

- During construction, the tenants of the Lynch building and Index-Tribune building who will remain during construction will have to park on the street, mostly in residential neighborhood. This is a significant impact per CEQA. Allowing the tenants to park in the Bank of Marin parking lot across the street poses the problem of pedestrian safety. It would also not mitigate the parking in residential neighborhood, because it would displace vehicles of employees of businesses which currently rent/lease parking space in that lot.

**7b-54**

## COMMENT LETTER # 7c.

**From:** Wendy Atkins <WendyA@sonomacity.org>  
**Sent:** Wednesday, September 12, 2018 10:44 AM  
**To:** Jim Reese (jreese@managementpartners.com); Steve Noack  
**Subject:** FW: Comments on Hotel Project Sonoma - Revised DEIR

Hi,

Please see below.

Wendy Atkins  
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-----Original Message-----

From: David Eichar [<mailto:eichar@sbcglobal.net>]  
Sent: Wednesday, September 12, 2018 10:42 AM  
To: Wendy Atkins <WendyA@sonomacity.org>  
Cc: Planning <[planning@sonomacity.org](mailto:planning@sonomacity.org)>; Rebekah Barr <[rbarr@sonomacity.org](mailto:rbarr@sonomacity.org)>; Carol Jansen <"Carol. Jansen"@sonomacity.org>; James Bohar <[james.bohar@sonomacity.org](mailto:james.bohar@sonomacity.org)>; James Cribb <[james.cribb@sonomacity.org](mailto:james.cribb@sonomacity.org)>; Kelso Barnett <[kelso.barnett@sonomacity.org](mailto:kelso.barnett@sonomacity.org)>; Lynda Corrado <[lynda.corrado@sonomacity.org](mailto:lynda.corrado@sonomacity.org)>; Robert Felder <[robert.felder@sonomacity.org](mailto:robert.felder@sonomacity.org)>; Robert McDonald <[robert.mcdonald@sonomacity.org](mailto:robert.mcdonald@sonomacity.org)>; Ron Wellander <[ronwellander@sonomacity.org](mailto:ronwellander@sonomacity.org)>  
Subject: Re: Comments on Hotel Project Sonoma - Revised DEIR

Wendy,

One more comment on the revised DEIR.

In the alternatives with residential components, the DEIR states that new residential units, "could generate new students within the SVUSD boundary" and states that this represents a slightly more impact to services. However, this assumes that student enrollment increases and new school facilities might be required. The reality in the school district is that the number of students enrolled is decreasing. This decrease in enrollment reduced the amount of money the school district receives from the state. The new students from the residential component might actually help the financial situation of the schools by offsetting the otherwise decrease in enrollment.

The DEIR should more closely analyze the specific school enrollment situation in Sonoma.

Regards,  
David Eichar

7c-01

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## **RESPONSE TO COMMENT LETTERS #7 FROM DAVID EICHAR**

Mr. Eichar submitted three sets of written comments which are provided responses below as 7a, dated August 31, 2018, 7b dated September 10, 2018, and 7c. dated September 12, 2018.

### **Response to Comments 7a-01**

See Master Response 7-Alternatives. As indicated on page 6-2 of the revised Draft EIR, no restaurant would be provided under the 50/50 Alternative. As stated on page 6-2 the building would be increased by 8,790 square feet to accommodate the residential uses.

There is no requirement that residential units in a CEQA alternative match other nearby approved apartments.

The comment asks why the restaurant was removed in this alternative when the resolution passed by the Council does not mention this? See Appendix xx. In the Resolution 43-2017 section D.3. the Resolution specifically states “An alternative in which the proposed restaurant is eliminated, and the hotel rooms is reduced in a manner an amount that clearly reduces the environmental impacts of the Project ins specified areas”

### **Response to Comment 7a-02**

The revised Draft EIR used a conservative estimate of student generation. Using 1 or 2 bedrooms and a lower persons per household number would not significantly change the conclusions. Residential uses tend to have higher calls for service for police and fire than commercial/hotel uses. Nonetheless this alternative results in similar impacts as the Project.

The commenter notes the proximity of the site to the downtown results in a high walk score which could reduce VMT and GHG for residential uses is noted. The same can be said of a hotel use at the site.

The commenter states they believe residential would have less vehicle trips and utility and service impacts than the Project. The revised Draft EIR adequately identifies that utility and service impacts would be similar under this Alternative.

The commenter asks why the 50% Alternative would result in similar impacts and doesn't identify slightly less severe impacts. As shown in Table 6-2 the weekday PM Peak Hour Trips is a difference of one trip. Therefore, the impact is similar.

### **Response to Comment 7a-03**

The commenter references that the 50% Alternative results in 12 additional parking spaces but should account for fewer employees. As indicated in the revised Draft EIR, the added spaces are to accommodate the residential use which requires higher parking. As indicated in the Project Description, employee parking can be accommodated offsite, so this is already taken into consideration. See Master Response 6 - Off Street parking.

### **Response to Comment 7a-04**

See Master Response 6- Bulb-outs for a discussion of bike lanes. Adequate width is available for the bike lanes and therefore the improvement is consistent with the General Plan.

This comment is regarding pedestrian impacts. See Master Response 4- Pedestrian Bulb-outs. The best available data was used to analyze pedestrian impacts.

#### **Response to Comment 7a-05**

The commenter questions when the traffic data was collected. Traffic counts have been collected four times, including in August 2011, March 2015, October 2017 and May 2018. The counts in May 2018 were taken on a holiday weekend when visitation would be high, and during the week schools were still in session. These counts reflect conditions during most of the year, with volumes potentially higher during less than 15 percent of the year. It is further noted that while weekend midday volumes may be higher during the summer, weekday peak hour volumes are generally higher during the school year. Given that the weekday PM peak hour was the more critical time-period of the two, the analysis can reasonably be expected to reflect conditions during peak summer conditions.

The Commenter is stating that Table 4.10-4 shows less traffic at four intersections than the June 2014 traffic study from the Circulation Element of the General Plan. The Project traffic analysis is based on more recent counts and therefore, is adequate for an analysis of the Project impacts.

#### **Response to Comment 7a-06**

The commenter questions the trip distribution analysis. The Trip Distribution was prepared by W-Trans, a traffic consultant with expertise in traffic analyses. Tweaking the trip distribution would not result in a significant impact. There is no requirement that Friday PM peak traffic be analyzed. The revised Draft EIR adequately analyzes weekday peak traffic impacts.

There are many nearby amenities that tourists will walk or bike to in the vicinity of the Plaza besides wineries, including commercial, restaurants, tasting rooms and historic sites. Therefore, it is logical to assume that some tourists will take advantage of the proximity.

#### **Response to Comment 7a-07**

The comment expresses concern about children living in the area and traffic safety. Please see Master Response 5- Deliveries. There would not be a significant safety impact to children in the vicinity of the Project. The Project Applicant has agreed to limit deliveries before 10 a.m. and most of the deliveries will be on trucks that will already be delivering in the area (i.e., not unique deliveries to the hotel, but on routes already operating in the vicinity). There is no evidence that a 62-room hotel and associated restaurant would lead to safety concerns from increased delivery trips.

#### **Response to Comment 7a-08**

The Comment expresses concern that there are not viable transit opportunities. According to the Sonoma Valley Transit there are both local and regional transit options that serve the City of Sonoma. Weekday transit services between Sonoma and Petaluma are provided via Route 40 and 53 (file:///F:/MAS/sonoma/hotel/oct%20FEIR/v5/SCT\_Schedule\_AUG19\_40-53.pdf) . Local Sonoma Shuttle services are provided at regular intervals via Route 32 (file:///F:/MAS/sonoma/hotel/oct%20FEIR/v5/SCT\_Schedule\_AUG19\_38.pdf). Regional service is provided between Sonoma and San Rafael with connecting transfer routes to San Francisco are available via Route 38 (<http://sctransit.com/maps-schedules/route-38/>)



Public transit bus services are supplemented by private transportation options including taxis, rideshare services, limos, and tour companies.

The traffic analysis adequately addresses traffic impacts and did not assume trip reduction based on transit.

#### **Response to Comment 7a-09**

The comment questions the peak hour analysis for the restaurant use indicating that restaurants are not full by 6 p.m. However, this comment supports the p.m. peak analysis. If peak restaurant use is later in the evening the traffic in the vicinity will be less. 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 (TRANS-4 Section, 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 Comment 7a-10**

The commenter expresses concern that vehicles would depart via a one-way vehicle ramp onto First Street West during the pm peak and weened midday from 12:00 noon to 2:00 p.m. The traffic report adequately analyzes the traffic impacts of the Project.

It also questions why there were 0 trips for the Umpqua Bank on the weekend even though it has an ATM. The ATM use would not be expected to generate a significant number of trips on the weekend that would change the conclusions of the revised Draft EIR. ATM trips account for very little traffic on the weekends, which is not enough to create a difference in the traffic analysis.

The commenter is suggesting that observed traffic at another hotel in a different location be used instead of the ITE Trip Generation Manual. The traffic analysis by W-Trans adequately analyzes the traffic impacts of the Project. The commenter references traffic information for MacArthur Place, however MacArthur Place is on a corner with different characteristics than that of the Project. MacArthur Place fronts onto Broadway, which is a busy thoroughfare including four travel lanes, not two travel lanes, as the Project does. Therefore, the traffic distribution is correct for the Project.

#### **Response to Comment 7a-11**

The comment indicates a discrepancy between the traffic volumes between traffic counts and the left turn warrant analysis. The traffic analysis adequately looked at the impacts of the Project.

While the volume was nearly enough to warrant a left-turn lane under projected future volumes, this is only one measure of the need for a left-turn lane. Other considerations include consistency with surrounding street segment; given that there are not left-turn pockets at other driveways along this street segment, nor are they provided at the intersections of West Napa Street with First Street West, Broadway or First Street East, a turn lane would not necessarily be appropriate, even if the volume warrant were met. Further, consideration is given to safety concerns, and with a lack of crashes associated with left-turns into driveways, again, even if the volume warrant were met it is unlikely that a turn lane would be recommended.

The left-turn warrant calculations reflect traffic volumes collected in the fall of 2017 and not those used in the summer of 2018 to prepare the revised Draft EIR. As shown in the updated left-turn warrant calculations (attached in Appendix R), under current volumes on West Napa Street the left-turning volumes into the hotel would need to nearly double (from 28 to 57) to warrant a left-turn lane and on weekends it would need to increase from 22 to 62. Note that volumes at First Street West were used as there are no driveways between the Project site and this intersection, so the volumes at the intersection and the driveway would be the same, while there are several driveways to the west of the Project site which contribute to the difference between the volumes at Second Street West and those used in the left-turn warrant analysis.

#### **Response to Comment 7a-12**

This comment references the Sonoma County 2016 Climate Action 2020 And Beyond Plan, specifically Measure 4-L1- Mixed Use Development in City Centers and along Transit Corridors. Climate Action 2020 and Beyond builds on prior commitments to reduce greenhouse gas emissions through a community-wide climate action plan (CAP) for all communities in Sonoma County. The regional framework creates an efficient and consistent approach to address climate change but allows local governments to adopt locally appropriate measures to reduce GHG emissions. It also provides information about local climate hazards and what Sonoma County communities can do to prepare.

Redeveloping an infill site, such as the Project in proximity to services is consistent with the Sonoma County GHG goals. Please see Master Response 2-Greenhouse Gas Analysis. Seven residential units are existing and will remain on the Project site with the Project. In addition, as indicated previously, the Hotel's location in the Downtown area will encourage walking and bike riding to destinations in the vicinity. Measures are included in the Project to reduce VMT.

#### **Response to Comment 7a-13**

The comment states that the Project is inconsistent with the Development Code and the General Plan because of the requested residential component waiver. None of the General Plan policies are inconsistent with the proposed Project. Page 9 of the Housing Element indicates that the City typically requires that new development include a residential component. However, that is not a mandatory requirement of the General Plan. As indicated in the Development Code the possibility exists for the Planning Commission to waive a residential component. Other General Plan policies encourage economic development.

The Project site is not identified in the Housing Element as a designated site to meet the City's Regional Housing Needs Allocation (RHNA). Therefore, if housing is not included in the Project it will have no impact on the City's ability to meet its RHNA number.

As indicated in the response to comments in other sections of this document, a hotel use in this location would be expected to provide walking and biking opportunities for tourists.

#### **Response to Comment 7a-14**

The comment questions the traffic analysis for employees commuting out of the area. The revised Draft EIR adequately accounts for employee commuting and did not assume that all the employees would come from the area. Further, the Project is redeveloping an existing commercial site. It is logical to assume that not all 60 employees would be net new employees to the area.

Refer to Master Response 1-VMT Analysis for a full analysis of VMT and Master Response 2-Greenhouse Gas Analysis.

### **Response to Comment 7a-15**

This comment indicates an opinion that if the Project causes parking in residential neighborhoods that would be an environmental impact. The Project provides sufficient parking to meet its demands and therefore, would not result in a significant impact. Parking supply is outside the normal scope of CEQA in that parking stalls are not environmental resources; they are physical features to accommodate vehicle trips to/from a site or that exist in the public right-of-way to support adjacent land uses. Parking supply was removed from the CEQA Appendix G Checklist as an impact topic for analysis earlier this decade.

The supply or availability of parking can have implications for a project's environmental impacts, in that a ready supply of convenient, accessible parking can lead to increased vehicle use at a given site, and a resulting increase in Vehicle Miles Traveled (VMT). Conversely, limiting parking supply in urban settings, in combination with the availability of other modes of travel, is a recognized method of reducing VMT associated with a project by discouraging unnecessary driving. In suburban or rural locations where non-auto modes of travel are limited, a lack of parking can lead to drivers having to drive additional (albeit typically minimal) distances searching for available parking in the vicinity of the destination, e.g. driving around a block or to an adjacent or nearby block to park.

In the case *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* the First District Court of Appeal (which also covers Sonoma County), held that "the social inconvenience of having to hunt for scarce parking spaces is not an environmental impact; the secondary effect of scarce parking on traffic and air quality is. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment." Additionally, according to the First District Court of Appeal, "Parking deficits are an inconvenience to drivers, but not a significant physical impact on the environment.". The revised Final EIR adequately addressed secondary effects associated with travel in the updated VMT analysis and greenhouse gas analysis.

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## **RESPONSE TO COMMENT LETTER #7b FROM DAVID EICHAR**

### **Response to Comments 7b-01**

The comment questions the 50% Alternative. The purpose of considering alternatives in CEQA is to identify options that would avoid one or more potentially significant effects, while continuing to achieve most of the Project objectives.

As indicated in Section 15126 of the CEQA Guidelines, an EIR is not required to consider alternatives which are infeasible.

The above ground portion of buildings in the 50%-50% Alternative would remain the same. However, in order to provide the needed parking for the mix of uses, the underground parking garage would be larger. The hotel rooms would likely be smaller than the mix proposed by the Project.

The Commenter is correct that the hotel rooms identified in the revised Draft EIR was high. The correct number of hotel rooms in this alternative should be 25 not the 37 identified.

As indicated on page 6-2 of the revised Draft EIR, under this Alternative, the site could accommodate hotel rooms at 450 square feet per room and 25 residential units at 800 square feet per room. Based on the Project acreage, a maximum of 25 units would be the maximum residential units allowed per the General Plan density.

#### **Response to Comments 7b-02**

This comment points out the discrepancy of 25 versus 37 hotel rooms in the 50% Alternative. Page 6-2 of Chapter 6, Alternatives to the Project, is revised to reflect that the number of hotel rooms in the Hotel/Residential (50%-50%) is 25, not 37. Therefore, there would be 25 hotel rooms.

#### **Response to Comments 7b-03**

The correct number of hotel rooms under this alternative is 25. Page 1-5 of Chapter 1, Executive Summary of the revised Draft EIR is revised to reflect that the restaurant would be removed under this alternative. Please refer to Master Response 7 – Project Alternatives.

The Alternative took into consideration the gross square footage needs to include the corridors, stairwells, elevators etc.

#### **Response to Comments 7b-04**

Please refer to Master Response 7- Project Alternatives. The determination to remove the restaurant from these alternatives was based on the desire to meet most of the Project objectives which is a hotel, while at the same time reducing environmental impacts.

#### **Response to Comments 7b-05**

The additional building square footage that the commenter is questioning in the 50% Alternative is from the fact that the units would include open space per unit. Please refer to Master Response 7 – Project Alternatives.

#### **Response to Comments 7b-06**

The comment states that the entire site should be used to determine the number of residential units. Although the Project site is 71,000 square feet (1.63 acres) in area, because no changes are proposed to the Lynch Building or Tribune Building, which will remain with the Project (and have 7 existing residential units), the affected area is limited to 54,000 square feet (1.24 acres), resulting in the 25-unit count.

#### **Response to Comments 7b-07**

The comment provides a statement on the purpose of the alternative's evaluation in an EIR. The comment does not directly question the analysis in the revised Draft EIR, and no additional response is required.

### **Response to Comments 7b-08**

The CEQA Guidelines require that alternatives meet the basic objectives of the Project, in this case a hotel, while reducing environmental impacts.

As stated on page 3-3, in Section 3.2, General Plan and Zoning Designation of the revised Draft EIR, “Commercial zoning is intended to allow for a range of commercial land uses, including hotel, retail, tourist, office, and mixed uses, and is consistent with the commercial land use designation of the General Plan.”

Chapter 6, Alternatives to the Project, included the “Hotel Only” alternative to present an alternative whereby potential environmental impacts are reduced, compared to the proposed Project.

### **Response to Comments 7b-09**

The comment is a quotation from the July 19, 2017 City Council hearing on the proposed Project. The comment does not directly question the analysis in the revised Draft EIR, and no additional response is required.

### **Response to Comments 7b-10**

This comment provides a comparison of the Project, as well as other recent housing projects, particularly in relationship to size of proposed units. Please refer to Master Response 7– Project Alternatives. An objective of providing an alternative with a housing component is to provide affordable housing options. Therefore, providing smaller residential units would provide more affordable options. CEQA simply requires that the alternatives meet the basic project objectives of the project while lessening or avoiding the identified significant impacts. CEQA does not require that the same size of hotel rooms or residential units, be included in an alternative.

### **Response to Comments 7b-11**

Please refer to Master Response 7– Project Alternatives. The alternatives must meet the basic Project objectives and be feasible.

### **Response to Comments 7b-12**

The commenter is expressing concern that the size of the units and hotel rooms are too small. Please refer to Master Response 7– Project Alternatives. Tweaking with the size of a hotel room or two or housing unit or two would not substantially change the conclusions of the analysis.

### **Response to Comments 7b-13**

This comment questions why the revised Draft EIR states that increased service demands, and student generation would result in slightly more severe impact in comparison to the proposed Project when development fees mitigates any impact to school districts. Comment noted. As stated in the revised Draft EIR, the Project would not generate any students and therefore, demand for schools. Therefore, adding a residential component would slightly increase demand over the Project. The text has been amended to eliminate the word “severe”.

### **Response to Comments 7b-14**

The comment is correct in noting that the average household size for Sonoma is 2.10 persons per household, and not 2.13, as reported in Chapter 6 Alternatives, however the number of residents in this Alternative would be unchanged, given the rounding up of  $(2.10 \times 25 = 52.5)$ . Furthermore, it is common practice to use average city-wide household numbers in estimating population generation, as opposed to breaking it down by unit type. Nonetheless if 1.75 persons per unit were used it would generate approximately 44 residents. This number would not change the conclusions of analysis. Residential uses tend to have higher calls for service, so this alternative would not have less overall service demand. The revised Draft EIR adequately analyzes service demands associated with this alternative.

### **Response to Comments 7b-15**

The commenter states that the walk score for the Project site is very high and expresses the opinion that the Draft EIR should have disclosed that the Project site would have slightly reduced impacts related to GHG emissions and VMT compared to other sites in the city for housing.

Under the 50% Alternative, the parking garage would need to be expanded to accommodate parking for the 25 residential units under this alternative, therefore, the conclusions in Subsection 6.5.6 in Chapter 6 Alternatives, remain valid. As noted on Page 4.6-22 of the 2016 Draft EIR, the net increase GHG emissions generated by the operational phase of the Project would be nominal and would not exceed BAAQMD's bright-line significance criteria of 1,100 MT of CO<sub>2</sub>e per year. The Hotel/Residential 50%-50% Alternative would be expected to generate similar GHG emissions and fall below the BAAQMD threshold. As shown in Table 6-2 of Chapter 6, Alternatives of the revised Draft EIR, the average daily trips generated under this alternative would be 492, which is a reduction of 26 trips compared to the Project, and as a result, would result in slightly lower GHG emissions, however, as noted in the Table peak hour trips would only be one trip less. This change would not change the discussion of the environmentally superior impact, which would remain the 30-room Hotel Only Alternative.

### **Response to Comments 7b-16**

The Commenter questions why the 50% Alternative results in similar impacts compared to the Project. As shown in Table 6-2 of Chapter 6, Alternatives of the revised Draft EIR, the average daily trips generated under this alternative would be 492, which is a reduction of 26 trips compared to the Project, and as a result, would result in slightly lower GHG emissions, however, as noted in the Table peak hour trips would only be one trip less. This change would not change the discussion of the environmentally superior impact, which would remain the 30-room Hotel Only Alternative.

The commenter indicates the analysis is flawed because the units are small and if they were calculated a different way it would change the analysis. However, as stated above, changing the sizes of the units/hotel rooms would not substantially change the alternative's analysis. As stated in Subsection 6.5.10 of Chapter 6, Alternatives to the Project, on Page 6-12 of the revised Draft EIR, "as shown in Table 6-2, under the Hotel/Residential (50%-50%) Alternative, daily trips would be slightly reduced but peak-hour trips would be roughly equivalent to those of the proposed Project." Because traffic LOS impacts are evaluated for peak hour periods, and the weekday and weekend peak hour trips are essentially the same, the impacts would be considered equivalent.

### **Response to Comments 7b-17**

This comment questions why 12 additional parking spaces are included, when employees would be less. Under the Project, the underground parking garage would be configured for “managed valet parking” as noted in Chapter 3, Project Description. The use of valet parking would allow cars to be parked closer together and in tandem, as guests would not be directly parking in the garage. In order to accommodate residential parking, the garage spaces would need to be larger, with additional space for access and maneuvering by residents.

While the hotel use would have fewer employees, offsite parking spaces at the Bank of Marin would be available to employees and this would not require additional underground spaces.

### **Response to Comment 7b-18**

The commenter questions why the restaurant was removed from the 50% Alternative. The commenter is correct that one of the Project objectives is to construct a 62-room hotel. However, in order to respond to the City’s direction to analyze an alternative that provides 50 percent housing, a 62-room hotel could not be accommodated in this Alternative. With the space planning required to fit 25 residential units of varying sizes and 25 hotel rooms, the inclusion of the restaurant was considered infeasible, given the smaller number of hotel rooms, and the space required to accommodate a restaurant on the site. While an onsite restaurant would be a nice amenity in conjunction with the hotel use, it is not as important of an objective as the hotel use, and therefore, is not included in the alternative.

### **Response to Comment 7b-19**

The comment again states that the size of the residential units in the Alternatives is too small. The comment is noted. There is no requirement that the alternative include apartments of a certain size.

### **Response to Comment 7b-20**

See Master Response 4- Pedestrian Bulb-Outs. Bike lanes can be accommodated within the bulb-out design.

### **Response to Comment 7b-21**

This comment states that West Napa street may not be wide enough to include curb extension, and bike lanes and that there are no details regarding the improvements. See Master Response 4 – Pedestrian Bulb-Outs. As noted therein, any modifications made that reduce crossing distance or promote better awareness of pedestrian traffic improve the situation over what exists *without the project, thereby mitigating its potential impact to a less than significant level*. Also, as shown in Master Response 4, Figure 4.10-7 was revised to include traffic and bicycle lane widths, and new Figures 4.10-7a and 4.10-7b are added to show turning movements for large trucks and fire trucks. There is adequate room to include the improvements.

### **Response to Comments 7b-22**

The comment states that if TRANS-6A is not implemented there would be a significant impact and there are not specific designs included. See Master Response- Bulbouts. The proposed improvements would conform to City standards. The City of Sonoma will be responsible for ensuring the improvements are implemented as identified in the City’s Systemic Safety Plan.

The Project would be responsible for paying its fair share contribution consistent with the Mitigation Monitoring and Reporting Program. Please refer to the Mitigation Monitoring and Reporting Plan, (Appendix S of this revised Final EIR) for information on implementing Mitigation Measure TRANS 6A.

**Response to Comment 7b-23**

The comment states that an employee parking lot on the other side of the street would cause a safety impact. Employees using the offsite parking lot would not be subject to a significant hazard. The offsite parking is within 300-feet of the use, which is consistent with the City's Development Code. Please refer to Master Response 6 – Off-Site Parking. The City's Systemic Safety Plan identifies improvements to the intersection that the Project would pay its fair share toward that would improve pedestrian safety.

**Response to Comment 7b-24**

This comment continues to question pedestrian safety. Page 4.10-30 of the revised Draft EIR adequately analyzes the impact on pedestrian facilities within the constraints of available methodologies and acknowledges the intersection of West Napa/First Street West encounters high pedestrian crossing volumes during busy periods, resulting in high crosswalk use that tends to create traffic congestion along West Napa Street. However, the limited number of additional pedestrians that would be generated by this Project over an hour, which is the study period for an operational analysis, can reasonably be expected to result in a minor effect on operation of the intersection. By reducing the crossing distance for *all* pedestrians, the conflict with pedestrians would be reduced and it is therefore reasonable to conclude that their impact on operation would be less than without the Project as a matter of common sense, regardless of the number of simulations run. Please refer to Master Response 4 – Pedestrian Bulb-Outs.

**Response to Comment 7b-25**

The comment questions when the traffic data was collected and states that more people area employed in the area and more tourists are visiting in 2019 than they did in 2018. It should be noted that the updated CEQA Guidelines no longer recognizes traffic congestion as a CEQA impact. Nonetheless, page 4-1-30 acknowledges that the intersection is congested and impacted by pedestrians during peak times. Traffic counts have been collected four times, including in August 2011, March 2015, October 2017 and May 2018. The counts in May 2018 were taken on a holiday weekend when visitation would be high, and during the week schools were still in session. These counts reflect conditions during most of the year, with volumes potentially higher during less than 15 percent of the year. It is further noted that while weekend midday volumes may be higher during the summer, weekday peak hour volumes are generally higher during the school year. Given that the weekday PM peak hour was the more critical time-period of the two, the analysis can reasonably be expected to reflect conditions during peak summer conditions.

The commenter is incorrect in stating that the DEIR called the impact less than significant. Impact TRANS-6A states that the Project would add pedestrian trips to an intersection that has been identified by the City's Traffic Committee as needing improvements to accommodate pedestrians. Mitigation is included which would reduce the impact to less than significant. See Master Response 4- Pedestrian Bulb-outs.



The reference to traffic congestion during the 4th of July fireworks from pedestrians is not pertinent to the impacts from the Project. In fact a hotel use could be assumed to reduce the number of vehicle trips during a holiday, since the Hotel would be within walking distance. Further, special events not associated with the Project are not required.

The traffic analysis in the revised Draft EIR is adequate. Using peak hour delay is a validated transportation industry practice.

#### **Response to Comment 7b 4-26**

This comment questions the 10% trip distribution in the traffic analysis. The revised Draft EIR adequately analyzed traffic impacts. Ten percent was used as the minimum distribution percent to ensure that no trips would be lost due to rounding. With a directional volume of seven trips outbound during the PM peak hour, a distribution of 7 percent equates to 0.49 trips, which would be rounded to zero. As noted in Table 4.10-6, the distribution instead resulted in over-counting trips, making the analysis more conservative.

Text on page 4.10-26 of the revised Draft EIR is modified as follows to clarify the distribution of Project trips.

Conditions with project-generated trips added to existing volumes as well as safety criteria were reviewed in evaluating the need for turn lanes at the project driveway on West Napa Street. It was conservatively assumed that all the traffic coming from the east and north would enter via the driveway, and further that all site-generated traffic would use the project driveway though some trips would be oriented to the parking lot on the north side of West Napa Street. ~~For the trips routed from the south on First Street West to access the driveway on West Napa Street, a restricted left turn would be required and was therefore not assumed.~~ Given the turn restriction at West Napa Street, drivers destined for the parking lot that would take access from First Street West would be expected to arrive from the south; as these trips would not include travel on West Napa Street and would not result in a left turn at the driveway, they are therefore not included in the left-turn lane warrant analysis.

#### **Response to Comment 7b-27**

This comment states that PM peak Friday traffic was not analyzed and would be higher than the rest of the week. Comparison of counts taken on Fridays typically indicates that they are not the highest of the week, and no specific evidence was provided to show there is more traffic on Friday versus other days of the week. In the experience of the traffic consultant, however, this statement has typically proven to be untrue. Volumes are often lower on Friday than Thursday, partially due to there being no classes at Santa Rosa Junior College on Fridays combined with alternative work schedules wherein employers close on alternating Fridays.

#### **Response to Comment 7b-28**

This comment references a traffic study at Mac Arthur Place. There is no reference in the revised Draft EIR to the trip generation of MacArthur Place. This comment is not related to the analysis presented but is noted.

### **Response to Comment 7b-29**

This comment questions why Highway 12 and Verano and Siesta Way within two miles of the Project was not analyzed. The study area for the analysis was chosen to reflect those locations where the additional traffic volumes might potentially be substantial enough to cause a change in operation. The further from the site an intersection is located, the more Project-generated trips are dispersed by the time they get to this intersection, resulting in lower and lower volumes of Project-related trips. The addition of a nominal number of through trips along Highway 12, through the intersections at Verano Avenue and Siesta Way can reasonably be expected to have a lesser impact than would be experienced at West Napa Street/Fifth Street West where the projected increase in delay is 0.2 seconds during the PM peak hour and 0.3 seconds during the weekend peak hour. Similar or lesser added delay at the two intersections noted would result in a less-than-significant impact under the standards applied.

### **Response to Comment 7A-30**

This comment states that hotel guests would likely not bicycle to wineries and references the executive summary of the Project which is indicating an overview of the Project. Given its location off the historic plaza, it is likely that patrons will be able to walk to destinations in the vicinity. While guests will be encouraged to leave their vehicles parked during the bulk of their stay at the hotel, the analysis performed reflects conditions as if guests used their vehicles daily, as is typical at the hotels sampled in establishing the trip generation rates applied. No deductions were taken from standard rates to reflect the potential for guests to make some of their visitor trips by foot rather than in a motor vehicle; should guests walk to local destinations as is anticipated, the actual trip generation would therefore likely be less than used in the analysis, making the analysis more conservative. The DEIR adequately analyzes transportation impacts.

### **Response to Comment 7b-31**

This comment references the Executive Summary Table 1-1, page 1-17 and states the TRANS-7 significance with mitigation as "N/A". Page 1-17 of the revised Draft EIR has been amended in the text changes identified in this revised Final EIR to identify that the impact is less than significant with mitigation. The improvements assumed for the analysis are those that were previously identified in the City's General Plan EIR as being necessary to accommodate anticipated future increases in traffic. Payment of a proportional share of the cost of making these improvements is an accepted and reasonable approach to mitigating the Project's contribution to these planned future improvements.

### **Response to Comment 7b-32**

The commenter references the executive summary of the Project which is indicating an overview of the Project.

### **Response to Comment 7b-33**

This comment questions why there is no onsite loading area. Page 4.10-29 includes a discussion regarding truck access and delivery. Further, the Project Description has been amended (see Master Response 5- Deliveries above) to indicate that deliveries will be restricted to before 10 a.m. The Project as proposed includes an area in the garage for loading together with establishment of a loading zone on First Street West. As discussed on page 4.10-27, the restriction of use to loading should be limited to ensure that parking for use of the Plaza area is retained. The operation of the loading zone will be essentially the same as the current use of the parking spaces; drivers getting out of delivery vehicles will result in the same disruption to traffic

as would be caused by a driver exiting a parked vehicle. There is no evidence of an impact due to the use of a parking lane for delivery activities.

Further, based on a survey of delivery use, the proposed hotel and restaurant deliveries will not be substantially new trips. Most of the deliveries will be by businesses that are already providing deliveries to nearby businesses.

**Response to Comment 7b-34**

This comment states that deliveries will impact children nearby. There is no evidence that introducing an average of two delivery trips per day to the existing traffic on First Street West would have any impact on safety issues for children. The two additional trucks that would use First Street West will have professional drivers who can reasonably be expected to drive safely and watch for any pedestrians or bicyclists, including adults as well as children. Again, most of the deliveries are already occurring in the vicinity to other businesses and hotel and restaurant deliveries would be part of existing delivery routes for many goods and services.

**Response to Comment 7b-35**

This comment again questions the left turn analysis. The analysis was performed using not only current volumes, but also projected future volumes, which represent the best data available. It is noted that future volume projections have historically proven to overstate the actual volumes experienced by their horizon date as development tends to occur more slowly and at lower densities than assumed in the modeling. Further, as the City of Sonoma has no significance standard requiring that traffic analyses be based on peak season data, there is no basis for needing to provide results that reflect such future conditions.

**Response to Comments 7b-36**

It is unclear what the commenter is referencing. The data obtained at MacArthur Place is not presented in the Draft EIR; nor is there mention of Saddles restaurant. Standard trip generation rates were applied to the Project, so the comment is not relevant to the analysis performed.

**Response to Comment 7b-37**

This comment states that the Project is close to meeting requirement to install a left turn lane on westbound West Napa Street into the hotel driveway. While the volume was nearly enough to warrant a left-turn lane under projected future volumes, this is only one measure of the need for a left-turn lane. Other considerations include consistency with surrounding street segment; given that there are not left-turn pockets at other driveways along this street segment, nor are they provided at the intersections of West Napa Street with First Street West, Broadway or First Street East, a turn lane would not necessarily be appropriate, even if the volume warrant were met. Further, consideration is given to safety concerns, and with a lack of crashes associated with left-turns into driveways, again, even if the volume warrant were met it is unlikely that a turn lane would be recommended.

Relative to the comment about using the splits obtained by observing traffic at MacArthur Place, it is noted that the study (which did include vehicles parked on the street) resulted in a much lower trip generation rate. If that rate and split were applied to the Project, the left-turn lane warrant would be further from being met, not closer. It would be inappropriate to pick and choose data; all data from one source or the other should be used and not a combination of the two.

The comment (2) questions the distribution factors in the traffic analysis. The left-turn warrant calculations reflect traffic volumes collected in the fall of 2017 and not those used in the summer of 2018 to prepare the revised Draft EIR. As shown in the updated left-turn warrant calculations (attached in Appendix R), under current volumes on West Napa Street the left-turning volumes into the hotel would need to nearly double (from 28 to 57) to warrant a left-turn lane and on weekends it would need to increase from 22 to 62. Note that volumes at First Street West were used as there are no driveways between the Project site and this intersection, so the volumes at the intersection and the driveway would be the same, while there are several driveways to the west of the Project site which contribute to the difference between the volumes at Second Street West and those used in the left-turn warrant analysis.

The comment (3) states that ATM uses at the Umpqua Bank should have been analyzed. Patrons accessing the ATM would not generate a huge volume of traffic during the weekend. ATM access is a very quick transaction, and at most you would expect only a few patrons at a time. The standard trip generation rates used would reasonably be expected to capture any activity that occurred during the peak hour on a Saturday. Given the location near the Plaza, users of the ATM would likely walk to the site while in the area anyway, resulting in few to no trips to the bank during the peak hour evaluated. Therefore, ATM use is not considered a significant source of vehicle traffic.

The comment (4) states that the warehouse space has been empty for years and should not have been included in the existing trips analysis. CEQA establishes the baseline for determining existing trips at the time the NOP circulated. If included in the analysis, the one to two trips deducted for the warehouse use would have a nominal effect on the conclusions and recommendations. In fact, the weekend midday trips as applied do not reflect the one-trip deduction because of rounding. The traffic analysis in the revised Draft EIR is adequate.

Under future weekend volumes the left-turn pocket is not as close to being warranted as is the case for weekday PM peak hour conditions. A sensitivity analysis indicates that the Umpqua Bank could generate 13 left turns during the weekday peak hour before a left-turn pocket would be warranted.

If included in the analysis, the one to two trips deducted for the warehouse use would have a nominal effect on the conclusions and recommendations. In fact, the weekend midday trips as applied do not reflect the one-trip deduction because of rounding. Counts of actual volumes associated with the existing uses would be difficult as the parking lot is used by patrons of various businesses in the area and as a pass-through from First Street West to West Napa Street west of the site. While such counts are desirable, a comparison between theoretical trip generations provides the most equitable analysis, so was employed in this case.

### **Response to Comment 7b-38**

This comment states that the data does not match appendix K.1. The left-turn warrant analysis is based on volumes at the driveway, and as the nearest intersection is at First Street West, the through volumes on West Napa Street at First Street West were used. There are numerous driveways between the site and Second Street West, which would cause volumes to vary between that intersection and the one at First Street West. Since both counts were done on the same day and at the same time, it is clear that the difference between volumes at Second Street West and First Street West is due to interim driveways.

### **Response to Comment 7b-39**

This comment states that the Project should include a requirement to recycle the biodegradable waste generated by the Project. Please refer to page 32 of the Initial Study that was prepared for the proposed Project (included as Appendix B of the 2016 Draft EIR). Sonoma Garbage Collectors, the solid waste collection company that serves the Project site, has a food waste program that allows for organic waste to be recycled. As a condition of approval, the Project will be conditioned to participate in the organic waste program.

### **Response to Comment 7b-40**

This comment references the Sonoma County 2016 Climate Action 2020 And Beyond Plan, specifically Measure 4-L1- Mixed Use Development in City Centers and along Transit Corridors. Climate Action 2020 and Beyond builds on prior commitments to reduce greenhouse gas emissions through a community-wide climate action plan (CAP) for all communities in Sonoma County. The regional framework creates an efficient and consistent approach to address climate change but allows local governments to adopt locally appropriate measures to reduce GHG emissions. It also provides information about local climate hazards and what Sonoma County communities can do to prepare.

Redeveloping an infill site, such as the Project in proximity to services is consistent with the Sonoma County GHG goals. Please see Master Response 2-Greenhouse Gas Analysis. Seven residential units are existing and will remain on the Project site with the Project. In addition, as indicated previously, the Hotel's location in the Downtown area will encourage walking and bike riding to destinations in the vicinity. Measures are included in the Project to reduce VMT.

### **Response to Comment 7b-41**

The commenter states that section 4.12.1 fails to mention the seven existing studio apartments in the Lunch Building. Page 4.12-2 of the revised Draft EIR is hereby amended as follows:

#### **Existing Conditions**

The Project site is developed with commercial uses, including the Lynch Building, the Sonoma-Index Tribune Building, and a metal building that was previously used for newspaper production by the Sonoma Index-Tribune. The Lynch Building contains seven residential units. In addition, rear parking is located behind the Tribune Building. The Project site is located in a downtown Sonoma, California, and is surrounded by urban development.

### **Response to Comment 7b-42**

The comment states that the Feed Store also contains residential units- one is a vacation rental. Page 4.12-2 of the revised Draft EIR is hereby amended as follows:

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 are not included in the proposed Project. The Feed Store contains at least one vacation rental. Downtown Sonoma contains a broad mix of uses, including boutique shops, hotels, restaurants, wine tasting rooms, a shopping center, and other commercial uses, such as a gas station and convenience store. Additionally, there are some residential neighborhoods nearby but not adjacent to the Project site, consisting primarily of single-family and mixed-use residential units.

### **Response to Comment 7b-43**

The comment states that the Project is inconsistent with the Development Code and General Plan policies because it is requesting a residential waiver. (Article II-19.10.020-B.3 of the Sonoma Development Code). Consistency with plans and policies are found on page 4.12-3 of the revised Draft EIR. The policies and quotations provided in the comment speak to the benefits of mixed-use development; however, the comment does not provide substantial evidence in support of the assertion that the conclusion in the revised Draft EIR is incorrect. As indicated, the Project is requesting a waiver to the residential requirement. The revised Draft EIR includes an alternative that would provide housing consistent with this requirement (see Chapter 6 of the revised Draft EIR). This alternative is expected to have similar GHG emissions as the Project.

### **Response to Comment 7b-44**

Again, the volumes at Second Street West are not representative of volumes at the driveway due to the influence of intervening driveways. Likewise, the future volumes at West Napa Street/Second Street West do not reflect volumes at the Project driveway; volumes from the immediately adjacent intersection at First Street West were applied.

### **Response to Comment 7b-45**

The comment states that the City Council could amend the Development Code prior to approval of the Project and therefore, waiving the housing component would eliminate development low income housing and impact the City's ability to meet RHNA objectives.

### **Response to Comment 7b-46**

The comment provides an opinion on the requested Waiver from the commercial zoning residential component. The comment does not provide substantial evidence in support of the assertion that a waiver from the commercial zoning residential component (Article II-19.10.020-B.3 of the Sonoma Development Code) would result in significant impacts. As indicated on page 4.12-4 of the revised Draft EIR and shown in Table 4.12-1 RHNA, the Project would not have any effect with respect to meeting the City's RHNA objectives. The site is not identified in the General Plan Housing Element as a Housing Opportunity Site, needed to meet the City's affordable housing goals. Table H-2 in the Housing Element identifies a surplus of sites available to meeting its RHNA (City of Sonoma 2015-2023 Housing Element adopted March 16, 2015).

### **Response to Comment 7b-47**

The comment references General Plan policies regarding pedestrian safety and concern about the parking lot across the street for employee use. Please see Master Response 7, Bulbouts.

### **Response to Comment 7b-48**

This comment questions the proposed hotel use consistency with the historic overlay district and states other nearby hotels are smaller. The Project has been reviewed for consistent with the Historic Overlay District, and provisions of the Development Code for site coverage, scale, height and massing and is found to be consistent. The Project is consistent with the character of the surrounding buildings in terms of architectural details (balconies, pedestrian scale). Because

the Project would redevelop the site, it will not create a significant change in the visual environment.

### **Response to Comment 7b-49**

The comment questions the tree mitigation found in the 2016 Draft EIR at a 1:1 basis and states native oaks should be replaced at a 2:1 ratio. The Project is consistent with the City of Sonoma Tree Ordinance (Sonoma Municipal Code 12.08):

Tree Replacement Program. A person owning or controlling a new development project shall be required to replace trees designated for removal as part of the approval of the project in accordance with the conditions of approval established by the planning commission or the design review and historic preservation commission as follows:

1. Unless otherwise approved by the review authority, tree replacement shall occur on-site and shall, at a minimum, occur at a 1:1 ratio and a 15-gallon box size for each six inches of tree diameter removed.
2. If the development site is inadequate in size to accommodate the replacement trees, the trees may be planted on public property with the approval of the public works director.
3. Upon the request of the developer and the approval of the city council, the city may accept an in-lieu payment of \$100.00 per 15-gallon replacement tree on condition that all such payments shall be used for tree-related educational projects and/or planting programs of the city.

### **Response to Comment 7b-50**

The comment expresses concern that that tourists will increase use on the Plaza and hiking trails. Comment noted. The Project is intended to locate a hotel proximate to the Downtown Plaza, historic attractions and retail area in order to reduce traffic congestion, vehicle miles traveled and GHG emissions. Consistency with plans and policies are found on page 4.12-3 of the revised Draft EIR.

It is expected that the Project would generate new employees and an associated need for housing. However, the Project site is not identified as a housing need site, in the City's General Plan Housing Element. A review of pending Projects in the City of Sonoma identified that there were adequate sites to meet its RHNA. A search on Zillow on July 28, 2019<sup>11</sup> found 44

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<sup>11</sup> [https://www.zillow.com/sonoma-ca/rent-houses/?searchQueryState={%22pagination%22:{},%22mapBounds%22:{%22west%22:-122.51650388403323,%22east%22:-122.41608197851565,%22south%22:38.271040731895404,%22north%22:38.320753666859126},%22usersSearchTerm%22:%22Sonoma,%20CA%22,%22regionSelection%22:\[{%22regionId%22:47746,%22regionType%22:6}\],%22isMapVisible%22:true,%22mapZoom%22:14,%22filterState%22:{%22sortSelection%22:{%22value%22:%22days%22},%22isForSaleByAgent%22:{%22value%22:false},%22isForSaleByOwner%22:{%22value%22:false},%22isNewConstruction%22:{%22value%22:false},%22isForSaleForeclosure%22:{%22value%22:false},%22isComingSoon%22:{%22value%22:false},%22isAuction%22:{%22value%22:false},%22isPreMarketForeclosure%22:{%22value%22:false},%2](https://www.zillow.com/sonoma-ca/rent-houses/?searchQueryState={%22pagination%22:{},%22mapBounds%22:{%22west%22:-122.51650388403323,%22east%22:-122.41608197851565,%22south%22:38.271040731895404,%22north%22:38.320753666859126},%22usersSearchTerm%22:%22Sonoma,%20CA%22,%22regionSelection%22:[{%22regionId%22:47746,%22regionType%22:6}],%22isMapVisible%22:true,%22mapZoom%22:14,%22filterState%22:{%22sortSelection%22:{%22value%22:%22days%22},%22isForSaleByAgent%22:{%22value%22:false},%22isForSaleByOwner%22:{%22value%22:false},%22isNewConstruction%22:{%22value%22:false},%22isForSaleForeclosure%22:{%22value%22:false},%22isComingSoon%22:{%22value%22:false},%22isAuction%22:{%22value%22:false},%22isPreMarketForeclosure%22:{%22value%22:false},%2)

properties for rent, exceeding the 33.2 required by the commenters reference, therefore, there are adequate rentals available to meet the needs of the Project generated employment. Further, this assumes all employees would be new to the area, which is not likely the case. The number of rentals needed is likely to be lower. Therefore, the Project would not result in a significant impact on housing.

#### **Response to Comment 7b-51**

The comment again questions the parking analysis. The adequacy of parking is not a CEQA issue, so under CEQA a lack of parking is not considered significant. The potential for inadequate parking to be a significant impact was removed from the CEQA Guidelines in 2010. However, the Project as proposed meets the City's requirements for parking, so the parking supply is considered adequate under this standard. See also Master Response 6 – Off-Site Parking. All other secondary impacts associated with inadequate parking (having to park farther away from a destination) have been adequately analyzed in the EIR (noise, air quality, traffic etc) and would be less than significant.

#### **Response to Comment 7b-52**

The comment again questions the use of the Bank of Marin parking lot for employee parking and states that employees will park in residential areas. See Response to Comment 7b-51 above.

#### **Response to Comment 7b-53**

The comment states that the EIR does not mention grey water recycling and since hotels use a lot of water grey water recycling should be considered. Water use is adequately addressed in the EIR. However, it should be noted that the Project will be designed to LEED certification as part of the Project Description. At the time the building is designed if the Project is approved, grey water recycling could be accommodated.

#### **Response to Comment 7b-54**

The comment states that during construction, the tenants of the Lynch and index Tribune buildings will have to park on the street, mostly in the residential neighborhood and that this would be a significant impact. Construction impacts would be temporary, and the construction can be staged to reduce onsite parking impacts. See Response to Comment 7b-51 above.

#### **Response to Comment #7c FROM DAVID EICHAR**

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##### **Response to Comment 7c-01**

This comment expresses that additional students would lead to increased enrollment and would help the school district's financial situation. Finances are not a physical impact on the environment.

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2isPreMarketPreForeclosure%22:{%22value%22:false},%22isMakeMeMove%22:{%22value%22:false},%22isForRent%22:{%22value%22:true},%22isCondo%22:{%22value%22:false},%22isMultiFamily%22:{%22value%22:false},%22isManufactured%22:{%22value%22:false},%22isLotLand%22:{%22value%22:false}},%22isListVisible%22:true}



Wednesday, September 5, 18

To Planning Staff, City Management, Chair Felder, Kenwood Investments

Last night at the Commission hearing on the Sonoma Hotel Project I really felt I needed to add some information on Traffic Calming measures, especially as it relates to the mitigation of traffic impacts in the Revised EIR. I was not allowed to speak as a commissioner as Chair Felder pointed out to me. I apologize; I thought that since it was a hearing on public input on the REIR, I would have been allowed. However, I feel that I have information pertinent to the REIR due 9/13. I should have in hindsight gone to the podium and spoken as a citizen but I did not. I feel the information I have is vitally important to this REIR.

This pertains to the "bulb outs proposed to mitigate traffic congestion at the 1<sup>st</sup> West W. Napa corner. Here is what I have that I feel needs to be shared with all Commissioners and the Public. It is from the **Federal Highway Administration** (FHWA), a division of the United States Department of Transportation that specializes in highway transportation.

*What is Traffic Calming?*

*"Traffic calming is a traffic management approach that evolved in Europe and is now being implemented in many U.S. cities. The following definition is quoted from An Illustrated Guide to Traffic Calming by Hass Klaus (1990):*

*"Traffic calming is a term that has emerged in Europe to describe a full range of methods to slow cars, but not necessarily ban them, as they move through commercial and residential neighborhoods. The benefit for pedestrians and bicyclists is that cars now drive at speeds that are safer and more compatible to walking and bicycling. There is, in fact, a kind of equilibrium among all of the uses of a street, so no one mode can dominate at the expense of another."*

*Traffic Calming Examples:*

- *Bumps, humps, extensions, and other raised pavement areas.*
- *Reducing street area where motor traffic is given priority.*
- *Street closures.*
- *Traffic diversion.*
- *Surface texture and visual devices.*
- *Parking treatments.*

*The most fundamental traffic-calming goal is to reduce the speed of vehicular movement. With reduction of speed, the following objectives can be realized:*

- *Improved "feel" of the street.*
- *Enhanced aesthetic values and a sense of nature*
- *Reduced crime.*

8-01

- *Equitable balance among transportation modes.*
- *Increased safety/decreased severity of injury in traffic crashes.*
- *Improved air quality and noise levels.*
- *Continued accommodation of motor vehicle traffic.*

*When any new traffic management approach is introduced, issues, concerns, and questions are bound to arise. Design decisions related to traffic can have far-reaching consequences. Lives, economic well-being, and urban livability are directly affected."*

However, when it is used to mitigate traffic impacts especially on or around the Plaza, not only does the Historic Overlay restriction come into question as to its viability but use in general on or around the plaza as a mitigation issue needs further evaluation before a certification can be made. The significance of using this mitigation measure in this location has serious consequences. According to FHWA:

*"Impact on traffic volumes, distribution, and operations.*

*The Issue: Traffic calming will never work on anything except very low-volume residential streets. It will substantially reduce the amount of traffic that a street can handle efficiently and this is counterproductive. We need to move vehicles, not restrict them. Furthermore, if we slow traffic on one street, the traffic will simply be diverted to another street. The net result will be increased congestion and more problems overall."*

Thank you for your consideration in distributing this document to the appropriate individuals.

Sincerely,

Lynda Corrado  
Alternate Planning Commissioner

8-01  
cont.

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## **RESPONSE TO COMMENT LETTER #8 FROM LYNDA CORRADO**

### **Response to Comment 8-01**

This comment expresses concern with the pedestrian bulb-outs and reducing traffic flow. Please refer to Master Response 4 – Pedestrian Bulb-Outs.

Chris Petlock, MBA  
426 Napa Road  
Sonoma, CA 95476  
[chris.petlock.mba@gmail.com](mailto:chris.petlock.mba@gmail.com)  
707-721-6000

Comments for the 09/05/2017 West Napa Street Hotel Revised Environment Impact Report (REIR):

Traffic and Parking

The intersection of West Napa Street (SR12) and First Street West is among the busiest and most congested in the City of Sonoma through the day. Most specifically this congestion is experienced by citizens at commute times and during community events. The congestion is exacerbated by periodically heavy and erratic pedestrian crossing at this intersection causing vehicle backups that affect other intersections along West Napa Street. Many times a day with traffic reaching all the way back to 5th Street West or further and pushing vehicles to use other East West Routes to avoid congestion. This overflow from Napa Street affects Spain Street to the North resulting in similar vehicle backups, as well as Andrieux and MacArthur Street to the South which tend to be less congested; except MacArthur Streets during commute and school drop off and pick times. The West Napa Street and First Street West intersection already has a significant impact on traffic in the City of Sonoma and the quality of life for the citizens of Sonoma. This intersection increases commute times with high pedestrian crossing concentrations causing unpredictable and erratic traffic queues. The qualitative experience related by many citizens of Sonoma does not seem to be reflected in the quantitative data or analysis expressed in this REIR.

9-01

The REIR contemplates an irrevocable easement for 25 parking spaces in the Bank of Marin parking lot to the North side of Napa Street. The Operations Analysis from CalTrans suggests this arrangement is to prevent vehicle queuing on West Napa Street presumably for vehicles traveling West along West Napa Street, not employee parking as stated in the REIR. The statements in the CalTrans report need to be reconciled with the REIR.

The report from CalTrans states in their report the irrevocable easement arrangement for the 25 spaces is intended to reduce queuing caused by left turns by Westbound traffic from West Napa street this also suggests an increase in the number of pedestrians crossing at the intersection West Napa Street and First Street East possibly offsetting any gains from left turn, presumably these pedestrians will be slowed by luggage for their hotel stay.

- What is the analysis of this arrangement causing additional pedestrian crossing, burdened with luggage, on traffic queuing on West Spain and how does this project mitigate the additional crossing of pedestrians on the 1st day and throughout the operational life of the proposed hotel?

9-02



- What information is provided to CalTrans to clarify whether the parking easement is for employee parking and is this use consistent with CalTrans stated understanding of reducing left turn queuing?
- What enforcement mechanism is contemplated by the City of Sonoma to monitor mitigations measures and hotel operational practices for Westbound vehicles to not make left turns and utilize the Northside parking lot?
- What are the projected yearly costs of enforcement of these traffic, pedestrian and operational mitigation measures and how are these costs recovered?
- If a truck loading zone is designated on 1st street west how will this affect parking on 1st street West, which is already at or near capacity?
- The CalTrans report suggests the Bank of Marin parking easement is for mitigating left turns from Westbound traffic, not specifically designated for employee parking as suggested in 3-14, Are these two uses in conflict and what plan does the city have to enforce this important mitigation measure for traffic queuing mitigation?

**9-02**  
**cont.**

### **Greenhouse Gas GHG:**

Climate change and greenhouse gases that contribute to climate change are one of the greatest challenges facing humans with outcomes that will affect us all today and for many generations to come. The County and City of Sonoma have adopted the Climate Action 2020 plan which provides strategies and guidelines to mitigate GHG's from future projects, such as this hotel. More recently, Riverwatch successfully challenged the basis for the Climate Action 2020 in court as too narrow in focus for estimating Vehicle Miles Traveled (VMT)'s as it only accounted for VMT's of local trips and not for miles traveled for trips into the Wine from across the country. This REIR accounts for and mitigates GHG's and air pollution related to construction but dismisses GHG's from VMT's as insignificant. This REIR does not provide a GHG inventory to determine the impact or to account for additional GHG generated by the net 317 additional tourist trips traveling to and from the Project or provide mitigation measures for the addition GHG produced by this project. See Riverwatch vs. County of Sonoma, et al.  
<https://www.sierraclub.org/redwood/sonoma/blog/2017/07/court-ruling-demands-strengthening-sonoma-county-climate-action-plan>

**9-03**

- What method and from what starting and ending point of a trip was used to determine a VMT?
- If the methods outlined in Riverwatch vs. Sonoma County et al. are used in determining a VMT are the resulting GHG's still insignificant?
- If GHG from deliveries and idling are included in the expanded VMT's and resultant GHG's are the impact still insignificant?
- A GHG inventory should include all VMT's, not just the marginal VMT's, to understand total impacts, even if it is decided that only marginal VMT's will be mitigated.

## Hydrological Impacts:

According to SVGMA (Sonoma Valley Groundwater Management Agency) the Sonoma Valley aquifer has a medium rating for impacts from overdraft, recharge and impact.

- If permeable paving were used would this mitigate any impacts on the aquifer?

9-04

City of Sonoma Water Master Plan shows a mix of Asbestos Concrete (AC) and unknown water pipe material in the project area. AC is notoriously susceptible to catastrophic failure in earthquake and the unknown material is likely older concrete or clay material. Considering the experience in Napa after the recent earthquake where water facilities failed and firefighting efforts were compromised.

- Are existing isolation valves functional and are they sufficient to isolate older pipes from new pipes to maintain fireflow for this location in the likelihood of the ACP failing in an earthquake?
- Have new isolation valves been considered to be installed to isolate water facilities more susceptible to failure from modern PVC pipes in order to protect public safety at this location after an earthquake and possible resulting firefighting activities in the area?

9-05

As related to the holding tank for wastewater:

- What is the Sonoma County Water Agency-Sanitation District (SCWA-SD) and City of Sonoma plan for coordination, enforcement?
- What are the projected costs to the respective agencies for monitoring and enforcement?
- What are the cost recovery mechanisms for oversight and monitoring this holding tank as the according to the REIR the responsibility falls on public agencies?
- What is the plan to monitor and detect failure of the holding tank?
- What is the plan to respond to a failure of the holding tank or potential failure of the wastewater mitigation system?

9-06

## Alternative Projects' Environment Impacts:

While "No Project" provides the lowest environmental impact, this does not reflect the best use of the space. According to this REIR analysis the eight unit alternative seems to provide the next lowest environmental impact and accomplish all the objectives of the project, while the 50/50 seems to have the highest environmental impact according to this analysis.

- Does the impact of each alternative change relative to each other when the countrywide standard of VMT's is used to calculate GHG's as described in Riverwatch vs Sonoma County et. al.?
- There is not site plan or floor plan available for the 50/50 alternative for public view?
- Without a site plan for each alternative the public cannot understand whether each alternative can comply with the General Plan or other requirements for residential units including, access, egress, parking, open space...

9-07

9-08

9-09

- What is the financial viability of each alternative?
- There is not analysis of the various alternatives for compliance with the General Plan or other requirements; for example open space for residential units under the 50/50 alternative.

9-10

9-11

**REIR inconsistencies:**

There are several instances throughout the REIR document with internal references that are not available or missing within the REIR document ; for example Chapter 4.6 is missing even though there are references to this chapter throughout the REIR. I am not sure if this is common or if the original EIR is to be used together with this REIR.

9-12

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## **RESPONSE TO COMMENT LETTER # 9 FROM CHRIS PETLOCK**

### **Response to Comment 9-01**

This comment expresses concern with existing congestion at West Napa and First Street West. The analysis of the operation at West Napa Street/First Street East was based on assuming all vehicles must stop as a means of addressing the effect pedestrians have on delay at this location. Unfortunately, there are no methodologies available that accurately reflect operation at this location, though ultimately the purpose of the analysis was to determine how much traffic from the proposed Project would be expected to change operation from conditions without the Project. As indicated on page 4.10-30 of the revised Draft EIR, pedestrian crossing volumes during busy periods, does result in high crosswalk use that creates traffic congestion. Given the low volume of traffic that the Project is expected to generate, and that these trips would be almost exclusively through trips and not conflicting turning movements, the conclusion that the impact will be less-than-significant based on the analysis as performed is reasonable.

### **Response to Comment 9-02**

This comment asks how the Project will mitigate additional pedestrians. See Master Response 4 – Pedestrian Bulb-Outs, Master Response 5 – Deliveries on First Street West, and Master Response 6 – Off-Site Parking.

The Mitigation Monitoring Plan is included as Appendix R of this revised Final EIR. This document identifies the timing and the City positions responsible for ensuring that the mitigation is implemented. Monitoring will be required on an ongoing basis.

The Project will be responsible for its fair share costs. Truck loading will occur during off peak times and will therefore, not impact on street parking. The Bank of Marin parking is not associated with left turns. It is proposed to provide additional employee parking opportunities.

As proposed, drivers would be able to turn left from westbound West Napa Street into the parking lot on the north side of the street, as they do today, so no enforcement measures would be necessary.

Traffic enforcement is part of the City's responsibility and the cost is covered in its annual operating budget, which will be increased as a result of the taxes generated by the Project.

### **Response to comment 9-03**

The commenter states that climate change is a great challenge and that the County and City adopted the Climate Action 2020 Plan to help mitigate impacts. The commenter states that the Climate Action 2020 Plan was successfully challenged in court for its focus on local VMT.

The Court's decision is not directly related to the analysis of potential impacts of the proposed Project. A climate action plan includes analysis of both existing and future emissions, whereas the typical CEQA impact analysis compares existing baseline conditions to conditions that would occur with the construction and operation of the subject Project. When considered together, the Draft EIR, the revised Draft EIR, and this revised Final EIR provide detailed analyses of all direct and reasonably foreseeable indirect GHG emissions associated with the Project.

The commenter expresses the opinion that a GHG inventory should include all VMT, not the marginal VMT. By "marginal" VMT, it is assumed that the commenter means the incremental



increase in VMT attributable to the Project. See Master Response 1 and 2. All emissions sources related to the proposed Project are included in the emissions estimate update.

GHG emissions impacts are addressed as a part of the Draft, revised Draft, and Final EIR. Please refer to Master Response 1 – VMT Analysis and Master Responses 2 and 3 for Greenhouse Gas Analyses.

#### **Response to Comment 9-04**

The existing site is almost entirely developed with paving and buildings. Redeveloping the site with the Project would not significantly impact the groundwater table. Permeable paving would allow some water percolation, but it would not have a perceptible effect on the volume of groundwater. As mentioned in the Draft EIR, the groundwater table in this location is high.

#### **Response to Comment 9-05**

This comment asks whether connection of new water pipes to existing older pipes able to maintain fire flow and new isolation valves been considered to isolate water pipes susceptible to failure during earthquakes. The Project will be required to meet current building codes for new construction. The questions in this comment do not address a specific impact discussion in the revised Draft EIR, or the 2016 Draft EIR. No further response is required.

#### **Response to Comment 9-06**

This comment includes specific questions related to the wastewater holding tank that was proposed. It should be noted that since circulation of the 2016 Draft EIR the Sonoma County Water Agency Sanitation District has updated the wastewater lines in the vicinity of the Project site. See <https://www.sonomawater.org/svcstdsewerproject>. Please refer to Appendix S for the Mitigation Monitoring and Reporting Plan. The City of Sonoma Public Works and Building Official will ensure that the Project is constructed to code and will monitor it to ensure that it is operating appropriately. In the event of an emergency safety personnel would respond. As far as costs, Section 15131 (a) of the CEQA Guidelines state that economic or social effects of a project shall not be treated as significant effects on the environment.

#### **Response to Comment 9-07**

This comment is stating the impacts of the Alternatives as outlined in Chapter 6, Alternatives of the revised Draft EIR and states that the Eight Unit Residential Alternative seems to provide the lowest environmental impact. No further response is required.

#### **Response to Comment 9-08**

The comment asks whether the conclusions in the alternatives change relative to each other when country wide VMT is used to calculate GHG. The conclusions would not change and are adequately analyzed in the revised Draft EIR.

#### **Response to Comment 9-09**

The comment expresses concern that the 50% Residential Alternative does not include a site plan or floor plan to determine access, egress parking and open space. CEQA does not require that the alternatives analysis include the same level of detail as the proposed project. Please refer to Master Response 7– Project Alternatives.

**Response to Comment 9-10**

This comment asks what the financial viability of each alternative is. Please refer to Master Response 7– Project Alternatives. CEQA requires that an alternative meet the basic project objectives. A financial analysis is not required under CEQA.

**Response to Comment 9-11**

The comment states that compliance with the general Plan for open space and other sections is not included. CEQA does not require that the alternatives analysis include the same level of detail as the proposed project. It is assumed that the alternatives would meet the City's requirements and policies for things like open space. Please refer to Master Response 7– Project Alternatives.

**Response to Comment 9-12**

This comment states that there are references to chapters that are not included in the revised Draft EIR. Please refer to Section 2.2 Summary of Revisions on page 2-4 of the revised Draft EIR which states, "The Revised Draft EIR is a partial EIR, and is limited to certain chapters of the 2016 Draft EIR listed under Section 2.3, Report Organization below." The revised Draft EIR did not recirculate the entire document. In this case Chapter 4.6 is referencing the original January 2016 Draft EIR.

## COMMENT LETTER # 10

**From:** Wendy Atkins <WendyA@sonomacity.org>  
**Sent:** Tuesday, September 04, 2018 11:26 AM  
**To:** Jim Reese (jreese@managementpartners.com); Steve Noack  
**Subject:** FW: comments on WEST NAPA HOTEL PROJECT EIR

Hi,

Please see email below.

Wendy Atkins  
Associate Planner  
City of Sonoma  
No. 1 The Plaza  
Sonoma, CA 95476  
(707) 933-2204  
[watkins@sonomacity.org](mailto:watkins@sonomacity.org)

-----Original Message-----

From: Marilyn Goode [<mailto:mgoode@vom.com>]  
Sent: Monday, September 03, 2018 12:09 PM  
To: Wendy Atkins <WendyA@sonomacity.org>  
Subject: comments on WEST NAPA HOTEL PROJECT EIR

Dear Planning Commissioners,  
My name is Marilyn Goode. I am a long time resident concerned by the ever increasing degradation of the Sonoma Valley for those living here. Increased traffic gridlock resulting in poorer air quality is one of the primary environmental effects of more and more tourists flooding into Sonoma. I believe this EIR still has not sufficiently developed the ALTERNATIVE PROJECT for a much smaller hotel which would include housing for its many employees, and a smaller restaurant or no restaurant at all. It is the responsibility of the Commission to see that the developer give the ALTERNATIVE PROJECT equal weight in order for many of us to even consider another hotel in our town. The community needs to diversify to keep a healthy economy. We are hooked on tourism and winemaking which are not sustainable long term.  
I appreciate all the hours and time you give when you serve on the Planning Commission.  
Blessing and good luck,  
Marilyn Goode

10-01

## **RESPONSE TO COMMENT LETTER #10 FROM MARILYN GOODE**

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### **Response to Comment 10-01**

The comment provides an opinion on growth in Sonoma; a statement on the alternative's evaluation, and a request to the Planning Commission for equal analysis of the alternatives as the Project. As stated in Master Response 7- Project Alternatives, CEQA does not require the same level of specificity as the Project.

**COMMENT LETTER # 11 a.**

RECEIVED

AUG 30 2018

CITY OF SONOMA

Sonoma Planning Commission

August 30, 2018

Re: Revised Draft EIR for W. Napa St. Hotel Project

Public Comment Hearing, September 4, 2018

The following are comments on the Revised Draft EIR

1. The EIR analysis of the 50% housing project alternate is inadequate. To do an adequate analysis of the Aesthetics, Land Use & Planning, Traffic, and Utility Services Systems required by CEQA, requires project design plans and documents. These plans and documents should be the same as those provided in the Draft EIR for the 8 unit residential alternate design documents. These are required to adequately evaluate the 50% housing alternate under CEQA.

**11a-01**

2. The revised traffic study is inadequate. It deducts traffic impacts, calculated per the ITE traffic generation manual, for existing commercial uses in existing buildings on the site that are proposed to be removed. These trip generation values are deducted from the proposed hotel trip generation values. But several of these commercial uses were errors in the Draft EIR, when the traffic counts were measured. For example the commercial space at 153 W. Napa St. was analyzed as a retail use as a "shopping center" for traffic generation values. The use was not a retail "shopping center" use, but is a corporate office use. This error overstated the deduction, and resulted in a lower total traffic generation values. This error would result in different outcomes for the various traffic impacts, for example to the Left Turn Warrant calculations.

**11a-02**

Thank you for your consideration.

Victor Conforti - Architect

## **RESPONES TO COMMENT LETTER #11a. FROM VICTOR CONFORTI**

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### **Response to Comment 11a-01**

This comment expresses a desire that the 50% Alternative provide more detail. See the Master Response to Comments 7-Alternatives.

### **Response to Comment 11a-02**

This comment questions the adequacy of the traffic analysis based on existing uses deducted. The traffic analysis was prepared based on the information available at the time, including the land uses for existing space to become the hotel. While the deduction in trips associated with a retail use would be greater than that for an office use, it is noted that due to its location at the Plaza, many of the Project's trips are expected to be made by walking, yet no deduction was taken to account for this effect. If the guests from only seven or eight of the 62 rooms elected to walk to a nearby restaurant, tasting room, or other visitor-serving use instead of driving, as would be necessary if the hotel were not located near such uses, this would more than offset the deduction taken for the retail land use. Because these walking trips were not deducted, it is expected that the trip generation as applied is still conservative.

West Napa Street Hotel  
DEIR Comments for Public Hearing

September 6, 2018

City of Sonoma Planning Commission

Please include these with my previous comments regarding the proposed project's DEIR:

**Aesthetics:**

The current fixed point of view renderings of the project from only one viewpoint from the surrounding streets and intersections, give only a single, selected by the project proponent, and are not adequate to give a true sense of the visual impacts. These project views were developed by using the 3D CAD electronic model, that is a normal part of the design of any project such as this. This 3D model can be viewed as a video showing a 3D drive-by, and a 3D fly-over video of the project site plan. This would show all the views that the public will experience as they drive on public streets, or are on neighboring properties, and provide a site plan view that the layman can fully understand. These are often used to show to the architect's clients and their prospective tenants or buyers.

11b-01

Also, story poles are needed to show Commissioners and citizens the scale, mass and height of the project, and motivate them to find the 3D images and videos that are, and can be provided, on the City website, prior to further public hearings.

11b-02

**Traffic:**

The project's traffic counts taken in the Spring of 2018 are inadequate. They need to be adjusted to reflect the higher traffic levels at the peak periods of traffic during the Summer months.

11b-03

Thank You,

Victor Conforti - Architect

## **RESPONSE TO COMMENT LETTER #11b. FROM VICTOR CONFORTI**

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### **Response to Comment 11b-1**

This comment provides a recommendation for additional 3-D visual simulations of the Project. It does not directly question the content of the revised Draft EIR, and no further response is required. The viewpoints that were chosen are those that would be visual from the street views. Internal or overhead views would not provide information pertinent to CEQA.

### **Response to Comment 11b-02**

This comment provides a request to install story poles on the Project site. Because buildings of similar height are already on the property, and the Project would not be substantially taller, there is no need for the installation of story poles. The Project meets or exceeds all of the Development Code provisions including height, and site coverage.

<b>Development Feature</b>	<b>Development Code Allowance (SMC Chapter 19.34, Table 3.7)</b>	<b>Project</b>
Building Setbacks	None Required	0-150 feet
Floor Area Ratio	2.0	0.62
Building Coverage	100%	44.1%
Maximum Roof Height	35 feet	35 feet
Additional height of roof mounted equipment	40 feet	40 feet
Open Space	10% of site minimum	32%

### **Response to Comment 11b-03**

This comment states that traffic counts taken in Spring of 2018 are inadequate. The traffic counts were taken while school was in session which is generally when the highest traffic occurs and determined to be adequate to analyze traffic impacts.



**From:** Tina Luther [mailto:tina@thenilesco.com]  
**Sent:** Thursday, September 13, 2018 11:10 AM  
**To:** Planning <planning@sonomacity.org>  
**Subject:** Hotel Project Sonoma commentary

I would ask that the Planning commission be very mindful of what is being proposed for parking for this project. Not only does the parking need to be adequate for guests, and visitors it must also need to be adequate for employees.

I realize there are ratios used to determine how many spaces are required based on the number of employees, however let's be honest when we say that most employees of this hotel cannot afford to live in Sonoma. Therefore, the bulk of the employees will be driving in from elsewhere. While it is altruistic to say that employees will carpool, take public transportation or ride bicycles, in reality most will not. There must be a robust amount of dedicated parking for all employees daily otherwise the burden will fall upon the neighboring business to fill that need.

In speaking specifically for Sonoma Marketplace Shopping Center, we are already heavily burdened with employees from the Best Western Sonoma Valley Inn, residents of Firehouse apartments (all of who apparently do not offer free or any parking for its employees and tenants) and employees of plaza businesses who do not have parking.

We, and the surrounding merchants cannot accept more burdens on our already limited parking. Now is the time to add that necessary parking to this project while it is in the planning stages because once built the opportunities have ended.

Respectfully,

Tina Luther  
Property Manager  
Niles Company  
P.O. Box 298  
Sonoma, CA 95476  
707-938-5616  
707-938-1886 fax

**12-01**

## **RESPONSE TO COMMENT LETTER #12 FROM TINA LUTHER**

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### **Response to Comment 12-01**

This comment as a nearby merchant expresses concern regarding lack of parking. Based on two parking analyses performed on the Project, adequate parking is being provided. Additional parking is being offered to employees as outlined above at the Bank of Marin site.

**COMMENT LETTER # 13**

*Item # 5*

RECEIVED

SEP 04 2018

CITY OF SONOMA

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

September 3, 2018

Sonoma Planning Commission  
1 The Plaza  
Sonoma, CA 95476

Re: Hotel Project Sonoma Revised Draft EIR

Dear Chairman Felder and Members of the Planning Commission,

One of the fundamental concerns I have with the environmental review of this proposal stems from the fact that it presupposes the aggregation of four parcels into one parcel, yet this was never addressed in the Land Use/Planning area of the DEIR or the Revised DEIR (RDEIR). The root of many of the proposal's environmental impacts on our community stems from the fact that the proposed project is out of scale with the fabric of Sonoma because the underlying proposed lot size is out of scale with the fabric of Sonoma. Yet we're all operating under the assumption that the lots have already been merged.

**13-01**

I would like to focus on two specific areas in the RDEIR that I feel are insufficient: the Alternative which includes 50% housing, and the Transportation and Traffic analysis.

I'd like to suggest that the RDEIR does not sufficiently evaluate an alternative which includes a minimum of 50% housing. Though the General Plan commercial land use designation "makes no reference to a required residential component," as is stated in RDEIR 4.12.1, the commercial land use designation is intended to provide commercial development "...in association with apartments and mixed-use developments...." (General Plan page 15). Furthermore, in the Development Code, "a residential component is required" in the Commercial Zoning District, "unless waived by the planning commission, and should normally comprise at least 50 percent of the total proposed building area." (SMC 19.10.020 B.) "Circumstances in which the residential component may be reduced or waived include, but are not limited to the following:

**13-02**

- a. The replacement of a commercial use within an existing tenant space with another commercial use.
- b. The presence of uses or conditions incompatible with residential development on or adjacent to the property for which a new development is proposed.
- c. Property characteristics, including size limitations and environmental characteristics, that constrain opportunities for residential development or make it infeasible.
- d. Limitations imposed by other regulatory requirements, such as the Growth Management Ordinance."

In my opinion, none of the circumstances which would allow the Planning Commission to waive the 50% required housing are applicable to this project and, as the City's stewards of the implementation of the Development Code, it would be irresponsible to do so. The City Council's Vision Statement for 2020 in the General Plan envisions a city where "housing is available and affordable to the residents and the local workforce to support an economically diverse population." What our General Plan envisions in its Community Development and Housing Elements is that growth is managed within a tight sphere of influence, and that a variety of housing types is provided for all segments of the population. There are few remaining opportunities to provide housing in Sonoma, if we are to build within our sphere of influence. One of the objectives of the applicant for this project is to "provide full- and part-time local employment opportunities to fill positions expected to operate the hotel and restaurant." (RDEIR 6.1.2). Where will these employees live? I feel that with the great opportunity enjoyed by the applicant to develop these four parcels comes great responsibility. Chief among these responsibilities is to comply with our Development Code by providing a minimum of 50% housing on the site.

13-03

CEQA states that "the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." (CEQA Section 15126.6d.) For the alternative which provides eight housing units there was limited supplementary graphic information included with the RDEIR, but no such information was submitted for the 50% housing alternative. I can only presume that this was omitted because it is not being seriously considered by the developer as it does not meet their stated objectives. What about the objectives of the City of Sonoma which are spelled out in our General Plan and Development Code?

13-04

In the 50% Housing Alternative, the only "slightly more severe" impacts compared to the proposed project are Air Quality, Greenhouse Gas Emissions, Noise and Public Services. The first three are attributed to the expansion of the subterranean garage by twelve parking spaces. The Public Service impact is attributed to the fact that there may be school-aged children living on the site in a 50% housing scenario which would increase student generation in the Sonoma Valley Unified School District. Why is "student generation" considered an environmental impact? According to the SVUSD Budget Review of June 2017, the School District "has experienced a decline in enrollment over the last several fiscal years." It seems to me that Sonoma would want to attract more students to the school district, and would not want to consider students as creating a negative environmental impact. By its transient nature, the tourist industry, to which the proposed hotel caters, is far more impactful to the environment than students living here. There is also an inconsistency in the RDEIR in the Public Service category of the 50% Housing Alternative where it is first stated that "overall service demands for fire and police protection would be similar to those of the proposed Project" and then goes on to say that under the 50% alternative there would be "Increased service demands." (RDEIR 6.5.9) The RDEIR makes no compelling argument that a 50% housing alternative would have substantially greater impacts than the proposed project. This being the case, I feel that the Applicant should be compelled to provide a minimum of 50% housing, as is anticipated in our Development Code.

13-05

Secondly, I feel that the Transportation and Traffic analysis in the RDEIR is too limited in scope and flawed. Erroneously, First Street West is categorized as a "collector street" in the RDEIR. Part of the RDEIR's conclusion that there will be less than a significant impact of delivery trucks from the project is based on this mis-categorization. (RDEIR page 4.10-29) Collector streets "link arterials to local streets and commercial and public destinations." However, south of Napa Street, the Circulation Element classifies First Street West as a "local" street, defined as "typically residential streets" which "provide access to neighborhoods and individual parcels within them." (2016 Circulation Element, page 7). The proposed loading zone and garbage pick-up area for the project is along the southbound lane of First

13-06



Street West which, in itself, may create a hazardous situation. As a resident of First Street West a few blocks south of the proposed project, I am concerned with the likely increase in delivery trucks and garbage trucks on this residential portion of First Street West, as this route will provide the most efficient way for a truck to return to a "collector" street (West MacArthur) or an "arterial" (Broadway). This was not addressed in the DEIR or the RDEIR. Though deliveries will occur during "off peak" hours, I live on First Street West during off peak hours and am therefore affected by the trips. While deliveries off peak hours may solve a traffic problem in the commercial district, they potentially create a neighborhood problem by having commercial vehicles travel through a residential neighborhood. In the RDEIR, though intersections as far west as Fifth Street West were studied, no intersection south of Napa Street was studied, yet Policy CE1.1 in the Circulation Element of the General Plan is to "ensure that the City's circulation network is a well-connected system that effectively accommodates vehicular and non-vehicular traffic in a manner that considers the context of surrounding land uses and the needs of all roadway users." CE Policy 3.3 is to "protect residential areas by keeping traffic speeds low and discouraging through truck traffic." And the bigger the project, the bigger the trucks; the RDEIR points to the potential use of "larger delivery trucks with trailers" on page 4.10-27. I don't envision that larger delivery trucks with trailers headed south on First Street West would willingly turn left on McDonnell or Maple Streets which are relatively narrow, or even Andrieux Street, which is another "local" street, to get to Broadway. Rather, they would likely continue their southward path by heading south on First Street West, through a residential area, until they got to the collector, West MacArthur, to get back to Broadway, the arterial, commercial street. Furthermore, it would be unenforceable even if it were prohibited for delivery trucks to travel south on First Street West to get to MacArthur.

It feels to me like we're at a tipping point here in Sonoma: are we going to be a city whose predominant focus is on catering to tourists, or will we choose to cater to our own citizens, realizing that what attracts tourists here in the first place is the natural beauty, the wine (of course), and the authenticity of our city. We need to stop being fearful that our property values will plummet if we stop building large hotels and the tourists stop visiting. The tourists will still come. It's beautiful here. We have good weather. We're an easy drive from San Francisco. We have significant history, and, of course, we have wine. Let's choose to be authentic by prioritizing the people who live in Sonoma. For starters, let's stop merging lots, as is proposed with this project, which creates new lots out of scale with the fabric of our community, and result in out-of-scale projects. Let's have the vision to shape our city, and not let developers who come along shape us. Let's continue to implement the vision in our General Plan, which is to make housing available and affordable to the residents and the local workforce to support an economically diverse population by requiring that at least 50% of this project is devoted to housing. It's hard, deliberate work, but our city is worth it.

Sincerely,

Carol Marcus

**13-06**  
**cont.**

**13-07**

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## **RESPONSE TO COMMENT LETTER #13 FROM CAROL MARCUS**

### **Response to Comment 13-01**

This comment expresses concern with the lot line adjustment/lot merger. In order to provide a thorough analysis of all potential impacts, under all or the environmental topics the EIR relies on the Project Description (Chapter 3 of the revised Draft EIR), including the assumption that the permits and approvals listed in Section 3.6.1, on page 3-16 of the revised Draft EIR would be approved. The Project meets the development code requirements for setbacks, height, lot coverage etc., with or without the lot adjustment/lot merger. The Project is consistent with the character of the surrounding buildings in terms of scale and massing. Because the Project would redevelop the site, it will not create a significant change in the visual environment. Further, a lot line adjustment/lot merger is a minor action, and it on its own would not constitute a significant physical impact on the environment.

### **Response to Comment 13-02**

The comment provides an opinion on the content of the alternative's analysis in the revised Draft EIR, and provides information on the Development Code, but does not question a specific component of the EIR, and no further response is required.

### **Response to Comment 13-03**

The comment expresses an opinion on the issue of adding residential units to the Project. It does not directly question the analysis in the revised Draft EIR. No further response is required.

### **Response to Comment 13-04**

This comment states that the 50% Residential Alternative does not contain the same level of detail as the Eight Unit Residential Alternative. Please refer to Master Response 7 – Project Alternatives.

### **Response to Comment 13-05**

This comment reflects the opinion that the 50% Residential Alternative would result in less significant impacts than the Project. Please refer to Master Response 7 – Project Alternatives. The opinion on providing residential housing on the site is noted. Residential uses typically result in an increased demand for service calls.

### **Response to Comment 13-06**

This comment expresses concern with deliveries. See Master Response 5– Deliveries on First Street West. As noted in the Master Response, the majority of deliveries will be made by small box trucks, such as the type used by FedEx and UPS. These trucks are already commonplace on every residential street, are likely already in the area making other deliveries, so the nominal number of added small trucks that might use First Street West can reasonably be expected to be imperceptible.

Because a nominal volume of traffic from the Project is expected to use First Street West, and because prior analyses for another project in Sonoma (Traffic Impact Study for the 853 Fourth Street West Project, W-Trans, June 15, 2018) showed that West MacArthur Street/First Street West is currently operating at LOS B and is expected to operate at LOS D under future volumes, analysis of additional intersections south of the Project site on First Street West was deemed unnecessary.

**Response to Comment 13-07**

This comment provides a conclusory statement to the preceding comments. The comment does not question the adequacy of the analysis of the EIR. No further response is required.

COMMENT LETTER # 14 a.

Johanna M. Patri, AICP  
P. O. Box 604  
Sonoma, CA, 95476  
707 996-6412  
jmpatri@aol.com

RECEIVED

SEP 04 2018

CITY OF SONOMA

September 1, 2018

***Delivered via email***

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

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

Dear Commissioners:

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

**Project Location and Project Description (Including Figure 3-1 DEIR)**

1.2 Project Location and Project Summary: The DEIR fails to state that the project site is bounded by Highway 12 (West Napa Street) on both the north and the south, as it fails to include the proposed use of the Bank of Marin property (136 West Napa Street) for employee parking, which entails ingress and egress and pedestrian crossing of Highway 12, adding to the vehicular and pedestrian traffic circulation of the proposed project.

14a-01

- (1) "Potential" Requirement for Off-site Parking: Is 136 West Napa Street proposed to be used for employee parking or is it not? It is not adequate to say, based on a now invalid Resolution, "a recommended condition of approval has been identified to require off-site parking on a property located across West Napa Street from the subject property". Is this site part of the "whole of the action" under the provisions of CEQA? An objection raised in the appeal of the previous EIR and addressed in City of Sonoma, Resolution #43-2017 Item 3. Revisions to the EIR A. Project Description was to update the Project Description to include the parking lot at 136 West Napa Street. "Potential Requirement for Off-site Parking", under the guise at this juncture in the environmental review process as a "recommended condition of approval" is not acceptable under the provisions of CEQA. Furthermore, the traffic impacts related to ingress and egress, traffic queueing and pedestrian crossing on Highway 12 need to be fully evaluated in the Traffic Study and reviewed by Caltrans. (Note: In their August 14, 2018 letter to David Goodison re: Revised DEIR, California Department of Transportation in *Project Understanding* does not mention the proposed off-site parking site for 25 additional vehicles, most likely because of its obscurity in the project description and only later Page 2 refers to "traffic queues on SR 12 from off-site parking.")

14a-02



(2) Many of the parking spaces at the Bank of Marin parking lot are currently used (leased or rented?) by other businesses in the immediate area. Once these spaces are no longer available to other businesses where will those employees park - in surrounding residential areas instead? On August 30, 2018 in the afternoon, my parking space count showed 18 vacant parking spaces, not 25. The multi-tenant use of this off-site parking lot proposed to be used to cover the insufficient parking of the hotel proposal has not been sufficiently addressed and perhaps should be eliminated altogether with a revised project whereby all parking can be provided on-site.

14a-03

(3) A Lot Line Adjustment proposal, with boundary descriptions, must be included in the project description as approval of a Lot Line Adjustment is required to perfect the project as proposed ("whole of the action") (refer to 3.1.2 (Assessor's Parcel Number 018-251-055) Lot Line Adjustment (LLA): The DEIR fails to mention a LLA as part of the project description nor are there any findings that a LLA would conform to the General Plan and Zoning Ordinances. In accordance with the Subdivision Map Act, review of a Lot Line Adjustment (LLA) is required to determine if it conforms to the General Plan and Zoning Ordinances.

14a-04

(4) The project proponents are clearly proposing a request for the approval of a Waiver from the development of a housing component as required by the zoning. (*Section 19.10.020 of the Sonoma Development Code requires on development in the commercial zone: "In applications for new development on properties of one-half acre in size or larger for which a discretionary permit is required, a residential component is required, unless waived by the Planning Commission. A residential component should normally comprise at least 50 percent of the total proposed building area."*) A full discussion of the requirement of Section 19.10.020 of the Sonoma Development Code needs to be included in the DEIR. The project sponsor and the DEIR continue to speculate that a Waiver will be granted.

14a-05

(5) Project and Whole of the Action: The Revised DEIR fails to address the whole of the action. Under State California Environmental Quality Act (CEQA) Guidelines (Section 15378), "project" means the "whole of the action", which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. This definition provides for the maximum protection of the environment. Under the provisions of CEQA, if the Lead Agency needs to grant more than one approval for a project, the CEQA document must include all those components. "Piecemealing", rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA.

14a-06

#### **Section 19.10.020 of the Sonoma Development Code 50% Housing Requirement**

The proposed project is in conflict with Section 19.10.020 B.3 of the Sonoma Development Code, which requires that a residential component be included "in applications for new development on properties of one-half acre in size or larger for which a discretionary permit is required,....., unless waived by the Planning Commission." The Planning Commission, in conjunction with this proposed project, has not waived this requirement. A residential component should comprise of at least 50% of the total proposed building area, or approximately 30,000 square feet in the case of the proposed structure(s). Logic would have

14a-07

it that under the zoning of the property and in compliance with the Sonoma Development Code, the primary proposed project should be in compliance with Section 19.10.020 B.3 with an alternative preferred project by the project sponsor requesting a *Waiver* to this requirement and only under circumstances under the regulations of Section 19.10.020 B.3 can a *Waiver* be granted. Therefore, the DEIR fails to address in any substantive, verifiable way a project that is required under the provisions of Section 19.10.020 B.3 of the Sonoma Development Code.

14a-07  
cont.

To adequately analyze a 50% Housing Alternative that would affect and impact of the design of the structure(s) including massing, height, balconies, architectural details, what is required here must include, but not necessarily be limited to, the following:

14a-08

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

Per the affordable housing crises in Sonoma and Sonoma Valley and 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 – it would be irresponsible for the City decision makers to grant any kind of *Waiver* to the housing requirement under the zoning and the Sonoma Development Code. New hotels and restaurants will induce the need for more workforce and affordable housing. Per the Nexus Study on commercial impact on the need for more housing, for a 67,478 square foot hotel, it could be deduced that 32 housing units are needed, of which 30 need to be affordable. 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, as required by the Development Code and encouraged through the General Plan, Housing Element, Policy 1.5: "*Continue to provide opportunities for the integration of housing in commercial districts and the adaptive reuse of non-residential structures.*" **The decision makers cannot wait until the merits of the project to study this requirement.**

14a-09

In addition, instead of proposing affordable employee on-site housing to facilitate a decrease in VMT, the project sponsor 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.

14a-10

The DEIR must adequately analyze a project with an on-site residential component consistent with the Sonoma Development Code and dedicated to affordable housing for employees of the project to reduce VMT and provide affordable housing opportunities to lower-paid employees.

14a-11

#### **Pedestrian Circulation**

The Pedestrian Circulation analysis does not address the pedestrian circulation for the 25 car users that will have to cross Highway 12 (West Napa Street) on a regular basis from the Bank of Marin off-site parking lot.

14a-12



### **Scale and Intensity of Use of the Proposed Building and Project**

In keeping with the consistency of character of the small-town scale of Sonoma, the proposed hotel project is too massive for the neighborhood. It appears larger than all of the buildings on the Plaza except for perhaps the Sebastiani Theatre. The other hotels around the Plaza are much smaller in size, with the largest being the El Dorado Hotel with 27 rooms. A small-scale hotel, with cottage-type employee housing units, could be most charming! The DEIR fails to provide enough detailed analysis, including photo simulations and on-site story poles, depicting and verifying that the proposed hotel of this size or a structure of this size for a hotel with a 50% housing component will not have a significant aesthetic and visual impact.

14a-13

### **Transportation, Vehicle Miles Traveled (VMT), Air Quality and Greenhouse Gas (GHG) Emissions and Mitigation Measures**

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

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

14a-14

Agencies (Pasadena and San Francisco) have adopted the VMT metric in place of LOS for all CEQA determinations and are using VMT models most notably for local climate action plans. The City of Sonoma has the authority to require use of VMT metrics in the Hotel Project Sonoma DEIR. The goal here is to reduce driving not only by tourists, but by the local work force, and a "down-town" work-force housing component must be analyzed to reduce driving to work and thus reduce VMT.

Furthermore, the California Global Warming Solutions Act of 2006 (Assembly Bill 32) requires the California Air Resources Board (ARB) to facilitate substantial greenhouse gas (GHG) emissions reductions, both from within the state and from imported electric power generated in other states. The goal of AB 32 is to reduce statewide GHG emissions to 1990 levels by 2020. This will be achieved by cutting about 30 percent from "business-as-usual" emission levels projected for 2020. In 2007, the state legislature passed Senate Bill 97, which required amendments to the California Environmental Quality Act (CEQA) Guidelines to incorporate analysis of, and mitigation for, GHG emissions from projects subject to CEQA.

14a-15

The CEQA Guidelines do not contain statewide quantitative thresholds of significance for GHG impacts; establishing numeric thresholds has been delegated to each of California's 35 air districts. However, in lieu of meeting a quantitative threshold, the Guidelines state that a project may be found to have a less than significant impact on climate change if it complies with an

14a-16

adopted plan – typically at the county or district level – that includes specific measures to limit future GHG emissions to substantially less than business-as-usual.

14a-16  
cont.

Most California air districts have adopted some form of GHG mass emissions thresholds expressed in the international units of metric tons per year of carbon dioxide equivalents (MT/yr CO<sub>2</sub>e). These thresholds can vary from district to district, and can comprise different thresholds for permitted stationary/industrial sources versus land use projects such as housing developments, office buildings, and shopping centers. Instead of stack emissions, land use projects generate direct and indirect GHG emissions – mainly via motor vehicle traffic and utilities consumption. This latter category is the focus of most CEQA GHG impact assessments conducted for the private sector.

14a-17

Many California cities and counties have updated general plan conservation elements or have developed "climate action plans" to include goals and policies designed to address air pollution and GHGs. Typical goals and policies apply to land use projects – not stationary sources – and tend to focus on sustainability topics including improvements to the transportation system, reducing long distance commuting, encouraging and supporting non-auto transportation, and reducing future land use conflicts related to air pollution. While many goals and policies are geared toward criteria pollutants, such as ozone and particulate matter, implementation of such goals and policies also benefits efforts to reduce GHG emissions.

Projects that decrease VMT have the potential to have a "less-than-significant" impact under CEQA. Providing a project with a housing component in the down-town segment, which lacks adequate regional public transportation, that is especially designated for employees of the proposed hotel, has the potential for reducing VMT and GHG emissions, and resulting in a better air quality.

14a-18

The DEIR fails to analyze traffic and the increase in VMT in sync with the State's goals and mission, particularly since West Napa Street is State Route 12 with a high volume of traffic going through the City of Sonoma.

#### **Traffic Impacts and Mitigation Measures**

Firstly, the DEIR's proposed project contains many unverifiable, misleading, unquantifiable, and highly speculative assumptions such as "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" (refer to page 1-4 **Pedestrian Circulation**). How will guests get to wineries, weddings, social functions outside of the Plaza Area? The hotel operator shall provide transit passes for employees will to travel to work by bus, allow employees to work virtually if feasible for their job classification (refer to **Impact Trans-2 and Mitigation Measure Trans-2**). Improvements to the intersection of West Napa Street/First Street West, identified by the City of Sonoma as part of the General Plan Update process, including curb extensions, striping modifications, and enhanced signing should be constructed by the project (refer to **Impact Trans-6A and Mitigation Measure Trans-6A**). Should the project include any changes to the existing frontage on West Napa Street, such changes must accommodate planned future bike lanes (refer to **Impact Trans-7 and Mitigation Measure Trans-7**). **Note: How will bicycles navigate the proposed bulb-outs?**

14a-19

The DEIR fails to provide engineered drawings – including the proposed bulb-outs - and review that verify how, or if, proposed broad-stroked Mitigation Measures will reduce to less-than-significant Impact Trans-1A (*Impact TRANS-1A: The Project would add vehicular and*

14a-20



*pedestrian trips to an intersection that is already operating at an unacceptable level of service during the weekend midday peak period.)* thereby: (a) resulting in a complete street system for pedestrian, bicycle, and vehicular traffic, including public transit stops; (b) allowing for public comment in accordance with the provisions of CEQA; and (c) resulting in assurance that any Caltrans required improvements in the State Route 12 road right-of-way, including, but not necessarily limited to, widening West Napa Street, construction of left-hand turn lanes, construction of bicycle lanes (*refer to Mitigation Measure TRANS-6B*) and bus stops, construction of pedestrian curb extensions, loss of on- street parking, and traffic signals will, in and of themselves, not be impacting. Policy measures within a General Plan cannot be used for Mitigation Measures as they are neither quantifiable nor verifiable.

**14a-20**  
cont.

Furthermore, case law and the courts have discussed improper deferral of CEQA mitigation and future projects. Precise details of proposed mitigation measures must be meaningfully analyzed prior to certification of a DEIR or project approval, otherwise certification would be made outside of, and without, specific plans where the public has input in accordance with the provisions of CEQA. Mitigation Measure TRANS-1A improperly defers the formulation of actual mitigation measures to the future, which is unacceptable at worst and speculative at best.

**14a-21**

In addition, the project lacks a Travel Demand Management Plan; and therefore, the DEIR fails to analyse the adequacy of a Travel Demand Management Plan to reduce traffic and green-house gas emissions and improve air quality. It does not address or provide a Travel Demand Management Plan (TDMP) with Best Employer-Based Practices and Implementations as part of the proposed project as encouraged by Caltrans to significantly reduce VMT and reduce green-house gases.

The DEIR must address the need for a Travel Demand Management (TDM) with Best Employer-Based Practices and Implementations as part of the proposed project and as encouraged by Caltrans to significantly reduce VMT and reduce green-house gases by providing employees with:

- Financial incentives such as transit passes for using Sonoma County Transit routes;
- Public transportation information;
- Employer-provided shuttle buses and vanpools;
- Shuttle transportation for hotel guests;
- Ride-sharing opportunities;
- Transportation options;
- Dedicated employee on-site parking spaces for carpoolers;
- Staggered work hours and flexible scheduling;
- Compressed workweek;
- Commute during off-peak times of day;
- Affordable employee on-site housing;
- Secure workplace parking for bikes, as well as shower and locker facilities for those who bike and walk to work; and
- Guaranteed-ride-home for unplanned trips home.

**14a-22**

## Conclusion

By its nature, a EIR is a document prepared by outside consultants, void of an understanding of the community's ambiance, uniqueness, and richness as an EIR is a technical document, which must contain quantifiable, objective, and complete information and data that can be verified.

The job-housing-vehicle miles traveled crises of Sonoma Valley is why the State passed in 2013, SB743. It reflects a State Legislative mandate to more appropriately address the bigger picture of traffic congestion management related to infill development and reduction of GHG emissions because of Vehicle Miles Traveled. The DEIR fails to analyze Vehicle Miles Traveled (VMT) and promote the State's smart mobility goals, thereby aligning the City of Sonoma's long-range transportation plans and reduction of greenhouse gases.

The DEIR fails to analyze traffic and the increase in VMT in sync with Caltrans' new mission, vision, and goals to reduce statewide vehicle miles traveled (VMT) and to promote the State's smart mobility goals, as West Napa Street is State Route 12 with a high volume of traffic going through the City of Sonoma.

A development model, consisting primarily of lower-income paid jobs, with no provision for housing, that require those workers to live outside of the community and commute long distances, is not a worthy or sustainable business model.

A basic principal of CEQA is simple: design, shape, and analyze the total project and sufficient alternatives to avoid significant impacts before deciding to certify an DEIR and subsequently approve a project.

CEQA requires the analysis and shaping of a project in quantifiable terms, not assumptions. Figuring it out later is neither a sound approach for the decision makers or the City of Sonoma as a community, nor likely a defensible approach under CEQA.

Thank you for your consideration.

Sincerely,



Johanna M. Patri, AICP

Desktop/Hotel Revised EIR 8\_30\_2018

14a-23

14a-24

14a-25

14a-26

## **RESPONSE TO COMMENT LETTER #14A FROM JOANNA M PATRI, AICP**

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### **Response to Comment 14 A-01**

This comment states that the Project description should have mentioned the project site is bounded by Highway 12 (West Napa Street on both the north and the south) and didn't include the Bank of Marin Property (136 West Napa Street). Please refer to Chapter 3, Project Description, Page 3-1, which notes that the site is bounded by Highway 12 on the north. The Project site is not bounded by Highway 12 (Broadway) to the south, which is located one block to the east of the Project site.

The use of the Bank of Marin parking lot is discussed in Chapter 3, Project Description, on page 3-13 of the revised Draft EIR. Please refer to Master Response 6 – Off-Site Parking.

### **Response to Comment 14A-02**

This comment states that the offsite parking should include the offsite parking lot at the Bank of Marin. The offsite parking is part of the Project and was adequately analyzed in the EIR. The adequacy of parking is not a CEQA issue, so under CEQA a lack of parking is not considered significant. The potential for inadequate parking to be a significant impact was removed from the CEQA Guidelines in 2010. However, the Project as proposed meets the City's requirements for parking, so the parking supply is considered adequate under this standard. See also Master Response 6 – Off-Site Parking.

As indicated in the traffic study, traffic impacts were adequately studied. Pedestrian bulb-outs are proposed which would result in a safety improvement for pedestrians.

### **Response to Comment 14A-03**

The comment states that based on their observation only 18 vacant parking spaces were available at the Bank of Marin. The adequacy of parking is not a CEQA issue, so under CEQA a lack of parking is not considered significant. The potential for inadequate parking to be a significant impact was removed from the CEQA criteria in 2010. However, the Project as proposed meets the City's requirements for parking, so the parking supply is considered adequate under this standard.

### **Response to Comment 14A-04**

The comment states that the lot line proposal with boundary descriptions should be included in the Project description. The lot line adjustment is referenced in Chapter 3, Project Description of the revised Draft EIR on page 3-3, Section 3.1.2, Project Site Setting which states that four existing parcels would be combined by a lot line adjustment into a single parcel. The text on page 3-16 has been amended to also include the lot line adjustment in the list of approvals.

The comment regarding findings as part of a lot line adjustment are required as part of the Project review, not as part of the EIR process. This information will be included in the staff report. The Project is consistent with the setbacks and site coverage with or without the lot line adjustment/lot merger.

### **Response to Comment 14A-05**

The comment states that the EIR continues to propose a residential waiver. This is correct. CEQA requires that an EIR analyze the proposed project. In this case the development application included a request for a waiver from the residential component. The residential waiver is discussed in Section 4.12, Land Use and Planning, of the revised Draft EIR. As noted

on Page 4.12-3, "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. Therefore, analysis of the Project's consistency with this section of the Development Code is not required under CEQA and the impact is less than significant. Section 4.12 does include a discussion of the waiver in relation to the City's Regional Housing Needs Assessment objectives and concludes that granting the waiver would not have any effect with respect to meeting the City's RHNA objectives. The site is not identified in the Housing Element as a housing opportunity site. The comment does not provide a reference to where the revised Draft EIR speculates that a waiver will be granted, and no further response is required.

#### **Response to Comment 14A-06**

This comment references CEQA and the "Whole of the Action and piecemealing. The requested entitlement approvals are listed in the revised Draft EIR on page 3-16. The comment does not identify any component of the Project that is not evaluated in the EIR.

#### **Response to Comment 14A-07**

The commenter feels that the Project is in conflict with the Development Code. It is correct that the Planning Commission has not granted a waiver to the housing component. That is because until the CEQA process has been completed, the Planning Commission has not considered the matter. As indicated in this comment, the Planning Commission may or may not grant a waiver to the housing component. The Project Applicant is requesting that this waiver be granted, which is allowed under the Development Code and is not considered a variance or exception. Please refer to Master Response 7 – EIR Alternatives.

#### **Response to Comment 14A-08**

This comments requests that the 50% residential alternative be examined in more detail. Please refer to Master Response 7 – EIR Alternatives. The CEQA Guidelines section 15126.6 (d)state that *.."the significant effects of an alternative shall be discussed, but in less detail than the significant effects of the project as proposed."* There is nothing in CEQA that mandates the alternatives provide unit sizes, location and required open space, floor plans or parking requirements. For purposes of the alternative analysis, CEQA requires that alternatives feasibly attain most of the project objectives and evaluate the comparative merits of the alternatives (Section 15126.6 (a). Nonetheless, please see page 6-2 of the revised Draft EIR where it states that the residential units would average 800- square feet and consist of 12- two- bedroom units and 13 one-bedroom units. The development footprint would remain the same and the height and massing would remain the same. Parking would be designed to be accommodated onsite.

#### **Response to Comment 14A-09**

This comment states that more housing is needed. Section 15131 of the CEQA Guidelines state that economic or social effects of a project shall not be treated as significant effects on the environment.

#### **Response to Comment 14A-10**

The comment states an opinion on a comment made by the Project Applicant that residential uses wouldn't be compatible with the hotel use. The comment does not directly question the adequacy of the revised Draft EIR. No further response is required.



#### **Response to Comment 14A-11**

This is another comment regarding the onsite residential component. Please see Master Response 7-Project Alternatives. The revised Draft EIR includes a residential component alternative.

#### **Response to Comment 14A-12**

This comment states that pedestrian impacts associated with employee parking have not been analyzed. Please refer to Master Response 6 – Off-Site Parking

#### **Response to Comment 14A-13**

This comment requests photo simulations and onsite story poles verifying that the proposed hotel of this size would not have a significant aesthetic or visual impact. Please refer to Master Response 7 – EIR Alternatives. The Project is the redevelopment of an existing developed parcel. The Project is consistent with setbacks, site coverage, scale and massing of the Development Code. The alternatives would also meet the Development Code standards. Further, CEQA does not require that Alternatives contain the same level of detail as the Project and nothing in CEQA requires that alternatives include story poles or visual simulations.

This comment provides a request to install story poles on the Project site. Because buildings of similar height are already on the property, and the Project would not be substantially taller, there is no need for the installation of story poles. The Project meets or exceeds all of the Development Code provisions including height, and site coverage.

<b>Development Feature</b>	<b>Development Code Allowance (SMC Chapter 19.34, Table 3.7)</b>	<b>Project</b>
Building Setbacks	None Required	0-150 feet
Floor Area Ratio	2.0	0.62
Building Coverage	100%	44.1%
Maximum Roof Height	35 feet	35 feet
Additional height of roof mounted equipment	40 feet	40 feet
Open Space	10% of site minimum	32%

#### **Response to Comment 14A-14**

The EIR requests a VMT Analysis. See Master Response 1- VMT Analysis. The revised Final EIR has been amended to include an expanded list of mitigation measures to reduce potential VMT from the Project. The City will ensure the measures are implemented as identified in the Mitigation Monitoring and Reporting Program found in Appendix R.

#### **Response to Comment 14A-15**

The commenter references AB 32 and SB 97, which directed the Resources Agency to develop guidance for assessing GHG emissions impacts under CEQA. The Draft EIR, revised Draft EIR, and Final EIR address GHG emissions impacts, consistent with the direction the Resources Agency provided in response to SB 97. The State legislative framework for GHG emissions reductions, including AB 32, but also several other elements, is described on pages 4.6-6

through 4.6-17 of the 2016 Draft EIR and in Master Response 2 and 3 above. Further the Project is proposed as a LEED certified building which will further ensure that operational impacts of the Hotel will be reduced over normal construction.

#### **Response to Comment 14A-16**

The commenter states that the CEQA Guidelines do not provide quantified significance thresholds, but that a project can have a less than significant impact related to GHG emissions if it complies with a plan prepared to reduce emissions.

The commenter is referencing material summarized in CEQA Guidelines Section 15183.5, "Tiering and Streamlining the Analysis of Greenhouse Gas Emissions." This is one option for lead agencies in addressing cumulative GHG emissions effects, but it is not mandated. Please see the 2016 Draft EIR (page 4.6-19), which states that the Project would not have a significant effect related to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, based on the Initial Study prepared prior to the 2016 Draft EIR (Appendix B to the Draft EIR, starting on page 31). In the Initial Study, the proposed Project was compared to the Air Resources Board Scoping Plan, and the statewide strategies that have been implemented to achieve State legislative GHG emissions mandates. The Project was also compared to the Metropolitan Transportation Commission/Association of Bay Area Governments Plan Bay Area, which is designed to achieve passenger vehicle related GHG emissions reductions, and the Sonoma County Community Climate Action Plan. Please see also the Master Response 2 and 3, which include detailed GHG estimates, and provide a discussion of different quantified options for assessing cumulative significance of GHG emissions effects.

#### **Response to Comment 14A-17**

The commenter states that air districts have established mass emissions significance thresholds. The BAAQMD's approach on this topic is summarized on pages 4.6-19 and 4.6-20 of the Draft EIR and was used to guide the analysis in the Draft EIR. Other approaches to analyzing significance are outlined in Master Response 2 above.

#### **Response to Comment 14A-18**

The commenter states that projects that decrease VMT could have a less-than-significant impact under CEQA and that a housing project designed for hotel employees could reduce VMT and GHG emissions. Please refer to Master Response 1 – VMT Analysis.

#### **Response to Comment 14A-19**

The comment asks for more specificity regarding pedestrian circulations, TRANS 2 mitigation and TRANS 7 mitigation and the bulbouts. See Master Response 4 – Pedestrian Bulb-Outs, and response to Comment B02-31.

#### **Response to Comment 14A-20**

The comment asks for detailed information regarding the bulbouts. It is assumed that the commenter is referring to Mitigation Measure TRANS-6A as there is no Mitigation Measure TRANS-1A in the Draft EIR. Please refer to Master Response 4 – Pedestrian Bulb-Outs. There

are three exhibits Figures 4.10-7, 4.10-7a and 4.10-7b which show the proposed improvements. Further, the VMT mitigation measures have been expanded. See Master Response 1.

#### **Response to Comment 14A-21**

The commenter states that mitigation can not be deferred. It is assumed that the commenter is referring to Mitigation Measure TRANS-6A as there is no Mitigation Measure TRANS-1A in the Draft EIR. Please refer to Master Response 4 – Pedestrian Bulb-Outs. Further, the VMT mitigation has been expanded to include more detailed quantifiable measures. See Master Response 1 above.

#### **Response to Comment 14A-22**

This comments references Caltrans VMT reduction measures. Please refer to Master Response 1 – VMT Analysis. More detailed mitigation has been identified.

#### **Response to Comment 14A-23**

The comment provides a statement on the content of the revised Draft EIR. The EIR has been prepared by consultants with expertise in environmental review and transportation analyses. It has been reviewed for adequacy by the City of Sonoma for compliance with CEQA. The purpose of CEQA is to provide information to decision-makers based on technical data. Its purpose is not to debate the merits of the Project.

#### **Response to Comment 14A-24**

The comment states that the EIR fails to analyze VMT. The EIR does contain a VMT analysis. See Master Response 1- VMT Analysis.

#### **Response to Comment 14A-25**

The comment states the EIR fails to analyze VMT in sync with Caltrans new mission vision and goals related to VMT. The EIR does contain a VMT analysis. See Master Response 1-VMT Analysis.

#### **Response to Comment 14A-26**

This comment provides a conclusory statement on previous comments. CEQA does not require that an EIR design or shape a Project. It is an information document which discusses the environmental impacts of the Project and ways to mitigate or avoid such impacts.

## COMMENT LETTER # 14b.

Johanna M. Patri, AICP  
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jmpatri@aol.com

September 12, 2018

***Delivered by hand***

***Please distribute this letter as noted:***

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 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.

14b-01

Firstly, who or what entity, on behalf of the City of Sonoma, the City of Sonoma Planning Commission, and the public, will be reviewing the adequacy of the West Napa Street Hotel Project Sonoma Revised Draft EIR (DEIR) and responses to comments of the DEIR as prepared by Placeworks? What qualifications in Land Use Planning and the California Environmental Quality Act (CEQA) does that person or entity have?

14b-02

Secondly, City of Sonoma Resolution #43-2017 Section 3. Revisions to the EIR states: "The City Council hereby directs that the EIR be revised as follows:

D. Alternatives. Analysis of an expanded range of alternatives including, at a minimum, the following:

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

14b-03

The DEIR fails to analyze with any degree of specifics in order for the decision making body or the public to make an objective determination as to this alternative.

Thirdly, because: (1) CEQA requires more than merely preparing environmental documents (CEQA Guidelines Article 1. Section 15002 General Concepts; (2) CEQA requires government to consider environmental consequences of their actions before approving plans or committing to a course of action on a project; (3) an EIR is a technical document, which must contain quantifiable, objective, and complete information and data that can be verified, so that the public and the decision makers are fully informed; and (4) the EIR must contain a meaningful discussion and analysis of project alternatives (*Laurel Heights Improvement Assn v. Regents of the Univ. of Cal.*), it is highly unlikely that the applicant's architect can develop and present an objective and unbiased 50%, feasible housing component to the hotel project and that plans for a housing component alternative. The DEIR fails to provide a thorough 50% housing alternative project prepared and peer reviewed by a licensed architect, not associated with the project developer.

14b-04

Fourthly, it should be noted that in Section 6. Alternatives to the Project, the revised DEIR, under Section 6.1.2 Project Objectives, has added

- Construct a 62-room hotel, restaurant, and spa on an infill site in downtown Sonoma, CA.

14b-05

This is the project, and the DEIR project should not be construed as a "project objective".

Fifthly, it should be noted that in the DEIR the Hotel Only Alternative, with no restaurant as part of the Project, and the number of hotel rooms reduced to 30, 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. This alternative provides a superior project minimizing the environmental impacts.

14b-06

#### **Section 19.10.020 of the Sonoma Development Code**

The proposed project in the DEIR is in conflict with Section 19.10.020 B.3 of the Sonoma Development Code. (*Section 19.10.020 of the Sonoma Development Code requires on development in the commercial zone: "In applications for new development on properties of one-half acre in size or larger for which a discretionary permit is required, a residential component is required, unless waived by the Planning Commission. A residential component should normally comprise at least 50 percent of the total proposed building area."*) The DEIR fails to provide a full discussion of the requirement of Section 19.10.020 of the Sonoma Development Code.

14b-07

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 speculate that a Waiver will be granted.

Logic would have it that under the zoning of the property and in compliance with the Sonoma Development Code, the primary proposed project would be in compliance with Section 19.10.020 B.3 with an alternative preferred project by the project sponsor requesting a Waiver to this requirement and only under circumstances under the regulations of Section 19.10.020 B.3 can a Waiver be granted. The DEIR fails to address in any substantive, verifiable way a

14b-08



project that is required under the provisions of Section 19.10.020 B.3 of the Sonoma Development Code.

14b-08  
cont.

To adequately analyze a 50% Housing Alternative that would affect the design of the structure(s) including massing, height, balconies, architectural details, what is 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

14b-09

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

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, as required by the Development Code and encouraged through the General Plan, Housing Element, Policy 1.5: *"Continue to provide opportunities for the integration of housing in commercial districts and the adaptive reuse of non-residential structures."* **The decision makers cannot wait until the merits of the project to study this requirement.**

14b-10

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.

14b-11

Given the inadequacy of small housing units within the Plaza area, there is insufficient data and analysis in the DEIR 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.

14b-12

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.

14b-13

Furthermore, the DEIR fails to thoroughly analyze with sufficient plans, including design and site plans, and infrastructure plans that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project. Factors that must be taken into account include:

14b-14

- site suitability;
- economic viability;
- impacts to infrastructure;
- General Plan consistency; and

- regulatory limitations and consistency.

B12-14  
cont.

While it is alleged that the applicant seeks a 5-star Hotel Project, which in and of itself has its own criteria, the Statement of Objectives in the previous EIR consisting of:

- (a) provide full- and part-time local employment opportunities;
- (b) stimulate the local economy;
- (c) provide aesthetically pleasing architecture;
- (d) promote economic vitality for the City; and
- (e) promote sustainability

14b-15

are broad enough that a reasonable range of alternative projects can be analyzed.

An EIR is required to "ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official." (*Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 197 [132 Cal. Rptr. 377, 553 P.2d 537].) The discussion must 'focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.' (*Guidelines*, § 15126, (d)(3).) (*Kings County Farm Bureau, supra*, 221 Cal. App. 3d at p. 733.) The discussion of alternatives must be "meaningful" and must "contain analysis sufficient to allow informed decision making." (*Laurel Heights, supra*, 47 Cal.3d 376, 403-404.)

14b-16

"Absolute perfection is not required; what is required is the production of information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." (*Foundation for San Francisco's Architectural Heritage, supra*, 106 Cal.App.3d at p. 910, 165 Cal.Rptr. 401.) The DEIR and Lead Agency shows a prejudicial abuse of discretion, when it has not proceeded in a manner required by law, and when the determination or decision is not supported by substantial evidence. (*California Public Resources Code* 21168).

#### **Traffic Impacts and Circulation Associated with Parking**

- (1) **"Potential" Requirement for Off-site Parking:** Is 136 West Napa Street proposed to be used for employee parking or is it not? The DEIR is inadequate to say, based on an outdated and not adopted Resolution, "a recommended condition of approval has been identified to require off-site parking on a property located across West Napa Street from the subject property". The revised DEIR cannot site a recommended condition of approval when there is no approval. Is this site part of the "whole of the action" under the provisions of CEQA? An objection raised in the appeal of the previous EIR and addressed in City of Sonoma, Resolution #43-2017 Item 3. **Revisions to the EIR A. Project Description** was to update the Project Description to include the parking lot at 136 West Napa Street. The DEIR cannot use in the environmental review process a "recommended condition of approval" under the provisions of CEQA. Furthermore, the traffic impacts related to ingress and egress, traffic queueing and pedestrian crossing on Highway 12 are not fully evaluated in the Traffic Study associated with the DEIR and reviewed by Caltrans. **(Note: In their August 14, 2018 letter to David Goodison re: Revised DEIR, California Department of Transportation the Project Understanding does not mention the proposed off-site parking site for 25**

14b-17

additional vehicles, most likely because of its obscurity in the project description and only later Page 2 refers to "traffic queues on SR 12 from off-site parking.)

14b-17  
cont.

- (2) The DEIR fails to mitigate the loss of public on-street parking associated with this project and the additional traffic it entails as the public circulates around the Plaza and environs trying to find parking.

14b-18

Thank you for your consideration.

Sincerely,



Johanna M. Patri, AICP

*Desktop/Hotel EIR 50%\_Waiver letter 9\_9\_2018 Final*



## **RESPONSE TO COMMENT LETTER #14b FROM JOANNA M PATRI, AICP**

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### **Response to Comment 14B-01**

This comment provides and 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 Comment 14B-02**

The comment asks who is responsible for reviewing the adequacy of the Project and their qualifications. The City of Sonoma staff are responsible for reviewing the adequacy of the Project consistent with CEQA and the City's plans and policies. Staff reviewing the document have extensive experience in land use planning and environmental review. This comment does not directly question the adequacy of the analysis of the EIR. No further response is required.

### **Response to Comment 14B-03**

The comment states that the EIR does not include enough specifics to review the 50% Alternative. Please refer to Master Response 7 – EIR Alternatives. The DEIR adequately analyzes the 50%-50% alternative as directed by the City Council.

### **Response to Comment 14B-04**

The comment references the CEQA Guidelines and states that it is unlikely the applicant's architect can develop an unbiased feasible alternative. CEQA does not require that the alternatives analysis include an alternative project prepared and peer reviewed by a licensed architect, not associated with the Project Applicant. The environmental consultant, Placeworks prepared the alternatives analysis consistent with CEQA. See Master Response 67- EIR Alternatives.

### **Response to Comment 14B-05**

The comment states that the project cannot be the project objective. The objective of the Project is to construct a hotel. This was included in the list of Project Objectives, as found in Chapter 3, Project Description of the 2016 Draft EIR and revised Draft EIR, in Section 3.3. The list was also included in Chapter 6, Project Alternatives. It was not added separately to Chapter 6.

Section 15126.6 (a) of the CEQA Guidelines state an EIR shall *describe a range of reasonable alternatives which would feasibly attain most of the **basic objectives of the project** but would avoid or lessen the impacts of the project*. Therefore, an objective of the Project is construction of a 62-room hotel.

### **Response to Comment 14B-06**

The comment states that the Hotel Only alternative with no restaurant would reduce environmental impacts. Comment noted. The comment does not directly question the analysis in the revised Draft EIR, and no further response is required.

### **Response to Comment 14B-07**

This comment states the request for a residential waiver is in conflict with the Development Code. Request of a housing component waiver is not in conflict with the Development Code because the Development Code allows an opportunity to request a waiver. The EIR includes alternatives which include housing components. See Master Response 7- EIR Alternatives.

#### **Response to Comment 14B-08**

This comment expresses the opinion that the Project should have been an alternative, and the proposed project should have included the 50 residential components. The City is required to analyze the impacts of the proposed Project that was submitted. Please refer to Master Response 7– EIR Alternatives.

#### **Response to Comment 14B-09**

This comment asks for more specifics in the 50% Residential Alternative. Please refer to Master Response 7– EIR Alternatives.

#### **Response to Comment 14B-10**

It is expected that the Project would generate new employees and an associated need for housing. However, the Project site is not identified as a housing need site, in the City's General Plan Housing Element. A review of pending Projects in the City of Sonoma identified that there were adequate sites to meet its Regional Housing Needs Allocation (RHNA). A search on Zillow on July 28, 2019 found 44 properties for rent, exceeding the 33.2 required by the commenters reference, therefore, there are adequate rentals available to meet the needs of the Project generated employment. Further, this assumes all employees would be new to the area, which is not likely the case. The number of rentals needed is likely to be lower. Therefore, the Project would not result in a significant impact on housing.

#### **Response to Comment 14B-11**

This comment quotes information from the Project Applicant. The waiver request is from the Project Applicant, as noted on page 3-16, in Section 3.6.1, Required Permits and Approvals of the revised Draft EIR. The waiver is not requested by the EIR, as stated in the comment.

#### **Response to Comment 14B-12**

CEQA requires the lead agency to analyze the environmental effects of the proposed Project, in this case a proposed hotel, restaurant and spa. Request of the waiver will be considered as part of the Project by the Planning Commission.

#### **Response to Comment 14B-13**

The comment states that the EIR presumes the waiver will be granted. The revised Draft EIR does not presume whether the Project will be approved or denied, it simply looks at the environmental effects of the proposed Project, which in this case is a hotel, spa and restaurant. As stated on page 4.12-4 of the EIR, whether or not to approve the waiver is a planning and policy decision for the Reviewing Authority. The document goes on to further state that although the approval of the Project's requested waiver would result in the loss of an opportunity to increase housing in the City it would not have any effect with respect to the City's affordable housing goals and RHNA objectives.

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.

Paraphrasing from the Project narrative, the Applicant makes the following reasons in support of the waiver request:

- The hotel use, in and of itself, would make it infeasible due to site size and configuration of the subject property. 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
- Sonoma has a limited amount of commercially-zoned property that can generate revenue for the City to support the development of low income and workforce housing through the housing impact fees should such fee program be available, and tax revenue.
- A residential component would impose size and economic limitations which would make it financially infeasible to develop the Project. It would require expansion of the proposed subterranean basement which would be financially prohibitive.
- The hotel's normal daily activities will generate pedestrian activity by hotel guests in the Downton area consistent with the intent expressed in the "Desired Future" of the Downtown area, as set forth in the Development Code.
- The restaurant will offer a ground floor retail component serving both visitors and local residents consistent with the Development Code guidelines for the downtown planning area.
- Sonoma has approximately 100 rental units in the development pipeline on sites that are better suited to support a residential component.

#### **Response to Comment 14B-14**

The comment is another request for more details. Please refer to Master Response 7 – EIR Alternatives.

#### **Response to Comment 14B-15**

This comment just lists the Project Objectives. The comment does not directly question the analysis in the revised Draft EIR. The EIR adequately analyzes alternatives.

#### **Response to Comment 14B-16**

This comment cites CEQA case law regarding alternatives analyses. The EIR adequately analyzes a range of reasonable alternatives. This comment is a summary of case law and does not directly challenge the content of the revised Draft EIR. No additional response is required.

**Response to Comment 14B-17**

This comment refers to offsite parking. See Master Response 6 - Offsite Parking.

**Response to Comment 14B-18**

This comment says that the EIR fails to mitigate loss of public on-street parking and additional traffic. The Project does not result in any loss of on-street parking; existing on-street parking would be retained with the Project. The traffic analysis adequately addresses traffic impacts.

## COMMENT LETTER # 15

City of Sonoma  
Mr. James Cribb  
Chair  
Planning Commission  
No. 1 The Plaza  
Sonoma, CA 95476

Dear Chair Cribb:

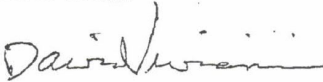
Kenwood Investment's plan to construct a 62 room hotel on West Napa is a solid project worthy of approval.

As a former board member of the Sonoma Valley Visitors Bureau and the Sonoma Valley Chamber of Commerce, too many times I have seen our city lose vital tax revenue due to lack of hotel rooms. I firmly support smart developments that keeps the "day visitor" overnight. Overnight visitors spend more money with our local restaurants, retail stores and businesses and contribute to our Sonoma's transit occupancy tax.

Being that the site of the Hotel is just off the square, overnight visitors can park their car and walk and bike instead of clogging up our roads.

Despite the naysayers, there are many benefits to Hotel Project Sonoma and I urge approval by the Planning Commission.

Thank you,  
David Viviani



15-01

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**RESPONSE TO COMMENT #15 FROM DAVID VIVIANI**

**Response to Comment 15-01**

The comment provides a statement in support of the Project. The comment does not directly question the content of the revised Draft EIR. No further response is required.

## PUBLIC HEARING COMMENTS

A total of 15 members of the public provided comments during the September 4, 2018 public meeting for the proposed Project's revised Draft EIR. Verbal comments were also provided by the City of Sonoma Planning Commission. Each comment is provided below with responses to these comments.

### A. Bill Hooper, Applicant Kenwood Investments

Been coming here a lot time, probably 2012 when we first started to review our proposal. At that time there were significant questions about the Project, a lot of public comment and as a result over the years a lot of changes to our Project. Significantly downsized, significant changes to the architecture. Those hearings didn't include just the Planning Commission, they also design review and other sort of community hearings as well as the Sonoma Valley Citizens Advisory Commission. So a lot of comment. Not to mention a public ballot initiative process. Lot of comments, lot of input to our Project, a lot of changes over the years. We agreed that an EIR was appropriate for this and agreed to fund it because there was just a lot of conjecture and a lot of non-facts being thrown around. What is good about an EIR is that it is done by your consultant with experts in their field with no skin in the game so highly credential people and I would just remind you that this is an objective analysis not guided by the Applicant.

One side note about the parking. We presented a parking study the PC hearing was originally to ratify the EIR or certify the EIR and then have the Use Permit hearing. Parking was not subject matter of the EIR. It became that when our parking study done by an independent consultant said the 115 spaces that we were proposing aren't enough on certain peak days, not every day, but certain peak days and peak times and we offered another property that we own across the street That triggered the need to do some study on the traffic involving how traffic would move in and out of that parking lot so parking is still not the subject of the EIR, only to the extent that it impacted traffic movement and so this is one of the revisions that was addressed and was asked to be addressed by City Council to this EIR.

For the residential alternatives, we were asked to provide a little bit of information on the 50/50 analysis we offered that a typical residential would be around 800 square feet where our hotel rooms are only 450 square feet. We provided that data to sort of guide staff and the consultant on the analysis of that alternative and then lastly, we were asked if we were just adding residential how much could we fit on the lot. We provided that of the 8-unit option and later in the process we provided some illustrations on how that would fit on the property.

**Response:** This comment is a summary statement from the Project Applicant. This comment does not directly question the content in the revised Draft EIR, and no further response is required.

### B. Larry Barnett

I have got to express some confusion as to why it took so long for this revision to take place. If I were the applicant I would wonder why particularly since the applicant is paying for it, but nonetheless that is what has happened. What surprises me over the course of that year relatively little has changed. The alternatives have been included in the language of the revision and the door was opened to actually consideration of the floor plans for the 8-unit addition to the Project. I say the door was open because there is nothing comparable to that regarding the

impacts on this Project of a 50/50 housing hotel mix. Now as you know as a commission, residential development is subject to its own set of conditions and requirements that have impacts on matters of design and layout and access and all of these questions still remain and have not been addressed in the EIR. For example, a residence has to have access to some kind of personal open space; a deck or a little porch or an outside courtyard or something like that. The questions of how would a 50/50 arrangement work if units were incorporated into the structure of the building. Obviously, we are not going to have tenants working thru the hotel lobby to get to residences although that might be the case, we don't know what that would look like because we have no design information whatsoever about how this would happen. Now why is this relevant? It pertains in part, and the consultant mentioned the waiver provisions that they outline in the document. This pertains in part to this waiver because how on earth will this commission or ultimately the city council come to any determination about the waiver without the information about what the impact of the changes or the design implications of a residential component of 50% might be. So that is one concern.

**Response:** Please refer to Master Response 7 – Project Alternatives.

Another concern has to do with the bulb-out on Napa Street. I have some concerns about this idea from a historic resource standpoint. But more significantly looking back of the course of this year, this was a perfect opportunity to test whether the bulb-out idea is even practical or what the effects of it might be and yet none of that has been done. We are now dealing with an abstract set of hypotheticals about a bulb-out when in fact we could have taken a month or two of this past year with Caltrans permission for an encroachment, used temporary curbing, which is readily available, you can go online and look up bulb-out materials and there is composite bulb-out materials that are readily available; we could have actually tested what is the impact on pedestrian crossing, what is the impact on the traffic on Napa Street, what is the effect on truck turning south onto First Street West from Napa Street, what are the design configurations that would have to be considered. None of that was done. So instead we are just going to guess. We are going to use our imaginations as to what this would be like when in fact there has been an opportunity to actually investigate it. It wasn't done; I don't really understand that.

**Response:** See Master Response 4 – Pedestrian Bulb-Outs, regarding potential for temporary bulb-out installation.

I also have great concerns about this use of First Street West as the loading dock for this hotel. I mentioned this and it was mentioned during the appeal. I don't understand and there is a lot about this Project I don't understand, but if you're going to scrape a parcel clean of all of its existing buildings and start fresh, why on earth would you not include a loading dock? Why would you essentially limit this Projects viability to the willingness of the City to sacrifice a portion of the public street for a loading function for a private business. To me it is unheard of and to compare it with what goes on in the plaza with historic pre-existing businesses with no parking at all just simply doesn't make any sense. Thank you very much.

### **C. Jerry Bernhaut**

The primary interest I have are the impacts discussed in the EIR is greenhouse gas emissions. Specifically, the failure to address long-range emissions from air travel. Nothing we do as individuals pumps carbon dioxide into the atmosphere faster than air travel. The revised Hotel EIR maintains the same refusal to account for greenhouse gas emissions from long range vehicle miles travels as did the prior EIR. The revised EIR continues to claim that the operational phase of the Project would not exceed AQMD significance criteria. This fiction can only be maintained by excluding emissions from long range vehicle miles traveled. The DEIR also justifies this by saying that the Project itself is not likely to have been the only reason for



aircraft travel. I would like to see any lawyer try to argue that in court. Anything to keep the wheels of commerce rolling without taking responsibility for the impacts. There are protocols to track and achieve these emissions even to multiple destinations if there was a good faith interest in full disclosure. I was the lead attorney in the case that overturned the climate action plan exactly on the same grounds of failing to account for long distance travel from local projects. There is every reason to believe the same legal arguments would prevail at the individual project level. These land use decisions at the municipal level have profound global impacts. Local governments have the power through the permitting process to at least demand an honest accounting of the true impacts of the project they approved. CEQA demands it.

**Response:** Please refer to Master Response 3 - Tourist Greenhouse Gas Emissions.

Let me also say that I am here and I speak on behalf of California River Watch; that was the group I represented in the climate action plan case. I will submit written comments that address other issues. Also I would like to say contrary to this advice you got from staff, thresholds of significance are not dispositive in a CEQA action. Courts can find significant impacts even if a project arguably satisfies thresholds of significance and I will submit some additional comments and I will include citations of cases that found that. Thank you.

**Response:** See Response to Comment 3 above regarding Riverwatch written comments.

#### **D. Regina Baker**

So I have been following this for a year. I want to get this straight. There is still going to be 62-room hotel with eight additional residential units, is that correct? *[No. The eight residential is an alternative... there would be some reduction in number of rooms I believe but we will let the project applicant speak to that if we need to.]* OK, well the sentiment of Sonoma is the residents that you will be spinning your wheels if you don't have at least 40 to 50% residential units. You will be spinning your wheels because it will go to council and you will see this room packed like you have never seen it packed before and that is a guarantee. So if you don't want to spin your wheels go back... you know Kenwood Investments might as well make more money just putting up all residential. So we want to see them make money, we like them in town but they also are working with... honorable with the residents of Sonoma so it is up to you if you want to spin your wheels or not. Thank you.

**Response:** The comment provides an opinion on the need to include residential development on the site. The comment does not directly question the analysis in the EIR. No further response is required.

#### **E. Judy Young**

I want to speak as another resident of Sonoma who feels entirely different than the woman who just spoke. A lot of people, we haven't done a good job of coming out to these meetings so I am trying to educate myself on this. I am pretty appalled at the dirty laundry that was shared at the beginning of the meeting and I just think this whole process is so, such a mess and my husband and I are all for good quality, necessary, appropriate growth, appropriate improvements, with you know checking environment, doing the traffic studies and all that, but guys this is a hotel. We need hotels. This is a quality high-end necessary hotel in this town to service our community as a hotel. It is not an apartment building. I would not want to stay in a \$600 hotel room with kids jumping over my head; its stupid. I mean how much would those apartments be, we are not talking about affordable housing which we need. We are talking about I don't know what. I live in town. I am in my car four or five times a day running in and out. You think that is not going to be a problem; you want 50 apartments, tiny little apartments with people doing their little chores in and out of town, it is going to make it worse. Let it be what it needs to be. People complain

about VRBOs, complain about the noise. The hotel is all for this. Guys we need it. Let it be a hotel. You're going to scare... I can't believe the patience, and the understanding, and the wherewithall of this developer to try to amend an appeal to the numerous..., one appeal after another. You fix one and it's like fingers in the dike, they have got another one. It's ridiculous. I mean we need a hotel. You have got a builder they are not building a Holiday Inn; they are building a nice damn hotel in this town. You want the tax base higher, you need parking. Raise the TOT tax, build a parking lot behind the barracks. You want traffic to move, put a pedestrian traffic path in front of EDK in Summervine. Fix those problems, those are the mess. Its parking and traffic, it's not the hotel. I'm appalled, believe me I speak here as myself but this is cocktail conversation around and my opinion is not a single opinion. WE are disgusted with the negativity and the slowing down of good quality projects with the proper due diligence. Thank you.

**Response:** This commenter is in support of the hotel proposal and expresses an opinion of not requiring residential units on the proposed Project site. The comment does not directly question the analysis in the EIR. No further response is required.

#### **F. David Eichar**

Anything with residential the city does require 20% affordable so if you've got 25 units then you would have some affordable units within that. What we don't design for in the 50/50 alternative but for the 8-unit alternative it was a separate... the building wasn't over your head .....people and the hotels. And this hotel does have impacts to traffic as identified by the traffic consultant in the traffic studies. Now whether they are significant or not is up for some debate and I will get into that a little bit later. But first there was some inconsistency, it looks like the IT also just only read the Executive Summary on the 50/50.... Well the Exec Summary says there is 25 hotel rooms but in Section 6.2 in Alternatives it says there is 37 hotel rooms, so which is it? The IT says the restaurant is to remain because it is not specified in the Executive Summary, however in Section 6.2 it says the hotel is going to be removed. The Exec Summary also says that ... increase the size. overall square footage of the buildings by almost 9,000 square feet. I don't think that is accurate. I think it still increases by my calculations but not by that much if we remove the hotel. And the 50/50 alternative is not what was requested by the City Council. They did not ask for removal of the restaurant. They were told by the Assistant City Attorney that the details .... Chosen such that the environmental impact is reduced. You can look at the video, about 58 minutes into the video, and you will see a whole explanation of how will do some iterations to see that the environmental impact of alternative is reduced. That is not completely the case here. As mentioned, the overall square footage is increased. The understanding was there was going to be the same square footage 50/50. Residential component right now shows about 10,000 square feet short of 50%. The hotel rooms are 450 square feet in the alternative but 480 square feet in the proposed Project because you have suites and ADAs and queen doubles which are larger in size than the standard hotel rooms. Residential units are much smaller than recently approved apartments including the Taub and Oliva apartments which average 780 square feet for 1 bedroom and 1130 square feet for a 2 bedroom. And the residential units in the 50/50 alternative are also smaller than the 8-residential unit alternative. The 8-residential alternative would be about 960 square feet averaging 1 and 2-bedroom units, not 800 square feet. So we don't have the details. It sounds like the developer chose some of the sizes of the hotel rooms, sorry of the residential units, and the size of them and then the consultant just took that and didn't really look at how best to fit that in for the environmental impact on that. Some other errors. The DEIR used 2.1 ??persons per household and that is wrong because that number includes 3 and 4 bedroom ones, this is only 1 and 2 bedrooms. For Sonoma area the census bureau has 1.17 persons per household in 1 bedroom units and 1.75 in 2 bedroom units and I will send detail links of all this later on in my written comments so you

can be verified. So the census bureau number should be used for this because that impacts the number of residents and a number of other environmentalists. So if a properly designed 50/50 alternative would have been used it would have reduced environmental impacts including greenhouse gas, pedestrian risk, vehicle congestion and parking in residential neighborhoods which is a CEQA concern. The method for the proposed Project now as opposed to the alternatives for the impact of pedestrians on traffic there is a method called a peak hour or factor to implement looking at that... [times up] This is a bad model and I will tell you why.

**Response:** Please refer to Master Response 7 – Project Alternatives

**G. Joanna M. Patri**

The Project proposal is 4 separate legal lots, EIR says a LLA is required. She proposes that the LLA needs to be included as it's own action in CEQA document. The subdivision map act states that LLA's must comply with local regulations such as the GP and ZO. She questions if the use of 4 legal lots would require a parcel map application which would merge the parcels into 1 underlying parcel.

**Response:** The revised Final EIR text has been revised to clarify the lot line adjustment.

The EIR does not sufficiently address the 50/50 housing/commercial alternative. This analysis has not been waived by the PC, and without a full analysis under CEQA, there is not enough information to understand impacts of the 50% housing alternative. She feels it is bias to consider waiving the 8-units of housing alternative because it is not currently adequately assessed. The General Plan policies ask for affordable housing to support an economically diverse population, and CEQA requires that this be fully compared to all alternatives, and the EIR is unfairly glossing over analysis of building housing elsewhere on the BOA property.

**Response:** see Master Response 7- Project Alternatives.

The TIA does not address any bike/ped in/egress of this BOA site, and Caltrans is not considering it as a real option. She observes that there are frequently 12 open parking spaces on the BOA site. MM TRANS-6a is speculative and unproven, and has too many assumptions such as "encouraging guests parking their cars for the duration of their stay and then choosing to walk or bike around town." Johanna states that the EIR does not address guests who do not bike or walk, and how guests will get to outlying areas for weddings, wine tasting, etc.

**Response:** See Master Response 6 – Off-Site Parking, regarding pedestrian trips to off-site parking location. The transportation analysis includes offsite trips and adequately addressed traffic from the Project.

**H. Sally Rumor**

Says she will reiterate part of what previous speaker said. Concerned about the fact that the Project is so large, 4 parcels rolled into one big project is a huge problem, and if you allow big ventures such as this, it changes the character of the community.

**Response:** The Project is redeveloping an existing Project site and meets the Development Code setbacks, height and design guidelines, therefore, it will be compatible with the community.

Concerned about the 50/50, she says 8 units of housing does not sound like 50% of 4 parcels. She notes that the EIR states that the 8-unit alternative (which she says is the 50/50 alternative), says that school-age children will be living on the Project site, in these units, and would increase student #s in the school district. She states that the EIR speaks of this student

population increase as if it is a negative impact, but in fact, the school district is currently trying to increase student enrollment, not decrease. She says that this statement is not objective, as an EIR is supposed to be.

**Response:** See Master Response 7- Project Alternatives.

Concerned that EIR is calling First St West a “Collector Street.” She does not believe that this street is a collector, states it is a neighborhood/ local street, and should be treated as so.

**Response:** See Master Response 5 – Deliveries on First Street West regarding street designation and use.

States that she does not need another hotel in the City, and states that the City needs less hotels.

**Response:** This comment states an opinion, and no further response is required.

### **I. George Thompson**

Confused about the whole Project process and commission meeting. Concerned about 50/50 split, wants to know if these are for rent or sale. Concerned that if they are for sale, rich people from out of town will buy them and use them as a seasonal home, therefore meaning they won't be used. Thinks the units should be as much affordable housing as possible, there is an affordable housing crisis in Sonoma and it is a serious problem. Should be workforce housing because the work force cannot afford to live in Sonoma.

**Response:** The comment asks if the residential units in the 50/50 alternative would be for sale or rent, and expresses support for making them affordable. The comment does not directly question the analysis in the EIR. No further response is required.

### **J. Logan Harvey**

Very clear there is a housing crisis in town, lots of people in town are commuting in to work there. The way the EIR has been produced, is it biased on an assumption that the 50/50 housing requirement will be waived, and that the hotel would just have 8 residences approved. He is shocked that this would be waived with an assumption that such a waiver would have “economic benefits for the town.” States that Sonoma has a lot of tourism already, and a strong economic base, and that the true problem at the time is a housing crisis. The Hotel Project would create a lot of low-wage jobs for people who will not be able to live in the City, therefore those hired to work at the proposed hotel wouldn't even be able to live in town. Says that by increasing # of low-paying jobs, and not increasing housing, will increase cumulative traffic impacts, more VMT and GHG over time. Harvey states that the City has codes in place to build housing and mitigate these problems, and that this Project should follow them, and that if they are waived, it defeats the point of having them in the first place. Points out that the rooms will be upwards of \$600 a night, and that means it is built for tourism, which is fine (backbone of the economy), but that as these developers come in, there needs to be accommodation/ projects for what is truly needed in the City (housing). Encourages that when the PC has a project where they are able to approve housing, they should do so. Asks why this Project is worded in a way that encourages removal of the housing component, and says the PC should not do so.

**Response:** The comment expresses support for including residential units in the proposed Project. The comment does not directly question the analysis in the EIR. No further response is required.

### **K. Jean Daley**

Concerned about the housing part of the Project. Says he supports affordable housing, but that this is not the location or right format for affordable housing in the City. Says that he does not want to see the site degraded by the type of people it would attract, that this is a nice part of town that should remain that way. Says that the Project location does not have any place for children to play, and will encourage they play in the streets or undesirable places around town. Recognizes that low income housing is a problem in the City that shouldn't be the responsibility of the developer on this case. Suggests partnering with a non-profit organization to build dense affordable housing elsewhere.

**Response:** The comment expresses an opinion on not including a housing component as part of the Project. The comment does not directly question the analysis in the EIR. No further response is required.

### **L. Tom Conlin**

Knows that tourism is the anchor of the City, and that the climate is changing, and that air and car travel is contributing to this problem. States that PlaceWorks claimed in the meeting that the document is black and white (and that it meets all the thresholds?), which is fundamentally at odds with the purpose of CEQA. CEQA asks us to look beyond the thresholds and analyze impacts enough to thoroughly understand it. EIR does not fully address this issue. Notes that he understands it can never be fully analyzed because it is so complicated and convoluted. He does, however, encourage that the applicant more fully address the TIA to talk about these impacts.

**Response:** Comment noted. The revised Final EIR has been expanded to provide additional information. See Master Responses 2 and 3, Greenhouse Gas and Tourist Green House Gas analyses.

Notes that there is an issue with new commissioners and staff members who may not be fully aware of the history of the Project, may not fully understand the impacts and alternatives, and therefore may not be able to make informed decisions. Recommends to postpone the decision so the public can have confidence that staff and commissioners and public are on the same page.

**Response:** This comment expresses an opinion to postpone the decision and is a comment on process, no additional response is required on the revised Draft EIR.

### **M. Chris Petlock**

Commutes next to the Project site, and gets stuck in traffic every day because of pedestrians. Says Caltrans report cites an irrevocable easement of 25 parking spaces on north side of street, but there is a section in the revised analysis section of the EIR that suggests these are for employee parking. Wants to know if these two items are in conflict, and if the Caltrans understanding of those 25 spots would change what Caltrans will expect of the Project. Noted that the TIA states this location is already at unacceptable LOS, suggests putting a left hand turn lane there right now, before construction starts, because it's already a need. Would like to see analysis of what a loading zone on First St West will do to parking and traffic in the vicinity.

**Response:** See Master Response 5 – Deliveries on First Street West.

EIR has GHG for construction, but dismisses GHG related to travel to and from the site. Is concerned where future VMT and GHG will come from (where are people traveling from).

**Response:** See Master Responses 3 - Tourist Greenhouse Gas Analysis.

Concerned about who is responsible for the holding tank mentioned in hydrology section, what process is in place to oversee tank, and what plan is in place to monitor and respond to failure of the holding tank. Would like to know what plan is in place to cover cost of potential tank failure.

Concerned there are no site plans for the 50/50 alternative and that public does not know what it would look like.

**Response:** The City of Sonoma Public Works Department and Building Office would be responsible for ensuring that new construction meets all applicable codes. The Project would be responsible for costs associated with the holding tank. The City would also be responsible for monitoring the Project consistent with the Mitigation Monitoring and Reporting Program found in Appendix S of the revised Final EIR.

Please see Master Response 7 - Alternatives.

#### **N. Bill Willers**

For 10 years, when first coming to Sonoma, he lived in an affordable unit above a commercial space right in downtown. He notes that the previous speaker who commented “who would ever enjoy living downtown” doesn’t know the true value of living in downtown Sonoma, and that he loved the experience, and it helped build character and a bond with the community for both him and his family. Says that his children growing up in downtown has created a strong bond between them and the City, but now they unfortunately cannot afford to live on their own in the City that they love. Says that the City needs to adequately plan for housing because that is what the City needs. Says the EIR does not adequately address and analyze the 50/50 alternative, and that PC needs to ask the applicant to do so.

**Response:** See Master Response 7 - Alternatives.

#### **O. Michael Ross**

Does not believe that the 50/50 alternative does not address the deeper question of whether or not this is the right spot for high density housing. He does not believe that this is the right place for residential development. Says that the City does not have enough commercial land, and that there are better ways to do housing in the City.

**Response:** The comment expresses an opinion on the suitability of the site for high density housing, provides background information on the Project alternatives. The comment does not directly question the analysis in the revised Draft EIR. No further response is required.

Says that the 8-unit alternative was explored more than the 50/50 alternative because there were setback and code requirements that needed to be tested before there could even be a proposal of housing. It was proposed as a way to try and solve a small part of the housing problem, and was done in the spirit of reducing impacts. Would like to unlink the housing from the hotel use. When the 8-unit residential area was included, the hotel loses essential areas such as loading zone and mechanical elevator; these spaces will be put in alternative locations that can have unsafe impacts.

Says that all requested items from the appellant have been addressed in some form. Says that the discussion should be addressing the Draft EIR itself, and not the deeper needs of housing in the City.

**Response:** This comment expresses an opinion regarding the alternatives. No additional response is required.

**P. Commissioner Barnett**

Says that this process, even though people don't like it, is a State law and is required of them. States it is important to get it right and that it may take time, and this is a Project that may produce litigation, and being thorough up front is what should happen to try and save time later.

**Response:** This comment is a statement about the review process. No further response is required.

In the cultural resources section, would like to know if there are other MMs, other than bulb-outs, that can be used to reduce traffic impacts (asking in regard to preserving cultural resources). Would like the EIR to address what "plaza" means, is it just the plaza in the middle (park) or is it also the adjacent buildings. When referencing the "park" is it just the park, or is it also the sidewalks around it, the buildings, or anything else? References the "Law of the Indies" and states that it requires the Plaza stay in a square or oblong shape, and that proposed bulb-outs will change the geometry of the Plaza which would be more than just a significant impact. Would like this to be more fully fleshed out on whether or not this is allowed based on the Law of the Indies. Would like this analysis to match that of the Chateau Project.

**Response:** Section 4.4, Cultural Resources, of the revised Draft EIR has been revised to respond to these comments. Please refer to Chapter 3, Revisions to the Draft EIR, to view the edits. Page 4.4-10 of the Hotel Project Sonoma Revised Draft EIR indicates that the sidewalks, curbs, paving roadway, traffic pattern, parking and marking/signage are not as old as the grid and the Plaza. Making changes to reduce the crossing distance for pedestrians would not meaningfully change the spatial character of the street. Also, see Appendix O of this revised Final EIR which contains a Historical Resource Evaluation of Potential Roadway Improvements. The report states on page 3 "There are four different existing historical designations which encompass the proposed project area: the Sonoma Plaza National Historic Monument, the Sonoma Plaza National Register District, the Valley of the Moon Survey, and the Sonoma Overlay District. The intersection at which the proposed work would occur is not individually listed as a historical resource, nor is it mentioned in these listings, but there are descriptions of the urban development pattern, street layout, and streetscapes which provide the basis on which to understand the historical significance of the existing intersection. In addition, the 2007 Downtown Guidelines, which indicate the Town's attitude toward treatment of the streets, reflect its concepts for historic preservation along with other urban design considerations." Additionally, page 4 states 'The description of Spain Street between First Street East and Second Street East says its inclusion in the boundaries is "essential to protect the historic setting of the Mission and Blue Wing Inn and also to protect sites which may provide information and artifacts through historic archeology." There is no physical description of this area, nor any mention of landscape, streetscape, etc., however. The National Historic Landmark nomination clearly takes into account the street grid, Plaza, and relationship among the buildings and this urban framework. It does not describe the street paving, sidewalks, circulation pattern, signage, or parking...The significance section of the nomination states, "It is significant in town planning because it was the last town in North American designed under the Laws of the Indies and still retains its integrity to that plan...with the size and location of the Plaza, orientation of the buildings, and the grid pattern of streets surrounding the Plaza."6 The nomination cites other colonial Spanish towns in the U.S. laid out under the Laws of the Indies and comments that "Sonoma retains its original plan integrity with the size of the Plaza, street layout, and arrangement of buildings." In contrast to Sonoma, San Juan Bautista does not have streets surrounding the plaza on all four

sides, they do not extend in all four directions, and the grid is located west of the Mission. Sonoma is notable for having streets on all four sides of its plaza, with an orthogonal street grid emanating in all four directions, the nomination says, and “The arrangement of the Plaza and the street pattern still remain virtually intact.”

The trip generation model creates trip generations from the Project and adds them to current real world conditions. The calculation does 62 rooms, and then subtracts the current conditions. The current use of the Project is only a single-occupant office, but the traffic generator classifies it as a shopping use, and it is an inappropriate metric to use for that retail building. Suggests replacing this with the use that is currently there, which is a single tenant office building. The ITE says that the retail use has a reduction of 46% of what is really there, and that it is currently inaccurate.

**Response:** It is common practice to assign trips associated with the zoning or allowed land use of a building rather than its actual current use so that the analysis reflects the same theoretical baseline as would be included in long-range planning and modeling. New projects are typically evaluated using a standard trip rate even when the planned operation would be less traffic-intensive so that the impact analysis reflects conditions that would occur if a different tenant with the same use, but different operational parameters, moved in. The trip generation assumptions, for planning purposes, go with the development and not the specific tenant. Hence the methodology applied is typical so that the Project is compared to what could reasonably be there even if the current uses are less (or more) intense. See Response A01-5 detailing analysis results with an increased trip generation.

States that the EIR says trip generation was not done for the restaurant because the hotel analysis assumes the restaurant is part of the hotel. Barnett feels this isn't the best way to look at it for this property because it seems the restaurant will be a “destination” restaurant, not just for the hotel guests, which would bring more people to the site. Suggests to take square footage of restaurant and apply the restaurant metric to the ITE, and to bring down trip generation from the hotel to .5 (ish) and make the restaurant portion much higher. Feels the traffic analysis is flawed.

**Response:** See Response to Comments 2-05 detailing analysis results with the restaurant considered separately for trip generation purposes.

Wants to make sure that the date the analysis was done is current to real-world conditions because he read an article saying that tourism is down, and therefore traffic may have changed since the data was gathered in May. Perhaps do a sensitivity analysis.

**Response:** Traffic counts have been collected four times, including in August 2011, March 2015, October 2017 and May 2018. The counts in May 2018 were taken on a holiday weekend when visitation would be high, and during the week schools were still in session. These counts reflect conditions during most of the year, with volumes potentially higher during less than 15 percent of the year. It is further noted that while weekend midday volumes may be higher during the summer, weekday peak hour volumes are generally higher during the school year. Given that the weekday PM peak hour was the more critical time-period of the two, the analysis can reasonably be expected to reflect conditions during peak summer conditions.

Would like to see if bike lanes with curb cuts are possible. Does not see how a bike lane can go through a curb cut and would like to see this in a graphic so he can better understand.

**Response:** There are no plans to put the bike lane through a curb cut; please refer to Master Response 4 – Pedestrian Bulb-Outs.



Wants to address the bulb-outs further because he isn't a fan of them in this location. States that those living in Sonoma and walking around avoid the longer crosswalks, says that making these crosswalks shorter (i.e. with bulb-outs) would create a magnet to these crosswalks, meaning all the pedestrians are choosing to use these crosswalks and it could have negative impacts to traffic. Would like the EIR to fully evaluate the traffic impact/ backup this could create.

**Response:** See Master Response 4 – Pedestrian Bulb-Outs. Bulb-outs create a shorter pedestrian street crossing length, that would make through traffic more efficient (i.e., a portion of the cross walk is protected allowing vehicles to move through the intersection until the pedestrian reaches the crossing).

The MM about a transit pass seems ridiculous that people will get a transit pass because Sonoma does not have the type of public transit system that will make this feasible. Says that this MM is not helping any real world problem or creating any solution.

**Response:** The revised Final EIR has been expanded to include additional measures as conditions of approval that would reduce VMT. See Master Response 1-VMT.

The 50/50 housing alternative is not really discussed in the EIR, but it does not strike him as being an environmental issue, and he doesn't see how it should be included very thoroughly. Feels that Sonoma could use more hotel rooms. Says that discussion should not focus on the 50/50 alternative because it is not an environmental issue.

**Response:** The comment expresses an opinion that discussion of the 50/50 housing alternative is not a CEQA issue. The comment does not directly question the analysis in the EIR. No further response is required.

Says that he would like to see high quality design/ aesthetics, and he feels that there is not enough information in the Draft EIR to address aesthetics and would like to see more analysis of aesthetics.

**Response:** The aesthetic analysis for the proposed Project, in Section 4.1 of the 2016 Draft EIR, indicates the Project would be consistent with the City's standards.

#### **Q. Commissioner MacDonald**

Concerned about the Bank of America parking lot. Says this lot is an environmental issue under CEQA. Discusses that the hotel already has a surface parking lot proposed, and using the Bank of America lot as a parking area will mean that the space is underutilized and creates a high land use in an alternative spot that isn't appropriate. This would also increase traffic generation, and would instead like to see a project developed in this space that is mixed-use and pedestrian friendly. Says that this is also against the downtown design guidelines which discourages surface parking in the downtown. Says the EIR does not address using a marginalized parking lot across the street for the purposes of creating hotel, and believes that the EIR should address this thoroughly. Specifically wants the EIR to address the impacts that the Project would create based on using this parking spot.

**Response:** The adequacy of parking is not a CEQA issue, so under CEQA a lack of parking is not considered significant. The potential for inadequate parking to be a significant impact was removed from the CEQA Guidelines in 2010. However, the Project as proposed meets the City's requirements for parking, so the parking supply is considered adequate under this standard. See also Master Response 6 – Off-Site Parking. All other secondary impacts associated with inadequate parking (having to park farther away from a destination) have been adequately analyzed in the EIR (noise, air quality, traffic etc) and would be less than significant.

Starts to address the aesthetics of the Project. He would like to see graphic representation that illustrates how the proposed Project looks in comparison to other parts of downtown. He states that there are clear historical themes, and would like to see illustrations of the proposed Project next to adjacent buildings, and other areas of downtown to see how it will aesthetically fit in. This would likely be a graphic of the proposed Project merged with an image of existing site conditions. Would also like to see more thorough reference of Project aesthetics to the Plaza Park and surroundings. States that the simulation of the housing component is inadequate, and should show other vantage points to have a well-rounded understanding of the impacts it will have. Requests visual simulations from several vantage points.

**Response:** Section 4.1, Aesthetics, in the 2016 Draft EIR, provides a comprehensive analysis of the Project's design in comparison to the surrounding area.

Says the EIR assumes the restaurant will have 24 employees per shift, but he points out that similar restaurants in town have more than 24 employees per shift. Suggests looking at an equivalent restaurant already operating in the Plaza, getting their employee #, and using that as a baseline.

**Response:** The number of restaurant employees was provided by the Project Applicant as part of the Project Description and is adequate as an ancillary use to the Hotel.

States that one of the versions of the Project suggested demolishing the Lynch building, but the current version preserves it. He says the Lynch building already has the floor plan for 7 apartments on the third floor, and says there is an opportunity here to look at the apartment floor plate to mitigate the Project, and to build more housing in the downtown using the floor plate that is built for 7 apartments. Would like the applicant to come back with an analysis of the floor plate of the Lynch building as an option to build housing without needing heavy construction.

**Response:** States the commenter's opinion that the existing residential uses on the site for example of additional housing. See Master Response 7- Alternatives.

Would like to see a MM that requires the developer to offer employee housing on-site. He says this would reduce employee trip to and from the site, and would truly mitigate a lot of impacts discussed in the EIR.

**Response:** As stated on Page 4.12-3 of the revised Draft EIR, in Section 4.12, Land Use and Planning, "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."

He states that First street West is a neighborhood collector street that has been superimposed with loading zones, and that loading should be done elsewhere, or at least considered.

**Response:** See Master Response 5 – Deliveries on First Street West.

Says that the bulb-out discussion is confusing and does not offer a clear and concrete solution. He thinks an independent peer review should be done as the bulb-outs relate to the Project itself and historical and cultural resources.

**Response:** See Master Response 4 – Pedestrian Bulb-Outs.

#### **R. Commissioner Bohar**

States that this is a good location for a new hotel and would like to see it here, and that First Street West is not very traffic intensive and the impacts shouldn't be too bad. However, he

knows it is a big Project and is an important part of the square, and wants to get the environmental review done right.

**Response:** The comment expresses an opinion in support of the location of the hotel and on traffic conditions on First Street West. The comment does not directly question the analysis in the EIR. No further response is required.

The BOA parking lot will mean pedestrians are walking back and forth along a state highway, and drivers sometimes speed significantly. Additionally, the existing restaurants nearby are very active, and there is not enough parking in the downtown to serve all those uses. These overlying issues mean that the MMs should be more aggressive in nature to reduce the impacts. Would like to hear a discussion about if it is possible to expand the underground parking to reduce the need for the BOA parking off-site. He does not feel comfortable that the significance is really close to maximum thresholds, and that the language in these analysis sections are speculative.

**Response:** Please refer to Master Response 6 – Off-Site Parking.

He is concerned with the fact that the 8 units would mean truck loading and unloading would be in the middle of First St West. He points out the Lodge project and that the loading zone should not have been allowed because it uses city property and right of way for their benefit while negatively impacting residents. He would prefer the loading zone be on the property, and does not feel that having this would mean a traffic backup occurs because it only takes a moment or two for a truck driver to back a semi up out of the road. He does not want any more loading and unloading happening in the streets.

**Response:** See Master Response 5 – Deliveries on First Street West.

He likes the idea of reducing the hotel rooms and adding a residential component, and would like to explore the idea of requiring residential units off-site. He also supports looking into the Lynch building apartment potential. He mentions the Hotel SLO in San Luis Obispo that purchased an apartment complex off-site and refurbished it, and turned it into affordable housing. He says a similar model could be done in Sonoma.

**Response:** The comment expresses a preference to add residential units to the Project, or consider off-site housing, and provides examples of other options and examples. The comment does not directly question the analysis in the EIR. No further response is required.

He likes the idea of testing the bulb-out ideas, but is worried about how it will impact traffic flow on the State highway because it has fast traffic. He is also worried about the bike lanes proposed because they will cause congestion in the areas that will have bulb-outs.

**Response:** Please refer to Master Response 4 – Pedestrian Bulb-Outs.

Would also like to know if the valet parking is free or not.

**Response:** This comment is a question on valet parking. The comment does not directly question the analysis in the EIR. No further response is required.

### **S. Commissioner Cribb**

Wants to clarify that there are housing options for the PC to choose from.

**Response:** Comment noted.

When the property had the printing business, there were a significant number of trucks in the area serving the business, and now that it is out of business, there is less trucks in the area. Would like the EIR to address the historical arc of past businesses and truck traffic, and see where current business numbers, restaurant seats, and truck intensity compares to present day.

**Response:**

He feels that there is precedence already in place allowing bulb-outs, and that having bulb-outs already in the City is successful. He notes that other commissioners are worried about whether or not the bulb-outs will work in the City, but says that bulb-outs have been around for a long time and have been tested in many different scenarios and are proven to be successful. Would like the EIR to analyze the aesthetic and the layout evolution of the plaza area to assess how bulb-outs will affect the downtown because the downtown will continue to evolve.

**Response:** Please refer to Master Response 4 – Pedestrian Bulb-Outs.

**T. Commissioner Wellander**

Says he hasn't been involved in the process very long and will take public comment into consideration

**Response:** Comment noted.

**U. Commissioner Jansen**

Says that the process is taking too long. Says it is really hard to combine residential and hotel uses with one another. Says that the decisions will be a political one, and that no matter what, the Project is going to go to the City Council.

**Response:** The comment does not directly question the analysis in the EIR. No further response is required.

**V. Chair Felder**

Disappointed that there isn't more factual data in the EIR given the large amount of time that was taken to bring it back. Also disappointed with language used saying something "should" be done instead of "shall" or "must." He says that he will not approve anything that says anything other than "must" because otherwise the MMs won't get done/ enforced.

**Response:** Comment noted. Text changes have been included in the revised Final EIR to change the wording of measures to "shall".

The trip generation needs to be reworked. He says there is not enough quantitative data assessing the impacts of left turn lanes or of the BOA parking lot. Says the BOA parking lot will create a pedestrian safety problem because there is no traffic signal, and that pedestrians crossing the State highway will mean there is an accident waiting to happen.

**Response:** Please refer to Master Response 6 – Off-Site Parking.

He says that the EIR underplays the impact the truck zones will have on the street. He says that First Street West is in fact a "residential street" and therefore traffic will be extremely impacted and changed in form if the truck zones are allowed. Reiterates how the Lodge's loading zone has negatively impacted the street. He encourages the Project Applicant to put a loading zone into the Project proposal.

**Response:** See Master Response 5 – Deliveries on First Street West.

Has issues with the bulb-outs and bicycle lanes, specifically with the proposed Class 2 bike lane. He says that this bike lane will not allow for bulb-outs, and if both are done, there will be a major conflict between pedestrians and bikes and cars. There is also too much conflict in regard to the impacts the bulb-outs will have on cultural resources. He would like to see other alternatives explored.

**Response:** Please refer to Master Response 4 – Pedestrian Bulb-Outs.

States that the City Council provided direction to the Project Applicant to provide an analysis of the proposed alternatives, and the small few paragraphs of analysis provided are not sufficient for what the Council asked for and does not sufficiently address the alternatives and flesh them out. There is currently not enough analysis to determine if any of the alternatives were even feasible, and more definition and data are needed to be able to make that determination.

**Response:** Please refer to Master Response 7 – Project Alternatives.

Encourages the Project Applicant to be very thorough when they come back, making sure to analyze all of the public comment and all suggested quantitative data so that once the EIR comes back, it is ready for a decision to be made.

**Response:** The comment does not directly question the analysis in the EIR. No further response is required.

