc.) is not unique.

- Sonoma's Plaza is one of California's most unique and authentic places, developing this project on it would degrade this and is in direct conflict with the General Plan.
- CE 3.7 "Ensure that new development mitigates its traffic impacts"  
Please see my comments below under the Transportation and Traffic heading concerning the flawed traffic study which must be redone during peak season to understand proper traffic mitigation.

As identified above, this project conflicts with our General Plan policies and therefore compels the preparation of an EIR.

### TRANSPORTATION & TRAFFIC

I personally have waited in traffic on Spain St. heading both east and west, with traffic delays of more than 5 minutes. This alone is factual testimony about existing environmental conditions which form the basis for substantial evidence supporting a fair argument that significant impacts or effects may occur

The staff report and CEQA Initial Study are also missing very important information about the traffic and parking study. This missing information is vital to the public being able to accurately analyze the project.

There are 2 major problems with the traffic study:

1. The traffic study also fails to take into account the increase in pedestrian traffic and its impact on vehicle traffic from the project.
2. Traffic and parking studies performed during off season right after the devastating wildfires, on November 11 and 14, 2017. The Nuns fire was fully contained on October 30th and the Tubbs fire fully contained October 31st.

The significance of the November dates should have been mentioned in the staff report and the CEQA Initial Study in the discussion on traffic and parking, but they are not. The dates are only mentioned in the traffic study document itself. Traffic and parking around the Plaza is much worse May through October than in November. This November had even lighter traffic than usual because of the October fires. The traffic and parking study were performed within two weeks after the fires were fully contained.

The entire traffic and parking study is thus legitimately able to be called into question on the basis of substantially unrepresented dates. The conclusions of Section 16 of the CEQA Initial Study are thus invalid. Because of this, the Planning Commission **cannot** adopt the Resolution making findings for a Mitigated Negative Declaration. The flawed study results in a much lower calculation of fees than they should have been for mitigation Measure 16.a.1, for traffic impact mitigation, and Measure 16.a.2, for parking impact mitigation.

The traffic study did not include W Napa St./1st St. W and Napa St./Broadway. It should have. The city council directed that the EIR for the new Napa St. Hotel by Kenwood

Investments include all of the intersections on the Plaza. The traffic study for the Cheese Factory project should also. Why? The volume of concomitant Plaza use is at least if not higher for the Cheese Factory project. At a minimum the increase in traffic would probably also require curb extensions for 1st St. W and W Spain St. as well as E. Napa St. and 1st St. E.

Traffic and parking analysis of the Oxbow Market should be done in order to get a better sense of the range of impacts with of this style of retail.

Section 10 of the CEQA Initial Study: Since the traffic study is flawed, the true impacts to traffic cannot be known; thus it cannot be known if the traffic impacts have been mitigated, as required by Circulation Element of the General Plan.

This Saturday, March 17<sup>th</sup> at 4:20 PM, I drove around the Plaza after stopping at the BofA ATM. There was some, but not many pedestrians out. It had been raining on and off this day, but not at the time of my trip. Here were my timed observations:

- East bound on W Napa St/Broadway – delay 36 seconds
- East bound on E Napa St/1<sup>st</sup> St W – delay 30 seconds
- West bound on W Spain St/1<sup>st</sup> St W – delay 51 seconds.

Of course the above is just one trip around the Plaza, but I have experienced much worse delays during the busy season, from May through October. One Saturday during the summer last year, around 11am, I experienced a delay of over 10 minutes, east bound on W Spain St and 1<sup>st</sup> St W.

The following picture was taken two years ago, on Saturday March 19<sup>th</sup>, 2016 at 1:49 PM. There were no events on the Plaza on this day. This shows traffic backed up on East Napa Street from 1<sup>st</sup> St East all of the way across Broadway onto West Napa Street. The traffic back up was worse than this past Saturday, March 17<sup>th</sup>, 2018. The backup at these intersections is a regular occurrence.



## CONCLUSION: AN EIR IS REQUIRED

In my analysis above, there is more than enough “substantial evidence” to require an EIR based on the “fair argument” standard in relation to:

- Aesthetics
- Cultural Resources
- Land Use/Planning
- Transportation & Traffic

The benefits of an EIR are obvious:

- Independent Analysis
- Alternatives Analysis
  - This is crucial information as the Use Permit recommendation is based on a flawed reading of the situation; that this is the only use that will work as a result of a decade or more of neglect.
  - A properly conducted “alternatives analysis” will allow meaningful evaluation, analysis, and comparison with the proposed project.

**OXBOW PUBLIC MARKET  
CURRENT RETAILERS: ANALYSIS**

<b>No.</b>	<b>Name</b>	<b># of Outlets</b>	<b>Additional Info</b>
1	Anette's Chocholates		
2	C Casa	2	Napa & Emeryville
3	Cru @ The Annex		
4	Eiko's At Oxbow		(Another location in Napa; not counting)
5	Fieldwork Brewing Company	5	Locations from Sacramento to San Mateo
6	Five Dot Ranch		
7	Gott's Roadside	7	Bay Area hamburger chain.
8	Hog Island Oyster Bar	2	Ferry Building & Napa
9	Hudson Greens & Goods		Juice Bar / Tasting Room. Offers Produce.
10	Kara's Cupcakes	10	Started in SF. 10 Bay Area Locations.
11	Kitchen Door		
12	Live Fire Pizza	2	Started at SFO, new location in Napa.
13	Napa Bookmine		
14	Napa Valley Distillery		(Another location in Napa; not counting)
15	Napastak Napa Valley		
16	Oxbow Cheese & Wine Merchant		
17	Ritual Coffee Roasters	6	Started in SF, 5 SF locations + Napa
18	The Fatted Calf	2	San Francisco & Napa
19	The Model Bakery	3	All locations in NV (St. Helena, Napa, Yountville)
20	The Olive Press	2	Cornerstone & Oxbow
21	Whole Spice		
22	Three Twins Ice Cream	7	Including shops at SFO, Korea & Japan
<b>Total</b>		<b>11</b>	
<b>% of Total</b>		<b>50%</b>	

***"Formula Retail Ordinance" must be dramatically strengthened  
This will not a "unique" retail experience***

**Subject:** Cheese Factory Condition of Approval

**Date:** Monday, March 19, 2018 at 8:29:32 AM Pacific Daylight Time

**From:** Gina Cuclis

**To:** David Goodison

**CC:** Prema Behan, Chuck Bingaman

David:

This is coming to you on behalf of the Sonoma League for Historic Preservation.

After reviewing the Cheese Factory project's Conditions of Approval, we believe stronger archaeological mitigations are needed. We would like the following Condition of Approval to be included:

The project area is situated in an highly sensitive area and may contain significant prehistoric and historic archaeological deposits. Prior to any ground-disturbing activities, the applicant should retain an archaeological consultant to consult with the Native American Heritage Commission, the Federated Indians of the Graton Rancheria and develop a strategy that may initially include presence/absence testing.

Thank you,  
Gina Cuclis, Chair  
Civic Advocacy Committee  
Sonoma League for Historic Preservation

**Subject:** Proposed Cheese Factory Project

**Date:** Tuesday, March 20, 2018 at 2:05:55 PM Pacific Daylight Time

**From:** Betty Kelly

**To:** David Goodison

I would like to offer my opinion in favor of the proposed new Sonoma Cheese Factory project proposed by Steve Carlin with the same general idea as the Oxbow Market in Napa, which is a thriving, exciting gathering place for both tourists AND locals.

On a personal note, I would like to mention that when we first started out as Wine Country Chocolates, before we had a retail location, I was in talks with owner Pete Viviani, who still walked to the Plaza every single morning to "keep his hand in" the operations. He showed me an architectural rendering of his idea for renovating the entire back portion of the building into small areas for local producers to lease to sell their products. He had an area designated for our (at the time) fledgling Wine Country Chocolates to operate a viewable chocolate kitchen, and there would be an entrance from the back parking lot past outdoor tables with umbrellas and into his building from the back. Unfortunately, his vision never came to fruition and we looked elsewhere for a kitchen for our business.

As a small business owner now on the Plaza, I know firsthand how very difficult it is for artisanal food purveyors to get started in this area for economic reasons. Many food purveyors in the Ferry Building started out there because whole storefronts in San Francisco were prohibitively expensive.

Proposals such as this are the exact opposite of allowing large corporate entities to come to sell in our town under the guise of small-town culinary producers which are actually operating under enormous corporate umbrellas. Small regional companies with several outlets, like Hog Island, etc., are in a different category entirely, and should be allowed.

Most people here don't want the Sonoma Cheese Factory to change, but the reality is that it will change. There is no avoiding that.

I am hoping that this proposal that Mr. Carlin is bringing to Sonoma will be allowed.

Thank you,

Betty Kelly

--

**Betty Kelly**

**Wine Country Chocolates  
14301 Arnold Drive, #2  
Glen Ellen, CA 95442**

**[\(707\) 996-1010](tel:7079961010)**



**Subject:** Sonoma Cheese Factory project

**Date:** Tuesday, March 20, 2018 at 9:14:06 AM Pacific Daylight Time

**From:** theresa hill

**To:** David Goodison

Good Morning,

I am writing this in favor of the SCF project. I believe it is exactly what is needed to bring life back into the Plaza. It is offering something for everyone and would bring much needed revenue to other businesses on the Plaza.

From doing my research, they have done everything that was asked of them to move forward and I believe it would be a huge loss to stop or delay the momentum they have. It also offers "on the plaza" opportunities for businesses that may not be able to afford it otherwise.

Please allow this to move forward. It would be such an asset to the community and its members.

Thank you,  
Theresa Goodwin Hill

Sent from my iPhone



## APD Preservation LLC

17 March 2018

David Goodison  
Planning Director, City of Sonoma  
1 The Plaza  
Sonoma, CA 95476  
[davidg@sonomacity.org](mailto:davidg@sonomacity.org)  
707-938-3681

### **Subject: Proposed Cheese Factory Renovation**

Dear Mr. Goodison:

Directed by my personal interest in this project as a resident of Sonoma Valley, I have independently reviewed the proposed renovation of the Cheese Factory at 2 West Spain Street on the north side of the Plaza. In brief, the proposed project retains about 15 feet of front of the building (the two-story block facing West Spain Street) and replaces the rear sections with a two-story block extending to the parking lot behind the Plaza.

My comments are based on my review of documents included in the March 2018 Planning Commission package, including: "Historic Resource Evaluation (HRE)" (Page & Turnbull, 11/6/14), "Proposed Project Review Memorandum" (Page & Turnbull, 6/19/17), "Conditions of Project Approval and Mitigation Monitoring Program" (City of Sonoma, 3/8/18), "Project Narrative" (SMS Architects, ND), Proposed Plans (SMS Architects, 6/14/17), and "Staff Report" (David Goodison, 3/8/18).

By my assessment, the proposed project **is not consistent with the "Secretary of the Interior's Standards and Guidelines for Rehabilitation"** and, therefore, would have **significant impacts** on an historic resource (the Cheese Factory). At the same time, the increased size of the rear mass overwhelms the historic "Servants Quarter's" immediately adjacent to the project area.

The proposed mitigations to reduce potential impacts to unidentified, potentially historic archeological resources are inadequate and fail to reduce the potential impacts to below the threshold of significant.

### **Historic Resource, as defined by the California Environmental Quality Act (CEQA)**

According to Page & Turnbull's 2014 HRE, the Cheese Factory at 2 West Spain Street is 74 years old (built 1945) and is eligible for listing in the California Register because of its association with the development of the cheese industry in Sonoma (criterion 1 – events). Its period of significance is 1925-1968. The building, therefore, qualifies as an historic resource as defined by CEQA (14 CA ADC § 15064.5 (a)(3)(A)).

### **Secretary's Standards**

According to CEQA, a project that follows the "Secretary's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" "(generally) shall be considered as mitigated to a level of less than a significant impact on the historical resource" (14 CA ADC § 15064.5 (b)(3)).

To assess consistency, one must first identify the resource's "character defining features," which are defined as those "**visual and physical**" features that "are the means through which historic character is expressed."<sup>12</sup>

---

<sup>1</sup> Heidi Hohmann and Katarzyna Grala, "Cultural Landscape Report: Platt Historic District, Chickasaw National Recreation Area, Oklahoma," Iowa State University, 2004 ([https://www.nps.gov/parkhistory/online\\_books/chickasaw/pdf/Chapter%207.pdf](https://www.nps.gov/parkhistory/online_books/chickasaw/pdf/Chapter%207.pdf))

<sup>2</sup> Lee H. Nelson, FAIA, Preservation Brief 17: Architectural Character (Washington, D.C. National Park Service, 1988), p. 1.



## APD Preservation LLC

### • Character Defining Features

According to the 2014 HRE (pages 2 and 34), the building's character defining features pertain to the primary façade and the massing and footprint of the building. Specifically:

- Primary façade:
  - Orange tile
  - Windows and doors
  - Awnings
  - Stucco-clad metal ribs
  - Projecting vertical perimeters
  - White stucco overhang and up-pitched roof
- Massing and footprint:
  - "...massing and footprint of the building, as it was originally constructed, which includes the front (south) two-story retail and office portion and the center one-story factory section" (HRE, page 2)
  - "...generally rectangular footprint and massing, including two story portion at the south (front) and one high bay story at the center portion. These portions convey the building's historic factory, retail, and office use." (HRE, page 34)
  - "The building's generally rectangular footprint and massing, which reflect the building's massing when it was originally constructed and convey the building's historic factory, retail and office use." (Project Review Memo, page 2) (see figures at end of letter for proposed and existing plans).

### • Secretary's Standards Analysis for Cheese Factory

"The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings" are intended to provide guidance to historic building owners and building managers, preservation consultants, architects, contractors, and project reviewers prior to treatment. (National Park Service)<sup>3</sup>

The table below compares the proposed project with each of the ten standards to establish consistency.

Standard	Cheese Factory
1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.	Consistent – The commercial use continues.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.	<b>INCONSISTENT:</b> The proposed project demolishes character defining features, namely the massing and footprint of the building that "convey the building's historic factory, retail and office use" (Project Review Memo, p. 2)
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.	Consistent – The proposed project makes no attempt at false historicism in its new addition.

<sup>3</sup> <http://www.nps.gov/tps/standards.html>





APD Preservation LLC

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.	N/A
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.	Consistent – The only distinctive craftsmanship found on this building is concentrated on the primary façade, which is retained under the current proposal.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.	<u>UNK</u> (Will the primary façade be restored?)
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.	N/A
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.	<u>INADEQUATE MITIGATION</u> : None of the reports contain information about previously identified historic or pre-historic deposits, or the project area's potential to contain such sites. Regardless, the "Conditions of Approval," Measure 5.B stipulates that, "Construction personnel involved with earthmoving shall be alerted to the potential for discovery...if...encountered, all construction activities within 50 feet shall halt." A qualified archaeologist should be present during all ground-disturbing activities to make such a determination and assess the potential historic character of any findings.
9. <b><u>New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property.</u></b> [emphasis added] The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.	<u>INCONSISTENT</u> : The "Project Review Memo" concedes that demolishing the one-story section destroys the massing that characterizes the property (page 4). The Memo then asserts that relocating the historic use (in this case, cheese storage) to the new basement maintains the building's association with the event for which it is historic, and thus retains the historic character of the building.  However, according to the National Park Service, character defining features are " <b><u>visual and physical</u></b> " elements that convey the historic character of the resource (see above). The proposed basement, by its subterranean nature, will not be a <b><u>visual</u></b> means by which the historic character and association of the building are conveyed.  I will grant that the proposed new addition is clearly distinguishable from the historic, two-story block of the building through its materials and massing and its use of a "hyphen" to transition the design from "old" to "new."
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	<u>INCONSISTENT</u> : The proposed demolition of the historic, character defining, one-story block of the building constitutes an <b><u>irreversible</u></b> change that could not be undone in the future.

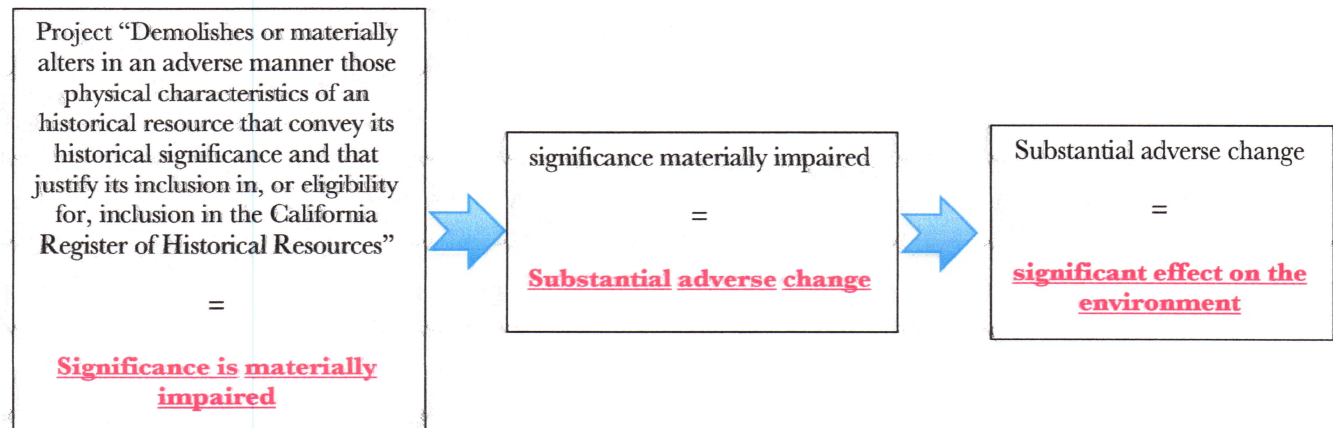




## APD Preservation LLC

Based on this analysis, the proposed project is not consistent with the “Secretary of the Interior’s Standards,” and, therefore, would have a significant negative effect on historic resources as defined in the CEQA Statute (CPRC 21084.1) and CEQA Guidelines (15064.5 (a)(2) and (b)).

### CEQA 15064.5



The proposed project demolishes a “physical [characteristic] that conveys [the] historical significance and that [justifies] [the resource’s] ...eligibility for...inclusion in the California Register.” By definition, therefore, the proposed action materially impairs the significance of the Cheese Factory (which is significant for its association with the cheese industry in Sonoma). Causing the “material impairment,” therefore constitutes a “substantial adverse change,” which CEQA qualifies as a “significant effect.”

Because the project does not follow the Secretary’s Standards, per the previous table, the project cannot be considered to be “mitigated to a level of less than significant.”

### VISUAL IMPACTS TO SERVANT’S QUARTERS

The two-story, adobe “Servant’s Quarters” directly east of the Cheese Factory is a contributing resource to both the Sonoma Plaza National Historic Landmark (NHL) and the Sonoma Plaza National Register Historic (NRHP) District. As such, it constitutes a historic resource as defined by CEQA.

The proposed project has the potential to impact visually the Quarters because of the greatly increased size of the rear massing of the Cheese Factory. As proposed, the rear section of the Cheese Factory overwhelms its historic neighbor.

I will grant that removing the outdoor dining area and increasing the width of the path between the Cheese Factory and the Quarters do open up the space around the Quarters, improving its setting.

### ARCHAEOLOGY

The Planning package contains no information about the site’s potential to “yield information important in prehistory or history,” meaning its potential to contain previously unidentified archeological resources. The City’s proposed “Conditions of Approval,” however, does acknowledge and address the potential presence of archeological and cultural/tribal resources. Specifically, the “Conditions of Approval” requires the developer to adopt the following mitigation measure:

“Construction personnel involved with earthmoving shall be alerted to the potential for the discovery of prehistoric materials and tribal resources. ... If prehistoric or historic-period archaeological resources are encountered, all construction activities within 50 feet shall halt and the



## APD Preservation LLC

Planning Director shall be notified.” (“Conditions of Project Approval and Mitigation Monitoring Program,” Mitigation Measure 5.b (page 9), March 8, 2018).

As the site of Vallejo’s 1835 “Casa Grande” and as part of the original 1835 Pueblo of Sonoma, the project area is rich in history and has a high potential to contain significant prehistoric and historic archeological and tribal/cultural deposits.

At the very least, the project needs to be researched in the records of the Northwest Information Center in Rohnert Park to determine if prior studies have identified archeologically sensitive sites in the vicinity. Preferably, a qualified archeologist would conduct a study of the area to assess the likelihood of the presence of resources and to pinpoint particularly sensitive areas prior to any ground-disturbing activities.

I anticipate that the study would recommend that all ground disturbing activities be monitored by a qualified archeologist, trained in identifying the archeological materials noted in the current mitigation measure (obsidian and chert flaked-stone tools, toolmaking debris, culturally darkened soil, heat affected rocks, shellfish remains, stone milling equipment, wells, privies, building footings, and deposits of metal/glass/and or ceramic refuse).

Proposing that the construction worker operating the heavy machinery, who in all likelihood has no archeological training, would be able to identify any such resources from his/her vantage high atop a large piece of machinery seems unrealistic to say the least.

### CONCLUSION

Demolishing the one-story, central block of the Cheese Factory negatively and irreversibly impacts the ability of the building to convey visually those reasons for which the building is eligible for listing in the California Register. Relocating the cheese storage function into the new basement is not a comparable replacement for the lost character defining feature (the one-story block) because it does not constitute a “visual and physical” feature that tells the history of the building.

The increased size of the rear mass overwhelms the historic “Servants Quarter’s,” thereby causing an adverse indirect impact on an historic resource.

Similarly, the proposed project fails to address the possible presence of previously identified archeological and/or tribal/cultural resources in the vicinity and provides woefully insufficient mitigation measures to limit impacts to prehistoric and/or historic archeological resources that could be discovered during construction.

Per CEQA, the proposed action constitutes at least two substantial adverse environmental impacts that have not been mitigated to below the level of significant. It is my opinion, therefore, that the “Mitigated Negative Declaration” is inappropriate and that the project requires an Environmental Impact Report (EIR) to thoroughly address these impacts to cultural resources.

Please feel free to call me at 415-806-4549 if you have any questions or comments.

Sincerely,

Alice P. Duffee  
APD Preservation LLC





APD Preservation LLC



*Figure 1: East Facade, one-story character defining block (massing)*



*Figure 2: South facade (West Spain Street), covered dining and path*





# APD Preservation LLC

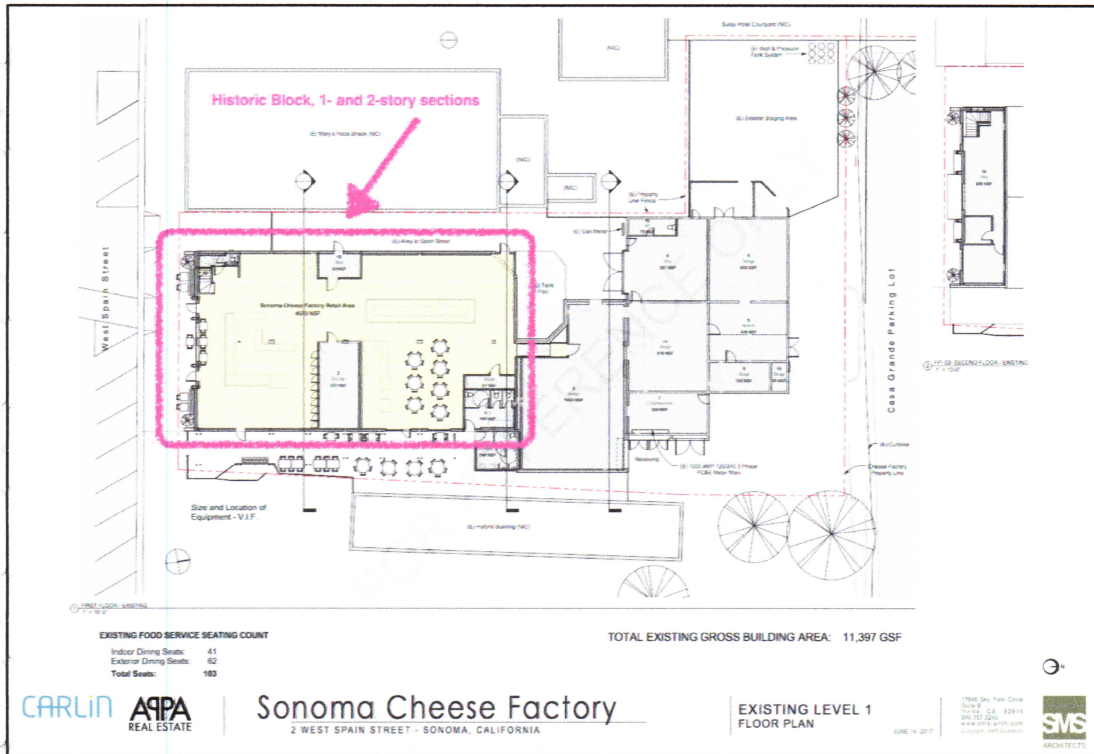
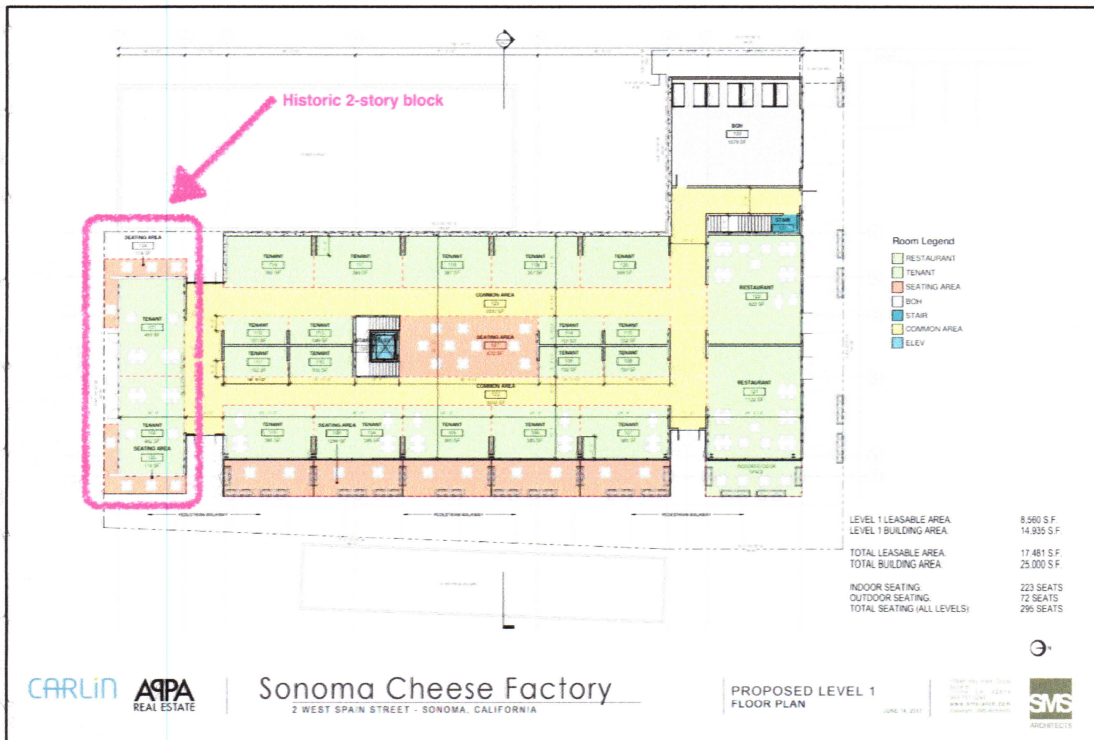


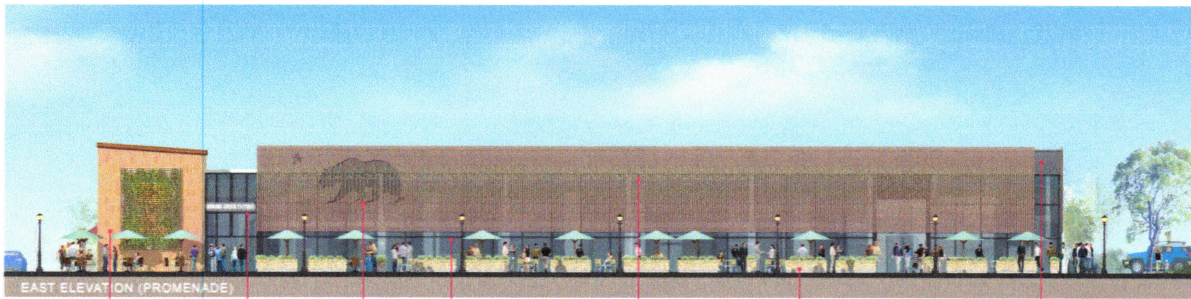
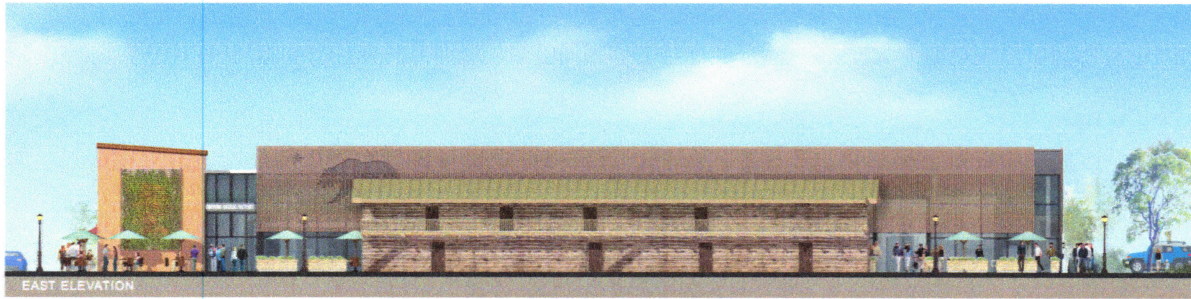
Figure 3: Existing and proposed plans, indicating historic block







APD Preservation LLC



(E) TILE  
FINISH

SIGNAGE

CA BEAR  
AND STAR

ANODIZED ALUMINUM  
STOREFRONT

VERTICAL WOOD  
ELEMENT

STONE VENEER ON  
PLANTER WALL

METAL  
PANEL

CARLIN ACPA  
REAL ESTATE

Sonoma Cheese Factory  
2 WEST SPAIN STREET - SONOMA, CALIFORNIA

ELEVATION  
EAST

JUNE 14, 2017

17448 Sky Park Circle  
Suite 200  
San Jose, CA 95131  
www.sms-architects.com  
(408) 437-1000



**Subject:** Cheese Factory

**Date:** Saturday, March 17, 2018 at 6:54:33 PM Pacific Daylight Time

**From:** Linda Welch

**To:** David Goodison

Sonoman's Were hoping for an ox bow type market on Broadway and MacArthur. not in the heart of the plaza. There is barely enough parking to support our local restaurants run by families here in Sonoma. It's too big of a project for that location.

Sent from my iPhone

**Subject:** Cheese Factory Parking

**Date:** Thursday, March 8, 2018 at 4:48:04 PM Pacific Standard Time

**From:** Victor Conforti

**To:** David Goodison

**CC:** Victor Conforti - Architect

Dave,

Please distribute this to the Planning Commissioners.

SONOMA CHEESE FACTORY... DEMAND OVERWHELMS SUPPLY OF PARKING AND STREET CAPACITY

The Cheese Factory Expansion is proposing more than **doubling the existing floor area**, adding two new restaurants, plus very large increases in food service with accompanying **seating totaling 245 seats**. This is an over-reach, and is clearly not conforming with the Development Code (DC). It's just another example of projects that are non-compliance with the DC. These kind of applications set dangerous precedents, and are undermining the DC. This application would further impact the Plaza's existing already inadequate parking and traffic capacities.

This is a "tragedy of the commons" problem... **"in which every individual tries to reap the greatest benefit from a given resource. As the demand for the resource overwhelms the supply, every individual who consumes an additional unit directly harms others who can no longer enjoy the benefits"**. In this case the "commons" is the streets and parking lots around the Plaza. It is apparent to all of us that live near the Plaza, that the demand for the resource has already overwhelmed the supply. During peak periods all of the Plaza parking and adjoining private and public parking lots are at capacity, street parking extends out into the surrounding residential neighborhoods, and traffic congestion at Plaza's intersections are below Level of Service D.

The existing Cheese Factory parking demand is a small percentage of the total commercial parking demand around the entire Plaza. Suggesting that a financial contribution of \$50,000 to help create additional parking at the Casa Grande parking lot, would give a parking credit to one individual property owner of 20 to 40 spaces is unfair. **It directly harms all the other Plaza merchants who will have their current parking and traffic capacity benefits reduced.** Any individual financial contribution should be credited in proportion to their percentage of parking demand versus that of the parking demand for all of the Plaza property owners. A single parking space in San Francisco costs approximately \$25,000 to build, including land. At the Cheese Factory's current size, it may have a parking demand share of approximately 5% of the total Plaza demand. A 5% share of 40 spaces would equal two spaces, which would be consistent with a contribution of \$50,000 for the cost of two \$25,000 spaces.

Expanding the Casa Grande parking lot, would be funded mostly by the City, and possibly with help from the County, as it will be a "common" benefit all the Plaza property owners. The opportunity to expand public parking should be pursued, but any parking credits given should be based on the individual property owner's demand percentage of the overall demand.

**The Development Code** has a clear method of preventing any one property owner from abusing the “commons” (see below). It **limits businesses expansion** by requiring additional on-site parking **for increased structure square footage**, and **change of use that requires with more than one parking space per 300 sf**. This provision is very clear, and is why existing retail uses cannot be converted to restaurants or bars, or other high parking demand uses. It is clear, that given the fact that the applicant has asked that the project be evaluated for parking as if it were a restaurant, and not a retail use, and it is a more than doubling of the existing building size, that this is clearly going to be a “commons” problem.

***19.48.040 Number of parking spaces required***

F. Existing Unreinforced Masonry Structures and **Structures Adjoining the Plaza**. For unreinforced masonry structures designated by the city in compliance with Government Code **8875** et seq. and existing structures that face the plaza, **additional parking shall not be required for a new use unless the new use results in one of the following:**

1. **An increase in the square footage of the structure;** or
2. **An off-street parking requirement that exceeds one parking space for each 300 square feet of floor area.**

Additional off-street parking shall only be **required for the expansion in building area or as associated with the increased parking ratio**, as applicable.

Thank You,

Victor Conforti - Architect

Johanna M. Patri, AICP  
P. O. Box 604  
Sonoma, CA, 95476  
707 996-6412  
[jmpatri@aol.com](mailto:jmpatri@aol.com)

Item #4  
LATE MAIL

March 7, 2018

***Delivered by e-mail***

***Please distribute to Planning Commissioners***

City of Sonoma Planning Commission  
Chair Person and Commissioners  
Sonoma City Council  
City of Sonoma  
No. 1 The Plaza  
Sonoma, CA 95476

**RE:    Redevelopment and Expansion of the Sonoma Cheese Factory  
      Staff Report and Mitigated Negative Declaration**

Dear Chair Person and Commissioners:

Please consider the following concerns and issues regarding the redevelopment and expansion of the Sonoma Cheese Factory:

1. Inadequate Transportation, Vehicle Miles Traveled (VMT), Air Quality and Greenhouse Gas (GHG) Emissions Analysis of this Large-Scale Project

The proposed mitigated negative declaration fails to analyze Vehicle Miles Traveled (VMT) and promote the State's smart mobility goals, leading to the reduction of traffic and greenhouse gas (GHG) emissions, thereby aligning the City of Sonoma's long-range transportation plans and reduction of GHG emissions with the regional and State's long-range transportation plans.

Passed in 2013 by the State's Office of Planning and Research (OPR), SB743 replaces measuring "Level of Service" (LOS), a measure based on how many vehicles pass through an intersection within a given time, to assessing overall VMT, which reflects State Legislative policy to more appropriately address the bigger picture of traffic congestion management related to infill development and reduction of GHG emissions.

Many agencies (Pasadena and San Francisco for example) have adopted the VMT methodology in place of LOS for all CEQA determinations and are using VMT models most notably for local climate action plans and to quantify and verify a project's impact on GHG emissions more definitively and accurately. The City of Sonoma has the authority to require use of VMT metrics. The goal here is to reduce GHG emissions not only by tourists, visitors, and local residents, but by the local and regional work force that this large-scale and intense use project will require. Analyzing VMT, better addresses greenhouse gas emissions and climate change than LOS.

## 2. Questionable Parking Analysis and Requirements:

The Cheese Factory Expansion more than doubles the existing floor area, and adds new uses including two new restaurants, plus intense increases in food service and customer seating. The Development Code (Section 19.48.040 Number of Parking Spaces Required) states that existing structures that face the plaza require additional parking when the new use results in one of the following:

1. An increase in square footage of the structure; or
2. An off-street parking requirement that exceeds one parking space for each 300 square feet of floor area.

Using the history of various "grandfathered" parking "credits" over the history of this property as it relates to the proposed expansion is questionable as these factors occurred after the adoption of the parking allocation ordinance of 1 space per 300 sf given to existing structures that face the Plaza. They created a valid "credit" for existing buildings around the Plaza. The Development Code when it was adopted in 2003. It states:

***Expansion of Structure or Change in Use. When a structure is enlarged or increased in capacity, or when a change in use requires more parking than the previous use, additional parking spaces shall be provided in compliance with this chapter. The number of parking spaces required for an addition to a structure shall be based on the parking requirement associated with the entire structure.***

The original cheese making "manufacturing" space would have had a parking ratio of 1 space per 500 square foot. The storage areas and aging buildings behind the "manufacturing" space, were "warehouse" uses, with 1 space per 1,000 sf parking ratios. I doubt any analysis was done on the added parking that this 1985 "remodel" from "manufacturing & warehousing" to "retail" parking ratios.

In this newly proposed expansion of the Cheese Factory, new and intensified uses, where will the resultant increase in employees park – on surrounding residential streets?? What are the provisions for employee parking??

## 3. Nexus Requirement for In-Lieu Fees for the Increase in Parking Demand

There is no finding of a nexus between the proposed mitigation in the form of an in-lieu parking/traffic fee in the proposed meager amount of \$60,000 to \$75,000 to off-set the increase in parking demand and improve capacity in a public, State-owned parking lot that will benefit the proposed development or mitigate the short-fall in parking or reduce the burden and impact of the proposed development on the current parking environment on the Plaza.

Furthermore, the staff report states that "As a result of participating in the support of a public parking facility, an owner or developer may receive a reduction in the total number of parking spaces required based on the number of spaces purchased in the public parking facility and subject to approval by the commission". What does this mean? That these "improvements" or "additional" parking spaces will be dedicated solely to the use Cheese Factory??

There are no calculations or analysis. One is just expected to believe this in-lieu fee will take care of the burden of additional parking on an already impacted Plaza.

While CEQA Guidelines acknowledge, and the Courts have stated, that mitigation measures must have an "essential nexus" to a legitimate government interest, and must bear a "rough proportionality" to the project's adverse impacts, the reverse is also true. Analysis and sufficient evidence must be presented that a mitigation measure (or condition of approval) is sufficient and proportionally reasonable to reduce an impact or burden of a proposed development.

The proposed development is a change and intensification of land uses. Are in-lieu fees adequate to solve the burden of parking on the plaza? Did the City use a proper baseline to calculate this fee? What is the baseline?

#### 4. CEQA and Climate Change, Greenhouse Gas Emissions and Timing of Traffic Study

The accumulation of greenhouse gases in the atmosphere over time is already causing the climate to change with more significant changes to come. Since a key purpose of CEQA is to maintain the quality of California's environment, both now and into the future, reducing the risk of climate change is an important objective under CEQA.

- Lead agencies must analyze the greenhouse gas emissions of proposed projects, and must reach a conclusion regarding the significance of those emissions. (See CEQA Guidelines § 15064.4.)
- When a project's greenhouse gas emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions. (See CEQA Guidelines § 15126.4(c).)
- Lead agencies may significantly streamline the analysis of greenhouse gases on a project level by using a programmatic greenhouse gas emissions reduction plan meeting certain criteria. (See CEQA Guidelines § 15183.5(b).)
- CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply, and ways to reduce energy demand, including through the use of efficient transportation alternatives. (See CEQA Guidelines, Appendix F.)

The Initial Study addresses GHG emissions primarily through green energy building programs, but not through traffic. Furthermore, the timing of the traffic study is questionable. Traffic studies should be done during the peak season of traffic in order to know the true traffic and parking impacts.

#### 5. Cumulative Impacts Must be Adequately and Fully Analyzed

CEQA requires that a Mitigated Negative Declarations (MND) must address and discuss cumulative impacts. CEQA provisions require that the MND must discuss cumulative impacts of a project when the incremental effect could be cumulatively considerable. A cumulative impact consists if an impact which is created as a result of the combination of the project evaluated together with other projects causing related impacts. An adequate discussion requires past, present, and probable future projects producing related impacts.

In Summary,

Analyzing VMT, better addresses greenhouse gas emissions and climate change than LOS.

How does the proposed in-lieu fee for the increase in parking demand provide adequate mitigation to presumptively justify an MND, when reviewed under CEQA?

What review has been done by the State of California to approve the intensity of this project and the construction mitigation measures in regards to the impact on the adjacent state park buildings?

What review has been done by the Department of the Interior for this project on the Plaza listed on the National Register of Historic Places?

I purport that almost doubling the size of the existing improvements and increasing the intensity of use of the retail space will have a great impact on the Plaza with negative consequences. In addition, no project should increase the demand for parking on the Plaza, which is already impacted.

I purpose that an independent reviews and analysis should be undertaken through an Environmental Impact Report, particularly to address:

Aesthetics

Cultural Resources

Land Use and Planning

Transportation and Traffic

Greenhouse Gas Emissions and Climate Change

Thank you for your consideration.

Respectfully submitted,

*Johanna M. Patri*

Johanna M. Patri, AICP  
(American Institute of Certified Planners)

Cc. Cathy Capriola, City Manager  
David Goodison, Planning Director

*Cheese Factory Letter 3\_8\_2018 Sent to Planning Commission*



Item #4  
LATE MAIL

Carol Marcus  
873 First Street West  
Sonoma, CA 95476  
707-996-4926

March 8, 2018

Sonoma Planning Commission  
1 The Plaza  
Sonoma, CA 95476

Re: Thursday's Agenda Item 4: Sonoma Cheese Factory

Dear Chairman Felder and Members of the Planning Commission,

The Cheese Factory proposal before you tonight is an ambitious one. The applicant is proposing to more than double the building's existing floor area. The applicant was previously granted entitlements to renovate the building's first floor, working within the existing footprint of the main building. The current proposal adds more area to the first floor of the building by enclosing the space between the Cheese Factory and Mary's Pizza. Though the Development Code may allow the applicant to build to their western property line, I feel this is where the applicant is asking too much.

The spaces between the buildings on the Plaza help create the rhythm of the experience of walking around the Plaza. Contrary to what the Initial Study concludes in its aesthetic impact section, I feel that allowing the building to be built to its western property line significantly impacts the views between the buildings, especially in the case of these buildings on the north side of the Plaza, where the views are to the hills. This slice of light and view may not seem "significant" now, but it will certainly be noticeable when it's gone.

While I favor the applicant's decision to locate a pedestrian walkway on the eastern side of the building, enlivening the space between the State Park and the Cheese Factory, I am not in favor of this coming at the expense of the currently entitled pedestrian outdoor space on the western side. This outdoor space is an opportunity to further enliven the pedestrian experience around the building. Some of the more memorable spaces around our Plaza occur in pedestrian walkways between buildings, for example, the Place des Pyrenees or El Paseo. The outdoor space included in the entitled design has great potential to become one of these kinds of spaces.

This proposal already represents a significant departure from the massing and scale of other buildings around the Plaza. I do not feel that the applicant should be allowed to further impact the "in between spaces" of the Plaza. I feel that the boundaries of the originally entitled footprint should be maintained.

I appreciate your taking the time to consider my comments.

Sincerely,

Carol Marcus

Item #4  
LATE MAIL

MAR 9 11 2018

Planning Commissioners:

Additional information on "Shopping Centers". The BAAQMD CEQA guidelines do not have "Shopping Center" land use, just "Regional Shopping Center". So, the use of the term "shopping center", instead of "regional shopping center" leads to erroneous conclusions on which development project may fit a land use designation of "regional shopping center" for CEQA purposes. I have found various definitions for regional shopping center and they are all pretty much the same:

"A short definition of Regional Shopping Center: The largest type of shopping center, having one or more major department stores, a variety of retail stores, usually a bank or savings and loan, and common parking and management."

<http://legaldictionary.lawin.org/regional-shopping-center/>

For example, the 364,000-square-foot East Washington Place regional shopping center in Petaluma.  
<http://www.northbaybusinessjournal.com/industrynews/4174516-181/group-sues-petaluma-over-approval>

All of the CEQA court cases and CEQA EIRs I have found for "regional shopping center" are for the type of development project identified above.

Examples of regional shopping centers:

- large regional shopping center: <https://www.ceqadevelopments.com/2015/10/13/fourth-district-addresses-ceqa-baseline-issues-in-partially-published-opinion-upholding-eir-for-carlsbad-shopping-mall-renovation/>
- 234-acre regional shopping center development: <https://www.ceqadevelopments.com/2014/04/14/some-ceqa-reminders-from-the-third-district-urban-decay-requires-actual-mitigation-when-identified-by-eir-as-a-significant-project-impact-and-be-careful-what-you-find/>
- 26-acre regional shopping center: [http://resources.ca.gov/ceqa/cases/1977/raley\\_040777.html](http://resources.ca.gov/ceqa/cases/1977/raley_040777.html)
- 61.3 acres <https://www.rmmenvirolaw.com/2014/08/california-clean-energy-committee-v-city-of-woodland/>
- 425,880 square feet: <https://planning.lacity.org/eir/CenturyPlan/Addendums/addendum2.pdf>
- approximately 55.1: [http://www.rocklin.ca.us/sites/main/files/file-attachments/1\\_introduction.pdf](http://www.rocklin.ca.us/sites/main/files/file-attachments/1_introduction.pdf)
- approximately 63.5 acres/700,000-square feet: <http://www.ci.irwindale.ca.us/DocumentCenter/View/1207>

Being there is no land use of "shopping center", only "regional shopping center", and the Sonoma Cheese Factory is absolutely NOT a regional shopping center, the CEQA Initial Study used the wrong land use designation in regards to GHG emissions; thus, the Initial Study CANNOT be adopted.

Regards,  
David Eichar

Other definitions of regional shopping center can be found here:

<https://www.realestateagent.com/real-estate-glossary/real-estate/regional-shopping-center.html>

[http://jrdelisle.com/research/NewSCDef\\_V23\\_WP1.pdf](http://jrdelisle.com/research/NewSCDef_V23_WP1.pdf)

<http://chicagorealtor.com/wp-content/uploads/2014/10/Anatomy-of-a-Shopping-Center.pdf>

On 3/7/2018 4:48 PM, Cristina Morris wrote:

Planning Commissioners:

It has come to my attention that another problem with the Initial Study for the Cheese Factory expansion is in the area of the greenhouse gas emissions. CEQA Initial Study discussion on question 7a on greenhouse gas selected an incorrect land use of regional shopping center. This results in an inadequate CEQA Initial Study, which cannot not be adopted.

The Bay Area Air Quality Management District (BAAQMD) adopted CEQA guidelines. Chapter 3 of the guidelines contains screening criteria for various land uses. "If all of the screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions." It is important to select the correct land use from table 3-1.

The proposed project includes expansion for restaurant as well as specialty food retail market. The specialty food retail portion of the project is closer to a supermarket than shopping center in use. Shopping centers have tenants in separate physical store with walls, while a supermarket has various sections of food within one open building.

The screening criteria for a shopping center projects is less than 19,000 square feet; while for a Quality Restaurants is 9,000 square feet; High Turnover Restaurant is 7,000 square feet , and a Supermarket is 9,000 square feet. Since the project would increase building area on the site by 13,603 square feet, the project exceeds the screening criteria; thus, a detailed air quality assessment of their project's air pollutant emissions is required to be performed. The Planning Commission should therefore not adopt the Initial Study.

[http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en)

Regards,  
David Eichar

MAR 07 2018  
LATE MAIL  
#4

**City of Sonoma**

#1 The Plaza  
Sonoma CA 95476

**From:** "Susan J. Dorey" <[susan@susandoreydesigns.com](mailto:susan@susandoreydesigns.com)>

**Date:** Wednesday, March 7, 2018 at 8:10 PM

**To:** David Goodison <[davidg@sonomacity.org](mailto:davidg@sonomacity.org)>

**Subject:** Cheese Factory project

I have seen the drawings to replace the Cheese Factory with a large Oxbow-style market. My comments:  
It is too big for its location in downtown Sonoma. The Oxbow Market, in contrast, is on the east side of Napa, not downtown.

Size wise it will overwhelm our Sonoma Barracks and the Historic Park.

We are left to choose between our heritage, which is why people come here, or tourist food.

Parking may be inadequate.

I vote NO.

**Susan J. Dorey**

Sonoma, CA

707-343-7382

LATE MAIL

Item # 4

MAR 07 2018

Planning Commissioners:

The CEQA Initial Study for the replacement and expansion of the Sonoma Cheese Factory is flawed and must not be adopted by the Planning Commission. The staff report and CEQA Initial Study are also missing very important information about the traffic and parking study. This missing information is vital to the public being able to accurately analyze the project.

Traffic and parking studies performed in November 11 and 14, 2017 The Nuns fire was fully contained on October 30th and the Tubbs fire fully contained October 31st.

[https://en.wikipedia.org/wiki/October\\_2017\\_Northern\\_California\\_wildfires](https://en.wikipedia.org/wiki/October_2017_Northern_California_wildfires)

The significance of the November dates should have been mentioned in the staff report and the CEQA Initial Study in the discussion on traffic and parking, but they are not. The dates are only mentioned in the traffic study document itself. Traffic and parking around the Plaza is much worse May through October than in November. This November had even lighter traffic than usual because of the October fires. The traffic and parking study were performed within two weeks after the fires were fully contained.

The entire traffic and parking study is thus legitimately able to be called into question on the basis of substantially unrepresented dates. The conclusions of Section 16 of the CEQA Initial Study are thus invalid. Because of this, the Planning Commission **cannot** adopt the Resolution making findings for a Mitigated Negative Declaration. The flawed study likely results in a much lower calculation of fees than should have been for mitigation Measure 16.a.1, for traffic impact mitigation, and Measure 16.a.2, for parking impact mitigation.

The traffic study did not include W Napa St./1st St. W, E Napa St./1st St. E, Napa St./Broadway. It should have. The city council directed that the EIR for the new Napa St. Hotel by Kenwood Investments include all of the intersections on the Plaza. The traffic study for the Cheese Factory project should also. Why? The volume of concomitant Plaza use is at least if not higher for the Cheese Factory project. At a minimum the increase in traffic would probably also require curb extensions for 1st St. W and W Spain St. as well as E. Napa St. and 1st St. E.

A traffic and parking analysis of the Oxbow Market should be done in order to get a better sense of the range of impacts with of this style of retail.

The Oxbow Market is a 40,000 square foot market place:

<http://oxbowpublicmarket.com/oxbow-public-market-fact-sheet/about-oxbow-public-market/>

Section 5 of the CEQA Initial Study: It is imperative the California State Park Services has had a chance to review and approve the construction mitigation measures in regards to the impact on the adjacent state park buildings.

Section 10 of the CEQA Initial Study: Since the traffic study is flawed, the true impacts to traffic cannot be known; thus it cannot be known if the traffic impacts have been mitigated, as required by Circulation Element of the General Plan.

In addition to the above, almost doubling the size of the current retail space will have a substantial impact on the Plaza, an increase of 50%, with potential negative consequences beyond just to traffic and parking. Besides rejecting the CEQA Initial Study, the Planning Commission should also reject the expansion plans.

Regards,  
David Eichar

PATRICIA CULLINAN  
425 DENMARK ST  
SONOMA CALIFORNIA 95476  
707-938-5721

3.7.2017

RE: the Sonoma Cheese Factory proposed project

Dear Planning Commissioners,

First I believe that the project should have a complete EIR that would allow the community time and the details necessary to review a project that will make important changes to the Sonoma Plaza.

This letter addresses only some of the concerns I have about the proposed project.

The proposal plans to remove all but the façade of the Cheese Factory building and construct a new building behind the façade.

Under CEQA, the Project would be considered to have a significant impact if it were to cause a substantial adverse change in the significance of any of the historical resources identified.

I have the following comments related to that criteria

The Historic Evaluation prepared by Page and Turnbull states: 'The project, as proposed, retains the original portion of the existing building, thereby preserving the following character-defining features: the fenestration pattern, flat metal awnings at the entrances, glazed orange tile cladding, stucco-clad metal ribs, pitched roof, and the projecting vertical perimeters.

The above statement is misleading as the project is only going to retain the façade and not any of the rest of the building which reflects to purpose of the building- a cheese factory.

The proposed plan substitutes, the original building that was built in 1945 and modified overtime to reflect the needs of the cheese making business, with a monolithic structure of contemporary design that in no way honors the original building as a working agricultural-based structure.

Nor does it reflect either contemporary or historical Sonoma rural agricultural history instead opting for creating a building that is large and featureless.

The statement that the project is preserving character defining features ignores the consultants own statement that the Cheese Factory character defining features ‘*includes the front (south) two-story retail and office portion and the center one-story factory section*’.

It is because of all the character defining features that the building is considered eligible for the California Register.

The report continues on stating:

‘Agglomerative additions at the rear of the building are not considered to be character defining features of the building, as they are utilitarian in design, were partially constructed outside of the identified period of significance, and are no longer used for cheese production’.

That statement ignores the utilitarian character of the building even if no longer used for cheese production it still reflective of important Sonoma history by its utilitarian character.

To counter the loss of the entire cheese making portion of the building the recommended solution by the city of Sonoma is:

“Mitigation Measure 5.a.1: The Project design shall be constructed and implemented substantial conformance with the “Sonoma Cheese Factory” site plans and elevations, prepared by SMS Architects and dated June 14, 2017, including the preservation of the historic Sonoma Cheese Factory building element and its associated character-defining features.”

Again ignoring the utilitarian character of the whole building and preserving just the façade that does not visually tell the story of a cheese making facility on Sonoma Plaza.

Also usually a design considerations for historic resources are incorporated into the project that is approved. It is not a mitigation.



The architect states on page 1 of the Project Narrative that ‘the Developer has made modest changes to the currently approved plans’. Replacing the existing building with a monolithic modern building almost 3 stories tall and of higher intensity of use makes that statement seems disingenuous at best.

In the Sonoma Plaza National Historic Landmark/Sonoma Plaza National Register Historic District section the consultant states:

The Project would not adversely affect the Sonoma Plaza National Historic Landmark or the Sonoma Plaza National Register Historic District for the following reasons:

‘The Sonoma Cheese Factory building was constructed outside of the period of significance of both the Landmark and the Register District. Therefore it does not contribute the significance of either district’

*Just because the building is non-contributing to the district doesn’t mean that there is not an adverse effect to the district from redevelopment of the newer building.*

The evaluator, Page and Turnbull, in the Historic Resource Report of did consider the buildings eligibility for the California Register and found it eligible.

Will the building, if built as per the proposed project, be eligible for the California Register after the changes?

Will the project affect the Landmark and National Register status of the Plaza and surrounding area?

An EIR will address these questions.

The proposed project includes the area that was once the site General Mariano Vallejo’s home and vineyard and is known for its rich archeology (archeologically sensitive).

I propose that the site be examined for potential archeological resources before any construction is undertaken. Not only, as suggested in the initial study, as planned guidelines to be used if archeological are features discovered during construction. The proposed project is in the heart of Sonoma and Mitigation Measure 5.b is insufficient.

The proposed project is asking not just for building footings but the removal of an entire basement area.

And asking construction personnel on earthmoving equipment to make decisions about archeological resources as in Mitigation Measure 5.b (pg. 66) may not be the best solution.

Other elements that need questioning:

The size and scale of the building.

The new building will dwarf the adjacent Sonoma State Historic Park lessening its ability to tell the story of Sonoma's history. The current building is partial hidden from the view of Sonoma's important historic resource-the Casa Grande Plaza.

The proposed building is almost 3 stories tall and in looking at the plans the first floor and the basement they are all designated as commercial areas with no storage.

Does that mean if the schematic plan currently proposed is approved the developer will come back to request another floor? There will certainly be room for another floor.

An architectural peer review of analysis of the project with the Downtown Sonoma Historic Preservation Design Guidelines is necessary to determine compliance.

I have not commented on the proposal as a food court/mall formula the proposed project but that is an issue that needs careful consideration. Sonoma needs to be protective of our small local business people that may have competition from larger stronger chains. Small business people support our local community.

Parking- needs to be clear and consistent.

Traffic- As anyone who lives here knows there is a traffic jam in the north Plaza area in the summer and weekends with nice weather. Especially in light of the traffic report that was done on November 11 and November 14, 2017 while the community was still reeling from the fires.

On a separate issue not concerned with the impact of the building I would like to question the developer's proposal for a 'Cheese Affinage' and also question the ability of the facility to comply with the Food Safety and Modernization Act. I suggest that having a 'Cheese Affinage' may be a reason for having a basement in

the proposal but the reality of compliance may make that a pipe dream. An EIR would hopefully take into consideration the realities of that part of the proposal.

## CEQA ENVIRONMENTAL ISSUES

I request that independent reviews in an EIR is needed to address the following areas:

- Aesthetics
- Cultural Resources
- Land Use / Planning
- Transportation & Traffic

The proposed project on Sonoma Plaza is a major project and will affect all of the surrounding properties in various degrees.

An EIR will address any issues for the surrounding community. And analyze options and allow public input that is not crammed into a short review period by city residents that are interested in the project proposals that are brought forth in Sonoma.

In closing the proposed project will have long lasting effects on Sonoma and careful consideration of all the aspects of the proposal through an EIR is necessary.

Heritage Tourism is an important element of Sonoma's economic health. One in 5 visitors come to Sonoma specifically looking to experience Sonoma's history. I personally look at all proposals in the historic districts in the light of the preservation of the character of Sonoma that supports Heritage Tourism and find this project lacking in sensitivity to the authenticity of Sonoma's cultural heritage.

Thank you for your consideration,

Patricia

**Subject:** FW: bringing napa to sonoma?

**Date:** Monday, March 5, 2018 at 11:25:52 AM Pacific Standard Time

**From:** CityHall Mailbox

**To:** David Goodison

See below...

*Rebekah Barr*, MMC

Rebekah Barr  
City Clerk/Exec Assistant  
City of Sonoma  
No. 1 The Plaza  
Sonoma, CA 95476

[707] 933-2216 Phone  
[rbarr@sonomacity.org](mailto:rbarr@sonomacity.org)  
[www.sonomacity.org](http://www.sonomacity.org)

---

**From:** liz brand [mailto:[lizbrand@yahoo.com](mailto:lizbrand@yahoo.com)]

**Sent:** Sunday, March 04, 2018 8:44 PM

**To:** CityHall Mailbox <[CityHall@sonomacity.org](mailto:CityHall@sonomacity.org)>; Planning <[planning@sonomacity.org](mailto:planning@sonomacity.org)>

**Cc:** Elizabeth Brand <[lizbrand@yahoo.com](mailto:lizbrand@yahoo.com)>; Bill Brand <[bbrand@earthlink.net](mailto:bbrand@earthlink.net)>

**Subject:** bringing napa to sonoma?

Dear Sir or Madam,

As an anti-development, pro-rustic abhorrent-of-change kind of gal, I am against turning Sonoma into a Napa or an anywhere else for that matter. Why not do something creative and unique with the Cheese Factory? Why do the same development available in S.F., Napa, and elsewhere? Yaaawwn.

As noted in the attached article, the developers of the Ferry Bldg, and Oxbow Market are planning the same thing for Sonoma Cheese Factory. For me, if I want a fancy food court like in the city, I take the ferry over to S.F. ferry building. It's fun. If the same style of development is created in Sonoma, once inside, how does a person know where he is until he steps outside?

Besides this news, I noticed that somebody posted fancy 'Entering Bennett Valley Viticulture Area' signs around here. Yuk. I don't want my area promoted to anyone. Bennett Valley speaks for itself and doesn't require a sign to attract visitors. Population and wealth growth alone in the Bay Area will provide the visitors and growth in income that local tourist-trade businesses require to thrive in this area.

I'm scared to death of changes that could lead to over-crowding, over-pricing and a hollowing-out of my beloved Sonoma area. What gives this area charm is the rustic, rural nature, the family atmosphere, and the quiet charm of the area. We are so much more than wine: apples, olives, beer, open space, fishing, artisan cheeses, cattle farmers, horses, artists, theater, spiritual centers, and a community of working people building a future for themselves and their families.

What ever development agreed upon, I pray that preserving the uniqueness that is Sonoma be on the minds and in the hearts of the decision makers.

Thanks For Reading,  
Elizabeth Brand  
Glen Ellen, CA

**Subject:** Cheese factory comment for PC

**Date:** Sunday, March 4, 2018 at 8:21:54 AM Pacific Standard Time

**From:** Fred Allebach

**To:** Cristina Morris, David Goodison

Hi, I'd love to come to the Cheese Factory planning session, but I have a conflict with a meeting to help with a Know Your Rights meeting for the immigrant community.

A few comments on the Cheese Factory project:

One, the linkage to Depot Park is a great idea, to expand the Sonoma central venue experience towards the Depot Park museum, and other historical resources (Marcy House, State Parks venues along the bike path), and to local experiences that are not contingent on spending money for entertainment, or that will spend only the best \$3.00 there is to spend in Sonoma, for the State Parks one day ticket to four different venues, and to a free hike through the cemetery or Overlook/ Montini Trails.

Two, please keep in mind the overall intensity of the proposed project, and how that will effect other hoped for expansions of tourism, and that business interests are not the only interests in town, and that residents would like to have a Plaza that is not entirely overrun by constant commercial activity and hype to draw ever more and more tourists.

I would suggest toning the scale of the project down, maybe by 35 to 40% to fit a preferred scale that favors the preservation of small town character, over a constant growth model. Sonoma can be "better, not bigger." Please see the following link to Eben Fodor's thesis about the myth of smart growth.

[http://www.fodorandassociates.com/Reports/Myth\\_of\\_Smart\\_Growth.pdf](http://www.fodorandassociates.com/Reports/Myth_of_Smart_Growth.pdf)

If the developer says they can't do the project without a certain amount of volume and returns, tell them to come back with a smaller project. Why? Because Sonoma has a municipal right to preserve its character, and not be beholden to, and roll over for every commercial interest that comes down the pike.

Three, keep in mind balancing the current glut of tasting rooms, alcohol venues, and restaurants, the proposed luxury hotel on Napa Street, and develop some sense of planning for balance, and an appropriate sustainable level of tourism. Which is to say, what is the *carrying capacity* of Sonoma, to keep its special character, before a rush to milk the goose that laid the golden egg actually ruins the authentic qualities that makes this place special.

That's my input for you.

best regards, Fred Allebach



P.O. BOX 766 SONOMA, CA 95476 • SONOMALEAGUE.ORG

RECEIVED

JAN 23 2018

*Preserving Sonoma since 1969*

January 17, 2018

CITY OF SONOMA

**TO:** City of Sonoma Planning Commission  
No. 1 The Plaza  
Sonoma, CA 95476

**RE:** Sonoma Cheese Factory Project


The Sonoma League for Historic Preservation has reviewed Carlin Company's proposal for the Sonoma Cheese Factory building at 2 West Spain Street, including the project's Historical Resources Evaluation and follow-up Project Review Memorandum by Page & Turnbull. Steve Carlin and Lloyd Llewelyn also gave a presentation to the League, which our entire membership was invited to attend.


After careful consideration, the League's Board of Directors voted to support the project, as it maintains the historic integrity of the building. We concur with Page & Turnbull's findings that, "the project appears sensitive and compatible with the Sonoma Cheese Factory as well as the historic resources in Sonoma State Historic Park."

The proposed project continues to associate the building with its historic use, and the applicants have been sensitive to the neighboring properties. We believe the shifting of the pedestrian walkway from the West side of the building to the East, thereby creating a wider berth between the Cheese Factory and the Casa Grande Servants' Quarters, will better protect the Servants' Quarters than the current situation. It also will better showcase Sonoma's history for pedestrians.

Thank you very much for your consideration. If you should have any questions about the League's position on this item, please contact the Chair of our Civic Advocacy Committee, Gina Cuclis, [ginacuclis@gmail.com](mailto:ginacuclis@gmail.com).

Regards,

  
Prema Behan  
President

  
Gina Cuclis  
Civic Advocacy Chair