

Response to Comment 3-09

This comment states that VMT has been under-estimated. Please refer to Master Response 1 – VMT Analysis.

Response to Comment 3-10

The comment provides a summary of Mitigation Measure UTIL-6. The comment does not directly question the analysis in the revised Draft EIR. No further response is required.

Response to Comment 3-11

The comment provides a summary of Mitigation Measure UTIL-6 regarding a holding tank for onsite sewer. The comment does not directly question the analysis in the revised Draft EIR. No further response is required.

Response to Comment 3-12

The Sonoma Valley County Sanitation District has a multi-year project to replace approximately 1.8 miles of the existing 21-inch diameter sewer trunk main originally constructed in 1958 with a new 27-inch diameter main, west of the proposed Project. The utility improvement project in the vicinity of the Project site was part of the first of three phases that has recently been completed (<https://www.sonomawater.org/media/Images/Water%20Resources/Sanitation/SVCSD%20Trunk%20Main/Sonoma%20Valley%20Trunk%20Main.jpg>).

In addition, the proposed Project would be consistent with the Water District's Private Sewer Lateral Ordinance which requires property owners of homes and businesses that are 30 years or older to have their sewer laterals inspected and repaired, if necessary, in order to prevent sewer overflows that contribute to pollution and result in costly fines to the District.

Response to Comment 3-13

This comment provides concern regarding the history of sewer system overflows in the SVCSD system. However, as noted in response to comment 3-12, the system has recently been upgraded. The comment does not directly question the analysis in the revised Draft EIR. No further response is required.



Transition Sonoma Valley
PO Box 5, Sonoma, California 95476 • www.transitionsonomavalley.org

RE: Hotel Project Sonoma – Revised Draft EIR (SCH # 2015062041)

Request for a More Complete Analysis and Disclosure of the GHG Impacts of the Proposed Project and Alternatives

Dear Esteemed Members of the Sonoma City Planning Commission,

As stated during oral public comments before your commission on June 25, 2015 (Project EIR Scoping Meeting), February 25, 2016 (Draft EIR Public Hearing) and most recently on September 4, 2018 (Revised Draft EIR Public Hearing) we and other members of the Sonoma Valley community have repeatedly requested that the applicant provide a reasonably complete and comprehensive accounting of the total greenhouse gas (GHG) impacts any reasonable person would estimate would result if this project were to be built as designed.

4-01

To date, the applicant has made no attempt to meet with us to better understand our concerns, nor have they provided any additional information in their revised EIR to fully document these potentially significant impacts. Instead they continue to rely upon a demonstrably inadequate claim that the threshold of significance for assessing GHG impacts should be a single static number (1,100MT CO₂e/yr.), based entirely upon analytical methodologies contained in guidelines that were published in June of 2010 (minimally revised in 2017). In fact, the CEQA guidelines cited by the applicant are so old, that the cover of the 2017 revision to those guidelines bears the following warning that it contains “outdated” information:

4-02

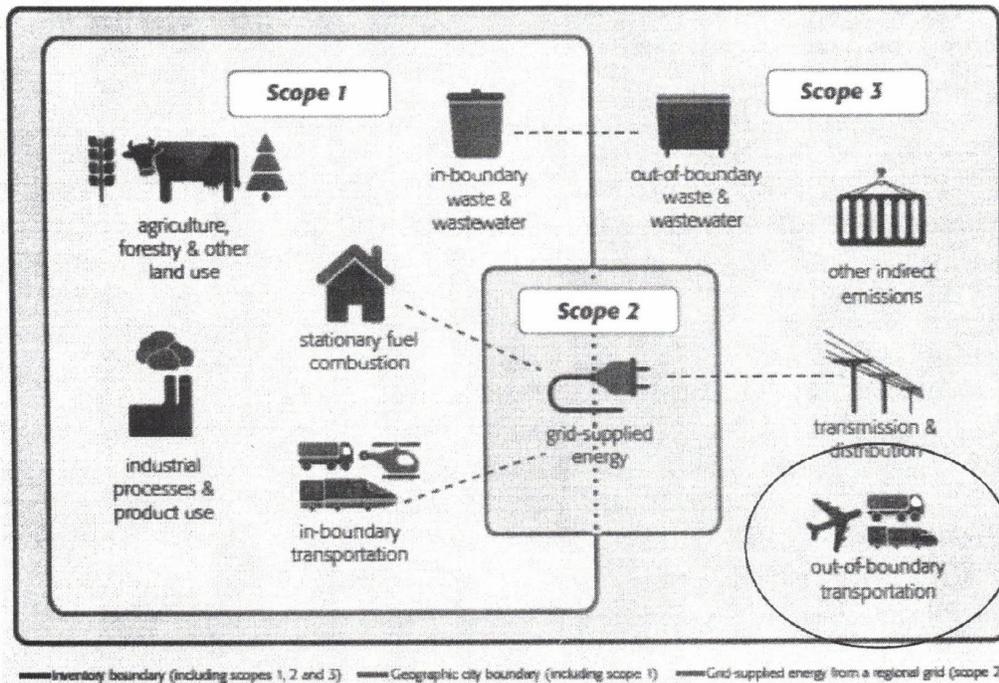
Note: This May 2017 version of the Guidelines includes revisions made to the Air District’s 2010 Guidelines to address the California Supreme Court’s 2015 opinion in Cal. Bldg. Indus. Ass’n vs. Bay Area Air Quality Mgmt. Dist., 62 Cal.4th 369. The May 2017 CEQA Guidelines update does not address outdated references, links, analytical methodologies or other technical information that may be in the Guidelines or Thresholds Justification Report. The Air District is currently working to update any outdated information in the Guidelines.

The applicant’s attempt to shirk their responsibility under CEQA to present a more reasonably complete accounting of their proposed project’s GHG impacts is especially odious when we have repeatedly informed them that trips by airplane and other modes of travel must NOT be overlooked. This is because Sonoma has become such a world-renown tourist destination that common sense requires that emissions resulting from tourists traveling between Sonoma and their point of origin must be included in all Environmental Impact Reports issued here.

4-03

Indeed, we believe this principle has been well established locally in the ruling in California River Watch v. County of Sonoma (SCV-259242), which found that the Respondent in that case “had a feasible ability to include the additional GHG data” (p.16) related to air-travel emissions. Now while we believe the burden of impact assessment remains entirely with the applicant, for the benefit of the Commission we offer the following methodological overview of the kind of GHG calculations we believe applicants must provide at a minimum.

First, the principle behind this approach comes from the well-known “Scopes Framework” which informs nearly all modern GHG impact assessment protocols. The figure below comes from the ICLEI Global Protocol for Communities (GPC) but the idea that a complete emissions assessment must include “out of boundary transportation” and other “Scope 3” impacts has become well established over the past five years.



4-04

Next, we offer the following transportation-focused definitions (again based on the GPC):

Scope 1: Emissions from all local transportation resulting from the project, including all GHG emissions from the transport of people and freight occurring within the city boundary.

Scope 2: Emissions from grid-supplied electricity used for transportation resulting from the project, including all GHG emissions from the generation of grid-supplied electricity used for electric-powered vehicles. The amount of electricity used should be assessed at the point of consumption within the city boundary.

Scope 3: Emissions from the portion of transboundary journeys occurring outside the city resulting from the project. This includes the out-of-city portion of all transboundary GHG emissions from trips that either originate or terminate within the city boundaries. This includes the out-of-city portion of any on-road, air, or sea transit that burns fuel, or any out-of-city travel by an electric railway. Also includes any transmission and distribution losses from grid-supplied energy from local electric vehicle use.

Because the proposed project is new, all future trips beginning or ending at the hotel should be considered 100% “project induced” (trips between other third-party destinations would not be included unless the hotel had pre-arranged these trips). Therefore sample itineraries of two hypothetical hotel guests are used to illustrate the calculation of project-induced travel.

Begin	End	Mode	Miles (VMT)	Project-Induced %	Induced VMT
Palo Alto (home)	New Hotel	Car	85.2	100%	85.2
New Hotel	BV Winery	Car	2.3	100%	2.3
BV Winery	Di Rosa Art	Car	7.9	0%	0
Di Rosa Art	New Hotel	Car	8.0	100%	8.0
New Hotel	Girl & Fig	Walk	0	100%	0
Girl & Fig	New Hotel	Walk	0	100%	0
New Hotel	Palo Alto (home)	Car	85.2	100%	85.2
Total			188.6		187.7

4 .04
cont.

A similar itinerary for a visitor originating in Shanghai might look like this:

Begin	End	Mode	Miles (VMT)	Project-Induced %	Induced VMT
Shanghai (home)	SFO	Airplane	6,150	94.6%	5,817.9
SFO	New Hotel	Car	64	100%	64
New Hotel	BV Winery	Car	2.3	100%	2.3
BV Winery	Di Rosa Art	Car	7.9	0%	7.9
Di Rosa Art	New Hotel	Car	8.0	100%	8.0
New Hotel	Girl & Fig	Walk	0	100%	0
Girl & Fig	New Hotel	Walk	0	100%	0
New Hotel	SFO	Car	64	100%	64
SFO	Shanghai (home)	Airplane	6,150	94.6%	5,817.9
Grand Total			12,446.2		11,774.1

In this example, a “Project-Induced Travel Activity” attribution factor of 94.6% has been applied. This is because the visitor originating in Shanghai traveled by ground to more destinations than just the new hotel during their visit, less than 100% of their air travel activity (to/from home) is attributed directly to the new hotel.

This factor is based on the percentage of “direct” project-induced ground miles over total ground miles for the complete itinerary. (138.3/146.2 = 94.6%).

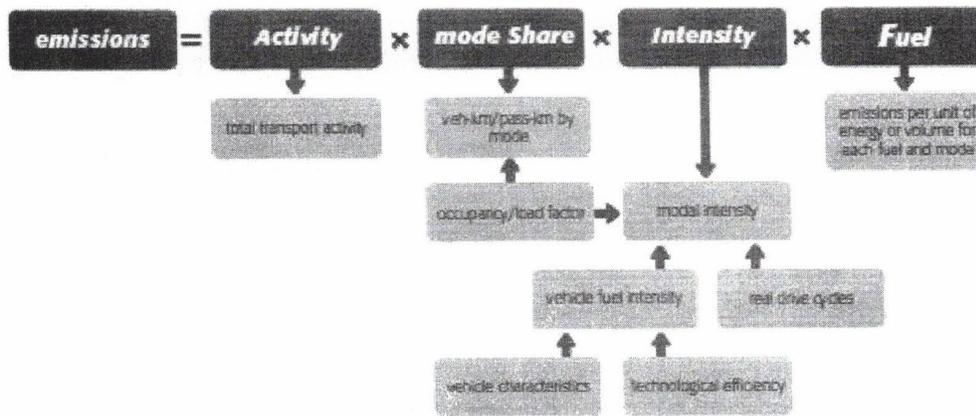
Subtotals	Miles (VMT)
All Ground Miles	146.2
Project-Induced Ground Only	138.3
Air Only	12,300
Grand Total	12,446.2

In this example, the Project-Induced Travel Activity factor is relatively high given the fact that their entire visit involved only one other trip between third-party destinations (i.e., not pre-arranged by the hotel itself). However, if hotel visitors are expected to visit more third-party destinations during a typical stay, a lower factor may be reasonable.

We believe the applicant could easily provide some estimates of the travel profiles of their anticipated guests, and from these calculate the resulting VMT impacts of their project.

The final step in calculating the emissions impact of the travel resulting from the project would be to identify the CO2e intensity of these travel activities. A straightforward approach such as the “ASIF” framework is recommended, where “activity” is the Vehicle Miles Traveled” (VMT).

Figure 7.1 ASIF framework²⁶



We believe this exercise demonstrates that the Revised EIR should not be certified until the applicants have provided some estimate of guest travel emissions for the new project.

Respectfully Submitted,

-Tom Conlon
Volunteer / Steering Committee

4-04
cont.

4-05

RESPONSE TO COMMENT LETTER #4 FROM TRANSITION SONOMA VALLEY

Response to Comment 4-01

The commenter requests a complete and comprehensive GHG emissions estimate. When considered together, the Draft EIR, the revised Draft EIR, and this Final EIR provide detailed analyses of all direct and reasonably foreseeable indirect GHG emissions associated with the Project. Please refer to Master Response 2 and 3 above for a detailed discussion of GHG impact analysis and mitigation.

Response to Comment 4-02

The commenter states that the BAAQMD bright line threshold is inadequate. See Master Response 2 and 3 above for a detailed discussion of GHG impact analysis and mitigation, as well as a discussion of BAAQMD-recommended significance thresholds, those developed by other agencies, and additional significance guidance developed for this EIR.

Response to Comment 4-03

The commenter states that GHG emissions associated with flights and other modes of travel by future visitors to the proposed hotel should be included in the EIR. See Master Response 2 and 3 above, for a detailed discussion of GHG impact analysis and mitigation, as well as the relationship between tourism in the area and air travel, and travel to the Project site by visitors and employees.

Response to Comment 4-04

The commenter references a Superior Court decision and states the opinion that the Project Applicant has the burden of impact assessment related to air travel. The commenter also goes on to describes the scopes framework, which is used to prepare GHG inventories for climate action plans and other related activities. Finally, the commenter goes on to state that because the Project is new, all trips beginning at or ending at the hotel should be considered. The commenter provides illustrative examples.

See Master Response 2 and 3 above for a detailed discussion of GHG impact analysis and mitigation, as well as the relationship between tourism in the area and air travel, and travel to the Project site by visitors and employees. The EIR adequately analyzed the GHG emissions from implementation of the Project.

Response to Comment 4-05

The commenter provides methodological suggestions. However, see Master Response 2 and 3 above. GHG emissions have been adequately analyzed.

RECEIVED

SEP 13 2018

CITY OF SONOMA

Sonoma Valley Housing Group

Dave Ransom, Chair (daveransom391@gmail.com)

Norma Barnett, Council Watchdog Project (normajean4455@gmail.com)

Ken Brown, Council Watchdog Project
(kenbrown@bearflagsocialclub.com)

September 12, 2018

Delivered via email and by hand

Please distribute this letter as noted to the following:

Robert Felder, Chair
City of Sonoma Planning Commission
City of Sonoma
No. 1 The Plaza
Sonoma, CA 95476

Mayor Madolyn Agrimonti
City Council Members

Jim Reese, Special Adviser, Management Partners

City Attorney

City Manager

**RE: Hotel Project Sonoma Revised Draft ENVIRONMENTAL IMPACT
REPORT (EIR) (West Napa Street), dated July 20, 2018
Planning Commission Hearing: September 4, 2018**

Dear Commissioners:

Please accept the following questions and comments regarding the adequacy of the West Napa Street Hotel Project Sonoma Revised Draft EIR (DEIR), dated July 20, 2018.

5- 01

First, REGARDING THE DEIR (Draft Environmental Impact Report (who will be reviewing the adequacy of the DEIR on behalf of the City of Sonoma, the City of Sonoma Planning Commission? What qualifications in Land Use Planning and the California Environmental Quality Act (CEQA) does that person have?

5-01

Second, the City Council charged the Planning Commission to revise the EIR in these ways:

The **DEIR should address an alternative** in which 50% of the proposed square footage of the project (excluding underground parking)

1) An alternative in which approximately 50% of the proposed building area (excluding the underground parking garage) is residential and 50% is commercial as per City Government Code.

2) The DEIR is required by CEQA (California Environmental Quality Act) requires consideration of environmental consequences of the project with quantifiable, objective and complete information and data than can be verified. The DEIR is also required to contain a meaningful discussion of project alternatives. The current DEIR has added:

5-02

Construct a 62-room hotel, restaurant, and spa on an infill site in downtown Sonoma, CA. This is the project, and should not be construed as a “project objective”.

Third, the DEIR could consider a Hotel Only Alternative, with no restaurant as part of the Project, and the number of hotel rooms reduced to 30. This would result in a significant reduction of the environmental impacts associated with the proposed Project and would not require off-site parking on the Bank of Marin site, because of an insufficient amount of parking on the project site required for a 62-room hotel, restaurant, and spa.

5-03

Fourth, the Planning Commission, in conjunction with this proposed project, has not waived the 50 percent housing requirement. The project sponsor and the DEIR continue to state that they intend to ask for a Waiver.

5-04

Fifth, the DEIR to meet CEQA and City Code requirements must analyze a 50% Housing Alternative that would affect the design of the structure(s) including massing, height, balconies, architectural details, what is

5-05

required here must include, but not necessarily be limited to, the following:

- Unit sizes,
- Locations and required open space,
- Floor plans, and
- Parking requirements, including bike parking

Obviously, this would require a different design project than a 62-room hotel, restaurant and spa.

Sixth, the DEIR fails to address the affordable housing crises in Sonoma and Sonoma Valley, given the number of staffing that a 62-room hotel, 80-seat restaurant, and spa, including valet parking attendants, maintenance staff, etc. – all on the lower pay scale level. The DEIR has not provided any verifiable, quantitative data or reason why there should not be a fully developed housing component in the proposed project on this commercially zoned property. **5-06**

Seventh, In addition, instead of proposing affordable on-site employee housing to facilitate a decrease in Vehicle Miles Traveled, the DEIR is requesting a Waiver from the residential component based on the project sponsor’s personal opinion that: “The hotel use, in and of itself, does not lend itself to an integrated residential component....” This is a highly personal opinion, with no basis of factual support contained in the DEIR. **5-07**

Eighth, the DEIR fails to provide sufficient data and analysis in as to why the required housing component should be waived. While the applicant may wish a 62-room hotel, the DEIR sets forth no substantial, verifiable evidence that a housing component at this site would be incompatible or infeasible. Requiring a housing component will require a revised project and send the DEIR back to the drawing board. **5-08**

Ninth, the DEIR presumes a Waiver from the required housing component will be granted, which is highly speculative. As a result of this speculation and assumption, the DEIR does not provide the public and the decision makers with sufficient data as to why the required housing component should not be included in the project and thoroughly analyzed with adequate design plans. **5-09**

Sincerely,

Sonoma Valley Housing Group

Dave Ransom, Chair

Ken Brown and Norma Barnett, City Government Watchdog Committee

RESPONSE TO COMMENT LETTER #5 FROM SONOMA VALLEY HOUSING GROUP

Response to Comment 5-01

The comment asks what qualifications the City has to review the adequacy of the DEIR. The City of Sonoma has hired a team of consultants with extensive expertise in land use planning, CEQA, and transportation planning. The City of Sonoma staff has reviewed the technical data and Project compliance and shall ensure mitigation measures are implemented consistent with the Mitigation Monitoring and Reporting Program found in Appendix S of the revised Final EIR.

Response to Comment 5-02

This comment suggests that the Project should not be construed as a “project objective”. Please refer to Master Response 7 – Project Alternatives. As indicated, the CEQA Guidelines Section 15126.6 (a) require that the Alternatives meet most of the Project Objectives, which include construction of a hotel.

Response to Comment 5-03

This comment states that a hotel only alternative should be considered. Please see page 6-18 of the revised Draft EIR which did consider a Hotel Only Alternative. Please refer to Master Response 7 – Project Alternatives.

Response to Comment 5-04

The Commenter is correct, the Project is requesting a residential waiver, that the Planning Commission could consider. It should be noted that 7 residential units exist on the site and will remain with the Project.

Response to Comment 5-05

This comment states that the 50% Alternative would affect the design of the structure including massing, height, balconies and architectural details and asks for detailed information. It should be noted that this alternative would not vary greatly in terms of massing, height, balconies etc. over what is being proposed. Any alternative would be similar in size within the confines of the Development Code (height limit is 35 feet, zero setbacks, with or without the Project, etc.). Please refer to Master Response 7 – Project Alternatives.

Response to Comment 5-06

In applications for new development on commercially zoned properties, larger than one-half acre, a residential component comprising at least 50% of the total proposed building area is normally required, unless waived by the Planning Commission (SMC 19.10.020 B.3). The Project is requesting that the Planning Commission approve the Project without a residential component. Waiving this requirement does not require a variance or an exception, since this allowance is built into the definition of the Commercial zone. Circumstances in which the residential component may be reduced or waived include, but are not limited to the following:

1. The replacement of commercial use within an existing tenant space with another commercial use.
2. The presence of uses or conditions incompatible with residential development on or adjacent to the property for which a new development is proposed.

3. Property characteristics including size imitations and environmental characteristics that constrain opportunities for residential development or make it infeasible.
4. Limitations imposed by other regulatory requirements, such as the Growth Management Ordinance.

The Project would result in the replacement of existing commercial uses with another commercial use. The site is constrained by existing buildings that will remain with the Project, which would make it difficult to provide both a viable hotel use and mixed residential uses. While the Project could be redesigned to include residential uses, it would likely require the removal of the restaurant as part of the Project. The onsite restaurant is a desirable amenity to guests. Further, existing residential uses are already located onsite in the Lynch Building (seven apartment units).

Further, the City has several other pending applications for residential uses. This site is not identified as an affordable housing opportunity site in the General Plan Housing Element and is not needed to meet the City's obligation under the Regional Housing Need Allocation (RHNA).

Response to Comment 5-07

The comment questions why a residential component is not proposed to reduce VMT. Please see response 5-06 above. See also Master Response 1- Vehicle Miles Traveled.

Response to Comment 5-08

The comment states that there is not sufficient data as to why the housing component should be waived. Please see response to comment 5-06 above and refer to Master Response 7 – Project Alternatives.

Response to Comment 5-09

CEQA requires that environmental document analyze the proposed "Project" which in this case includes a development application that requests a waiver from the housing component. The Development Code includes a provision that allows the Planning Commission to consider a waiver.

Larry Barnett
637 5th Street East
Sonoma, CA 95476
707-939-0915

August 30, 1918

Sonoma Planning Commission
Robert Felder, Chair
#1 The Plaza
Sonoma, CA 95476

Dear Chairman Felder:

I am writing to provide comments on the EIR currently under review for the Hotel Sonoma Project on West Napa Street.

6-01

Firstly, let me express my disappointment. After a year since the City Council upheld the appeal of the certification of the previous EIR and directed that a new EIR be created, I find this new version nearly as insufficient as the original version. In directing staff and the consultants as to the additional material that needed to be added, I thought it was clear that a 50/50 (housing/hotel) alternative was to be developed and analyzed, yet this new EIR dispenses with the 50/50 version with a spare paragraph and no substantial analysis or calculations. The eight-unit housing addition alternative, remarkably, gets more attention and analysis than the 50/50 alternative. What makes this remarkable is that the 50/50 alternative is actually what is required on this parcel in the development code, yet that alternative continues to be nearly ignored.

6-02

The question this raises, aside from not providing substantive data (layouts, sizes, location, conformance with code provisions, effects on parking and traffic, etc.) necessary for its evaluation in the EIR, is that it also eliminates the ability of the Planning Commission to evaluate the request for a housing waiver. In other words, without a detailed plan, upon what basis can a housing waiver be granted? The 50/50 alternative needs to be evaluated on the basis of projected data, and that data is not provided except in the most cursory manner. The consultant should be directed to develop meaningful and properly executed plans and projections for the 50/50 alternative. Given the workforce housing shortage in Sonoma, the 50/50 alternative needs full and proper consideration.

I am also concerned about the pedestrian "bulb outs" planned for the intersection of West Napa Street and First Street West. During the course of this past year there has been ample opportunity to use a temporarily installed curb bulb-out; rubberized and composite materials for this purpose are widely available. A temporary installation would have revealed whether bulb-outs are, in fact, a viable mitigation in this location; information such as the effect on traffic, pedestrian safety, and impacts on truck traffic headed East on Napa Street then turning South on First Street West, and the opinion of Cal Trans all could have been assessed. To rely on assumptions only seems foolhardy when other, more verifiable options are present. A temporary bulb-out, accordingly, should be installed and evaluated.

6-03

Certain other matters in the report, such as left-hand turn lane analysis, appear to be right on the edge of requiring additional mitigation measures. It just seems prudent to adopt street improvements (such as a left-hand turn lane) in anticipation of increased traffic over the coming years. Traffic continues to increase, and the addition of a new restaurant in the building across the intersection on First Street West will further, from a cumulative basis, increase the intensity of traffic and pedestrians on that corner. To ignore such cumulative impacts makes no sense.

6-04

Finally, I continue to feel that the use of the public street (First Street West) as a loading dock and delivery zone is highly inappropriate. Unlike the existing businesses on the Historic Plaza without such loading docks, this project is planned for a large parcel that will be scraped clean, and the opportunity to include a proper loading dock for big-rigs on the property has always been viable and should have been part of the development plan from the beginning. That such a loading dock might reduce space available for hotel rooms or service facilities is possible, but such concerns cannot and should not outweigh the obligation to get truck traffic off the public street when it comes to the matter of loading goods and supplies for a private business.

6-05

I will leave it to others to point out errors, inaccuracies, ambiguities, and mistaken calculations in this latest EIR; from what I've been told, unfortunately there are many.

6-06

Thank you for your attention to these concerns.

Sincerely,
Larry Barnett

RESPONSE TO COMMENT LETTER #6 FROM LARRY BARNETT

Response to Comments 6-01

This comment provides an introduction to the comment letter and does not question the adequacy of the analysis of the EIR. No further response is required.

Response to Comments 6-02

This comment expresses concern that the 50% Residential Alternative is not presented in the same level of detail as the Project. Please refer to Master Response 7 –EIR Alternatives.

Response to Comments 6-03

This comment requests that temporary bulbouts be installed. There is no requirement to install practice improvements. The installation of bulb-outs is an accepted traffic calming measure used in many jurisdictions to provide a shorter crossing space for pedestrians in the travel lane. Please refer to Master Response 4 – Pedestrian Bulb-Outs.

Response to Comments 6-04

This comment refers to a question about cumulative traffic impacts and mitigation for left turn lanes. The left-turn lane warrant analysis indicates that a left-turn lane would not be warranted based on volumes alone under volumes projected at the 2040 horizon year (Page 4.10-26 of the revised Draft EIR) The turn lane is not warranted for current conditions. Given that volumes, as well as the safety record do not indicate need for a left-turn lane, one has not been recommended.

Response to Comments 6-05

This comment states that First Street West as a loading dock and delivery zone is inappropriate and that a loading dock should be required. The Project is the redevelopment of an existing commercial site, with several uses that will remain. The site is irregular in shape and constrained. An onsite loading dock is not viable, nor necessary to support the use. The use is not comparable to a grocery store or a retail center that would require significant quantity of deliveries and an associated loading dock. See Master Response 5 – Deliveries on First Street West.

Response to Comments 6-06

This is an editorial comment that does not directly question the analysis in the EIR. No further response is required.

EIR comments from David Eichar

August 31, 2018

Below are my comments and questions concerning the revised draft EIR for the Hotel Project Sonoma for the Planning Commission meeting of September 4th. I will present all of this in more detail at a later date.

Hotel-Residential (50%-50%) Alternative

Section 1.4 states the 50%-50% alternative has 25 hotel rooms, increases the size of the building area by 8,750 square feet. There is no mention of removing the restaurant. Section 6.2 says 37 hotel rooms and the restaurant is removed.

- How many hotel rooms are in the 50%-50% alternative?
- Is the restaurant removed for this alternative?
- What is the increase in building size of this alternative?
- Why is the averages size of the residential units in this alternative significantly smaller than those in newly approved Oliva and Taub apartments?
- Why is the averages size of the residential units significantly smaller than the units in 8 residential unit addition alternative?
- Why are there no detail drawings for the 50%-50% alternative, while there is for the 8 residential unit addition alternative? Details are needed in order to properly evaluate the alternative.

Why was the restaurant removed in this alternative when Resolution 43-2017 passed by the city council does not mention removal of the restaurant in the alternative, nor was it discussed in the city council meetings?

Even with the removal of the restaurant, this would not provide enough building area to accommodate the 25 residential units, without an increase in building square footage.

This alternative is does not meet the expectations of the city council, which were told that the mix residential units would be selected which reduces the environment impact compared to the proposed project. See the video of the July 19, 2017 city council meeting at just past the 58 minute mark.

No matter the answers to the above questions, 25 residential units at 800 square feet average size are only about one third the total 67,748 square feet, not 50%. The alternative as analyzed does not meet the requirements of Resolution 43-2017.

Using the correct size of hotel rooms would reduce the number of rooms from 25 to 24 (or 37 to 35). Using the correct size of residential units would reduce the number of residential units from 25 to 21. However, this still increases the overall size of the building area. The 50%-50% alternative should use the same building area as the proposed project, which would require reducing the number of hotel rooms and/or residential units even more.

7a-01

This error in choosing the size and number of hotel rooms and residential units throws off many of the calculations on the environmental impact of the 50%-50% alternative.

Public Services – 50%-50% Alternative

In section 6.5.9 PUBLIC SERVICES, the DEIR has a contradiction. It states, “As set forth in California Government Code Section 65995, the payment of development fees mitigates any impact to school districts...” But then it states, “The increased service demands and student generation would result in a slightly more severe impact in comparison to the proposed Project.” However, if the development fee mitigates any impact to school districts, then there cannot be “slightly more impact” to school districts after mitigation. As for impacts to service demands, the DEIR states, “overall service demands for fire and police protection would be similar to those of the proposed Project.”

Why did the DEIR use a number of persons per household which includes 3, 4 and more bedrooms units, instead of using numbers for only one-bedroom and two-bedroom units?

The 50%-50% alternative uses 2.13 persons per household number for calculating environmental impact for both Public Services, Utilities and Service Systems. The cited internet document from the state actually indicates 2.10, not 2.13, persons per household for the city of Sonoma. Also, this number was taken from data which includes all households, including 3, 4 and more bedroom houses. The 50%-50% alternative has only 1 and 2 bedroom units.

According to Census Bureau’s 2012-2016 American Community Survey, within the geographic area which includes Sonoma, the average number of persons living in one-bedroom units is 1.17 and living in two-bedroom units is 1.75. Using the numbers from the Census Bureau would actually reduce the impact to overall service demands for fire and police protection versus the proposed Project.

Table 6-1 needs to be updated so that Public Services shows “Less Severe Impacts” for the 50%-50% alternative.

Air Quality, GHG Emissions, and Noise – 50%-50% Alternative

The DEIR states in section 6.5.2, that there would be slightly more severe air quality impacts, section 6.5.6 that there would be slightly more GHG emissions, and 6.5.8 slightly more noise impact because of the need to expand the underground garage for the residential units. However, since the 50%-50% alternative is flawed in specifying the number of residential units and hotel rooms comprised in this alternative, the underground garage may not need expansion.

Walk Score rates cities, neighborhoods and addresses on proximity to amenities useful to residences within walking distance. It is a 100-point system, with anything over 80 being good. (See walkscore.com) A Walk Score correlates to vehicle trips and GHG emissions.

The location of the Hotel project on West Napa St has a Walk Score of 91, "Daily errands do not require a car", which Walk Score calls a "Walker's Paradise." The Walk Score for the Hotel

7a.- 02

Project Sonoma site is higher than all of the housing opportunity sites listed in the city's Housing Element document in the city of Sonoma and higher than other new residential projects.

So, one of the best places in Sonoma to put new homes to limit vehicle trips, VMT and GHG is right on the hotel project site. The fact that the project site has slightly less severe impact to VMT and GHG than other sites in Sonoma for housing should have noted in the DEIR.

Transportation and Traffic, Utilities and Service Systems – 50%-50% Alternative

Section 6.5.10 and 6.5.11 state that this alternative would have similar impact to the proposed hotel project. Since the 50%-50% alternative is flawed in specifying the number of residential units and hotel rooms comprised in this alternative, the vehicle trips, utilities and service systems for the alternative are actually less than with the hotel project.

Why does section 6.5.10 Transportation and Traffic say the impact of the 50%-50% alternative “would result in similar impacts compared to the proposed Project” and not slightly less severe impact? Clearly table 6-2 shows fewer Daily Trips and fewer Weekday PM Peak hour trips. If the correct size and allocation of residential unit sizes were used, the Weekend Peak Hour Trips would also be less.

Parking – 50%-50% Alternative

Besides the before mentioned error in calculating the number of hotel rooms and residential units, the DEIR states the 50%-50% alternative adds 12 parking spaces, but this fails to take into account fewer parking spaces needed because a smaller hotel would have fewer employees.

7a,-03

EIR for Proposed Project Comments

Impact on Pedestrians

Trans-6A mitigation, curb extensions, is inconsistent with Circulation Element of the General Plan, which specifies future Class II Bike Lanes on West Napa Street. West Napa Street may not be wide enough to include the curb extensions, bike lanes and the center median on the west side of the intersection. But it is unknown if this is the case since the DEIR does not include a design for the curb extensions.

7a-04

If the mitigation is not completed, then the impact most definitely becomes significant.

Allowing some of the parking for the project across the street presents a pedestrian safety hazard. Many of the employees who park across the street will walk directly across highway 12 in the middle of the block. And this is legal since there is no traffic signal at 1st St E and W. Napa St. There is a high potential for pedestrians to be hit by the traffic.

Pedestrian impact on Traffic

The impact of pedestrians on traffic continues to be inadequately analyzed. Hotel guests are going to make a complete trip around the Plaza. They will start by crossing West Napa St. at 1st

Street West (let's face it, the BofA building is not very inviting), continue up 1st Street West, stop at a couple of shops and tasting rooms and on the way, crossing West Spain Street, then 1st Street West again, heading east. They make a complete loop, eventually crossing East Napa and 1st Street East, then cross Broadway.

The DEIR found that simulations for the pedestrian impact on traffic did not accurately reflect real observed conditions. The DEIR continues, "The approach applied was therefore based on increasing the volumes through use of the Peak Hour Factor (PHF), which is a ratio between the volume during the highest 15-minute period and the total volume for the hour. Application of a lower PHF increased the traffic volumes to reflect the additional conflicts associated with pedestrians, which increased delay and queuing to levels more consistent with actual observed conditions."

The approach is flawed. Absent pedestrians, vehicular traffic will continue to move through a four-way stop intersection, no matter how big the back-up, because cars take their turn. The increase in delay when you add more vehicles is mostly linear at a four-way stop intersection. However, the impact of pedestrians on traffic at an unsignalized intersection is exponential, not linear.

At some point at a two-way or four-way stop intersection, when you reach a steady stream of pedestrians, traffic stops dead, unless a group of pedestrians allows a vehicle, which creeps into the intersection, to pass. You can witness this near the Plaza after the 4th of July fireworks, as I have numerous times at the intersection of West Spain Street and 2nd Street West.

So, the traffic study failed to use any government or academic methodology specifically for analyzing the impact of pedestrians on traffic at unsignalized intersections. There is no estimate for the saturation point, where a steady stream of pedestrians essentially stops all traffic. The approach chosen for the impact to traffic does not have a saturation point where all traffic stops, only a saturation flow rate, at which vehicles continue to advance through the intersection.

Therefore, the impact of the increase in pedestrian traffic generated by the proposed project cannot be determined to be less than significant. It can only be determined to be "potentially significant." So, either the impact needs to be mitigated at all intersections around the Plaza, or deemed "significant, unavoidable."

Traffic Impact Analysis

Existing traffic volume data was collected on May 2018. The traffic counts should have been collected in September or October. The number of people employed and the number of tourists drops in May compared to September in the prior year.

May 2018 employment in Sonoma County was 1.8% lower than the previous September. 267,200 employed in September 2017 versus 262,400 in May 2018.

Employed residents in the City of Sonoma and the Springs area was 1.42% lower in May 2018 than the previous September. 14,100 employed in September 2017 versus 13,900 in May.

7a-04

7a-05

Since 2014, the averaged decrease in hotel room nights rented from September to May of the following year is 11.8%. For 2014 through October 2016 (October 2017 not used because of the devastating wildfires), the decrease in hotel room nights rented is averaged 14.7%.

More people employed in the area and more tourists in the city of Sonoma translate to more traffic in September and October than in May. This calls into question the accuracy of both the Left Turn Analysis and intersection LOS (Level of Service) calculations.

Further evidence that the collection of traffic volumes was performed at a less than peak time of year, is to compare the numbers to the traffic study performed in June 2014 for the latest Circulation Element of the General Plan. The PM Peak for the delay and LOS for the two intersections in common are less in the DEIR than the Circulation Element.

Table 4.10-4 is from the DEIR:

TABLE 4.10-4 SUMMARY OF EXISTING PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection <i>Approach</i>	Existing Conditions			
	PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS
1. W Spain St/First St W	23.1	C	26.4	D
2. W Napa St/Fifth St W	30.1	C	28.2	C
3. W Napa St/Second St W	27.0	C	21.2	C
4. W Napa St/First St W	26.6	D	25.7	D
<i>Northbound Approach</i>	11.4	B	11.6	B
<i>Southbound Approach</i>	11.7	B	16.0	C
5. Napa St/Broadway	26.7	D	24.2	C
6. E Napa St/First St E	13.6	B	13.4	B

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersection are indicated in *italics*.
Source: W-Trens 2018.

7a.-05

From the Circulation Element:
 Table CE-3: Intersection Levels of Service

Intersection	Type of Control	Year 2014	Year 2030	Year 2040
1. Sonoma Hwy (SR 12)/Verano Ave	Signal	22.7/C	25.3/C	28.4/C
2. Sonoma Hwy (SR 12)/Maxwell Village Center	Signal	18.3/B	20.9/C	22.7/C
3. Sonoma Hwy (SR 12)/W Spain St	Signal	26.0/C	33.1/C	43.5/D
4. Fifth St W/W Spain St	All-Way Stop	40.0/E	44.7/E	46.4/E
<i>a. Add EB and WB right turn lanes</i>	<i>All-Way Stop</i>	<i>n/a</i>	<i>31.6/D</i>	<i>33.9/D</i>
<i>b. Install mini-roundabout</i>	<i>Mini Roundabout</i>	<i>n/a</i>	<i>11.6/B</i>	<i>13.1/B</i>
5. Sonoma Hwy (SR 12)/Riverside/W Napa St	Signal	15.9/B	16.3/B	17.5/B
6. Fifth St W/W Napa St (SR 12)	Signal	37.3/D	47.5/D	59.5/E
<i>Add SB right-turn lane and EB overlap</i>	<i>Signal</i>	<i>n/a</i>	<i>n/a</i>	<i>43.0/D</i>
7. Broadway (SR12)/Napa St	All-Way Stop	32.2/D	53.0/F	58.7/F
<i>a. Install traffic signal</i>	<i>Signal</i>	<i>n/a</i>	<i>51.2/D</i>	<i>58.6/E</i>
<i>b. Install single-lane roundabout</i>	<i>Roundabout</i>	<i>n/a</i>	<i>9.6/A</i>	<i>11.7/B</i>
8. E Napa St/Fifth St E Northbound Approach	Two-Way Stop	1.7/A	2.1/A	2.4/A
		12.3/B	13.5/B	14.3/B
9. Eighth St E/E Napa St Northbound Approach	Two-Way Stop	6.1/A	6.4/A	6.6/A
		12.3/B	12.9/B	13.4/B
10. Fifth St W/W MacArthur St	All-Way Stop	17.1/C	21.1/C	24.8/C
11. Broadway (SR 12)/MacArthur St	Signal	17.4/B	19.3/B	21.2/C
12. Fifth St E/E MacArthur St	All-Way Stop	8.9/A	11.2/B	13.7/B
13. Fifth St W/Leveroni Rd	Signal	11.6/B	12.7/B	13.5/B
14. Broadway (SR 12)/Leveroni Rd/Napa Rd	Signal	36.7/D	44.6/D	51.1/D
15. Fifth St E/Napa Rd	All-Way Stop	39.5/E	44.6/E	49.3/E
<i>Install traffic signal</i>	<i>Signal</i>	<i>n/a</i>	<i>10.0/A</i>	<i>11.6/B</i>
16. Eighth St E/Napa Rd	Signal	21.5/C	34.1/C	48.2/D

Results are expressed as Delay/LOS; Delay is measured in average seconds per vehicle; LOS = Level of Service; **Bold**=operation below LOS D; *italicized* rows reflect mitigated or alternate configurations; NB=Northbound; SB=Southbound; EB=Eastbound; WB=Westbound

In Trans-1, Trip Distribution, the DEIR states, "Because of the limited number of new trips, 10 percent was considered the minimum distribution." This is a good practice for those intersections which would otherwise be below 10%, but wrongly decreases the trip distribution at other intersections which have more traffic. What would the trip distribution have been for those intersections given more than 10%, if a minimum of 10% were not given to the two intersection and how would this impact the "Trip Assignment by Study Intersection" and LOS at those intersections? (tables 4.10-7 and 4.10-8) Same question for future, plus project calculations.

Friday PM peak traffic not analyzed. There is more traffic on Fridays than the rest of the weekdays.

Mitigating Traffic Impact

Page 1-4 of the DEIR states, "Pedestrian Circulation. The Project is planned to be pedestrian oriented by encouraging hotel guests to park their vehicles for the duration of their stay and walk or bike in and around the Sonoma Plaza area."

7a-06

This is overly optimistic. Tourists come to Sonoma to go wine tasting at wineries and to attend weddings. Public transportation is completely inadequate to go to wineries and very few tourists bicycle to wineries. Other than the avid bike rider, most tourists will not take bicycles to wineries, as all but one or two are too far, it is unsafe on the rural roads, and too hot during most of the summer.

Other Traffic Issues

The delivery trucks on 1st Street West pose a safety issue with children living in the apartments and townhomes on 1st Street West south of the project. Pedestrian safety was not analyzed on 1st Street West, south of the project. At the corner of First Street West and Andrieux, there is an apartment complex where children live.

7a-07

DEIR states: "Given that the proposed project is located within Downtown Sonoma, it is reasonable to assume that some project patrons and employees will want to walk, bicycle, and/or utilize transit to reach the hotel." On weekends, the last bus from Sonoma towards the Springs, Glen Ellen and Santa Rosa leaves Sonoma Plaza too late for any restaurant employees to take the bus and it is too dark to ride a bicycle, so they will drive to get to work. There is no longer bus service to/from Napa. Buses to Petaluma and San Rafael do not even run on weekends. Also, buses do not run very frequently, often more than an hour apart and up to 4 hours apart. Public transit is not a viable option for employees when it is needed the most. And in order for employees to bike to work, they would need to live in Sonoma or nearby. As detailed later, this is unlikely. If none live within 10 miles, then it is not reasonable to anticipate any will bicycle to work.

7a-08

Tourists don't even take public transportation, because the frequency and routes are not conducive to bringing tourists to their desired destinations. Sonoma is not New York, Paris or even San Francisco in regards to the convenience of public transit.

Left Turn Analysis

Because of the lower than peak season dates for the collection of traffic data, as shown above, more people employed and more hotel guests throughout Sonoma results in more vehicle trips than the numbers used for the left turn analysis. Using correct vehicle traffic numbers (September or early October) would put left turn warrant over the threshold for "Future plus Project - Weekday PM Peak Hour", since the threshold was only 2 left-turning vehicles away from being reached.

7a-09

As for not using MacArthur Place numbers in the left-turn lane analysis, saying that more inbound vehicles would go to Saddles restaurant between 5 and 6 pm, than the project's restaurant because it is bigger is just pure speculation. Restaurants in Sonoma are not full by 6pm. That is like saying that if you have an 80 seat restaurant that is half full at 6pm (40 diners) that if you double the size of the restaurant that somehow miraculously, another 40 diners will show up by 6pm.

The left turn-warrant calculations are close to meeting the requirement to install a left turn lane on westbound W Napa St into the hotel driveway.

1. The allocation of 10% of trip distribution to/from the parking lot on First St. W is not included the left-turn warrant calculations. The trip allocation even ignores that “during weekday evening peak traffic periods (4:00 p.m. and 6:00 p.m.) and weekend midday peak hours (12:00 noon and 2:00 p.m.) guests would depart via a one-way vehicle ramp from the parking garage onto First Street West” (page 1-4).
2. The Directional Distribution factor used by the W-Trans engineer for Entering driveway was 51% (from the ITE Trip Generation Manual, 9th edition) instead of 61% observed at MacArthur Place entering during peak. This alone would increase traffic turning left into the driveway such that a left turn lane is warranted. As stated in ITE research documents, a local comparable use is always a far more accurate estimate of traffic generation, than nationwide samples of a use (e.g. hotel), because these surveys include uses with many that are not comparable to the specific use being analyzed.
3. Since the Umpqua Bank lobby is closed on Saturdays, the weekend peak calculations used 0 trips for the bank, even though the bank has an outside ATM. Customers use the ATM outside the bank, which is open 7 days a week, 24 hours a day.

7a-10

Discrepancy in Traffic Volumes between Traffic Counts and Left Turn Warrant Analysis

East bound traffic on West Napa St from 2nd St W numbers in the left turn analysis do not match the traffic volume listed in subappendix K.1.

7a-11

From subappendix K.1, Weekday PM, existing, plus project: 428 eastbound through + 79 northbound 1st St West right turn + 39 southbound 2nd St West left turn = 546 heading east on West Napa Street towards the hotel project.

HCM 2010 Signalized Intersection Summary
3: 2nd Street W & W. Napa Street

05/22/2018

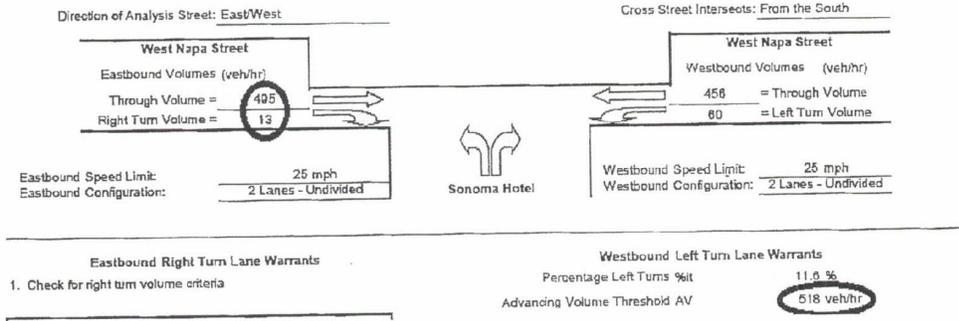


Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↑	↑	↑	↑	↑	↑	↑	↑	↑	↑	↑	↑
Traffic Volume (veh/h)	28	428	96	71	357	22	272	82	79	39	75	17

However, in subappendix K.3, the left turn warrant analysis, Existing plus Max – Weekday PM Peak Hour Threshold has a total of 508 vehicles arriving from the west (495 through + 13 turning into project parking = 508). The total should be 546, which would put traffic volume over the threshold, warranting a left turn lane.

Turn Lane Warrant Analysis - Tee Intersections

Study Intersection: West Napa Street/Sonoma Hotel Driveway
 Study Scenario: Existing plus MAX - Weekday PM Peak Hour Threshold



There is also a discrepancy for the future plus project eastbound traffic numbers.

Subappendix K.1, existing with project:

HCM 2010 Signalized Intersection Summary

3: 2nd Street W & W. Napa Street

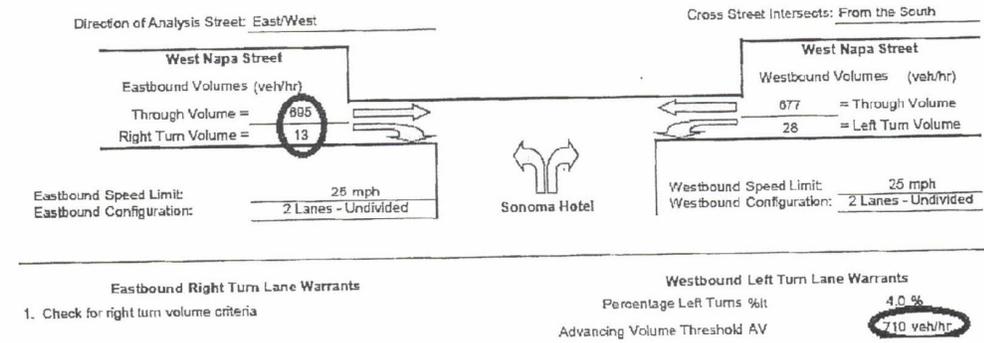
04/03/2018

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	55	552	142	84	540	36	358	122	82	77	112	36

Subappendix K.3, future plus project:

Turn Lane Warrant Analysis - Tee Intersections

Study Intersection: West Napa Street/Sonoma Hotel Driveway
 Study Scenario: Future plus Project - Weekday PM Peak Hour



From subappendix K.1, future with project, weekday PM peak: 552 eastbound through + 82 northbound right + 77 southbound left = 711. From subappendix K.3, future plus project,

weekday PM peak, 695 eastbound through + 13 eastbound right turn =708. This should be a total of 711, which puts the volume of traffic over the threshold of 710 vehicles per hour.

Consistency with City Council Adoption of 22 Local Climate Protection Measures

The city-adopted Measure 4-L1, Mixed-Use Development in City Centers and along Transit Corridors, p. 3-43 of county Climate Action 2020 textbook, is consistent with the CA2020 goal of reducing travel demand through focused growth. The annual GHG reduction potential is high, 3,494 metric tons of CO2 equivalent. This is now a specific city goal and planning parameter. Waiving the residential component requirement is inconsistent with the Climate Action 2020 goals.

Land Use Impact

Waiver of Residential Component

LU-1 states, "The residential component required in the Sonoma Development Code is intended to increase the residential housing supply near commercial uses and within in the city as a whole, and is not intended for the purpose of avoiding or mitigating an environmental effect." This is not true. In the Housing Element of the General Plan, it states, "Furthermore, within its commercial and mixed use land use districts, the City now requires new development to include a residential component of at least 50% the total building area, a policy that has proven effective in integrating housing within walking distance of commercial uses."

The Circulation Element of the General Plan states:

- "The Circulation Element policies and implementation measures are intended to recognize and enhance the inherent positive qualities of walking in Sonoma to get more people out of their vehicles more often."
- "The Land Use Plan envisions increased densities around existing retail commercial areas and promotes mixed-use development to encourage walking..."
- "...in order to reduce auto dependence and promote walking, the Land Use Plan establishes higher densities adjacent to commercial centers and encourages mixed-use development."

By being able to walk to commercial uses, this reduces traffic congestion, vehicles miles traveled, and greenhouse gases.

The General Plan even states specifically that walking *mitigates* traffic congestion. The Content and Purpose section of the 2020 General Plan states, "*In 2020, Sonoma will be a place where ... walking and bicycling are safe and the use of clean-fuel transit is popular. Traffic congestion is mitigated.*" (bold font added)

The Environment Resource Element of the General Plan states, "Through its policies aimed at promoting transit use and walking and biking, the Circulation Element provides the basis for both transportation and recreation systems that help sustain the environment and community

7a-12

7a-13

health.” Here again, the General Plan states that promoting walking is an environmental and health.

The various sections of the General Plan make it clear that requiring a housing component in commercial development is linked to mitigating negative environment impact.

At the August 6th, 2018 city council meeting the city council reviewed options for inclusionary affordable housing. The staff report states, “consideration be given to a blended requirement, in which half of the units would be required at the low income level and half at the moderate income level.” The necessary changes to the development code could be made prior to the approval of the hotel project. If so, then waiving the housing component would eliminate the development of housing for those in the low income level, and have a negative effect with respect to meeting the City’s RHNA objectives, for which the city has not met its objective. This would be a significant impact. (LU-1 and LU-2)

Housing Impact

As for the project inducing the need for new housing, the staff report states that the level of employment at the project can be reasonably accommodated by the existing workforce in the area. This is contradictory to the KMA nexus study on the impact of new development on housing needs. Unemployment is very low in the city and county of Sonoma. Using the nexus study numbers, for a 67,478 square foot hotel on W Napa St, the calculated number of new housing units needed is 33.2 (30 of which are affordable). The consultants who prepared the nexus study are considered experts on housing impact of new commercial development.

If the official city position is that the hotel project 60 employees will come from existing workforce in the area, then how can the city legally access a housing impact fee?

VMT and GHG

Additional comments regarding Vehicle Miles Traveled (VMT) and Greenhouse Gases (GHG):

- For VMT (Trans-2) and GHG from employees driving to work, the DEIR has the hotel employer providing transit passes to the employees, but the bus schedules are designed for residents to commute out of Sonoma, not into Sonoma. The bus schedule is so limited; employees will not be able to take the bus to work. Currently many low wage workers commute from Vallejo and Fairfield, but there is no public transit between Sonoma and these cities.
- Also VMT (Trans-2), includes a VMT reduction measure to provide telework options. However, it is not feasible to telework for most, if not all, of the employees working at the hotel, spa and restaurant: maids, valet, cooks, wait staff, bus boys, front desk, concierge, spa workers. Telework is only feasible for back office staff; however, they will not be located within the project site.
- Another part of VMT reduction, “placing a hotel within easy walking distance of numerous destinations, ...making it easier for guests to make some trips as pedestrians.” However, VMT is increases by drawing more tourists to Sonoma and requiring more employees to drive to Sonoma from outlying areas, such as Vallejo and Fairfield.

7a-14

Without a complete VMT analysis, this claim cannot be made, unless qualified with a comparison to locating the hotel in a different part of town.

- There is no attempt to quantify the VMT of tourists, nor even acknowledgement that VMT would increase because of hotel guests driving to Sonoma, mostly from the Bay Area or Bay Area airports.

Miscellaneous Impacts

Additional comments on the DEIR:

- If a project causes problems with additional parking in residential neighborhoods, then this is considered a CEQA significant impact. The W-Trans analysis of the parking requirements in the original DEIR cited the 7 reserved spaces for the existing apartments. The staff report states, "On the east side of the court, next to the Lynch Building, five parking spaces would be retained for customer use." However, the W-trans analysis did not take into account these 5 reserved parking spaces. If you visit the parking lot now, you will see that most of the spaces are reserved, including for the bank, the apartments, Pacific Union and the Index Tribune. I agree the apartments should have dedicated parking spaces. But, as stated by W-Trans, higher peak parking demand "could be expected with any use of reserved spaces." Mitigation measures must include that bank and other businesses do not get reserved parking spaces; otherwise, the parking spaces are not shared.
- The use of the Bank of Marin parking lot for the hotel project will result in more parking in residential neighborhoods. Currently, many of the parking spaces are rented or leased out to other businesses in the area. Often, at midweek PM peak time, there are only 4 or 5 spaces available. If the hotel is provided with an easement for parking, the businesses will lose their parking spaces. Since parking is already a problem around the plaza and/or much of the area is limited to 3 hour parking, employees of those businesses will park in residential areas.

7a-15

Hotel Project Sonoma DEIR comments from David Eichar

September 10, 2018

Hotel-Residential (50%-50%) Alternative

First of all, there are conflicting descriptions of the 50%-50% alternative. The narrative starts out by saying, "the Project's proposed building area (excluding the underground parking garage) of 67,478 square feet would include approximately 50 percent as hotel and 50 percent as residential." But later in the same paragraph, it states, "Overall, the building would be increased by 8,750 net square feet." 67,478 square feet is the size of the building as proposed. Also, in sections 6.5.1 through 6.5.12 state, "Under the Hotel/Residential (50%-50%) Alternative, the Project's overall site layout and building design would be maintained; however, half of the interior space would be used for residential uses."

7b-01

So, is the 50%-50% alternative the same size as the proposed project or 8,750 square feet larger? If the same size, there is no way to replace 25 hotel rooms and the restaurant with the proposed residential units.

There is also a conflict between the description in section 1.4.1 and 6.2.:

- Section 1.4.1: "the site could accommodate 25 hotel rooms (450 square feet per room) and 25 residential units"
- Section 6.2: "the site could accommodate 37 hotel rooms (450 square feet per room) and 25 residential units"

7b -02

What is the correct number of hotel rooms in the 50%-50% option? Also, section 1.4.1 does not mention the removal of the restaurant, while section 6.2 does. Is the restaurant being removed in the 50%-50% alternative? Even if it is, this would not provide enough building area to accommodate the 25 residential units. When calculating gross building size to accommodate either hotel rooms or residential units, the gross square footage needs to include the area of corridors, stairwells, elevators, etc.

7b -03

Resolution 43-2017 passed by the city council does not mention removal of the restaurant in the alternative, nor was it discussed in the city council meetings with regards to the 50%-50% alternative. If it is removed, why is it removed rather than reduced in size? From the resolution; "An alternative in which approximately 50% of the proposed building area (excluding the underground parking garage) is residential and 50% is commercial." Since the underground area includes conditioned space other than underground parking garage (e.g. restrooms, lockers, housekeeping/laundry, general store, kitchen dry storage, wine/food storage, and employee facilities), this conditioned space must be included toward the total building area¹. And if the residential component is less than 50% of the total building area, this must be noted in the EIR.

7b -04

¹ See definition of Gross Building Area:

<https://homeguides.sfgate.com/difference-between-gross-living-area-gross-building-area-45225.html>

No matter the answers to the above questions, 25 residential units at 800 square feet average size are only about one third the total 67,748 square feet², not 50%. This indicates that the 50%-50% alternative was not thought out very well.

7b -05

In addition, with the lot line adjustments joining the four parcels into one, the calculation for the maximum number of residential units should be done using the size of the entire joined parcel of 1.63 acres. At a density of 20 residential units per acre, this results in 33 residential units.

7b -06

It is up to the city to choose the alternatives for the EIR. An alternative must avoid or lessen one or more of the significant impacts, such as the impact to pedestrians on 1st Street West and West Napa Street. (See the CEQA Guidelines, in Title 14 California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports, section 15126.6)

7b -07

The DEIR calls the alternative "HOTEL/RESIDENTIAL (50%-50%) ALTERNATIVE"; however, the resolution, as noted above, calls for 50% residential and 50% *commercial*, not 50% hotel. This alternative is does not meet the expectations of the city council, which were told that the mix of residential units would be selected which reduces the environment impact compared to the proposed project.

7b -08

In the July 19th, 2017 City Council meeting³, while discussion the selection of alternatives, the assistant city attorney said,

"I think we have a pretty good sense of what the public is looking for relative to the environmental document, at least what they think should or shouldn't be in it. But I do think that to the extent council is interested in saying look, relative to the appeal, we feel that these things need improvement in the document and staff has identified 2 that we think need improvement and you expanded on one of those, for instance, this evening. I think that is valuable information. We will be looking for that information from the council this evening in order to bring that forward in the actual resolution, so that everybody understands what's being, I'll call it, revised in the document to be recirculated.

7b -09

"A little bit of the refinement of those; however, in particular talking about alternatives section comes out of the iterative process with the environmental consultant. In other words, sometimes you are looking for a sweet spot, what would reduce this impact; well if you had one less unit it you might reduce that impact. So we wouldn't want to decide,

<https://appraisersforum.com/forums/threads/including-basement-area-in-gba.209169/>
http://www.investorwords.com/13378/gross_building_area.html

² 25 residential units at 800 square feet average equals 20,000 square feet. Allowing for 25% extra for corridors, stairwells and elevators yields 25,000 square feet. 25,000 divided by 67,748 equals 37%. Even less, if you include the basement area in the total building area other than the underground parking garage.

³ See the video of the July 19, 2017 city council meeting at just past the 58 minute mark.
<https://www.youtube.com/watch?v=xgfQh18Jffw&feature=youtu.be>

ok it was 8, then find out that 9 would be the threshold of a significant reduction. So we try not to get too far into the fine line details because as the consultant is actually rolling out the analysis, sometimes there are minor modifications to those alternatives in order to address hitting that spot as to what gives us a benefit for that alternative."

7b-09
cont.

The alternative in the DEIR, not only did not hit the sweet spot, the chosen sizes for the residential units are much smaller than other apartment projects. The DEIR also uses the averages size for hotel rooms in the alternative which is smaller than for the proposed project. This alternative includes 25 (or 37) "hotel rooms (450 square feet per room) and 25 residential units (800 square feet average size per unit), consisting of 12 two-bedroom units and 13 one-bedroom units."

1. The hotel rooms in the proposed 62 room hotel project includes 3 ADA accessible rooms, 45 standard rooms, 6 queen double rooms and 8 suites. The average size is approximately 480 square feet. The 50%-50% alternative must include the same mix of hotel rooms, and thus the same average square footage, but does not.
2. The average size of 25 residential units is much smaller than recent approved market rate apartment projects and is even smaller than the size of the 8 residential unit addition alternative, which itself has smaller than normal one-bedroom apartments. The 50%-50% alternative should use an average size for the residential units of around 946 square feet (780 square feet for one-bedroom and 1,127 square feet for two-bedroom).
 - a. The market rate two bedroom apartments at the Gateway project are 1,261 to 1,275 square feet. There are no inclusionary affordable two-bedroom apartments at the Gateway project. There are no market rate one-bedroom apartments at the Gateway project to compare against.
 - b. In the 8 residential unit addition alternative, the average size of the one-bedroom units is approximately 540 square feet and the average size of the two-bedroom units is approximately 1,330 square feet. Using the sizes for 12 two-bedroom units and 13 one-bedroom units yields an average size of approximately 920 square feet.
 - c. However, as mentioned, at 540 square feet, the one-bedroom units in the 8 residential unit addition alternative, is smaller than usual, even smaller than the average size of the one-bedroom apartments in the all affordable Altamira Apartments. Looking at the two recent market rate apartment projects, the Oliva⁴ and Taub⁵ apartments, the average size of all of the one-bedroom apartments in these 2 projects is 780 square feet and for all two-bedroom apartments is 1,127 square feet. Using these sizes for 12 two-bedroom units and 13 one-bedroom units yields an average size of approximately 946 square feet.

7b-10

⁴ The Oliva Apartments, a mix of 1 and 2 bedroom apartments, has an average unit size of 1,057 square feet. "The apartments consist of six 1 bedroom/1 bath units (704-712 square feet), sixteen 2 bedroom/2 bath units (956-1,153 square feet), and eight 2 bedroom/2.5 bath units (1,349-1,477 square feet) with an average unit size of 1,057 square feet."

https://storage.googleapis.com/proudcity/sonomaca/uploads/2017/11/2_Oliva-Apartments-655-W.-Spain-Initial-Study-MND-R2.pdf

⁵ The Taub Apartments at 19410 Sonoma Hwy has 6 one-bedroom apartments at 850 square feet and 6 two-bedroom apartments at 1056 square feet.

<https://sonomacity.civicweb.net/document/15414>

Bill Hooper of Kenwood Investments at the September 4th, 2018 Planning Commission meeting said, "For the residential alternative, we were asked to provide a little bit of information on the 50/50 analysis. We offered that a typical residential unit would be around 800 square feet, where our hotel rooms are only 450 square feet. We provided that data to guide staff and consultant on the analysis of that alternative." It appears that this information was accepted without regard to verifying if it was accurate or appropriate for the 50/50 alternative, nor adjusting the numbers to arrive at a design which met the city council's directives of providing an alternative which reduces the environmental impact.

7b-11

Using the correct size of hotel rooms would reduce the number of rooms from 25 to 24 (or 37 to 35). Using the correct size of residential units would reduce the number of residential units from 25 to 21. However, this still increases the overall size of the building area. The 50%-50% alternative should use the same building area as the proposed project, which would require reducing the number of hotel rooms and/or residential units even more.

7b-12

Note: any increase in size of building area based upon size of hotel rooms and residential units must take into account the extra building area not in the rooms or units, such as hallways, stairwells, and elevators. It appears that this was not the case.

This error in choosing the size and number of hotel rooms and residential units throws off many of the calculations on the environmental impact of the 50%-50% alternative.

Public Services – 50%-50% Alternative

In section 6.5.9 PUBLIC SERVICES, the DEIR has a contradiction. It states, "As set forth in California Government Code Section 65995, the payment of development fees mitigates any impact to school districts..." But then it states, "The increased service demands and student generation would result in a slightly more severe impact in comparison to the proposed Project." However, if the development fee mitigates any impact to school districts, then there cannot be "slightly more impact" to school districts after mitigation. As for impacts to service demands, the DEIR states, "overall service demands for fire and police protection would be similar to those of the proposed Project."

7b-13

The 50%-50% alternative uses 2.13 persons per household for calculating environmental impact for both Public Services and Utilities and Service Systems. The cited internet document from the state actually indicates 2.10, not 2.13, persons per household for the city of Sonoma. Also, this number was taken from data which includes all households, including 3 and 4-bedroom residents and single family residences. The 50%-50% alternative has only 1 and 2 bedroom units.

7b-14

According to Census Bureau's 2012-2016 American Community Survey⁶, within the geographic area which includes Sonoma the average number of persons living in one-bedroom units is 1.17

⁶ These averages are for housing units, excluding group quarters. From the Census Bureau, 2012-2016 American Community Survey data file contains data for a geographic area called Public Use Microdata Area (PUMA). Source: 2012-2016 ACS 5-year Public Use Microdata Samples (PUMS) - CSV format

and living in two-bedroom units is 1.75. The same survey indicates that for residences, the average number of persons per household is 2.02. Even adjusting for the difference between the state and Census Bureau averages for all households, the DEIR could use a rate of 1.23 persons per residential unit for one-bedroom and 1.81 for two-bedroom units⁷, not 2.13.



ACS-ss16hca-housin
g-Sonoma.xlsx

7b-14
cont.

Using 1.23 and 1.81 persons per residential unit would actually reduce the impact to overall service demands for fire and police protection versus the proposed Project.

Table 6-1 needs to be updated so that Public Services shows "Less Severe Impacts" for the 50%-50% alternative.

Air Quality, GHG Emissions, and Noise – 50%-50% Alternative

The DEIR states in section 6.5.2, that there would be slightly more severe air quality impacts, section 6.5.6 that there would be slightly more GHG emissions, and 6.5.8 slightly more noise impact because of the need to expand the underground garage for the residential units. However, since the 50%-50% alternative is flawed in specifying the number of residential units and hotel rooms comprised in this alternative, the underground garage may not need expansion.

Walk Score rates cities, neighborhoods and addresses on proximity to amenities useful to residences within walking distance. It is a 100-point system, with anything over 80 being good. (See walkscore.com) A Walk Score correlates to vehicle trips and GHG emissions.

The location of the Hotel project on West Napa St has a Walk Score of 91, "Daily errands do not require a car", which Walk Score calls a "Walker's Paradise." Note that the affordable housing development, Altamira Apartments, on Broadway and Clay, across from Train Town, has a Walk Score of 58. The site of the once proposed FSE project has a Walk Score of from 58-64.

7b-15

Below are the Walk Scores for the housing opportunity sites (listed in the city's Housing Element document) in the city of Sonoma, which are not already under construction:

Housing Opportunity Location	Walk Score
216 First Street East	64
226 First Street East	58

(https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_pums_csv_2012_2016&prodType=document)

California Housing Unit Records:

https://www2.census.gov/programs-surveys/acs/data/pums/2016/5-Year/csv_hca.zip

The PUMA covering the city of Sonoma includes most of Sonoma County, but excludes the cities of Santa Rosa, Rohnert Park, Cotati, and Petaluma. <https://tigerweb.geo.census.gov/tigerweb/>

⁷ 1.17211329 * 2.10 / 2.023106547 = 1.233712871

1.747454175 * 2.10 / 2.023106547 = 1.813870739

254 First Street East	64
parking lot south of hospital (Hayes/W MacArthur/4th St W)	56-67
19910 Fifth Street West	57
700 Curtin Lane	67
45 & 69 Napa Road	50
20269 Broadway	58
477 West Napa Street (Safeway property)	84
19320 & 19330 Sonoma Highway	69

7b-15
cont.

As you can see, the only one with a score greater than 80 is the Safeway property. In their expansion plans presented to the city, Safeway did not include any housing.

So, one of the best places in Sonoma to put new homes to limit vehicle trips, VMT and GHG is right on the hotel project site. The fact that the project site has slightly less severe impact to VMT and GHG than other sites in Sonoma for housing should have been noted in the DEIR.

Transportation and Traffic, Utilities and Service Systems - 50%-50%

Alternative

Section 6.5.10 and 6.5.11 state that this alternative would have similar impact to the proposed hotel project. Since the 50%-50% alternative is flawed in specifying the number of residential units and hotel rooms comprised in this alternative, the vehicle trips, utilities and service systems for the alternative are actually less than with the hotel project.

7b-16

Why does section 6.5.10 Transportation and Traffic say the impact of the 50%-50% alternative “would result in similar impacts compared to the proposed Project” and not slightly less severe impact? Clearly table 6-2 shows fewer Daily Trips and fewer Weekday PM Peak hour trips. If the correct size and allocation of residential unit sizes were used, the Weekend Peak Hour Trips would also be less.

Parking - 50%-50% Alternative

Besides the before mentioned error in calculating the number of hotel rooms and residential units, the DEIR states the 50%-50% alternative adds 12 parking spaces, but this fails to take into account fewer parking spaces needed because a smaller hotel would have fewer employees.

7b-17

Project Objectives - 50%-50% Alternative

Section 6.8.2 states, “Under the Hotel/Residential (50%-50%) Alternative, the Project would not fully meet the following objectives:

- Construct a 62-room hotel, restaurant, and spa on an infill site in downtown Sonoma, CA.
- Provide full- and part-time local employment opportunities to fill positions expected to operate the hotel and restaurant.

7b-18

The objective per CEQA should be to develop a hotel. The 50%-50% alternative would meet this objective. Section 15126.6 of the CEQA Guidelines, Consideration and Discussion of Alternatives to the Proposed Project, states:

“(a) Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the *basic* objectives of the project...” (Emphasis added.) Note the word “basic”. “Construct a hotel” is basic. “Construct a 62-room hotel” is too restrictive.

If this alternative does not meet the objective of constructing a restaurant, then instead of removing the restaurant, it should have remained and been made smaller. The city council resolution did not stipulate removing the restaurant, so there was no reason to remove it as part of this alternative. It is obvious that removing the restaurant was not part of the resolution for this alternative, since the resolution request a separate alternative with a reduced hotel size AND the restaurant removed. If the city council wanted the restaurant eliminated in the 50%-50% alternative, this would have been included in the resolution.

Also, the 50%-50% alternative still meets the basic objective of providing employment opportunities, which is the basic objective.

7b-18
cont.

Eight Residential Unit Addition Alternative

In the 8 residential unit addition alternative, the average size of the one-bedroom units is approximately 540 square feet, which is much smaller than the average size one-bedroom apartments in recently approved apartment complexes. See details on apartment sizes in the Hotel/Residential 50%-50% alternative section above.

7b-19

EIR for Proposed Project Comments

Impact on Pedestrians

Trans-6A mitigation, curb extensions, is inconsistent with Circulation Element of the General Plan, which specifies future Class II Bike Lanes on West Napa Street. West Napa Street may not be wide enough to include the curb extensions, bike lanes and the center median on the west side of the intersection.

7b-20

Page 4.10-32 states, “The modifications to the intersection of West Napa Street/First Street West, as required per Mitigation Measure TRANS-6A, must be designed to accommodate future installation of Class II bicycle lanes, as shown on the conceptual drawing of potential improvements.” However, the drawing does not show any bicycle lanes.

There are no detail designed improvements for mitigation measure TRANS-6A. Whatever improvements are required to improve pedestrian safety at West Napa Street/First Street West to a level of less-than-significant must be designed and included as part of the project scope and analyzed in the EIR. There is no definitive commitment or time-line for the City to determine the improvements to West Napa Street/First Street West. The city may decide not to add curb extensions at this intersection, if it finds that they are impractical due to the large delivery trucks

7b-21

needing to turn onto 1st St West to get to the loading zone on that street. (This is yet another reason why the design must be determined and vetted by the city and CalTrans.)

7b-21
cont.

Design consideration also needs to include turning delivery trucks and emergency vehicles. From the San Francisco Guide on Street Design⁸, “Emergency vehicles: All streets greater than 150’ in length should accommodate emergency vehicle (WB-40) turns within the full right-of-way of the intersection. Because emergency vehicles have sirens and flashing lights and other vehicles must pull over, they can typically use the full right-of-way without encountering opposing vehicles. On busier streets, the ability of emergency vehicles to swing wide may be limited by queued traffic which may not be able to pull over.” Also, “Where bike lanes are present, curb extensions should be set back so that the gutter pan does not extend into the bike lane.” Since the developer cannot obtain a grading permit until the improvements are completed, if the city takes too long to design and implement the improvements, the developer may ask for that mitigation TRANS-6A be removed from the conditions of approval. If the mitigation is not completed, then the impact most definitely becomes significant.

7b-22

The DEIR simply defers the mitigation to the City with no specific plan, design or analysis and without articulating specific performance criteria with mitigation measures designed to satisfy the criteria.

Allowing some of the parking for the project across the street presents a pedestrian safety hazard. Many of the employees who park across the street will walk directly across highway 12 in the middle of the block. I have observed pedestrians already doing this. And this is legal since there is no traffic signal at 1st St E and W. Napa St. There is a high potential for pedestrians to be hit by the traffic.

7b-23

Pedestrian impact on Traffic

The impact of pedestrians on traffic continues to be inadequately analyzed. Hotel guests are going to make a complete trip around the Plaza. They will start by crossing West Napa St. at 1st Street West (let’s face it, the BofA building is not very inviting), continue up 1st Street West, stop at a couple of shops and tasting rooms and on the way, crossing West Spain Street, then 1st Street West again, heading east. They make a complete loop, eventually crossing East Napa and 1st Street East, then cross Broadway.

Starting on page 4.10-14 of the DEIR, it states “An approach (to evaluate traffic delays which includes the impact of pedestrians) based on simulations was researched, but the results were found to be inconsistent with actual field conditions; further, they could not be reliably reproduced so it could not be determined with any confidence whether increases in delay were due to the project or just the random seeding of traffic within the model.”

7b-24

As part of the appeal, after I pointed out that city policy cannot be used to make an impact less than significant, the traffic consultant performed simulations which included pedestrian impact to traffic at the intersection of West Napa Street and 1st Street West. The traffic consultant expressed confidence that running 10 simulations showed that curb extensions indeed mitigated a significant impact to traffic. Here is my response which I sent to the city council:

⁸ http://www.sf-planning.org/ftp/BetterStreets/docs/FINAL_5_Street_Designs.pdf

“For the simulation runs (aka trials) on the traffic delays at 1st St W and W Napa St only ten simulations were run. If the randomization used the Monte Carlo sampling technique, then 10 simulation runs is inadequate. Around 500 runs are needed to achieve a 95% confidence level. Typically, for retirement planning, 10,000 trials are run. If Latin Hypercube sampling technique was used for sampling, fewer trials are needed than Monte Carol, but 10 trials will produce results with poor confidence.”

Now it seems that the traffic consultant agrees with me that the simulations do not predict what happens in the real life around the Plaza.

The DEIR continues, “The approach applied was therefore based on increasing the volumes through use of the Peak Hour Factor (PHF), which is a ratio between the volume during the highest 15-minute period and the total volume for the hour. Application of a lower PHF increased the traffic volumes to reflect the additional conflicts associated with pedestrians, which increased delay and queuing to levels more consistent with actual observed conditions.” These actual observed conditions are only samples in a narrow range of conditions not including the extreme condition of when a large number of pedestrians crossing the street completely stops traffic.

For example, here is a chart showing a selection of possible observations with random deviation of an exponential function.

- Series1 is the exponential function, $y = 1.1^x$.
- Series2 is the same exponential function with a random deviation for y.
- Series3 is the straight line function, $y = 0.5 * x + 0.3$.

The following chart shows the results for values of x from 1 to 10:

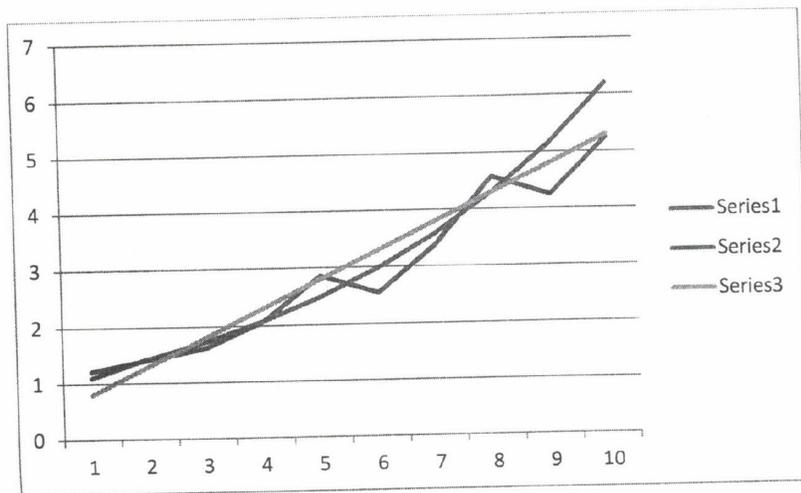


Chart 1: x=1 to 10

The following chart shows the results for values from 1 to 25.

7b-24
cont.

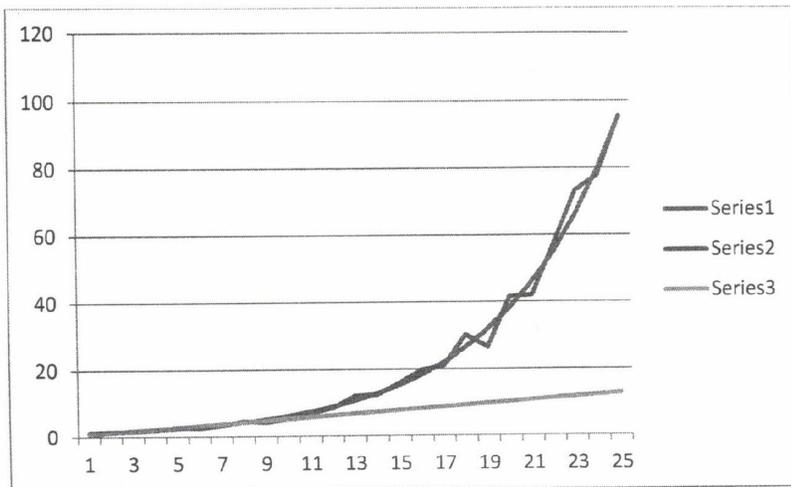


Chart 2: x =1 to 25

By not extending the observations past $x = 10$, (Chart 1) the observed values (Series2) could fit either the linear or exponential function. However, it is clear from Chart 2 that the function is exponential, not linear. The observations of pedestrian impact on traffic flow must either have a large number of observations to smooth the curve or extend closer to the steep slope of the function to be conclusive. It is obvious that this was not the case in the traffic study.

**7b-24
cont.**

Absent pedestrians, vehicular traffic will continue to move through a four-way stop intersection, no matter how big the back-up, because cars take their turn traversing the intersection. The increase in delay when you add more vehicles is linear at a four-way stop intersection without pedestrian interference. However, the impact of pedestrians on traffic at an unsignalized intersection is exponential, not linear⁹. With a significant number of pedestrians, the intersection vehicle flow resembles a 2-way stop controlled intersection, where cross traffic (through lanes) does not stop. At such an intersection, when traffic reaches a saturation point in the through lanes, the cross traffic at the stop signs will not be able to enter the intersection¹⁰. Pedestrians act like the vehicles in through lanes.

At some point at a two-way or four-way stop intersection, when you reach a steady stream of pedestrians, traffic stops dead, unless a group of pedestrians allows a vehicle, which creeps into the intersection, to pass. You can witness this near the Plaza after the 4th of July fireworks, as I have numerous times at the intersection of West Spain Street and 2nd Street West.

Thus, the “Peak Hour Factor” approach is flawed. The traffic study failed to use any government, academic, or industry accepted methodology specifically for analyzing the impact of pedestrians

⁹ See formula in *Impacts of Pedestrians on Capacity and Delay of Major Street Through Traffic at Two-Way Stop-Controlled Intersections* <https://www.hindawi.com/journals/mpe/2015/383121/>

¹⁰ *Congestion analysis of unsignalized intersections* <https://arxiv.org/pdf/1802.06858.pdf>

on traffic at unsignalized intersections. There is no estimate for the saturation point, where a steady stream of pedestrians essentially stops all traffic. From real world experience, the number is somewhere between the typical pedestrians per seconds seen at Plaza intersections and an estimated 10 pedestrians per second observed after the 4th of July fireworks. The Peak Hour Factor approach chosen for the impact to traffic does not have a saturation point where all traffic stops, only a saturation flow rate, at which vehicles continue to advance through the intersection.

Again, from the DEIR, the method used “increased delay and queuing to levels more consistent with actual observed conditions.” However, the complete stoppage of traffic was not observed, thus, the Peak Hour Factor method was not validated to determine if it accurately predicts the pedestrian arrival rate at which all traffic stops. The traffic consultant deems the simulation inaccurate, but at one time deemed it accurate. The method used in the DEIR for pedestrian impact on traffic is not accurate when there is a steady stream of pedestrians.

Therefore, the impact of the increase in pedestrian traffic generated by the proposed project cannot be determined to be less than significant. It can only be determined to be “potentially significant.” So, either the impact needs to be mitigated at all intersections around the Plaza, or deemed “significant, unavoidable.”

Traffic Impact Analysis

Existing traffic volume data was collected on May 8, 2018 (weekday PM peak) on May 12, 2018 (weekend peak). The traffic counts should have been collected in September or October. The number of people employed and the number of tourists drops in May compared to September in the prior year.

For Sonoma County in September 2017 there were 267,200 people employed¹¹. In May 2018 this was down to 262,400, for a difference of 4,800. May 2018 employment in Sonoma County was 1.8% lower than the previous September.

Employed residents in the City of Sonoma, Boyes Hot Springs, El Verano, Fetters Hot Springs and Agua Caliente¹²: September 2017 was 14,100; May 2018 was 13,900, for a difference of 200. In the city of Sonoma, plus the Springs, employment was 1.42% lower in May 2018 than the previous September.

Since 2014, the averaged decrease in hotel room nights rented from September to May of the following year is 11.8%. For 2014 through October 2016 (October 2017 not used because of the devastating wildfires), the decrease in hotel room nights rented is averaged 14.7%.

More people employed in the area and more tourists in the city of Sonoma translate to more traffic in September and October than in May. This calls into question the accuracy of both the Left Turn Analysis and intersection LOS (Level of Service) calculations.

¹¹ [http://www.labormarketinfo.edd.ca.gov/file/indhist/satr\\$hwxs.xls](http://www.labormarketinfo.edd.ca.gov/file/indhist/satr$hwxs.xls)

¹² <http://www.labormarketinfo.edd.ca.gov/cgi/dataanalysis/areaselection.asp?tablename=labforce>

7b-24
cont.

7b-25

Further evidence that the collection of traffic volumes was performed at a less than peak time of year, is to compare the numbers to the traffic study performed in June 2014 for the latest Circulation Element of the General Plan. The PM Peak for the delay and LOS for the two intersections in common are less in the DEIR than the Circulation Element. Table 4.10-4 is from the DEIR:

TABLE 4.10-4 SUMMARY OF EXISTING PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection <i>Approach</i>	Existing Conditions			
	PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS
1. W Spain St/First St W	23.1	C	26.4	D
2. W Napa St/Fifth St W	30.1	C	28.2	C
3. W Napa St/Second St W	27.0	C	21.2	C
4. W Napa St/First St W	26.6	D	25.7	D
<i>Northbound Approach</i>	11.4	B	11.6	B
<i>Southbound Approach</i>	11.7	B	16.0	C
5. Napa St/Broadway	26.7	D	24.2	C
6. E Napa St/First St E	13.6	B	13.4	B

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersection are indicated in italics.
Sources: W-Trans 2018.

7b-25;
cont.

From the Circulation Element:

Table CE-3: Intersection Levels of Service

Intersection	Type of Control	Year 2014	Year 2030	Year 2040
1. Sonoma Hwy (SR 12)/Verano Ave	Signal	22.7/C	25.3/C	28.4/C
2. Sonoma Hwy (SR 12)/Maxwell Village Center	Signal	18.3/B	20.9/C	22.7/C
3. Sonoma Hwy (SR 12)/W Spain St	Signal	26.0/C	33.1/C	43.5/D
4. Fifth St W/W Spain St	All-Way Stop	40.0/E	44.7/E	46.4/E
a. Add EB and WB right turn lanes	All-Way Stop	n/a	31.6/D	33.9/D
b. Install mini-roundabout	Mini Roundabout	n/a	11.6/B	13.1/B
5. Sonoma Hwy (SR 12)/Riverside/W Napa St	Signal	15.9/B	16.3/B	17.5/B
6. Fifth St W/W Napa St (SR 12)	Signal	37.3/D	47.5/D	59.5/E
Add SB right-turn lane and EB overlap	Signal	n/a	n/a	43.0/D
7. Broadway (SR12)/Napa St	All-Way Stop	32.2/D	53.0/F	58.7/F
a. Install traffic signal	Signal	n/a	51.2/D	58.6/E
b. Install single-lane roundabout	Roundabout	n/a	9.6/A	11.7/B
8. E Napa St/Fifth St E Northbound Approach	Two-Way Stop	1.7/A	2.1/A	2.4/A
		12.3/B	13.5/B	14.3/B
9. Eighth St E/E Napa St Northbound Approach	Two-Way Stop	6.1/A	6.4/A	6.6/A
		12.3/B	12.9/B	13.4/B
10. Fifth St W/W MacArthur St	All-Way Stop	17.1/C	21.1/C	24.8/C
11. Broadway (SR 12)/MacArthur St	Signal	17.4/B	19.3/B	21.2/C
12. Fifth St E/E MacArthur St	All-Way Stop	8.9/A	11.2/B	13.7/B
13. Fifth St W/Leveroni Rd	Signal	11.6/B	12.7/B	13.5/B
14. Broadway (SR 12)/Leveroni Rd/Napa Rd	Signal	36.7/D	44.6/D	51.1/D
15. Fifth St E/Napa Rd	All-Way Stop	39.5/E	44.6/E	49.3/E
Install traffic signal	Signal	n/a	10.0/A	11.6/B
16. Eighth St E/Napa Rd	Signal	21.5/C	34.1/C	48.2/D

Results are expressed as Delay/LOS; Delay is measured in average seconds per vehicle; LOS = Level of Service; Bold=operation below LOS D; italicized rows reflect mitigated or alternate configurations; NB=Northbound; SB=Southbound; EB=Eastbound; WB=Westbound

7b-25
cont.

In Trans-1, Trip Distribution, the DEIR states, "Because of the limited number of new trips, 10 percent was considered the minimum distribution." This is a good practice for those intersections which would otherwise be below 10%, but wrongly decreases the trip distribution at other intersections which have more traffic. What would the trip distribution have been for those intersections with more than 10%, if a minimum of 10% were not given to the two intersection and how would this impact the "Trip Assignment by Study Intersection" and LOS at those intersections? (tables 4.10-7 and 4.10-8) Same question for future, plus project calculations.

7b-26

Friday PM peak traffic not analyzed. There is more traffic on Fridays than the rest of the weekdays.

7b-27

Traffic study at MacArthur Place was in late June, early July. Peak period is in September and October. October room-nights rented average 16.6% higher in October versus June, 2012 through 2015. This would bring MacArthur Place PM peak hour traffic above that projected by ITE standards.

7b-28

Why were the intersections of Highway 12 and Verano Avenue and Highway 12 and Siesta Way, arguable the worst traffic delayed intersection in the valley and within 2 miles of the project, not analyzed for traffic impacts?

7b-29

Mitigating Traffic Impact

Page 1-4 of the DEIR states, "Pedestrian Circulation. The Project is planned to be pedestrian oriented by encouraging hotel guests to park their vehicles for the duration of their stay and walk or bike in and around the Sonoma Plaza area."

This is overly optimistic. Tourists come to Sonoma to go wine tasting at wineries and to attend weddings. Public transportation is completely inadequate to go to wineries and very few tourists bicycle to wineries. On the rare occasion I have seen bicyclists at wineries, the most I have seen is 6 to 8, where there can be 50 to 100 other people tasting wine who have driven to the winery. It is almost impossible to carry more than half a case of wine on a bicycle. Besides providing bicycles, there is nothing in the conditions of approval to require the hotel to discourage hotel guests from visiting wineries which would require private vehicles to get to them. Other than the avid bike rider, most tourists will not take bicycles to wineries, as all but one or two are too far, it is unsafe on the rural roads, and too hot during most of the summer. The average highs during the summer are in the upper 80's to 90 degrees, often with temperatures in the upper 90s or even over 100 degrees¹³.

7b-30

Trans-7A in Table 1-1 identifies "Significance with mitigation" as "N/A". This is incorrect. The intersection of 5th Street West and West Napa Street changes from a LOS D to E in the future with the project in the westbound and northbound direction. (page 148 and 151 of pdf) The intersection improvement with a right turn lane and signal will not significantly reduce delays since:

1. the vast majority (more than twice) of the southbound traffic is through traffic.
2. the significant impact to traffic LOS is in the westbound and northbound direction, especially the westbound traffic LOS which changes from D to F.

There are 2 other problems with using the potential changes at this intersection in determining future LOS.

1. Again we have a mitigation taken place in the future, rather than being done simultaneously with the project.
2. The intersection should have been analyzed with and without impacts of the project. For example:
 - a. future without the intersection improvement versus future without the intersection improvement plus the project,
 - b. future with the intersection improvement versus future with the intersection improvement plus the project.

7b-31

¹³ <https://www.usclimatedata.com/climate/sonoma/california/united-states/usca1076>

Other Traffic Issues

The service vehicles having no on-site loading area has not been adequately addressed. This will require the removal of several street parking spaces on both the north and south sides of the 1st Street West parking lot driveway. Also loading will create a significant impact causing congestion on First St. W. and unsafe conditions, where delivery drivers unloading their trucks and getting in and out of the driver’s side disrupt traffic.

7b-32

The delivery trucks on 1st Street West pose a safety issue with children living in the apartments and townhomes on 1st Street West south of the project. Pedestrian safety was not analyzed on 1st Street West, south of the project. At the corner of First Street West and Andrieux, there is an apartment complex where children live.

7b-33

DEIR states: “Given that the proposed project is located within Downtown Sonoma, it is reasonable to assume that some project patrons and employees will want to walk, bicycle, and/or utilize transit to reach the hotel.” On weekends, the last bus from Sonoma towards the Springs, Glen Ellen and Santa Rosa leaves Sonoma Plaza too late for any restaurant employees to take the bus and it is too dark to ride a bicycle, so they will drive to get to work. There is no longer bus service to/from Napa. Buses to Petaluma and San Rafael do not even run on weekends. Also, buses do not run very frequently, often more than an hour apart and up to 4 hours apart. Public transit is not a viable option for employees when it is needed the most. And in order for employees to bike to work, they would need to live in Sonoma or nearby. As detailed later, this is unlikely. If none live within 10 miles, then it is not reasonable to anticipate any will bicycle to work.

7b-34

Tourists don’t even take public transportation, because the frequency and routes are not conducive to bringing tourists to their desired destinations. Sonoma is not New York, Paris or even San Francisco in regards to the convenience of public transit.

Left Turn Analysis

Because of the lower than peak season dates for the collection of traffic data, as shown above, more people employed and more hotel guests throughout Sonoma result in more vehicle trips than the numbers used for the left turn analysis. Using correct vehicle traffic numbers (September or early October) would put left turn warrant over the threshold for “Future plus Project - Weekday PM Peak Hour”, since the threshold was only 2 left-turning vehicles away from being reached.

7b-35

As for not using MacArthur Place numbers in the left-turn lane analysis, saying that more inbound vehicles would go to Saddles restaurant between 5 and 6 pm, than the project's restaurant because it is bigger is just pure speculation. Restaurants in Sonoma are not full by 6pm. That is like saying that if you have an 80 seat restaurant that is half full at 6pm (40 diners) that if you double the size of the restaurant that somehow miraculously, another 40 diners will show up by 6pm.

7b-36

The left turn-warrant calculations are close to meeting the requirement to install a left turn lane on westbound W Napa St into the hotel driveway.

7b-37

1. The allocation of 10% of trip distribution to/from the parking lot on First St. W is not included the left-turn warrant calculations. The trip allocation even ignores that “during weekday evening peak traffic periods (4:00 p.m. and 6:00 p.m.) and weekend midday peak hours (12:00 noon and 2:00 p.m.) guests would depart via a one-way vehicle ramp from the parking garage onto First Street West” (page 1-4). The diagram of the hotel shows this parking lot would have 6 staff parking spaces and 6 spaces for valet parking. However, if the use of parking spaces at the Bank of Marin is approved, the employee parking will be moved to that location, resulting in the entire 12 spaces used for valet parking. Valet parked vehicles will be moved from the 1st St W parking lot to the hotel driveway on W Napa St when guests pick up their vehicles, as the driveway from the hotel to 1st St W is a one way exit. The 2 most likely paths of travel for valet parking attendants will result the vehicles being driven through the intersection of Napa St and Broadway, (unless the valet attendants make an illegal left turn from 1st St W onto W Napa St.) then turning left into the hotel driveway on W Napa St.
2. The Directional Distribution factor used by the W-Trans engineer for Entering driveway was 51% (from the ITE Trip Generation Manual, 9th edition) instead of 61% observed at MacArthur Place entering during peak. This alone would increase traffic turning left into the driveway such that a left turn lane is warranted. As stated in ITE research documents, a local comparable use is always a far more accurate estimate of traffic generation, than nationwide samples of a use (e.g. hotel), because these surveys include uses with many that are not comparable to the specific use being analyzed. (Note: the MacArthur Place traffic study was flawed in determining the number of vehicles entering and exiting, due to the fact that many vehicles are parked on the street, rather than using the parking lot, as well as the study being performed in June, not the peak tourist period of September and October. However, the entering percentage should still be valid, if not on the low side because of cars parking on the street rather than entering MacArthur Place.)
3. Since the Umpqua Bank lobby is closed on Saturdays, the weekend peak calculations used 0 trips for the bank, even though the bank has an outside ATM. Customers use the ATM outside the bank, which is open 7 days a week, 24 hours a day.
4. Table 4.10-5 subtracts trips for existing uses which are to be removed. However, the warehouse space has been empty for a number of years and the retail space to be demolished houses the office space for Sonoma Brands. Therefore, the “existing trips” in this table are higher than actual. There are no existing trips for the warehouse space. For the other building to be demolished office space category, not retail space category should be used for calculating existing trips. Better yet, use real data. I called Sonoma Brands and was told that they currently have 8 employees at 153 West Napa Street. Daily and peak hour trips for the demolish of this building should be calculated based upon 8 employees.

7b-37
cont.

Discrepancy in Traffic Volumes between Traffic Counts and Left Turn Warrant Analysis
East bound traffic on West Napa St from 2nd St W numbers in the left turn analysis do not match the traffic volume listed in subappendix K.1.

7b-38

From subappendix K.1, Weekday PM, existing, plus project: 428 eastbound through + 79 northbound 1st St West right turn + 39 southbound 2nd St West left turn = 546 heading east on West Napa Street towards the hotel project.

HCM 2010 Signalized Intersection Summary
3: 2nd Street W & W. Napa Street

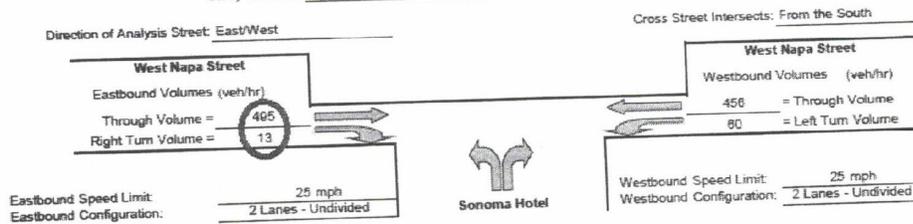
05/22/2018

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	28	428	96	71	357	22	272	82	79	39	75	17

However, in subappendix K.3, the left turn warrant analysis, Existing plus Max – Weekday PM Peak Hour Threshold has a total of 508 vehicles arriving from the west (495 through + 13 turning into project parking = 508). The total should be 546, which would put traffic volume over the threshold, warranting a left turn lane.

Turn Lane Warrant Analysis - Tee Intersections

Study Intersection: West Napa Street/Sonoma Hotel Driveway
Study Scenario: Existing plus MAX - Weekday PM Peak Hour Threshold



Eastbound Right Turn Lane Warrants
1. Check for right turn volume criteria

Westbound Left Turn Lane Warrants
Percentage Left Turns %lt: 11.8 %
Advancing Volume Threshold AV: 518 veh/hr

There is also a discrepancy for the future plus project eastbound traffic numbers.
Subappendix K.1, existing with project:
HCM 2010 Signalized Intersection Summary
3: 2nd Street W & W. Napa Street

04/03/2018

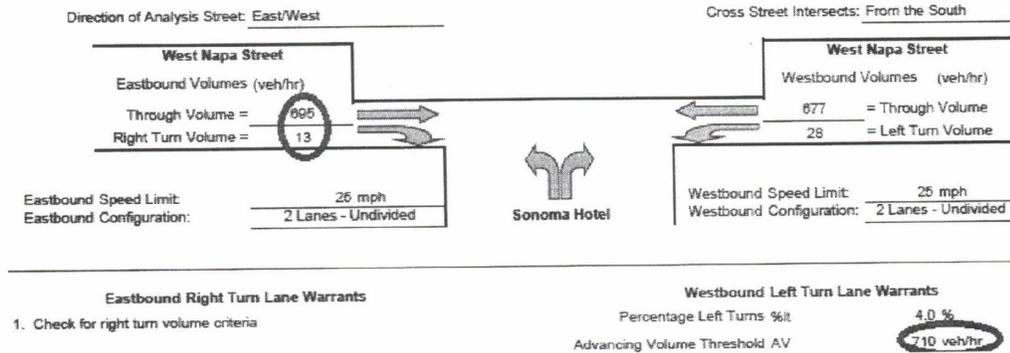
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	55	552	142	84	540	36	358	122	82	77	112	36

Subappendix K.3, future plus project:

7b-38
cont.

Turn Lane Warrant Analysis - Tee Intersections

Study Intersection: West Napa Street/Sonoma Hotel Driveway
 Study Scenario: Future plus Project - Weekday PM Peak Hour



7b-38
cont.

From subappendix K.1, future with project, weekday PM peak: 552 eastbound through + 82 northbound right + 77 southbound left = 711. From subappendix K.3, future plus project, weekday PM peak, 695 eastbound through + 13 eastbound right turn = 708. This should be a total of 711, which puts the volume of traffic over the threshold of 710 vehicles per hour.

Solid Waste and Recycling

The DEIR states, "The Project would comply with the recycling requirements of the City of Sonoma." However, the city does not mandate biodegradable/compostable recycling. The hotel and restaurant should be required to recycle their compostable waste, as 50 to 70 % of restaurant waste is compostable, which should be recycled rather than sent to the land fill. The increase in biodegradable/compostable waste generated by the project is a significant impact, which should be mitigated with the requirement to recycle the biodegradable waste.

7b-39

Consistency with City Council Adoption of 22 Local Climate Protection Measures

The city-adopted Measure 4-L1, Mixed-Use Development in City Centers and along Transit Corridors, p. 3-43 of county Climate Action 2020 textbook, is consistent with the CA2020 goal of reducing travel demand through focused growth. The annual GHG reduction potential is high, 3,494 metric tons of CO2 equivalent. This is now a specific city goal and planning parameter. Waiving the residential component requirement is inconsistent with the Climate Action 2020 goals.

7b-40

Land Use Impact

Missing and Erroneous Information

Table 3-1, Existing Project Site includes a "3-story building (Lynch Building) featuring retail, offices, and seven studio apartments, and a parking lot." But, section 4.12.1 under "Existing Conditions" fails to mention the seven studio apartments in the Lynch Building, stating that the "Project site is developed with commercial uses."

7b-41

The same section states, "An existing retail building known as the Feed Store at the southwest corner of West Napa Street and First Street West and its parking lot located on First Street West are located directly east of the Project site..." And later, "there are some residential neighborhoods nearby but not adjacent to the Project site." The Feed Store actually does contain residential units. One is currently a vacation rental.¹⁴

7b-42

Waiver of Residential Component

California Code of Regulation, Title 14, Chapter 3, Appendix G, §X, Land Use and Planning
Would the project:

- a) *Physically divide an established community?*
- 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

The EIR fails to identify a land use impact that it conflicts with the Development Code. A project creates a land use impact if it conflicts with an applicable land use plan, policy, or regulation including, but not limited to the general plan, specific plan, or zoning ordinance adopted for the purpose of avoiding or mitigating an environmental effect (appendix G of CEQA). The Development Code is such a regulation and is where the residential component requirement in new commercial development is contained. The General Plan also mentions the residential component requirement, along with providing the policy and reasoning.

The General Plan policy is to build mixed-use projects in the Commercial Zone, including Downtown, but the project is asking for a waiver to the residential component requirement.

7b-43

General Plan, Community Development Element

The Land Use Plan

Town Center and Northern Hills

"Starting from the center of town at the Plaza, the Land Use Plan maintains the existing commercial district and seeks to enliven it with an additional residential presence through mixed use development and added higher density housing in established multifamily areas surrounding the commercial core."

General Plan, Community Development Element, Land Use Designations, Table CDE-3: Land Use Definitions : "Commercial: This designation is intended to provide areas for retail, hotel, service, medical, and office development, in association with apartments and mixed-use developments and necessary public improvements."

General Plan, Housing Component

¹⁴ <https://www.staysonomavalley.com/feed-store-loft>

“Furthermore, within its Gateway Commercial, Commercial, and Mixed Use districts, the City requires new development to include a residential component of at least 50 percent of the total building area.”

(Note: The Community Element of the General Plan does allow for a residential component waiver, but only mentions it for the Mixed Use zone. Saying the residential component in the Mixed Use zoning is required, “unless an exemption is granted through use permit review.” In the Housing Component of the General Plan there is no mention of Planning Commission able to waive the residential component. Does this mean the Development Code is allowing something which is inconsistent with the General Plan?)

LU-1 states, “The residential component required in the Sonoma Development Code is intended to increase the residential housing supply near commercial uses and within in the city as a whole, and is not intended for the purpose of avoiding or mitigating an environmental effect.” This is not true. In the Housing Element of the General Plan, it states, “Furthermore, within its commercial and mixed use land use districts, the City now requires new development to include a residential component of at least 50% the total building area, a policy that has proven effective in integrating housing within walking distance of commercial uses.” The Circulation Element of the General Plan states:

- “The Circulation Element policies and implementation measures are intended to recognize and enhance the inherent positive qualities of walking in Sonoma to get more people out of their vehicles more often.”
- “The Land Use Plan envisions increased densities around existing retail commercial areas and promotes mixed-use development to encourage walking...”
- “...in order to reduce auto dependence and promote walking, the Land Use Plan establishes higher densities adjacent to commercial centers and encourages mixed-use development.”

Being able to walk to commercial uses reduces traffic congestion, vehicles miles traveled, and greenhouse gases.

The General Plan even states specifically that walking *mitigates* traffic congestion. The Content and Purpose section of the 2020 General Plan states, “*In 2020, Sonoma will be a place where ... walking and bicycling are safe and the use of clean-fuel transit is popular. Traffic congestion is **mitigated.***” (bold font added)

The Environment Resource Element of the General Plan states, “Through its policies aimed at promoting transit use and walking and biking, the Circulation Element provides the basis for both transportation and recreation systems that help sustain the environment and community health.” Here again, the General Plan states that promoting walking is an environmental and health.

The various sections of the General Plan make it clear that requiring a housing component in commercial development is linked to mitigating negative environment impact.

At the August 6th, 2018 city council meeting the city council reviewed options for inclusionary affordable housing. The staff report states, “consideration be given to a blended requirement, in

7b-43
cont.

7b-44

which half of the units would be required at the low income level and half at the moderate income level.” The necessary changes to the development code could be made prior to the approval of the hotel project. If so, then waiving the housing component would eliminate the development of housing for those in the low income level, and have a negative effect with respect to meeting the City’s RHNA objectives, for which the city has not met its objective. This would be a significant impact. (LU-1 and LU-2)

7b-44
cont.

Housing Impact

As for the project inducing the need for new housing, the staff report states that the level of employment at the project can be reasonably accommodated by the existing workforce in the area. This is contradictory to the KMA nexus study on the impact of new development on housing needs. Unemployment is very low in the city and county of Sonoma. Using the nexus study numbers, for a 67,478 square foot hotel, the calculated number of new housing units needed is 33.2, of which 30 are needed to be affordable. The consultants who prepared the nexus study are considered experts on housing impact of new commercial development.

7b-45

If the official city position is that the hotel project 60 employees will come from existing workforce in the area, then how can the city legally access a housing impact fee?

VMT and GHG

Additional comments regarding Vehicle Miles Traveled (VMT) and Greenhouse Gases (GHG):

- For VMT (Trans-2) and GHG from employees driving to work, the DEIR has the hotel employer providing transit passes to the employees, but the bus schedules are designed for residents to commute out of Sonoma, not into Sonoma. The bus schedule is so limited; employees will not be able to take the bus to work. Currently many low wage workers commute from Vallejo and Fairfield, but there is no public transit between Sonoma and these cities.
- Also VMT (Trans-2), includes a VMT reduction measure to provide telework options. However, it is not feasible to telework for most, if not all, of the employees working at the hotel, spa and restaurant: maids, valet, cooks, wait staff, bus boys, front desk, concierge, spa workers. Telework is only feasible for back office staff; however, they will not be located within the project site.
- Another part of VMT reduction, “placing a hotel within easy walking distance of numerous destinations, ...making it easier for guests to make some trips as pedestrians.” However, VMT is increased by drawing more tourists to Sonoma and requiring more employees to drive to Sonoma from outlying areas, such as Vallejo and Fairfield. Without a complete VMT analysis, this claim cannot be made, unless qualified with a comparison to locating the hotel in a different part of town.
- There is no attempt to quantify the VMT of tourists, nor even acknowledgement that VMT would increase because of hotel guests driving to Sonoma, mostly from the Bay Area or Bay Area airports.

7b-46

Consistency with General Plan

Pedestrian Safety - Utilize Parking Across Street from Project

The General Plan includes policies regarding pedestrian safety, but the project includes the use of the parking lot across the street from the project for employee. Since the Bank of Marin parking lot is directly across the street from the hotel project, employees will likely cross mid-block, rather than walk the extra distance to the intersection cross walk. There is a high potential for pedestrians to be hit by the traffic and rear-end traffic accidents as drivers slam on their breaks. Even if the employees use the closest cross walk at 1st Street West and West Napa Street, there is no stop sign for opposing traffic.

7b-47

General Plan, Circulation Element
Goals, Policies, and Implementation

“Policy 1.2: Promote safety for all users of the street system.”

“Policy 2.13: Resolve potential conflicts between bicycles and vehicles and pedestrians”

See the Land Use section above for additional comments concerning consistency with the General Plan.

Consistency with Surrounding Area

From the Sonoma Municipal Code: “Section 19.42.050, Guidelines for Infill Development, provides guidelines that are intended to encourage new infill development in the historic overlay district to be compatible in scale and treatment with the existing, older development and to maintain the overall historic character and integrity of the community.”

7b-48

A large room hotel is not consistent with the other building in the historic overlay district. The square footage is greater than most buildings on the Plaza, with the noted except of the Sebastiani Theatre. The other hotels on the Plaza have fewer than half the number of rooms. The Hotel Sonoma has 16 rooms, El Dorado Hotel 27 rooms, and Ledson Hotel 6 rooms.

Landscaping

Bonnie Brown commented about all of the trees that are planned to be cut down. The project plan calls for removal of 48 of the 50 trees on the site, including several oak trees (coast live oak, valley oak, red oak and scarlet oak) and two 40 to 45 foot coast redwood trees. While many of the trees are in poor condition, especially the Shamel ash, the oak and redwoods trees are in good condition.

As mitigation trees “would be replaced on a one-for-one basis”, though the arborist report says, “native oaks are recommended for replacement at a 2:1 ratio.” So, the mitigation falls short of the arborist’s recommendation. Given the carbon sequestration of these mature trees, to cut down so many healthy trees is a shame. Most of the oak and redwood trees should be spared not cut down.

7b-49

You can view the arborist report in Appendix C of the 2016 Draft EIR.

Miscellaneous Impacts

Additional comments on the DEIR:

- The revised DEIR did not address my concerns of the impact on the Plaza and hiking trails, the Final EIR response says “the Project would not increase the population in ... Sonoma beyond regional growth projections...” This ignores the increase in tourists using the Plaza and hiking trails. The population of Sonoma essentially will be increased by the transient population of the hotel. Other jurisdictions include consideration of transient occupants on population growth in EIRs.¹⁵ In addition, if a project attracts out of the area employees, it could indirectly foster population growth.¹⁶ With the unemployment rate at approximately 3%¹⁷ in the City of Sonoma and surrounding areas, below the point which economists consider it to be full employment, the hotel, spa and restaurant will most certainly attract out of the area employees.
- If a project causes problems with additional parking in residential neighborhoods, then this is considered a CEQA significant impact. The W-Trans analysis of the parking requirements in the original DEIR cited the 7 reserved spaces for the existing apartments. The staff report states, “On the east side of the court, next to the Lynch Building, five parking spaces would be retained for customer use.” However, the W-trans analysis did not take into account these 5 reserved parking spaces. If you visit the parking lot now, you will see that most of the spaces are reserved, including for the bank, the apartments, Pacific Union and the Index Tribune. I agree the apartments should have dedicated parking spaces. But, as stated by W-Trans, higher peak parking demand “could be expected with any use of reserved spaces.” The W-Trans analysis states that 2 more parking spaces are required because of the 7 reserved parking spaces for the apartments. Mitigation measures must include that bank and other businesses do not get reserved parking spaces; otherwise, the parking spaces are not shared. However, the businesses may have clauses in their lease granting reserved parking spaces. If this is the case going forward, then even more parking spaces are required. If W-Trans had taken into account the additional reserved parking spaces, then more parking spaces would be needed.
- The use of the Bank of Marin parking lot for the hotel project will result in more parking in residential neighborhoods. Currently, many of the parking spaces are rented or leased out to other businesses in the area. Often, at midweek PM peak time, there are only 4 or 5 spaces available. If the hotel is provided with an easement for parking, the businesses will lose their parking spaces. Since parking is already a problem around the plaza and/or much of the area is limited to 3 hour parking, employees of those businesses will park in residential areas.
- No mention of grey water recycling. Hotel laundry uses a lot of water. Grey water recycling should be required.

7b-50

7b-51

7b-52

7b-53

¹⁵ <http://www.co.monterey.ca.us/home/showdocument?id=62622>

http://www.co.monterey.ca.us/planning/major/Paraiso%20Springs%20Resort/DEIR_071113/4._CEQA%20Considerations.pdf

<https://www.townofmammothlakes.ca.gov/DocumentCenter/View/206/409-Population-Housing-and-Employment>

¹⁶ City of Santa Cruz, Hotel La Bahia EIR: <http://www.cityofsantacruz.com/home/showdocument?id=35842>

¹⁷ <https://www.labormarketinfo.edd.ca.gov/data/unemployment-and-labor-force.html>