

Subject: Broadway & MacArthur Project

Date: Saturday, August 4, 2018 at 9:48:47 AM Pacific Daylight Time

From: Diane Jacobson

To: Madolyn Agrimonti, Amy Harrington, David Cook, Gary Edwards, Rachel Hundley

CC: David Goodison

To the Sonoma City Council Members:

We are writing to express our strong support for the project proposed by Broadway & MacArthur, LLC. That lot has been an eyesore for many years, and has descended into dereliction during the past ten. The proposed project has been well-designed, thoroughly reviewed and vetted, and is responsive to the needs of the city. Our city sorely needs the housing that will be provided, and the project will be welcoming (rather than ugly and repelling) to visitors.

We respectfully ask that you approve this project without further delay.

Thank you.

Diane and Ken Jacobson
649 First Street W, #9
Sonoma
707 996 9548

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

August 1, 2018

Sonoma City Council
1 The Plaza
Sonoma, CA 95476

Re: Sonoma Gateway Project Appeal

Dear Mayor Agrimonti and Members of the City Council,

I am writing to ask that you support the appeal of the Sonoma Gateway project at 870 Broadway. I have offered verbal and/or written comments about this project since its preliminary Study Session before the Planning Commission last September. I remain opposed to the project based on the following:

- The project is not in compliance with the General Plan or the Development Code
- Unsubstantiated analyses of Aesthetic Impacts in the Initial Study
- The Planning Commission made its decision based on incomplete submittal information from the applicant and without making necessary findings for exceptions to the Development Code

Paragraph One on Page One of the General Plan describes the quality that has remained consistent in every General Plan produced in the City of Sonoma, **“These plans have represented the collective vision of the community and expressed its desire to preserve and improve upon the *essential characteristics that define Sonoma*”** (italics mine). Those of us lucky enough to call Sonoma home were originally attracted to the City in large part due to these essential characteristics, and these characteristics remain a central reason why tourists flock to us. We are unique. We are an historic city with a downtown plaza, approached from the south by the original, mission-linking El Camino Real. The General Plan and the Development Code have been sound guiding documents to ensure that Sonoma retain these essential characteristics while allowing for new development. In fact, General Plan Goal 4.1 in the Community Development Element **“promote(s) innovative design and mixed uses through the Development Code.”** It’s important to note that Implementation Measure 4.1.1 of this Goal calls for the implementation of the Development Code **“to ensure the provision of *appropriate street connections, lot patterns, site designs, building forms...in specific areas of the community...*”** (italics mine).

The reason the proposed project violates so many of the City’s policies and regulations is because it does not offer the type of housing that is envisioned in the General Plan or the Development Code for a Mixed Use site. The MX (Mixed Use) zoning district is **“intended to allow for higher density housing types, such as apartments and condominiums, both separately and in conjunction with commercial and office development, in order to increase housing opportunities, reduce dependence on the automobile, and provide a pedestrian presence in commercial areas.”** (SMC 19.10.020 C.1.) The current proposal, contrary to the type of housing envisioned in this zoning designation, offers predominantly shared-wall, single-family, market-rate, owner-occupied homes, each with its own two-car garage (as one would expect for a single-family home), with eight 486 square-foot rentals added as a

nod to providing “housing opportunities.” The decision by the developer to include two-car garages with each shared-wall and single-family home is what’s necessitating the request for an exception to the site coverage regulation because of the disproportionately large area dedicated to automobile circulation (whether permeably-paved or not), and results in a less-than adequate, if not dangerous, pedestrian experience. The proposed buildings are taller than what’s allowable in the MX zone without an exception, a result of the ground floors being dedicated to two-car garages.

I find the analysis in the staff report’s Summary of General Plan Consistency insufficient. Under the Community Development Element (CDE), staff refers to its Initial Study to support its conclusion that the proposed project will have no significant impact on scenic vistas. Staff argues that since the existing buildings on the site partially obscure views to the hills, “construction of the Project would not have a substantial adverse impact on a scenic vista and would result in a less-than-significant impact.” Where is the data to back up this analysis? The proposed buildings are far greater in number, far taller and more closely spaced than the existing buildings. Though three-dimensional renderings of the project showing surrounding development along Broadway and along MacArthur were requested of the applicant by the Planning Commission and by the public, none were ever furnished. How are staff and the Planning Commission supposed to render informed analyses and decisions about the project’s impact without this information? It is not out of the ordinary for applicants to provide this information. Three dimensional renderings were provided by the applicants of the Hotel Sonoma project because of its important location near the Plaza. As a gateway to the Historic District, this project, too, is in a prominent location. This is too critical a site in Sonoma to make these decisions based on insufficient information.

Also, under the Community Development Element, staff’s analysis of the project’s compliance with CDE Policy 5.5 which is to “**promote higher density, infill development, while ensuring that building mass, scale, and form are compatible with neighborhood and town character,**” concludes that the Project will be “visually compatible with its surroundings” based on its analysis in the Initial Study. The project is inconsistent with the development standards of height, site coverage and setbacks. Thirty feet is the height limit in the Mixed Use Zone. Though thirty-six feet high is allowed as an exception in the Commercial and Mixed Use zones, it is to allow for “**third-floor multi-family residential development.**” (SMC 19.40.040 B.1.) The intent behind this exception is in the detail of its language: to allow smaller, third floor units, such as apartments and condominiums (SMC 19.10.020 C.1.) not three-story, shared-wall, owner-occupied, single-family homes which dedicate the ground floor to two-car garages. During both the March and the May Planning Commission meetings, staff argued that these height-limit violating buildings are on the “interior” of the site and will therefore not be viewable from Broadway or MacArthur. Once again, had three-dimensional renderings been produced showing views from Broadway and MacArthur, it would have become apparent that this is not the case. Furthermore, in order to grant the height exceptions, the Planning Commission must make all of the following three findings (SMC 19.54.050 E.), which it did not and, I would argue, cannot.

1. **The adjustment authorized by the exception is consistent with the General Plan, any applicable specific plan, and the overall objectives of this development code;**
2. **An exception to the normal standards of the development code is justified by environmental features or site conditions; historic development patterns of the property or neighborhood; or the interest in promoting creativity and personal expression in site planning and development;**
3. **Granting the exception will not be detrimental to the public health, safety or welfare, or injurious to the property or improvements in the vicinity and in the same zoning district.**

The project also exceeds the site coverage requirement, yet the above findings to grant the exception were never discussed by the Planning Commission. The Initial Study concludes that this issue can be addressed with the use of permeable pavers, and that “subtracting out the area of permeable paving would bring the Project into compliance...” There is no citation in the Initial Study as to where in the Development Code this calculation is allowable.

In the Initial Study’s Guidelines for Infill Development in the Historic Overlay District, staff concludes that the project is consistent with the overall development pattern of Broadway and East MacArthur Street as “all structures adjoining street frontages are designed with doors, windows and porches facing the street.” What about the street which accesses all of the units in this development? It is apparent that this street is not considered as a street at all, but, rather, as a back alley. The “fronts” of Buildings 2, 3 and 7 face fifteen-foot wide setbacks from their respective property lines, and the “fronts” of Buildings 5 and 6 are in a sunless, twenty-foot wide, 33-foot tall canyon. A drive down the street in this development reveals that the street fronts are actually the backs of the buildings, as one is confronted by nothing but garage doors. This is a pattern which is inconsistent with development patterns in the Historic Overlay District and with the design standard of the Broadway Corridor (Section 19.32.020 A.5) which states that, “**multi-family developments shall require screening and buffering of parking and driveway areas.**” Though this issue was raised by the public at the Planning Commission meetings, these garage-laden facades were determined to be on the “interior” of the site, therefore the parking was determined to be screened from view from MacArthur and Broadway. Had the applicant provided three-dimensional renderings of the actual experience of moving around and through the site, as requested, it would have become apparent that this is not the case, and how anomalous this project is in Sonoma. Whereas “pedestrian presence” is supposed to be emphasized in the Mixed Use zone, the site planning of this development makes it very difficult, if not dangerous, for a pedestrian, as the car is given priority. Personally, I would not want to have to access my front door along the northern or eastern property lines of this development, nor would I want my guests to have to arrive this way.

Under the Environmental Resources analysis of the General Plan, staff concludes that the project is in compliance with the General Plan because, though 75% of the existing trees on the site are proposed to be removed, the applicant is proposing a replacement tree program which exceeds the City’s Tree Ordinance. A total of 36 trees are proposed to be removed, and a Condition of Approval is for the trees to be replaced at a ratio of 2:1. Valley Oaks with heights of 32, 38, 40 and 50 feet are proposed to be cut down and replaced by 15-gallon Crape Myrtles. Though 72 new trees are required, the proposed Landscape Plan indicates a total of 28. This issue received little to no scrutiny by the Planning Commission. I would conclude that this proposal is not in compliance with Policies ER 2.6 or ER 2.9 of the Environmental Resources Element of the General Plan which requires the applicant to “**preserve existing trees and plant new trees**” and “**require new development to avoid potential impacts to wildlife habitat, air quality, and other significant biological resources, or to adequately mitigate such impacts if avoidance is not feasible.**”

Under the Circulation Element analysis of the General Plan, staff concludes that the Project will not result in unacceptable intersection operation at Broadway and MacArthur Streets. The traffic analysis did not consider the number of people in cars exiting the site in search of parking because of the insufficient number of parking spaces proposed. While I appreciate the theory that shared parking can reduce the number of parking spaces necessary on a mixed-use site, this is best implemented when office spaces, rather than neighborhood-serving retail spaces, are in the mix. Empirical evidence from impacted neighbors suggest that as a minimum, the City’s stated parking standards in SMC 19.48.040,

Table 4-4 should be met. For **“multifamily dwellings, condominiums and other attached dwellings: one and one-half space for each unit with one space for each unit covered, plus guest parking at the rate of 25% of total required spaces.”** For **“retail: one space for each 300 square feet of gross sales area plus one space for each company vehicle...”** And, for **“single family housing: one space in a garage or carport per unit.”** Buildings 1 and 4 have a total parking deficit of eight spaces. Buildings 2 and 3 have a total deficit of one guest space. Building 8 has a deficit of at least eleven spaces, and Buildings 9, 10 and 11 have a surplus of eight guest spaces, as the surplus garage spaces in these homes cannot be considered as guest spaces. Thus, the project has a total parking deficit of at least twelve spaces. To expect that Buildings 1 and 4 will have their parking requirement of 16 (only eight of which are provided near Buildings 1 and 4) met by the guest spaces behind Buildings 9, 10 and 11 is poor planning. To expect that Building 8’s parking requirement of at least twenty-one spaces (10 provided) would have to (almost) be met by utilizing the same eight guest spaces behind Buildings 9, 10 and 11 is equally problematic. Yet, these eight spaces are the only ones available to meet the parking deficits of Buildings 1, 4 and 8. The other guest spaces scattered about the site barely fulfill the parking requirements of Buildings 2, 3, 5, 6 and 7. These are not insignificant parking shortfalls, and are unlikely to be mitigated by a shared parking model. Required findings to grant the parking exception were never made by the Planning Commission. Furthermore, I feel it is poor planning to have to rely on the project’s CC &R’s to enforce that no one will use their garages for anything other than the storage of cars. This is a policy that pits neighbor against neighbor, and is therefore unlikely to happen, or, if it does, creates a hostile environment among neighbors.

This site represents one of the few remaining opportunities in Sonoma to provide affordable housing as is intended in the Mixed Use zone, (SMC 19.44.050) that is, affordable units **“reasonably dispersed throughout the development and should be compatible with the design or use of the market-rate units in terms of appearance, materials, and finish quality.”** The proposed affordable units do not comply with the description of inclusionary units in the Development Code in that they are all 486 square feet, one-bedroom rentals, clustered in four-plexes. The proposed affordable units bear no similarity whatsoever to the market rate, for-sale units. Though they may represent 24% of the number of living units on the site, they account for less than 10% of the floor area of the living units.

It’s notable that there is a section singled out as “Streetscape” in the Development Code (SMC 19.12.010). It reads, **“Sonoma’s streetscapes are among the most important urban design features of Sonoma, because their appearance, character and the impressions they evoke, create the public image of the City. That image is significant to how residents and visitors think and feel about the City.”** What is most visible as one travels north on Broadway are the trees, and the hills to the north as a backdrop. There is no question that something needs to be developed on the vacant lot at 870 Broadway. The weeds are advancing through the asphalt, and it is not a desirable gateway to Sonoma’s Historic District. The massing of the current proposal is antithetical to the streetscape along the Broadway Corridor. As proposed, this project looks as if it could be located in just about any American city. In fact, as I write this, a similar project by the same developer is under construction in the City of Napa. Only there, the project is not located on the main axis leading to the historic center of the city. There is nothing in terms of this project’s massing, its site planning or its architecture which indicate that this project belongs in Sonoma. There are examples of housing developments of a similar density in the City of Sonoma which adhere to the General Plan and Development Code. As a gateway to the Historic District, and one of the last remaining large, Mixed Use-zoned parcels in Sonoma, it is important that this project undergo a thorough analysis of its impacts on the community based on a complete

presentation by the applicant, substantiated analysis, thorough scrutiny by the Planning Commission, and that, at very least, it complies with Sonoma's General Plan and Development Code.

I appreciate your taking the time to consider my comments.

Sincerely,

Carol Marcus