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# **Hotel Project Sonoma 2023 Recirculated Final EIR**

City of Sonoma

SCH # 2015062041

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# ACRONYMS AND ABBREVIATIONS

ADA	American Disabilities Act
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CalRecycle	California Integrated Waste Management Board
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CEQA	California Environmental Quality Act
City	City of Sonoma
CPC	California Plumbing Code
dB	decibel
EEA	European Economic Area
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
FEIR	Final Environmental Impact Report
FHWA	Federal Highway Administration
GAO	United States General Accounting Office
GHG	Greenhouse Gas
ICAO	International Civil Aviation Organization
ITE	Institute of Transportation Engineers
LOS	level of service
MPO	metropolitan planning organization
NOP	Notice of Preparation
NOP	Notice of Preparation
OPR	California Governor's Office of Planning and Research
RDEIR	Recirculated Draft EIR
SB	Senate Bill
SCTA	Sonoma County Transportation Authority
SDC	Sonoma Developmental Center
STN	State Transportation Network
SVCSD	Sonoma Valley County Sanitation District (District
SWPPP	Stormwater Pollution Prevention Plan
TAZ	traffic analysis zones
TDM	transportation demand management
TMP	Transportation Management Plan
VMT	Vehicle Miles Traveled

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# 1 INTRODUCTION

The City of Sonoma (City) prepared an environmental impact report (EIR) to evaluate the potential environmental effects of the proposed Hotel Project Sonoma (referred to henceforth as the project or proposed project) in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

## 1.1 INPUT ON THE DRAFT EIR

To assist the City in determining the focus and scope of analysis for this EIR, pursuant to the provision of Section 15082 of the CEQA Guidelines, the City circulated a Notice of Preparation (NOP) dated August 3, 2021, to government agencies, special service districts, organizations, and individuals with an interest in or jurisdiction over the proposed project. The NOP is a brief notice sent by the lead agency to inform the public, interested parties, responsible agencies, trustee agencies, and potentially affected federal, state, and local agencies that the lead agency plans to prepare an EIR. The NOP also seeks comments regarding the scope and content of the EIR. The City held a public scoping meeting for the project on August 12, 2021 to solicit additional input.

The NOP and responses to the NOP are contained in Appendix A of the Recirculated Draft EIR (RDEIR).

## 1.2 PUBLIC REVIEW OF THE DRAFT EIR

The RDEIR (State Clearinghouse Number 2015062041) was received by the State Clearinghouse and circulated for a 45-day public review period from June 23, 2023 to August 7, 2023. The City circulated the document to public agencies, other public and private organizations, property owners, developers, and other interested individuals. Detailed information related to the Hotel Project Sonoma and this RDEIR are available at the City of Sonoma City Hall and online at the project webpage: <https://www.sonomacity.org/hotel-project-sonoma/>.

City staff provided a presentation on the RDEIR at a public meeting of the City of Sonoma Planning Commission on July 20, 2023, at 6:00 p.m. to solicit additional input on the RDEIR.

In accordance with Section 15088 of the CEQA Guidelines, the City, as the lead agency, has reviewed the comments received on the RDEIR, and has prepared written responses to the comments received.

## 1.3 ORGANIZATION OF FINAL EIR

The City prepared this Final EIR, which includes:

- ▶ A full list of agencies, organizations, and individuals that provided comments on the RDEIR in Chapter 2 of this Final EIR;
- ▶ A summary of comments and responses to comments on the RDEIR in Chapter 2 of this Final EIR; and
- ▶ Minor revisions to the RDEIR detailed in Chapter 3, “Errata,” of this Final EIR.<sup>1</sup>

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<sup>1</sup> Chapter 3, “Errata,” includes only pages of the Draft EIR where revisions have been made, not the entire Draft EIR.

- ▶ References used in this Final EIR are provided in Chapter 4, “References,” of this Final EIR.

Chapter 2, “Comments and Responses to Comments” of this Final EIR includes the written comments received on the RDEIR and responses to these comments (as required by the CEQA Guidelines Section 15132). To assist the reader, each response includes a summary of the comment. The range of responses include providing clarification on the RDEIR, making factual corrections, explaining why certain comments may not warrant further response, or simply acknowledging the comment for consideration by decision makers when the comment does not relate to the adequacy of the EIR for addressing potential adverse physical environmental effects of the proposed project.

In some instances, responses to comments may warrant modification of the text of the RDEIR. In those cases, the text of the RDEIR is revised and the changes compiled in Chapter 3, “Errata” of this Final EIR. The text deletions are shown in ~~strikeout~~ and additions are shown in underline. The revisions summarized in Chapter 3 of this Final EIR do not change any of the impact conclusions presented in the RDEIR, do not require any change to mitigation measures, and do not change the conclusions related to the alternatives analysis or cumulative analysis as presented in the RDEIR.

This document and the RDEIR together constitute the Final EIR that the Planning Commission and City Council will consider.

## 1.4 USE OF THE FINAL EIR

The Final EIR allows the public and the City decision makers an opportunity to review revisions to the RDEIR and the Responses to Comments. The Final EIR serves as the environmental document to inform the City Council’s consideration of the proposed project, or one of the alternatives to the project discussed in the RDEIR.

As required by Section 15090(a)(1)-(3) of the CEQA Guidelines, a lead agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the lead agency’s independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record.

The possible findings are:

1. Changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen the significant environmental effect, as identified in the Final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

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## 2 COMMENTS AND RESPONSES TO COMMENTS ON THE HOTEL PROJECT SONOMA RECIRCULATED DEIR

This section of the Final EIR contains comment letters received during the public review period for the Hotel Project Sonoma Recirculated Draft EIR (RDEIR). In conformance with California Environmental Quality Act (CEQA) Guidelines Section 15088(a), the City has prepared written responses to comments related to potentially adverse environmental effects of the proposed project, as well as topics raised by commenters that are unrelated to environmental impacts under CEQA.

### 2.1 COMMENTS ON THE HOTEL PROJECT SONOMA RDEIR

Table 2-1 identifies a label for each comment letter received, the author of the comment letter, and the date of the comment letter.

**Table 2-1. Comments Received on the Hotel Project Sonoma RDEIR**

Letter #	Commenter	Date
A1	California Department of Transportation (Caltrans)	7/8/2023
A2	Sonoma Valley Collaborative	8/4/2023
R1	Fred Allebach	7/8/2023
R2	David Eichar	7/14/2023
R3	Robert C Demler	7/19/2023
R4	Michael Wearing	7/24/2023
R5	Fred Allebach	7/29/2023
R6	Gladys	7/29/2023
R7	Bill Willers	8/5/2023
R8	Carol Marcus	8/4/2023
R9	JJ Abodeely	7/26/2023
R10	David Eichar	7/31/2023
R11	Donna Dambach	7/19/2023
R12	Johanna M. Patri	7/19/2023
R13	Sue Bartlett	7/13/2023
R14	Sandy Hollander	7/13/2023
R15	Victor Conforti	7/18/2023

### 2.2 COMMENTS AND RESPONSES TO COMMENTS

This section of the Final EIR contains summaries of the comment letters received during the public review period for the Hotel Project Sonoma RDEIR and the City’s responses to these comments.

Several of the comment letters on the RDEIR repeat comment topics. The following “Master Responses” consolidate information on these subjects to provide a more comprehensive response. Responses to individual comments identify the following master responses for ease of reference.

- ▶ Master Response 1 – Vehicle Miles Traveled (VMT) Analysis
- ▶ Master Response 2 – Greenhouse Gas Emissions Analysis
- ▶ Master Response 3 – Tourist Greenhouse Gas Analysis
- ▶ Master Response 4 – Off-Site Parking and Pedestrian Activity
- ▶ Master Response 5 – EIR Alternatives
- ▶ Master Response 6 – Parking Requirements
- ▶ Master Response 7 – Residential Component

## **MASTER RESPONSE 1 – VEHICLE MILES TRAVELED (VMT) ANALYSIS**

### **Overview**

Several comments on the RDEIR address vehicular travel demand or vehicle miles traveled (VMT) associated with the proposed project, and the discussion of VMT in the RDEIR. The analysis of the proposed project's VMT was prepared in accordance with guidance from the California Governor's Office of Planning and Research (OPR), which states that, when assessing VMT impacts under CEQA, lead agencies may evaluate each component of mixed-use projects separately, which was the approach adopted for the analysis of the proposed project. The VMT analysis is based on: (1) the estimated number of trips, as determined through standard Institute of Transportation Engineers (ITE) trip generation rates, which account for the presence of associated uses such as the proposed restaurant and spa, and (2) the estimated trip lengths.

The RDEIR presents a comprehensive analysis of VMT attributable to the hotel component, including the proposed spa and restaurant, *and* the residential component of the project. Guidance from OPR states that, when assessing VMT impacts under CEQA, lead agencies may evaluate each component of mixed-use projects separately, which was the approach adopted for the analysis of the proposed project. The analysis of travel demand associated with the proposed project is broken down below by the hotel component and the residential component.

Rather than relying only on travel demand forecasting model or other methods of estimating future vehicular travel demand, the VMT analysis for the hotel component of the project considers actual data characterizing trip patterns of guests and staff at three hotels located near the project site (RDEIR, pages 4.13-16 through 4.13-18). The analysis in the RDEIR, then, represents *actual* trip data rather than model-based estimates. The hotels from which these empirical data were collected have similar ancillary uses as those proposed as a part of the project and the VMT examined was inclusive of all arriving and departing trips, including guest trips, commute trips by employees, and deliveries. Consistent with suggestions from the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR Technical Advisory) the transportation analysis of the hotel component of the proposed project uses the most recent trip generation rates available (*Trip Generation*, Institute of Transportation Engineers, 11th Edition, 2021).<sup>1</sup> In order to present conservative results (that would tend to overestimate the actual impact), the existing project site VMT generated by office and warehouse uses that would be discontinued to accommodate the proposed project were not subtracted from the VMT results presented in the RDEIR.

As noted in RDEIR Appendix G, for the proposed project, a 7.5-percent reduction in VMT from the comparison hotels was applied due to the land use context of the project site. This level of trip reduction was based on research conducted by the U.S. Environmental Protection Agency (EPA). This level of VMT reduction is appropriate for the

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<sup>1</sup> For more detail, please see the OPR technical guidance, available: [https://opr.ca.gov/docs/20180416-743\\_Technical\\_Advisory\\_4.16.18.pdf](https://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf).

analysis of the project since the comparison data does not account for the expected increase in pedestrian and bicycle trips. The project site is less than one block from Sonoma Plaza, in an area with a wide variety of land uses, including many dining establishments and services in close proximity of the project site. A portion of hotel guest and employee trips associated with the hotel component of the proposed project will be walking trips, and it is reasonable to reflect this reality in the impact assessment. Trip lengths for the VMT analysis were derived from location-based apps on mobile devices, including the entire trip lengths. This approach is consistent with the OPR Technical Advisory. As noted in Section 15064.3 of the CEQA guidelines, VMT, for the purposes of CEQA analysis, is defined as “amount and distance of automobile travel attributable to a project.” As further described in the OPR Technical Advisory, VMT for the purposes of transportation impact analysis includes only miles driven by automobile and light duty trucks, and does not consider air travel, so for visitors entering the region by air, VMT would be accounted for from and to the appropriate airport.

The VMT analysis of the proposed residential component of the project is also comprehensive – addressing all residential trip types. The VMT associated with the proposed residential component of the project was compared with citywide residential-generated VMT. Consistent with the suggestion in the OPR Technical Advisory, this comparison between the project VMT rate and citywide VMT rate was focused on whether the project site is relatively VMT efficient. As noted in the OPR Technical Advisory, “[b]ecause location within the region is the most important determinant of VMT, in some cases, streamlining CEQA review of projects in travel efficient locations may be the most effective means of reducing VMT” (OPR 2018, page 10). Specifically, the OPR Technical Advisory recommends that a 15-percent improvement in VMT per capita for a subject project compared to existing citywide or regional per-capita VMT can be presumed to be a less-than-significant VMT impact (OPR 2018, page 12).

The Sonoma County Transportation Authority (SCTA) travel demand model was used to compare the relative VMT efficiency of the project site to existing citywide VMT efficiency for residential-generated VMT. The SCTA model includes traffic analysis zones (TAZ) for the entire county, including all of the city of Sonoma and the project site. As detailed in Appendix G to the RDEIR and Section 4.13 of the RDEIR, the location of the project site is, in fact, 15 percent more efficient for residential-generated VMT compared to the existing citywide residential-generated VMT, and therefore the application of the OPR-recommended threshold is appropriate for the residential portion of the project.

## **VMT Analysis Background**

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743, a bill which directed OPR to establish new practices and metrics to evaluate transportation impacts under the CEQA. OPR developed proposed revisions to the CEQA Guidelines establishing significance criteria for transportation impacts using the VMT metric. The recommended VMT metric measures miles traveled by vehicles rather than measuring traffic congestion. For development projects, these recommendations are:

- ▶ Residential: VMT/capita 15 percent below regional and city average.<sup>2</sup>
- ▶ Office: VMT/employee 15 percent below regional average.<sup>3</sup>

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<sup>2</sup> “Regional and City Average”: City average or average of the local regional association of government agency.

<sup>3</sup> “Regional Average”: Average of the local regional association of government agency.

- ▶ Retail: Net decrease in VMT, local-serving retail presumed to be insignificant.
- ▶ Roadway Projects: Less than 5,685 VMT/day.
- ▶ Other Projects: Lead agency to develop their own thresholds.
- ▶ Projects with Less than 100 Trips per Day/Projects with Fewer Trips than Threshold with the Regional Congestion Management Program: Almost always less than significant.<sup>4</sup>

With the adoption of the revisions to the CEQA Guidelines, automobile delay is not considered a significant impact on the environment under CEQA. As noted above, while lead agencies maintain discretion in setting thresholds for VMT as with all environmental impacts OPR has recommended a threshold for residential projects of (1) existing city household VMT per capita minus 15 percent or (2) existing regional household VMT per capita minus 15 percent may indicate a significant transportation impact. SB 743 is limited to defining transportation impacts under CEQA. It did not change laws related to general plans, powers granted to cities and counties, or traffic impact fee programs. As such, jurisdictions may still choose to use level of service (LOS) to size roadways in their general plan or determine nexus relationships for their impact fee programs. Lead agencies will still be able to condition a project pursuant to other laws and may continue to require that projects show conformity with general plans and congestion management plans that typically include congestion-based goals and policies, such as LOS. Therefore, some lead agencies may require that transportation analyses for projects include potential impacts based on the VMT metric as required by CEQA, and additional analyses based on LOS/congestion metrics to satisfy local requirements.

While OPR did not provide a specific recommendation for hotel projects, the intent of SB 743 is important to consider in the context of evaluating the proposed project’s VMT impact. SB 743 was intended to “[m]ore appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions” (Senate Bill No. 743, CHAPTER 386). Since the project is an infill project, it is consistent with this aspect of the intent of SB 743. Since the project site is in a mixed-use downtown setting, visitors, employees, and residents at the project site will access destinations throughout the downtown area using non-vehicular (active) modes of transportation. As detailed in the RDEIR, relative to the comparison hotels examined, the proposed project will reduce VMT, and since transportation is the top source of greenhouse gas emissions, compared to other hotels in other locations, the proposed project has the potential to reduce greenhouse gas emissions (RDEIR, pages 4.13-17 and 4.13-18 and 4.7-5).<sup>5</sup> In summary, while OPR does not have a recommended threshold for examining VMT impacts of hotels, and while the RDEIR determined that the VMT impact of the non-residential component of the project is significant, development of the project site appears to be consistent with the intent of SB 743.

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<sup>4</sup> “Congestion Management Programs”: Programs established by regional agencies such as the County or local regional association of government agency.

<sup>5</sup> Hotels that include an attraction or large meeting facilities could function as a destination and attract additional VMT. However, hotels without a specific draw will instead redistribute existing visitor trips to a given area through the provision of additional lodging options. The proposed project does not include features that would represent a specific draw, and therefore would generally redistribute existing trips to the city. VMT impacts of the proposed project would generally be less than for other hotels in the City, as the Plaza and surrounding shops and restaurants are the most popular destinations in the city, and would be most conveniently accessed by walking from the project site. Hotel guests choosing to stay at the proposed project would be expected to generate fewer vehicle trips than guests staying at lodgings in less central locations, such as the three local hotels used for VMT data collection.

## VMT Mitigation

Since the City determined that the VMT impact associated with the non-residential portion of the project could be significant, the RDEIR includes feasible mitigation tailored for the proposed project, and focused on reducing both visitor and employee-generated VMT (RDEIR, pages 4.13-19 through 4.13-21). The VMT benefits of the mitigation imposed on the proposed project was quantified using available research. The publication *Quantifying Greenhouse Gas Mitigation Measures* (California Air Pollution Control Officers Association 2010, 2021) suggests that the generalized maximum VMT reduction potential for a land use project in a suburban center context is 15 percent.<sup>6</sup> The OPR Technical Advisory also concludes that a 15-percent reduction in per capita or per worker VMT is generally achievable within metropolitan planning organization (MPO) boundaries. Given the type of project in question (tourist-serving hotel) and land use context (Sonoma Plaza area), the 15-percent reduction in VMT was established as a target for Greenhouse Gas (GHG) mitigation for the non-residential component of the proposed project, with a 7.5-percent reduction in VMT demonstrated as attributable to the project site location in a relatively compact, mixed-use environment (RDEIR, pages 4.13 through 4.13-19).

Mitigation Measure 4.13-2a includes potentially feasible transportation demand management (TDM) strategies that are specifically relevant for the proposed project and designed to reduce vehicle trips and trip lengths. For each individual bullet within Mitigation Measure 4.13-2a, the RDEIR describes the details of implementation required, along with a quantified estimate of the benefit of each VMT reduction strategy included in the mitigation, where evidence for this effectiveness is available.

As detailed on page 4.13-21 of the RDEIR, Mitigation Measure 4.13-2a has components that are demonstrated to be effective in reducing vehicular travel demand associated with the non-residential component of the proposed project. However, since there is not currently high-quality transit available to employees of the project, and since the City and applicant have very limited influence over VMT associated with visitor activities, the City determined that this impact would be significant and unavoidable. The project does not have the scale, and the City does not have the staffing or expertise to administer an annual monitoring of VMT, and the effectiveness of such monitoring with respect to visitor surveys or other means of measuring visitor-related VMT makes monitoring infeasible. The proposed project is located in a VMT-efficient part of Sonoma where destinations are nearby and easily reachable on foot, and the project is consistent with the intent of SB 743. There is no additional feasible mitigation available.

## MASTER RESPONSE 2 – GREENHOUSE GAS EMISSIONS ANALYSIS

Impacts related to greenhouse gas (GHG) emissions attributable to the proposed project are discussed in Section 4.7 of the RDEIR. The GHG analysis includes all sources of emissions attributable to the proposed project, including construction, mobile sources, area sources, energy sources, water and waste generation sources, refrigerant use, and a stationary source (backup generator). The analysis considers both new sources of emissions attributable to the proposed project during construction and operational phases. To ensure a conservative analysis (that would tend to overestimate the actual impact), emissions associated with on-site uses were not subtracted or “netted out” of the total emissions reported in the RDEIR (RDEIR, page 4.7-17).

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<sup>6</sup> Similar maximums are included as a part of the 2021 update to the 2010 CAPCOA guide, the GHG Mitigation Handbook – California Air Pollution Control Officers Association. 2021. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. Available: [https://www.airquality.org/ClimateChange/Documents/Final%20Handbook\\_AB434.pdf](https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf). Accessed September 20, 2023.

As noted throughout Section 4.7 of the RDEIR, the environmental consequences of climate change represent a significant cumulative impact. Since no single project would generate significant GHG emissions impacts on its own, impacts must be evaluated in a cumulative context, evaluating whether each subject project would represent a cumulatively considerable contribution to the significant cumulative impact of global climate change. The RDEIR details the threshold used by the City to evaluate exactly that question for this proposed project – whether the emissions represent a cumulatively considerable contribution to the significant cumulative impact of global climate change. Despite the large number of potentially feasible mitigation measures imposed by the RDEIR, the City ultimately concludes that, while Mitigation Measures 4.7-1a, 1b, 1c, 1d, and 1e would reduce emissions, and would ensure that the proposed project contributes its fair-share of emissions reductions toward the State GHG reduction mandates and the State’s goal of statewide carbon neutrality, the City cannot guarantee the availability of emissions credits meeting the standards outlined in Mitigation Measure 4.7-1f. The impact is cumulatively considerable and significant and unavoidable.

Lead agencies have flexibility to develop significance thresholds that are supported by substantial evidence or to determine significance thresholds on a case-by-case basis. For the RDEIR, the City has developed a GHG efficiency metric that is based on the statewide framework for reducing GHG emissions embodied in legislation, but is tailored for a new development project, to the proposed project, and to the proposed project location to assess the GHG efficiency of the proposed project, such that the proposed project will allow for consistency with the State’s GHG reduction mandates.

For determining whether or not the proposed project’s emissions are cumulatively considerable, the significance threshold should be designed to allow an assessment of consistency with the State’s emissions reduction mandates – namely the statewide context established by AB 32 (2006), which requires reduction of statewide GHG emissions to 1990 levels by 2020; SB 32, which established a reduction mandate of 40 percent below 1990 statewide emissions levels by 2030; and AB 1279, which requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels. The RDEIR significance threshold for evaluating GHG emissions impacts of the proposed project is connected quantitatively to these statewide emissions reduction mandates (RDEIR, pages 4.7-12 through 4.7-17). The State’s reduction mandates create a framework for determining the fair share of emissions reductions for individual projects, and whether GHG emissions associated with a project would represent a cumulatively considerable contribution to the significant cumulative impact of climate change. As the Supreme Court held, “consistency with meeting [those] statewide goals [is] a permissible significance criterion for project emissions” (*Center for Biological Diversity v. Department of Fish & Wildlife* [2015] 62 Cal.4th 204 [*Center for Biological Diversity*]). As proffered by the Supreme Court and referenced by Bay Area Air Quality Management District (BAAQMD) in its threshold justification report for climate change impacts, “[t]o the extent a project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall greenhouse gas reductions necessary [to achieve the State’s climate goals], one can reasonably argue that the project’s impact is not cumulatively considerable, because it is helping to solve the cumulative problem...” (*Center for Biological Diversity* [internal quotation marks omitted]; BAAQMD 2022).

The Bay Area Air Quality Management District adopted recommended thresholds of significance on April 20, 2022 for evaluating a project’s impacts under CEQA related to the generation of GHG emissions and climate change. BAAQMD’s approach was to identify what project design features and transportation performance standards “will be required of new land use development projects to achieve California’s long-term climate goal of carbon neutrality goal by 2045” (BAAQMD 2022, page 2). As noted in the BAAQMD thresholds justification report, the “thresholds of significance [are] based on typical residential and commercial land use projects and... [a]s such, these thresholds

may not be appropriate for other types of projects that do not fit into the mold of a typical residential or commercial project...” (BAAQMD 2022, page 3). As detailed in Section 4.7, the RDEIR includes a detailed evaluation of the project’s consistency with the performance standards adopted by BAAQMD, but also augments that approach with a significance threshold that is tailored for use with the proposed project (RDEIR, pages 4.7-20 and 4.7-21).

As described in the RDEIR, it is important to evaluate whether a subject project “incorporates efficiency and conservation measures sufficient to contribute its portion of the overall greenhouse gas reductions necessary” for the State to achieve its own mandates (*Center for Biological Diversity*). If a project demonstrates that the *rate* of GHG emissions is efficient enough to provide its share of State emissions reduction targets, the impact is not cumulatively considerable (*Center for Biological Diversity*; Crockett 2011). Therefore, as an additional point of reference for evaluation of the project’s GHG emissions, and for an evaluation under the State’s shorter-term goal of SB 32 (achieve 40 percent below 1990 levels by 2030), the City has also chosen to use a GHG efficiency metric that is tailored for a new development project, to the proposed project, and to the proposed project location to assess the GHG efficiency of the proposed project. The GHG emissions efficiency of a project is measured as the amount of emission per some specified unit of measurement – often “service population,” which is the sum of residential population and employment. By evaluating the project’s emissions divided by service population, the City is able to evaluate whether the proposed project emissions, on per-unit basis, is consistent with the State’s emissions reduction targets. To develop the efficiency target, the statewide mass emissions targets embodied in state law were divided by the forecast population and employment statewide for the same year. This yields an emissions “budget” for each resident/employee, and allows the City to determine whether or not its emissions rate demonstrates that the proposed project has provided a “fair share” of emissions reduction. Adjustments to the emissions in the numerator of the efficiency ratio and the service population in the denominator ensure that the threshold is tailored to *this specific* project. The City’s approach also ensures that the threshold is appropriate for *new* development (as opposed to existing, on-the-ground development). All emissions sources related to the proposed project are evaluated as if they are created by the proposed project. While the proposed project will accommodate demand for lodging, and will likely serve demand that would otherwise be served in another facility, the analysis does not attempt to estimate displaced emissions. This approach “allows” existing development to be relatively less GHG-efficient, while still allowing the State as a whole to meet GHG legislative mandates. To further ensure conservative results that are appropriate for new development, the service population accounted for in the denominator of the calculation to determine the project’s GHG efficiency only accounts for the proposed project’s employees and residents, not the hotel guests, whose use of the facility generate the majority of the GHG emissions (all hotel guest-related emissions *were* included, however, in the emissions numerator of the efficiency ratio).

The RDEIR is supported by a tailored estimate emissions that includes all sources attributable to the construction and long-term operation of the proposed project. The emissions estimate uses both industry standard modeling, as well as “off-model” methods that allow a more precise and comprehensive assessment of the proposed project’s emissions profile than would be possible using only typical methods. The analysis was supplemented with empirical data from area hotels, adjusted to fit the proposed project site characteristics, to create a tailored VMT to support a more accurate GHG emissions estimate than would be possible using California Emissions Estimator Model (CalEEMod) default data for travel demand. The operational emissions analysis in the RDEIR includes both direct and indirect (electricity related, for example) emissions. Although there are existing operational land uses on-site that would be demolished as part of the proposed project, it was not assumed that this would result in a reduction in GHG emissions from existing conditions. As noted, to ensure conservative results for this analysis, emissions associated with existing on-site operations were not subtracted from the emissions estimates presented in this RDEIR.

The RDEIR analysis also includes all GHG emissions associated with short-term construction activities. While the most recent BAAQMD CEQA Thresholds Justification Report (April 2022) states that GHG “emissions from construction represent a very small portion of a project’s lifetime GHG emissions” and that the BAAQMD’s GHG “thresholds for land use project are designed to address operational GHG emissions which represent the vast majority of project GHG emissions,” the RDEIR is designed to provide a more comprehensive and conservative evaluation of GHG emissions-related effects, and therefore included construction-related emissions in addition to operational emissions.

GHG emissions attributable to the proposed project identified as cumulatively considerable, requiring mitigation. The City identified all potentially feasible mitigation and the RDEIR provides a quantified estimate of the benefits of such mitigation (RDEIR, pages 4.7-21 through 4.7-24). And while, the identified mitigation would reduce emissions associated with the proposed project, the City cannot as of the writing of the RDEIR or this Final EIR guarantee the availability of emissions credits meeting the standards outlined in the mitigation presented in the RDEIR and the impact is cumulatively considerable and significant and unavoidable.

When considered together, the RDEIR and this Final EIR provide detailed analyses related to the Project’s environmental setting, applicable regulatory context, and potential impacts on the environment, which are based on substantial evidence, including facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (CEQA Guidelines Section 15384). The RDEIR and this Final EIR together provide an adequate, complete, and good-faith effort at full disclosure of the physical environmental impacts, and the conclusions are based on substantial evidence in light of the whole record (CEQA Guidelines Section 15151). The combination of the RDEIR, the RDEIR, and this Final EIR provide a thorough and accurate analysis of the potentially significant environmental impacts of the proposed project (CEQA Guidelines Section 15126).

### **MASTER RESPONSE 3 – TOURIST GREENHOUSE GAS ANALYSIS**

Some commenters suggest that implementation of the proposed project would result in greenhouse gas emissions impacts due to air travel and other transportation modes used by tourists. The project would be part of the area’s already strong attraction and recognition as a primary visitor destination, but would not, itself generate a substantial amount of tourism or long-distance travel. The Sonoma region has long been a destination for travel and the presence of this hotel is not an appreciable factor in the amount of tourism in the region, the origin of travelers, or the mode of their travel in reaching the proposed project site.

The GHG analysis presented in the RDEIR uses industry standard methods that have been augmented to present a more complete, accurate, custom tailored, and conservative estimate of GHG emissions associated with the residential and non-residential components of the proposed project, including mobile data from other nearby hotels to create emissions estimates for employee travel, as well as the travel of guests. The focus is on direct emissions (occurring at the project site) and reasonably foreseeable indirect emissions related to the project. This is consistent with the CEQA Guidelines and the intent behind changes to the CEQA Guidelines that incorporate GHG emissions direction: “CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration.... Mitigation can only be required for emissions that are actually caused by the project” (California Natural Resources Agency 2009).<sup>7</sup>

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<sup>7</sup> For more details, please see: [https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf).



The methodology used in the RDEIR is also consistent with CEQA Guidelines Section 15358, which characterizes “effects” for the purposes of CEQA analysis to include: (1) Direct or primary effects which are caused by the project and occur at the same time and place; and (2) Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. The project does not create tourist activity or long-distance travel, but rather accommodates such travel that exists and will exist in the future. Relative to transportation-related effects, as described in the OPR Technical Advisory, VMT for the purposes of transportation impact analysis includes only miles driven by automobile and light duty trucks, and does not consider air travel.

There is no element of the project approvals related to the method of arrival to the proposed hotel project. In addition, it would be speculative to include estimates of emissions related to air travel for a development project – the level of emissions would depend on whether this analysis is limited to the flight itself, or whether to include emissions associated with ground support equipment, travel to the airport, travel back home from the airport, energy-related emissions at each airport, emissions associated with shuttles within the airport, or other sources. For these reasons, air travel is not included in CEQA analysis for development projects and is not included as a part of the analysis of the proposed project.

The proposed project would employ an estimated 60 full-time employees compared to a total of 22,686 travel-related employees in Sonoma County (ITE 2003, GO-Biz 2018). The project would add lodging to the county after three hotels were destroyed in wildfires (Sonoma County Economic Development Board 2018). The project proposes 62 rooms – fewer than 0.9 percent of an estimated total of 7,100 hotel rooms in the County (Press Democrat 2018).

The specific routes and modes of travel to the hotel for future hotel guests are unknown and neither the project applicant nor the City can dictate the mode or route of travel to the proposed project site. Travel demand fluctuates with economic growth and contractions.<sup>8</sup> Economic activity relates to the amount of air travel in complex ways and the influence of future economic changes on air travel is unknown.<sup>9</sup>

Airlines use pricing and scheduling strategies to increase revenue, which has an effect on the number of passengers per airplane (United States General Accounting Office 2001). This, in turn, effects how much of one flight’s emissions would be attributable to the future project if, for example, a single individual from one flight has a reservation at the future hotel. Overall, travel demand fluctuates with economic growth and contractions (Federal Highway Administration 2012). Economic activity relates to the amount of air travel in complex ways and the influence of future economic changes on air travel is unknown (International Center for Air Transportation, FAA 2005). Aircraft emissions of water vapor can create contrails, which have “complex regional and temporal net radiative forcing effects that currently have a low level of scientific certainty” (U.S. EPA 2018, IPCC 2013). According to the Federal Aviation Administration (FAA), aircraft fuel efficiency has historically improved by about one percent per year, and while this trend is anticipated to continue into the future, the precise efficiency improvements are not currently known (FAA 2005).

In 2016, the International Civil Aviation Organization (ICAO) decided to implement a carbon offset, whereby additional GHG emissions from global aviation after 2020 will be compensated by abatement activities in other

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<sup>8</sup> Federal Highway Administration. 2012. Exploring the Relationship between Travel Demand and Economic Growth.

<sup>9</sup> International Civil Aviation Organization (ICAO). 2016. On Board: A Sustainable Future. Federal Aviation Administration. Office of Environment and Energy. 2005. Aviation & Emissions: A Primer.

sectors (ICAO 2016). For international travel, in the European Economic Area (EEA), the European Union Emissions Trading Scheme covers flights that both take-off and land within the EEA (European Commission).

The GHG analysis presented in the RDEIR considers all direct and reasonably foreseeable indirect impacts associated with the proposed project. The proposed project would not create tourist activity, air travel, or other long-distance travel, and it would therefore be inappropriate to attribute impacts related to tourism and long-distance travel to the proposed project.

#### **MASTER RESPONSE 4 – OFF-SITE PARKING, PEDESTRIAN ACTIVITY, AND TRANSPORTATION SAFETY**

Some comments on the RDEIR address concerns regarding off-site parking, pedestrian safety, and overall transportation safety.

As noted in Chapter 3 of the RDEIR, “Project Description,” the proposed project includes 130 off-street, on-site parking spaces. As detailed in Appendix G to the RDEIR, the parking provided is adequate to meet the project demand with the exception of nine parking spaces that are recommended for employee overflow use during peak times. The applicant controls surface parking across West Napa Street from the project site that would be made available for employee overflow use. While it is legal for pedestrians to cross State Route 12/West Napa Street at any point along the project’s frontage, all employees would be specifically directed to cross in the crosswalk at First Street West in the Parking Management Plan, which is required as a condition of project approval. There is no evidence that pedestrians would have a greater exposure of being hit if crossing mid-block, however. In fact, because they would not have the right-of-way at such a location, most pedestrians are more cautious than they would be at a marked crosswalk. The off-site parking would be for the use of employees. The project will have an adequate supply of parking for guests and all other needs apart from the potential for periodic employee overflow parking needs (RDEIR, Appendix G). Hotel guests would park on-site while checking in and getting their luggage to their rooms; guests will not need to cross West Napa Street with their luggage in tow.

As detailed in Appendix G to the RDEIR, the collision history of intersections in the vicinity of the project site was evaluated. Collision rates for the intersections in the vicinity of the project site were compared to collision rates for similar facilities statewide. The collision rate at the intersection of West Spain Street and First Street West was higher than the statewide average, one injury was recorded, and the injury rate was 9.1 percent, substantially below the statewide average of 40.3 percent for similar facilities. With slow speeds and the below-average injury rate, and considering the predominance of collisions that occurred near, but not at the intersection, there does not appear to be an underlying intersection safety concern (RDEIR Appendix G, page 9). The collision rate at West Napa Street/First Street West was also higher than the statewide average for similar facilities, and the injury rate was well below the statewide average with 22.2 percent at this intersection compared to an average of 41.2 percent. Considering the low speeds and the relatively low injury rate, there no evidence of an underlying intersection safety concern (RDEIR Appendix G, page 9).

The 2019 City of Sonoma Systemic Safety Analysis Report includes some recommendations for intersections in the vicinity of the project site (City of Sonoma 2019). At the intersection of First Street West and West Napa Street, this report describes that safety could be improved by implementing directional median openings to restrict left turns for northbound and southbound vehicles and installing “through traffic does not stop” and “right turn only” signs. The proposed project does not include any changes to the existing sidewalks on the frontage and does not conflict with any proposed pedestrian enhancements at this intersection or any relevant programs, plans, policies,

or ordinances related to pedestrian travel. As such, no aspect of the project, including the off-site parking component, would conflict with pedestrian safety.

The transportation impact study for the proposed project recommends that the project contribute 50 percent of the cost of pedestrian crossing enhancements at the intersection of West Napa Street/First Street West. This has been included as a condition of project approval. The project would increase pedestrian movements at this location where improvements have been identified by the City. Due to low speeds, relatively low injury rates, and the fact that there were no recorded collisions involving pedestrians at this location from 2016 through 2021, there is no apparent safety concern for pedestrians at this location, the incremental increase in pedestrian crossings associated with the proposed project would not be expected to introduce any new safety concerns or lead to any impact as evaluated in the RDEIR (RDEIR, page 4.13-22). However, as noted, a contribution to improvements at this intersection could nonetheless be a condition of approval.

As a part of the transportation analysis conducted to support the City's review of the proposed project, the need for a left-turn lane on West Napa Street at the proposed driveway was evaluated based on criteria maintained by the Transportation Research Board and methodology consistent with the Caltrans Highway Design Manual (RDEIR, Appendix G, pages 25 and 26). The analysis conservatively assumes that all vehicles traveling to the project site from the east and north would enter the site using this driveway. Looking at the scenario with existing conditions plus proposed project trips and long-term future conditions plus proposed project trips, a left-turn lane is not warranted on West Napa Street at the project driveway during any of the peak periods evaluated.

A clear line of sight will be available at the West Napa Street and First Street West driveways (RDEIR, page 4.13-23, RDEIR Appendix G). A clear line of sight is important at unsignalized intersections and driveways so that the motorist leaving a driveway or entering an intersection can see approaching vehicles at an adequate distance. Sight distances were evaluated using standards maintained by the California Department of Transportation (Caltrans). All proposed driveways would have more than 150 feet of stopping sight distance in all directions, which exceeds the minimum required.

## **MASTER RESPONSE 5 – EIR ALTERNATIVES**

Section 15126.6 of the CEQA Guidelines require an EIR to describe a range of reasonable alternatives to the project that would attain most of the project objectives, but would avoid or substantially less any of the significant effects of the project. The alternatives evaluated in the RDEIR were designed to address potentially significant impacts attributable to the proposed project.

Some comments pertained to the evaluation of the alternatives in the RDEIR, particularly focusing on the Hotel/Residential (50%-50%) alternative, and the Hotel/Residential (75%-25%) alternative. This Master Response addresses the questions and issues raised in the comments on both of these alternatives, as well as other topics raised by commenters in relation to the alternatives analysis.

The City Council Resolution presented at the August 14, 2017 City Council meeting<sup>10</sup> included the following direction on the additional EIR Alternatives:

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<sup>10</sup> City of Sonoma. Resolution #43-2017. Website: <https://storage.googleapis.com/proudcity/sonomaca/uploads/2019/11/Appendix-Q-Resolution-2.pdf> (accessed 9/19/23).

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.
- 2) An alternative in which approximately 75% of the proposed building area (excluding the underground parking garage) is commercial and 25% is residential.
- 3) An alternative in which the proposed restaurant is eliminated and the number of hotel rooms is reduced in a manner and an amount that clearly reduces the environmental impacts of the Project in specified areas.

According to the Section 15126.6, of the 2018 CEQA Guidelines, “(a)n EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” However, based on the high level of interest, a large number of alternatives was evaluated in detail in the RDEIR, including Alternative 1: No Project Alternative; Alternative 2: Hotel/Residential (50%-50%) Alternative; Alternative 3: Hotel/Residential (75%-25%) Alternative; Alternative 4: Hotel Only Alternative; and Alternative 5: Fewer Hotel Rooms Alternative. In light of the City Council resolution, and Section 15126.6 of the CEQA Guidelines, the evaluation of the project alternatives provided a direct comparison of the potential impacts of the proposed project compared to the alternatives for all of the environmental topics. While CEQA does not require that alternatives be evaluated at the same level of detail as the proposed project, as noted in Section 15126.6(d) of the CEQA Guidelines, the alternatives analysis is relatively detailed, even providing quantified estimates of building square footage associated with the different alternatives and quantified differential effects for such topics as air quality, GHG emissions, VMT, and utility demands (RDEIR, pages 5-10 through 5-37).

An alternative that may potentially be determined in the future by City decision-makers to be inconsistent with Sonoma’s General Plan and/or Development Code can be considered as potentially feasible for analysis as a project alternative. An alternative that may potentially be determined in the future by City decision-makers to be inconsistent with Sonoma’s General Plan and/or Development Code can be considered as potentially feasible for analysis as a project alternative.

The RDEIR cannot speculate on whether the proposed project will be approved, denied, or conditioned in some material way, though a broad range of alternatives is included as a part of Chapter 5 of the RDEIR to inform the City’s review of the proposed project. If in the future a different version of the proposed project is forwarded for consideration by the City, the RDEIR will need to be examined to determine whether the analysis, reporting, mitigation, or alternatives need to be updated to address this future version of the proposed project. However, the RDEIR analysis must focus on the proposed project, and it is not the role of the RDEIR to advocate for a waiver by the Planning Commission in relation to housing or to advocate for any other aspect of the proposed project, but rather to provide the comprehensive and dispassionate analysis and reporting that is in the current version of the RDEIR. The RDEIR authors have not, as alleged by the commenter, requested a reduction in housing. Instead, the Alternatives chapter of the RDEIR, Chapter 5, examines the relative environmental effects of alternatives vis-à-vis the proposed project – including alternatives with different amounts of housing (RDEIR, pages 5-5 through 5-38).

## MASTER RESPONSE 6 – PARKING REQUIREMENTS

A number of comments on the RDEIR addressed the parking requirements for the project. Issues related to parking supply compared to anticipated demand are not generally considered adverse environmental effects under CEQA.

As discussed in Section 4.10 of the RDEIR, the project proposes a hotel, restaurant, spa, and eight residential units, which is allowed in the Commercial zoning district with a Use Permit (RDEIR, page 4.10-1). Parking and loading standards are contained in Municipal Code Chapter 19.48 (Parking and Loading Standards). Based on the parking standards contained in Chapter 19.48 Table 4-4 (Parking Requirements by Land Use), the proposed project would require 200 parking spaces (RDEIR Appendix G, page 23). Pursuant to Municipal Code Section 19.48.050 (Adjustments to parking requirements), parking requirements for a second use within a single building (e.g., a restaurant in a hotel or a shop within a sports facility) may be reduced by up to one-half the normal parking requirement upon the determination by the Planning Commission that a reduction is justified. Adjusting the required parking for the restaurant, spa, and bank by one-half would result in 164 required parking spaces on site.

Chapter 19.48 (Parking and Loading) of the City's Municipal Code would require a greater number of parking spaces than is proposed as part of the project. However, additional considerations are set forth in Section 19.48.050.B (Shared Use of Parking Facilities), which allows the Planning Commission to reduce parking requirements for commercial and residential mixed uses located in a commercial zone upon determination that the reduction is justified.

As stated in Section 3.1 of the RDEIR, the proposed project would provide 130 off-street parking spaces (consisting of a 113-stall basement parking garage, 9 surface parking spaces, and 8 covered residential parking spaces). The combined hotel, restaurant and bar, spa, and residential uses would be provided 97 parking spaces. In addition, 33 parking spaces for the Sonoma Index-Tribune Building and Lynch Building's existing residential, retail, and office uses (which are not changing as part of the proposed project) would continue to be provided. The hotel's basement parking garage would provide 113 parking spaces.

The proposed parking demand was also evaluated using a shared parking model that accounts for the fact that different uses have different peak parking demand times of day and even different peak parking demand months of the year. For the shared parking analysis, it was assumed that 122 of the 130 on-site spaces would all be available to employees, visitors, and customers associated with the proposed hotel component of the project and ancillary uses, as well as existing uses in the Lynch and Sonoma Index Tribune buildings. The eight proposed residential units would each have a designated on-site parking space in a separate parking lot. To accommodate additional demand, nine employees are proposed to be assigned parking spaces in the Bank of Marin lot across the street, which is owned by the applicant.

Accounting for the ability to share parking among uses when one use has a peak demand period while another use does not, the estimated peak parking demand for the proposed project is 139 spaces (RDEIR Appendix G, page 24). The transportation impact study conducted to support the City's review of the project recommends that the applicant should designate a minimum of nine parking spaces in the 144 West Napa Street parking lot for use as employee overflow parking to accommodate peak demand (RDEIR Appendix G, page 27). A condition of project approval requires the preparation of an annual parking management plan, which would outline parking requirements and procedures for both employees and guests and identify how the hotel will accommodate parking during peak periods. Implementation and success of the parking management plan will be monitored by the City during the operational life of the proposed project, if approved and developed.

## MASTER RESPONSE 7 – RESIDENTIAL COMPONENT

A number of comments on the RDEIR addressed concerns with the residential component of the project, as well as the Planning Commission and City Council’s role in approving and/or modifying the residential component of the project. The proposed project was originally submitted in 2012 and various iterations of the project have been subject to review since the original submittal. SMC Section 19.01.040(F) requires that a land use permit application be processed according to the provisions of the development code in effect when the application was accepted as complete.

As discussed in Section 3.1 of the RDEIR, the City of Sonoma Municipal Code Section 19.10.020(B)(3) requires in applications for new development on commercially zoned properties 0.5 acre or larger and for which a discretionary permit is required, a residential component is required, unless this requirement is waived by the City Planning Commission. Section 19.10.020.B.3 of the City’s Municipal Code addresses this requirement, as follows:

Residential Component. 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. Circumstances in which the residential component may be reduced or waived include, but are not limited to, the following:

1. The replacement of a 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 limitations 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.

As discussed in Section 4.10 of the RDEIR, the residential component should normally comprise at least 50 percent of the total proposed building area. Hotel Project Sonoma proposes the development of a 65,606-square foot hotel, restaurant /bar, and spa building and a 21,221-square foot residential building containing eight residential units. The total project combined building area is approximately 86,827 square feet.<sup>11</sup> Pursuant to SMC Section 19.10.020 (B) (Commercial), the residential component for the proposed project should be at least 43,414 square feet. As proposed, the residential building would include 21,221 square feet, resulting in a residential component deficit of 22,193 square feet. The applicant is requesting that this requirement be reduced and is proposing eight residential units to meet the proposed project objectives and has included a number of recommended measures to compensate for the 22,193 square feet of residential component not included on-site. Potential measures include:

1. Credit on a per square foot basis the conversion of seven existing market-rate apartments totaling approximately 4,570 square feet at 135 West Napa Street to low-income units. These units would convert as current tenants terminate their leases or qualify as low-income residents.

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<sup>11</sup> The SMC Chapter 19.92 (Definitions) lacks a definition for "Building Area." The closest definition would be "floor area," which means the total of the gross horizontal areas of all floors, excluding basements, cellars, attics, and below-grade parking, within the outer surfaces of the exterior walls of buildings, or the center lines of party walls separating buildings or portions thereof. This section of the Development Code was amended in March 2023 to eliminate such ambiguities. The recent amendment modified the term "building area" in SMC Section 19.10.020 to be "floor area" in order to address this issue.

2. The purchase of existing low-income housing units in the City of Sonoma. A number of these units are scheduled to expire and will become market rate. The applicant would renew the low-income requirement on the proposed purchased units.
3. The purchase of current market rate apartments and converting them to deed-restricted Affordable Housing Units.
4. The payment of \$100 per square foot in-lieu fee to be used by the City of Sonoma for the development of affordable housing. This payment would be paid in five annual installments starting with occupancy and on each anniversary of the occupancy date for an additional four years. An escrow account will be established that can be used for Option 3 above. If the applicant fails to qualify a purchase of a market rate apartment under Option 3, the City can use the funds to pursue other housing opportunities.

The proposed project would be required to comply with this requirement through the Use Permit process by either providing the required housing or by the Planning Commission granting a reduction or a waiver. A condition of project approval would require that the project comply with the residential component.

The RDEIR comprehensively addresses the project as proposed, along with a detailed analysis of several alternatives to the proposed project. The relationship between the proposed project and the Municipal Code on this topic is not germane to the environmental analysis unless a different approach were proposed related to housing (e.g., the project proposed 10 instead of 8 dwelling units).

Section 4.10 of the RDEIR identified that Ordinance 3-2023 applied to the project. Upon further review, and as noted above, it has been determined that pursuant to SMC section 19.01.040(F) land use permit applications shall be processed according to the provisions of the development code in effect when the application was accepted as complete and therefore Ordinance 3-2023 does not apply to the project. Section 4.10 has been amended to reflect the correct language for Section 19.10.020(B)(3). See Chapter 3 of this Final EIR, "Errata," which details revisions to the Draft EIR. These changes do not affect any of the conclusions as presented in the RDEIR, mitigation measures, or alternatives examined in the RDEIR.



## 2.2.1 Comment LETTER #A1:

### CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

#### California Department of Transportation

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OFFICE OF REGIONAL AND COMMUNITY PLANNING  
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660  
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August 7, 2023

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No.1 The Plaza  
Sonoma, CA 95476

#### Re: Hotel Project Sonoma – Recirculated Draft Environmental Impact Report (DEIR)

Dear Kristina Tierney:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Hotel Project Sonoma. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system.

A1-1

The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the June 2023 Recirculated DEIR.

#### Project Understanding

The proposed project would demolish the existing commercial buildings and develop a 62-guestroom hotel, 80-seat restaurant and bar, spa with 6 treatment rooms, raised swimming pool veranda, 130 on-site parking spaces, and an 8-unit residential building. This 1.24-acre project site is located adjacent to State Route (SR)-12.

A1-2

#### Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

A1-3

"Provide a safe and reliable transportation network that serves all people and respects the environment"



The DEIR recognizes that this project would have significant and unavoidable Vehicle Miles Traveled (VMT) impacts. To help mitigate VMT impact, the applicant may consider developing a partnership with the city and Sonoma County Transit to provide free or discounted shuttle and transit service to visitors that would connect to most visited tourist destinations during peak periods of the year. Such partnership could also be applied to employees in combination with the employee focused VMT mitigation measures identified on page 4.13-19 and 4.13-20 to provide non-motorized vehicle commute options.

A1-3

The applicant may consider providing electric bicycles for the bike share program mentioned for hotel guests. For employees, in addition to providing bicycle trip-end facilities, the applicant may also explore avenues of partnering with the city to create a rebated or discounted electric bicycle program to encourage employees to use electric bicycles for daily commute.

### **Construction-Related Impacts**

Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

A1-4

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

### **Lead Agency**

As the Lead Agency, the City of Sonoma is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

A1-5

### **Equitable Access**

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

A1-6

"Provide a safe and reliable transportation network that serves all people and respects the environment"

**Encroachment Permit**

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to [D4Permits@dot.ca.gov](mailto:D4Permits@dot.ca.gov).

A1-7

To obtain information about the most current encroachment permit process and to download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter or future early coordination opportunities or project referrals, please contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,



YUNSHENG LUO  
Acting District Branch Chief  
Local Development Review

c: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

## RESPONSE TO COMMENT LETTER A1

**Comment A1-1** Summary of Comment: The comment states that the California Department of Transportation (Caltrans) has reviewed the RDEIR for the proposed project to ensure consistency with State planning priorities.

Response: The City appreciates the commenter's review of the RDEIR. This comment does not pertain to the adequacy or completeness of the environmental analysis contained in the RDEIR; the comment is noted.

**Comment A1-2** Summary of Comment: The commenter has provided a summary of the proposed project.

Response: This comment does not pertain to the adequacy or completeness of the environmental analysis contained in the RDEIR; the comment is noted.

**Comment A1-3** Summary of Comment: The commenter recommends that the project applicant consider developing a partnership with the City and Sonoma County Transit to provide free or discounted shuttle and transit service to visitors in combination with the employee focused VMT mitigation measures to help mitigate the project's VMT impact. In addition, the commenter recommends that the project applicant consider providing electric bicycles for the bike share program mentioned for hotel guests, as well as consider partnering with the City to create a rebated or discounted electric bicycle program.

Response: As discussed on page 3-13 of the RDEIR, as proposed, the hotel would provide, maintain, and encourage use of a fleet of bicycles for its guests and employees. The hotel would provide, maintain, and offer the use of a fleet of 12 bicycles or more for guests. Further, employees of the hotel would be encouraged to use bicycles for transportation to and from the hotel by providing employee showers. Secured employee bicycle parking would be provided in the parking garage, and public bicycle racks would be provided at the front of the hotel. In September 2023, the City Council of the City of Sonoma accepted the Downtown Parking Management Plan and directed staff to begin implementation of all Phase 1 recommendations. One of the recommendations was for the City to investigate the possibility of collaborating with local hotels for a downtown circulator. The City would need to conduct a formal study of a potential circulator accounting for factors such as routing, frequencies, ridership forecasts (including seasonal fluctuations), funding, and other relevant considerations. The comment related to recommending that the project applicant consider providing electric bicycles for the bike share program for hotel guests and partnering with the City to create a rebated or discounted electric bicycle program is noted and will be forwarded for consideration as a part of an overall City program.

**Comment A1-4** Summary of Comment: The commenter requests additional analysis of potential impacts to the State right-of-way from project-related temporary access points, as well as mitigation for significant impacts due to construction and noise. The commenter states that project work that requires movement of oversized or excessive load vehicles on State roadways will require a transportation permit that is issued by Caltrans, and prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).



Response: The RDEIR comprehensively analysis construction and operational noise effects attributable to the proposed project, including noise impacts along SR 12 in Section 4.11.3 of the RDEIR. As discussed in Section 4.11.3 of the RDEIR, the assumed maximum construction-related traffic volume of 200 vehicles per day would not cause an increase of more than 1 decibel (dB) in traffic noise along the roadways surrounding the project site. The assumption of 200 vehicles per day is merely that – an assumption that demonstrates that, even with a very high amount of traffic along area roadways, there will not be a significant construction traffic impact. Actual construction related trips along SR 12 would be much lower.

In addition, as discussed in Section 4.11.3 of the RDEIR, with the implementation of Mitigation Measure 4.11-1, construction would be limited to daytime hours and impacts from temporary, short-term exposure of sensitive receptors to increased equipment noise from the project would be reduced. Where possible, construction equipment activity would occur in locations away from the edges of the project site, at a relatively greater distance from adjacent properties, which would attenuate noise levels by 5 dB or more based on the distance. Properly maintaining the equipment and equipping with noise-reduction intake and exhaust mufflers and engine shrouds; shutting down all motorized equipment when not in use to prevent idling; using available quieter procedures and equipment (e.g., using welding instead of riveting, mixing concrete off-site instead of on-site); and using noise-reducing enclosures around stationary noise-generating equipment (e.g., compressors and generators) could further reduce project construction noise levels by at least 5 dB. However, there is no additional feasible mitigation, and impacts would remain significant and unavoidable.

The City acknowledges that project work that requires movement of oversized or excessive load vehicles on State roadways would require a transportation permit that is issued by Caltrans, and coordination may be required with Caltrans to develop a transportation management plan. The project does not propose any temporary closure of lanes or any other substantial disruption to the flow of traffic during construction; however, a condition of approval has been included requiring the preparation of a construction management plan to ensure that there would be no issues related to construction. The construction management plan shall be prepared prior to issuance of a building permit and is required to address neighbor/agency outreach and coordination, employee parking, equipment staging, traffic control, etc. This plan shall be subject to the review and approval of the Community Development Director. The comments related to large vehicles, a transportation permit, and a transportation management plan do not pertain to the adequacy or completeness of the environmental analysis contained in the RDEIR. The comment has been provided to decision-makers for their consideration.

**Comment A1-5** Summary of Comment: The commenter states that as the Lead Agency, the City of Sonoma is responsible for all project mitigation, as well as the project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring.

Response: The City acknowledges that applicable project mitigation, as well as the project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring are the responsibility of the City. The commenter does not specify what impacts the proposed project may have on the state highway system, but the RDEIR comprehensively evaluates all

adverse physical environmental effects associated with the proposed project, and there is no need to evaluate effects to the highway roadways surface itself as a part of the City's environmental review.

**Comment A1-6** Summary of Comment: The comment requests that if any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion, and the project must maintain bicycle and pedestrian access during construction.

Response: The City appreciates the commenter's review of the RDEIR. The City acknowledges that if any Caltrans facilities are impacted by the project, those facilities would be required to meet ADA standards after project completion, which would be verified by the City staff. The project does not propose any changes to the SR 12 frontages or any aspect of the state highway system. In addition, the City would maintain bicycle and pedestrian access during construction.

**Comment A1-7** Summary of Comment: The commenter states that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit.

Response: The City acknowledges that construction work associated with the project within the Caltrans right-of-way would require an encroachment permit. The project does not propose any changes to the SR 12 frontages or any aspect of the state highway system.

## 2.2.2 Comment Letter #A2:

### SONOMA VALLEY COLLABORATIVE



## Comment on the Sonoma Hotel Project

August 4, 2023

Dear City of Sonoma Planning Commissioners, Council members, and staff,

Sonoma Valley Collaborative is a forum of community leaders from a wide range of sectors across Sonoma Valley, finding solutions and taking action to address our community's biggest challenges.

The Sonoma Hotel Project will set a precedent for how the City of Sonoma leverages its desirability as a destination to benefit people who actually live or work in Sonoma Valley. The members of Sonoma Valley Collaborative ask the City of Sonoma to **apply creativity and take a proactive problem-solving approach** to identify mechanisms to **obtain the greatest possible number of below-market housing units through this project**. Relevant to the RDEIR, this outcome would produce the greatest reduction in Vehicle Miles Traveled and greenhouse gas emissions while still allowing the project to proceed.

The City can achieve this outcome that Sonoma Valley Collaborative seeks—the greatest possible number of below-market housing units—by choosing some of the following options:

- Selecting Alternative 2
- Reducing the amount of required parking and putting the maximum proportion of parking underground
- Consolidating all housing into a 100% below-market building on the Bank of Marin parcel to attract nonprofit housing developers and state, federal, and local private funders
- Reducing the number of housing units in exchange for increasing the number of below-market units
- Proactively supporting proposals from, and fundraising with, nonprofit housing developers or nonprofit housing land trusts, potentially in partnership with Kenwood Investments or through using in-lieu fees and the City's Housing Fund
- Increasing the number of stories

Thank you for dedicating your time to the benefit of the City and Valley of Sonoma,  
For the Sonoma Valley Collaborative Council,

A2-1

Sincerely,

Members of Sonoma Valley Collaborative

Disability Services & Legal Center

La Luz Center

Morton's Hot Springs

Sonoma Ecology Center

Sonoma Valley Education Foundation

Sonoma Valley Community Health Center

Sonoma Valley Hospital

Sonoma Valley Housing Group

Sonoma Valley Interfaith Ministerial  
Association

Sonoma Valley Mentoring Alliance

Winery Sixteen 600

Staff contact: Kim Jones, SVC Coordinator, [kim@sonomavalleycollaborative.org](mailto:kim@sonomavalleycollaborative.org). 707.933.7747

## RESPONSE TO COMMENT LETTER A2

**Comment A2-1** Summary of Comment: The commenter introduces the letter and provides a summary of the Sonoma Valley Collaborative. The commenter states that the Sonoma Hotel Project will set a precedent for how the City of Sonoma leverages its desirability as a destination to benefit people who work in Sonoma Valley, and asks the City of Sonoma to take a creative, proactive problem-solving approach to incorporate the greatest possible number of below-market housing units to produce the greatest reduction in VMT and GHG emissions. The commenter states that the Sonoma Valley Collaborative believes that the city can achieve this outcome through selecting Alternative 2; reducing the amount of required parking and putting parking underground; consolidating all housing to a building on the Bank of Marin parcel; reducing the number of housing units in exchange for increasing the number of below-market units; proactively supporting proposals from nonprofits, potentially in partnership with Kenwood Investments or through using in-lieu fees and the City's Housing Fund; and increasing the number of stories of the building. The commenter closes the comment letter and gives thanks to the City for dedicating time to the benefit of the city and valley of Sonoma.

Response: The City appreciates the commenter's review of the RDEIR. The City evaluated several alternatives as a part of the RDEIR, and while parking and housing were areas of contrast in the alternatives evaluated, the focus of this effort was on alternatives that could reduce or avoid one or more potentially significant effects attributable to the proposed project. Please see Master Response 5 – EIR Alternatives for more information. Regarding the selection of Alternative 2, the City, as the lead agency, has the ability to approve the project, deny it, further condition the project, or approve a project alternative. As the lead agency, the City will consider the information in the RDEIR along with any other available information in considering action on the proposed project. Please see Master Response 6 regarding the project's parking requirements, Master Response 1 regarding VMT, and Master Response 7 regarding the residential component of the project.



## 2.2.3 COMMENT LETTER #R1:

### FRED ALLEBACH

**From:** Fred Allebach  
**To:** publiccomment; David Guhin; Kristina Tierney; Rebekah Barr  
**Subject:** Public comment in support of Hotel Project Sonoma and the applicant's preferred Alternative  
**Date:** Saturday, July 8, 2023 2:15:18 PM

please forward to new City Planning/ Development Director

Fred Allebach  
7/8/23

#### Public comment in support of Hotel Project Sonoma and the applicant's preferred Alternative

<https://mail.google.com/mail/u/0/#inbox/WhctKKZGTwsFCvhTDMJdglMkPMNSZxSrnfdmFZxTkXXkRpDfKTwnCdqCINrtHNNGJLsKKO>

#### City Council will decide this

First of all, this Project will be decided by the elected City Council and not the appointed Planning Commission. This is proper. It is highly likely the applicant will appeal any Planning Commission decisions anyway bc of perceived bias. The real game here is not at the PC level, which is just the warm-up act to the real show.

R1-1

I suspect for a current end game, that a lawsuit against the Project (similar in basis to the lawsuit against Climate Action 2020) based on cross-border transportation GHG impacts is in the cards; we might as well get this moving past the PC ASAP bc the Project has already been stalled for 10 years and had one lawsuit already.

#### I withdraw as a Project appellant

Years ago, I was an appellant against Hotel Project Sonoma but no longer.

R1-2

#### Ethics conflict of interest and biased track record by PC Chair Barnett?

The primary Hotel Project appellant, and architect of Measure B, hotel appeal, and lawsuit is the Chair of the Planning Commission. Is this an ethical conflict of interest calling for recusal? When do accusers ever get to also be the judge in a fair hearing?

R1-3

Institute for Local Government ethics principles say, "Cannot participate in quasi-judicial proceedings in which they have a bias with respect to the parties or facts." "The law is aimed at the perception, as well as the reality, that a public official's personal interests may influence a decision. Even the temptation to act in one's own interest could lead to disqualification, or worse."  
[https://www.ca-ilg.org/sites/main/files/file-attachments/key\\_ethics\\_law\\_principles\\_final\\_0.pdf?1643134234](https://www.ca-ilg.org/sites/main/files/file-attachments/key_ethics_law_principles_final_0.pdf?1643134234)

I see no way around that Mr. Barnett will be seen by the public as a biased actor on this Project. He should recuse. I would say that same about any public official who had a similar record on a project. This is the cost of being outspoken, biases are revealed.

#### Union commitment and worker equity in local tourism

The Project's up-front commitment to union labor, in both construction and daily operation, is a very strong action that supports the sustainability paradigm's triple bottom line (TBL) equity pillar, that which is most lacking in Sonoma. This Project has a very good chance to tip other hospitality and hotel businesses to go union, pay a living wage and to give benefits that will make worker's lives here more secure. This is a very good aspect of this Project.

R1-4

The Project's pro-union stance stands in contrast to the Art Museum and the Sonoma Mission Inn where businesses actively seek to defeat union organizing and social equity, even by illegal means.

#### Time for local tourism to adhere to full cost accounting

It's about time that the tourism industry horse here pulled the cart of local equity. Hotel Project Sonoma will do just that and encourage other wine-tourism-hospitality entities to do the same. The Project's support of unions is exactly what's needed to balance the sustainability triple bottom line and to have actual full cost accounting. City economic policy is farmed out to the Chamber who represents management not labor. Labor equity is exactly what is missing in Sonoma for an overall sustainability paradigm policy.

R1-5

#### City Sustainability and Sustainable Tourism web pages

In fact, on the City's Sustainability and Sustainable Tourism web pages, there is nothing, nada about social equity. This even as it is well known from UN and other sustainable tourism materials, that sustainable tourism needs to have an equity component. It's not like the TID, SVVB, City staff, and Council do not know this, I've said this countless times already. It's disingenuous to advertise

R1-6



sustainability and not have it be TBL and include equity.

In local sustainability, if solid equity points have been ignored, so have tourism's transportation GHG impacts. Why? Bc the City (and County) have made a Faustian Bargain to benefit from a tourism economy and have become addicted to the revenues. Tourism management actors have intimidated the City to not address any legitimate labor-equity sustainability issues.

R1-6

**City tourism transportation GHG impacts are already treated as unavoidable costs**

IMO, with the City so firmly committed to a tourism economy, any big tourism project EIR has to take transportation GHG impacts as unavoidable. Attacking fossil fuel-based transportation now misses the point: the whole world is on a path towards electrification and battery-powered transit. If Sonoma forsakes fossil fuel transit while whole counties like Brazil or India do not, that gives Sonoma the "sucker's payoff", we sacrifice our own economic bottom line, others do not. The City will punish its own economic bottom line and balanced budget and high level of resident services for inevitable changes to transportation that will be happening anyway?

R1-7

For Sonoma at this point, IMO, the path towards TBL sustainability and full cost accounting lies in balancing the TBL to offset those things that can't be helped in the short run. For full cost accounting: Equity is already in a large deficit here; the economy and tourism attraction are strong; environmental transportation changes to GHG impacts are now happening anyway. It will be counterproductive for Sonoma to penalize this Project that clearly will help tourism labor equity. IMO, allow the Project's strong equity component and augmentation to City revenues and TOT/ TID and Housing Trust Fund to offset GHG transportation impacts and any fine differences surrounding the housing component.

**See the forest from the trees on the housing component  
Give the applicant a partial housing component waiver**

The Council should see the forest from the trees on the housing component and not be drawn into a CEQA minutiae chess game designed to further punish and stall the Project. The applicant is offering good faith tradeoffs and good community benefits overall. The applicant is not the big bad wolf greedy developer some may want to see, there is a new big bad wolf in town whose name is not Darius Anderson, who is not offering a project with lots of community benefits. IMO, give the applicant a partial housing component waiver and don't cave to pressure to buy into a long-term anti-Project vendetta.

R1-8

IMO, the Project deserves a break on the housing component for all the money they have sunk and lost, and deserves credit for all the GHG impacts that did not happen in the last 10 years. The costs to the applicant of all the CEQA stalling should be figured in to some EIR offsets to their benefit now.

**City tourism GHGs are all unaccounted for anyway, not fair to punish only the applicant**

The City's "sustainability" effort is non-existent for tourism transportation GHG impacts anyway. Where can the City show that it has acted to show serious concern about tourism's transportation GHG impacts? What the City has now for "Sustainable Tourism" entirely ignores its tourism transportation GHG impacts. The "Sustainable Tourism" page, centered only in environmental sustainability (a way to disarm the TBL and full cost accounting), is a perfect example of feel-good, light-duty greenwashing. What we see from the City is full-out tourism boosting, with @ \$800,000 a year from the City, TID, and SVVB to tell the whole world to come here. This is bc tourism is the City's cash cow and economically, Sonoma is lucky enough to be a draw where people want to visit.

R1-9

Fact: the City has already accepted overall tourism transportation GHG impacts and costs as unavoidable. If the City proposes a GHG offset fee for the Project, it will only be fair that every other City hotel and tourism entity pay the same exact offset fee.

**Hospitality-Wine-Tourism labor gets the short end of the stick**

What is really lacking in Sonoma is a sustainable tourism policy that addresses how workers can benefit too and not just pay disproportionate costs for all the high-priced luxury that inflates all prices and ends up displacing the very workers who serve the visitors. The Catalyst Fund retained former City Manager Cathy Capriola who did a study showing a stunning percent of Valley workers are food insecure. How can this be when the City's main wine tourism-hospitality economy is steeped in luxury? This same economy and City land use/ housing policy has resulted in sky high real estate prices, yet workers keep getting screwed.

R1-10

Clearly the City is not pursuing a sustainable policy course if the social equity leg of the triple bottom line's full cost accounting is so roundly ignored and not addressed. There is no way the City can come up so short on wine tourism-hospitality worker equity but then make Hotel Project Sonoma accountable for its own failures to be sustainable on the environmental pillar of the TBL.

**Best path forward: allow the Project to balance the triple bottom line**

The best path forward for the City IMO is to take this Project as a vehicle to advance a more balanced overall sustainability policy, boost the social equity pillar, be realistic about GHG impacts and the world economy and tech advances, and approve the Project ASAP and move past this classic chapter of Sonoma Green Checkmate and CEQA stalling.

R1-11

Had this Project not been resisted with CEQA stalling tactics that have delayed it for so long, hoping to kill the Project, approximately \$6 million would have already gone to the City in TOT revenues, a percent of which would have gone to the City's Housing Trust Fund. And, the City would not have its current deficit.

**Use new TID contract and Hotel Project Sonoma to juice up the Housing Trust Fund**

The City will soon have an expiring TID arrangement with City hotels, and with lots of new hotel revenue on the horizon and a refigured TID contract, much more money can be steered to the Housing Trust Fund. The City would then be on track to having an actual sustainable tourism policy.

R1-12

Overall, the Project provides multiple opportunities to boost City tourism economy equity greatly, balance the triple bottom line and this is all much-needed and justified change. The Project can be a harbinger of needed changes if we can get three votes to push it through and then weather the likely next lawsuit. My advice, get moving, approve the project ASAP so as to get to the end game sooner. No more delays and stalling. If need be, the City Council supersede the Planning Commission and take the wheel.

City of Sonoma records, including emails, are subject to the California Public Records Act. Unless exemptions apply, this email, any attachments and any replies are subject to disclosure on request, and neither the sender nor any recipients should have any expectation of privacy regarding the contents of such communications.

## RESPONSE TO COMMENT LETTER R1

**Comment R1-1** Summary of Comment: The commenter states that the project will be decided by City Council, and that a lawsuit against the project is likely based on cross-border transportation GHG impacts.

Response: The City appreciates the commenter's review of the RDEIR. See Master Response 1 related to VMT, Master Response 2 related to GHG emissions impacts, and Master Response 3 related to the impacts of tourism.

**Comment R1-2** Summary of Comment: The commenter states that they withdraw as a project appellant.

Response: The commenter's position is acknowledged and included in this document for decision-maker consideration.

**Comment R1-3** Summary of Comment: The commenter states that there is an ethics conflict of interest and biased track record by PC Chair Barnett.

Response: The commenter's position is acknowledged and included in this document for decision-maker consideration.

**Comment R1-4** Summary of Comment: The commenter states that this project's upfront commitment to union labor is a very good aspect of the project.

Response: The commenter's position is acknowledged and included in this document for decision-maker consideration.

**Comment R1-5** Summary of Comment: The commenter states that the project will encourage labor equity that is missing in Sonoma, and it will encourage other wine-tourism-hospitality entities to do the same.

Response: The commenter's position is acknowledged and included in this document for decision-maker consideration.

**Comment R1-6** Summary of Comment: The comment states that there is no information about social equity on the City's Sustainability and Sustainable Tourism web pages.

Response: The commenter's position is acknowledged and included in this document for decision-maker consideration.

**Comment R1-7** Summary of Comment: The commenter states that City tourism transportation GHG impacts are already treated as unavoidable costs, and it will be counterproductive for Sonoma to penalize this project, as it will help tourism labor equity.

Response: Please see Master Response 2 related to GHG emissions and Master Response 3 related to the impacts of tourism in the region.

**Comment R1-8** Summary of Comment: The commenter states that the project should not be stalled further, and deserves credit for the housing component and GHG impact. The commenter also states that the costs to implement the project should be considered.

Response: This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration. Please see Master Response 2 related to GHG emissions effects. The baseline for the RDEIR impact analysis is generally existing conditions and the date of the publishing of the Notice of Preparation, and the analysis does not detail actions related to the proposed over the past 10 years referenced by the commenter. However, the commenter’s position is acknowledged and included in this document for decision-maker consideration.

**Comment R1-9** Summary of Comment: The commenter states that the City’s “sustainability” effort is non-existent for tourism transportation GHG impacts, and the City has already accepted overall tourism transportation GHG impacts and costs as unavoidable. The commenter also states that GHG offset fees should be addressed fairly.

Response: Please see Master Response 3 related to the impacts of tourism in the region. Please see Master Response 2 – Greenhouse Gas Analysis. As discussed in Section 4.7.3 of the RDEIR, the proposed project’s emissions would be higher than the project-tailored, locally tailored GHG efficiency threshold, and the primary emission source associated with the proposed project is mobile activity, which is primarily the result of hotel guest travel. Potentially feasible mitigation has been included as a part of the RDEIR, including Mitigation Measure 4.7-1f, which reduces the proposed project’s impacts related to the generation of GHG emissions, as it requires the purchase and retirement of GHG emissions credits based on protocols approved by the California Air Resources Board, consistent with Section 95972 of Title 17 of the California Code of Regulations.

CEQA Guidelines Section 15041 requires public lead agencies to impose feasible mitigation measures as part of the approval of a project in order to substantially lessen or avoid the significant adverse effects of the project on the physical environment.

**Comment R1-10** Summary of Comment: The commenter states that the City is lacking a sustainable tourism policy and provides a summary of hospitality-wine-tourism labor issues.

Response: The commenter’s position is acknowledged and included in this document for decision-maker consideration. The RDEIR comprehensively addresses potential impacts attributable to the proposed project, including those that are often characterized using the term “sustainability” (GHG emissions, energy efficiency, etc.).

**Comment R1-11** Summary of Comment: The commenter states that the City should consider utilizing the project as an example of a balanced overall sustainability policy. The commenter also provides a summary of the project’s potential benefits to City revenue.

Response: Please see the Response to Comment R1-10. Fiscal considerations are a part of the City’s decision making, though generally separate from the physical environmental focus of the RDEIR and this Final EIR.

**Comment R1-12** Summary of Comment: The commenter provides a summary of the expiring arrangement with City hotels, and provides a summary of the project's potential benefits to the City's tourism economy. The commenter also recommends approval of the project and believes that there should not be further delays associated with project approvals.

Response: The commenter's position is acknowledged and included in this document for decision-maker consideration.



## 2.2.4 Comment Letter #R2:

DAVID EICHAR

**From:** [David Eichar](#)  
**To:** [Kristina Tierney](#); [Planning Commission](#)  
**Subject:** Comment on Hotel Project Sonoma RDEIR  
**Date:** Friday, July 14, 2023 3:17:50 PM  
**Attachments:** [Hotel Project Sonoma 07-20-2023.pdf](#)  
[Hotel Project Sonoma GHG and VMT comments - complete trip 07-20-2023.pdf](#)

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Please find attached 2 documents with my comments on the RDEIR for the Hotel Project Sonoma on W Napa St.

Regards,  
David Eichar

City of Sonoma records, including emails, are subject to the California Public Records Act. Unless exemptions apply, this email, any attachments and any replies are subject to disclosure on request, and neither the sender nor any recipients should have any expectation of privacy regarding the contents of such communications.

## Comments on W. Napa Street Hotel EIR and Project

By David Eichar, for July 20, 2023 Planning Commission Meeting

(Compiled and updated from prior Planning Commission meetings.)

The West Napa Street Hotel project, as it stands, is not good for Sonoma. The RDEIR is not adequate, the hotel is too large resulting in negative impact to the quality of life, and the circumstances do not allow for a reduction of the required residential component.

R2-1

Deny Use Permit:

1. On-site loading spaces do not meet Development Code standards.
2. Residential component falls far short of required size
3. Inadequate parking, deny off-site parking across street due to safety

R2-2

Inadequate EIR:

1. GHG from air travel not included
2. VMT calculation assumptions and miles must be justified
3. Excessive reduction (7.5%) in VMT based on proximity to Plaza
4. Inconsistent VMT assessment for project versus eliminated uses.

R2-3

GHG and VMT are discussed in a separate document.

## Project Use Permit

### Quality of Life

Preserving city character and quality of life are important goals expressed by the City Council. In the past, the City Council even voted for a moratorium on new vacation rental permits and tasting rooms on the Plaza based upon quality of life issues. A big hotel near the Plaza degrades the quality of life in Sonoma. Over the past few years, the Plaza area has become more tourist oriented and less local serving. The City should not approve such a big hotel so close to the Plaza.

General Plan Policies includes, “ensuring that building mass, scale and form are compatible with the neighborhood and town character.”

The Hotel Limitation Measure, which would have limited the size of new hotels to 25 rooms, narrowly lost. I worked on the Measure campaign and spoke to a lot of voters. Many were OK with a 60 room hotel on the edge of town, but were against hotels with more than 25 rooms near the Plaza, so they voted No on the ballot measure. Others voted No because they agreed to “let the process work”, even though they did not want to see big hotels built in Sonoma. If the ballot measure’s restrictions were only for hotels within a couple blocks of the Plaza, it most certainly would have passed. It is clear that a majority of the residents of Sonoma do not want a hotel anywhere near 62 rooms so close to the Plaza. It does not fit the town character for lodging near the Plaza.

R2-4

General Plan Policies also states, “Focus on the retention and attraction of businesses that reinforce Sonoma’s distinctive qualities. . . **and** that offer high-paying jobs.” Notice the “and”, not an “or”.



Hotel and restaurant jobs are mostly low paying jobs. Since the new businesses are not mostly offering high pay, the project does not meet this General Plan Policy.

### Residential Component

In the City of Sonoma, just like the entire county and all of the San Francisco Bay Area, housing is in short supply, driving up the cost of all housing. The city council is very concerned about housing, enough so to approve a restriction, no new vacation rentals due to concern about housing, as well as quality of life.

The hotel and restaurant will need employees. Where will these new employees live? The unemployment rate in Sonoma is very low and the rental occupancy rate is very high. There are unfilled employment opportunities in Sonoma because those who live here already have jobs and those who don't live here cannot find a place to live nearby.

In the Carneros region of Napa County, a new hotel was required to build workforce housing to house at least part of its employees.

The KMA nexus study analyzed the impact of new development on housing needs. Using the nexus study numbers, for a 67,478 square foot hotel, the calculated number of new housing units needed is 33.2, of which 30 are needed to be affordable.

The Hotel Project Sonoma project should not be given a reduction on the required residential component. Since 20% of the residential units would be affordable, waiving the residential requirement would mean a loss of up to 6 affordable units. A good developer or architect could design a smaller hotel and residential units on the property.

R2-5

Municipal Code 19.10.020:

*Circumstances in which the residential component may be reduced or waived include, ...*

*a. The replacement of a commercial use within an existing tenant space with another commercial use.*

This is new construction, so this circumstance does not apply.

*b. The presence of uses or conditions incompatible with residential development on or adjacent to the property for which a new development is proposed.*

Also, as noted in the staff report, there are 7 residential units in the Lynch building, and the applicant noted that they have no problem keeping them rented. This means that this property is compatible with residential development.

*c. Property characteristics, including size limitations and environmental characteristics, that constrain opportunities for residential development or make it infeasible.*



There are no such property characteristics for this project which would constrain opportunities for residential development. If there were any size or environmental characteristics that make the property incompatible with residential units, then it would also be incompatible with a hotel.

*d. Limitations imposed by other regulatory requirements, such as the Growth Management Ordinance.*

There are no regulatory requirements which would prohibit a residential component.

The applicant states, "Sonoma has a limited amount of commercially-zoned property." Again, this is not included in the circumstances for granting a waiver. In addition, former Planning Director David Goodison said in one public meeting that there were a number of sites available for commercial development. (See details in the Appendix.)

The applicant states, "A residential component would impose size and economic limitations which would make it financially infeasible to develop the project." Here again, financial feasibility is not included in the circumstances for granting a waiver. If financial feasibility were a factor, then developers can just claim "financial infeasibility" on any and all projects to get the waiver. And if the applicant is saying that a smaller hotel is not financially feasible, then this is contrary to the success of the smaller hotels in Sonoma, such as the Inn at Sonoma; plus, there is the new 9-unit hotel almost completed across West Napa Street.

R2-5

The applicant states, "The hotel's normal daily activities will generate pedestrian activity by hotel guests in the Downtown area consistent with the intent expressed in the 'Desired Future' of the Downtown area..." This is a misrepresentation of the guidelines. The primary purpose of including the residential component is to reduce the reliance on cars, as stated in chapter 19.34 of the Development Code, "the downtown's housing stock should be preserved and extended. Multi-family and live-work development in the town center provide customers for downtown businesses and **reduce automobile dependence**." This reduction of automobile dependence was noted in the Plan Bay Area, as this not only cuts down on traffic, but help with reducing greenhouse gases. In any case, providing an alternative to housing to increase pedestrian traffic is NOT included in the circumstances for granting a waiver.

The applicant states, "The restaurant will offer a ground floor retail component serving both visitors and local residents consistent with Development Code guidelines for the Downtown planning area." Once again, NOT included in the circumstances for granting a waiver.

The applicant states, "Sonoma has potential rental units in the development pipeline on sites that are better suited to support a residential component." And again, NOT included in the circumstances for granting a waiver.

When I noted in the SVCAC meeting where the project was reviewed, that there were 662 applications for the 60 apartment units built in the Springs, the response was that many of these applicants were not from Sonoma Valley. What does that have to do with the price of beans? Do the



remaining 602 applicants who want to live in the Springs, not want to live in the city of Sonoma? Bottom line: We would still need 500 more units in and around Sonoma to provide homes for those 500 families who did not get chosen for the Springs apartments. That is just one reason why a reduction of the residential requirement should NOT be given to this project.

The city intends to continue requiring a residential component on new commercial development on half acre or more.

- Commercial zone - A comment was made that only 7% of the city is zoned commercial. This may be the case, but commercial development is also allowed, and encouraged, in the mixed zone district. Also, former Planning Director Goodison mentioned that there were several parcels available for more commercial development.
- Mixed Use, Hotels and Residential - Mixed use development with hotels and condos are becoming more prevalent, even with boutique hotels. They provide an opportunity to share amenities, such as pools, spas and exercise rooms.

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

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

R2-5

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

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

As you can see, the only one with a score greater than 80 is the Safeway property. In their expansion plans presented to the city, Safeway did not include any housing and Safeway has abandoned their plans for expansion, which means no new housing on the site for quite some time.



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

R2-5

At SVCAC and City Council meetings, there was talk about having an employee shuttle. If an employee shuttle is warranted, isn't this evidence that hotel employees cannot find places to live in Sonoma?

### **The Project's Application**

The application for the project is mostly a sales pitch, trying to convince the city to accept the application by providing misleading, unrelated, and irrelevant information. Many of these pitches have already been discussed above.

R2-6

The applicant touts the economic benefits of a new hotel; however, they fail to include incremental costs to the City of Sonoma in road maintenance, Plaza maintenance, police and fire services.

### **Pedestrian Safety - Utilize Parking Across Street from Project**

The hotel project is just too big. The buildings will be visible from the Plaza, 1st St E and 2nd St E. The developer is putting too much onto the property, evidenced by the inclusion of underground parking and utilization of the parking lot across E Napa St. The overall square footage needs to be reduced to alleviate problems with parking, traffic and aesthetics.

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

R2-7

General Plan, Circulation Element  
Goals, Policies, and Implementation

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

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

### **Parking**

The use of the Bank of Marin parking lot for the hotel project will result in more parking in residential neighborhoods. Currently, many of the parking spaces are rented or leased out to other businesses in the area. If the hotel is provided with an easement for parking, the businesses will lose their parking spaces. Since parking is already a problem around the plaza and/or much of the area is limited to 3 hour parking, employees of those businesses will park in residential areas.

R2-8

There seems to be two opposing forces, adequate parking and traffic reduction. The developer states, “Upon arrival guests will be encouraged to park their cars for the duration of their stay and enjoy Sonoma via walking and biking” and will provide bicycles for use by hotel guests. But this



increases the need for parking, because the hotel guests will be leaving their cars at the hotel during the day.

The W-Trans analysis of the parking requirements cited the 7 reserved spaces for the existing apartments. The staff report states, "On the east side of the court, next to the Lynch Building, five parking spaces would be retained for customer use." However, the W-trans analysis did not take into account these 5 reserved parking spaces. If you visit the parking lot now, you will see that most of the spaces are reserved, including for the bank, the apartments, Pacific Union and the Index Tribune. I agree the apartments should have dedicated parking spaces. But, as stated by W-Trans, higher peak parking demand "could be expected with any use of reserved spaces." The W-Trans analysis states that 2 more parking spaces are required because of the 7 reserved parking spaces for the apartments. Condition of approval must include that bank and other businesses do not get reserved parking spaces; otherwise, the parking spaces are not shared. However, the businesses may have clauses in their leases granting reserved parking spaces. If this is the case going forward, then even more parking spaces are required. If W-Trans had taken into account the additional 5 reserved parking spaces, then more parking spaces would be needed.

R2-8

Note that the developer's parking analysis fails to take into account any of the reserved parking spaces.

#### **Consistency with Surrounding Area**

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

R2-9

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

#### **Grey Water Recycling**

No mention of grey water recycling. Hotel laundry uses a lot of water. Grey water recycling should be required.

R2-10

#### **Consistency with City Council Adoption of 22 Local Climate Protection Measures**

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

R2-11



## Conclusion

The Planning Commission must deny the application for a 62 room hotel, plus restaurant. The Planning Commission should direct the applicant to revise the project to reduce the size of the hotel to 25 rooms and include a the full required residential component with affordable housing.

R2-12

## Appendix – Supporting Facts and Analysis

### The Demand for Affordable Housing

Below are some quotes from the Press Democrat article on the New affordable housing Fetters Apartments has 60 apartments.

<http://www.pressdemocrat.com/news/6818306-181/sonoma-valley-affordable-housing-project?artslide=0>

“Close to 850 families applied to live in the new apartments.”

“As another sign of the dire need for rental assistance, there are about 3,000 of those (Section 8 housing program) vouchers available in Sonoma County but more than 20,000 people seeking to get one, according to Margaret Van Vliet, executive director of the Sonoma County Community Development Commission.”

“Burbank Housing, which also provides low-income housing in Sonoma County, has a waiting list of 10,000 families for a portfolio of 2,800 units, up from 7,000 families just three years ago.”

This link is to another article regarding the Fetter Apartment:

<http://www.northbaybusinessjournal.com/events/6147269-181/fetters-apartments-sonoma-construction>

Sonoma needs more affordable housing, and needs it NOW. The 73 housing units in the pipeline noted by the developer is woefully inadequate, given that almost 800 families, who wanted to live in the Fetter apartments, were turned away. The Planning Commission must not waive the residential component for this development.

R2-13

### Residential Component

KMA in the nexus study says that it takes \$94.80 per square foot of hotel space to make up for the "affordability gap" for the employees of a hotel. (And KMA admits this number is conservative and would be higher if indirect and induced employees were included in the calculation; page 23 of Nexus Appendix B.) However, the impact fee the city council supports is only \$12 per square foot. So, Kenwood Investments would be paying around 12.7% of the amount needed to provide affordable housing for its own employees.

R2-14

Given the affordability gap for moderate income for a 2 bedroom 1050 square foot townhouse (page 25 of Appendix B), the city would receive enough money to subsidize 4.3 affordable townhouses. If you take half the 67,478 square feet for housing instead, you can build 30 two bedroom townhouses. With a 20% inclusionary requirement, you get 6 units built with the project.

And with the sale of the residential units, the city could still get about the same impact fee dollars as with just the hotel. The recommended impact fee for for-sale residential housing is \$8 to \$12 per square foot. The city council has not decided on an amount yet.

2 options for the site:

- hotel only, the impact fees are enough to pay the affordability gap for 4.3 affordable townhouses.
- half hotel, half for-sale townhouses, the city would still get the affordability gap money for around 4 townhouses, plus you get 6 affordable townhouses.

You get more than twice the number of affordable housing with inclusion of for-sale residential component and inclusionary housing (10) than you do with the impact fee alone (4.3).

R2-14

Reduction in the required residential component could cost the city 4 affordable homes.

### Hotel and Residential Mix

Read the following articles and information regarding hotels and residential mix:

<http://www.condohotelcenter.com/articles/a144.html>

<https://www.ccim.com/cire-magazine/articles/developers-add-condominiums-hotels-increase-profits/?gmSsoPc=1>

<http://www.sb-architects.com/the-impact-of-place-oriented-design-in-mixed-use-developments/>

<http://www.djc.com/news/ae/11183443.html>

<https://finance-commerce.com/2018/04/hotel-condos-too-tall-for-minneapolis-neighbors/>

<https://hotellaw.jmbm.com/category/hotel-mixed-use>

<https://www.jmbm.com/global-hospitality-group.html>

<http://www.sdg-structure.com/projects/hospitality-multi-family-mixed-use-experience/>

### Commercial Development Sites

The developer claims that there are few potential commercial development sites. This is not true. At the March 20, 2016 City Council meeting, (approximately 1 hour 30 minutes into the meeting) David Goodison in his response to the question by the city council about the availability of

R2-15



commercial sites said, "We actually have a number of opportunities for new commercial development, both short term and long term." He said that there are projects in pipeline. There are opportunities for both new development and redevelopment; for example, redevelopment along W. Napa St. And there is a substantial amount of land by 4 corners, Broadway at Napa Rd/Leveroni Rd.

R2-15



Here are comments on the Revised Draft EIR for the Hotel Project Sonoma on W. Napa Street regarding greenhouse gas emissions and vehicle miles traveled.

Any hotel in Sonoma County, especially one with a spa, will be a destination for tourists and draw additional tourists to Sonoma County. The applicant and the Planning Commission both admitted as such, since both touted the additional transient occupancy tax (TOT) the hotel would generate to the City of Sonoma. If the hotel did not draw additional tourists, instead drawing away tourists from other local hotels, then TOT would not increase and may actually decrease because competition for hotel guests would reduce nightly room rates.

R2-16

The tourists will come both domestically and internationally. Air travel will be part of many of the tourists means of transportation. The vehicle miles traveled (VMT) and greenhouse gases (GHG) generated by the entire trip must be included in calculation of VMT and GHGs in the RDEIR.

Appendix V, Hotel Project Sonoma Vehicle-Miles of Travel (VMT) Estimate, Memorandum, Fehr & Peers, 2019 specifies some details about how VMT is impacted by the hotel project

#### VMT Generated by Existing Uses

The reduction to VMT by existing uses in Appendix V is flawed. Some or all of the VMT reduction for the following existing uses should not be included:

- 117 West Napa Street – 3,100 Square Feet of Warehouse: the warehouse is vacant at the time of the VMT study. “4. Single-Story Warehouse on the Sonoma Index-Tribune Building Parcel. The parcel that includes the Sonoma Index-Tribune Building, at 117 West Napa Street, also includes an approximately 3,813-square-foot, one-story, metal warehouse building that was constructed in 1977 and shares a common wall with the two-story metal warehouse building on the 135 West Napa Street parcel. . . . The Sonoma Index-Tribune Building would remain unchanged.” Page 3-6 of RDEIR, section 3.1.2
- 135 West Napa Street – 5,346 Square Feet of Office plus 2,220 Square Feet of Warehouse: The office space remains and is not part of the project. The warehouse is vacant and not in use at the time of the study. “2. The Lynch Building’s current uses would not be altered or modified as part of the proposed project.” “3. Two-Story Metal Office and Warehouse South of the Lynch Building. The 135 West Napa Street site also includes a 7,690-square-foot, two-story metal warehouse and office building that was constructed in 1986 and was **previously** used for newspaper production” Page 3-6 of RDEIR, section 3.1.2
- 153 West Napa Street – 4,750 Square Feet of Retail Space: The VMT for deliveries for retail space is an over estimate. First of all, there were not daily delivers of furniture or FedEx/UPS. Also, all of these delivery vehicles would have made multiple stops, so only a portion each delivery VMT should be attributed to the retail space. “Hotels and restaurants in the area typically use common vendors with deliveries originating from throughout the Bay Area. Area. It is typical for those vendors to schedule their deliveries so that they service as many Sonoma hotels and restaurants as possible in common trips.” Page 3-14 DEIR “In addition, vendor

R2-17



deliveries to and from the project site would be coordinated with surrounding business, thereby limited additional individual vendor trips associated specifically with the proposed project.”  
Page 4.7-28

R2-17

### VMT Calculations

A reduction of 7.5% reduction in VMT due to proximity to the Plaza compared to the 3 area hotels equates to around 5 fewer round trips per occupied room. I doubt hotel guests make even 2 trips per day, let alone 5.

Why are the existing uses also not reduced by 7.5% for proximity to the Plaza? The calculations for VMT for the project are using different methodology and calculations than for the existing uses being eliminated.

From Appendix V, Page 1 and 2: “An update of the CEQA Guidelines that comply with SB 743 was certified on December 28, 2018 and the California Governor’s Office of Planning and Research (OPR) has developed a non-binding Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018) to help guide VMT-based impact analysis. The Technical Advisory outlines considerations for methods to estimate project generated VMT and corresponding VMT impact significance thresholds. These considerations include, but are not limited to, the following:

- “Estimate methods of VMT for a proposed project should track the full length of the trip, and trips should not be truncated at a model or political boundary (i.e. city limit, countyline, MPO boundary)”

R2-18

But then Appendix V goes on to say that only covers trips within the "larger Bay Area region" were included, "thus satisfying the recommendation that the full lengths of trip be captured." Basically, this is saying that NO visitors will come to the new hotel from outside of the Bay Area. This is absurd.

According to studies done by Sonoma Valley Tourism Bureau and Sonoma County Tourism, visitors come from all across California, the US and international locations. I myself, have used the Sacramento airport when traveling, but the study excludes the Sacramento area. Visitors drive to Sonoma Valley from all over California, plus parts of Nevada and Oregon. The calculation should include ground travel from all of this geographic area, as well as air travel. Miles from the visitors’ homes to and from their local airport also need to be included. Why is this completely ignored? I will be traveling to Minnesota. If you were to calculate my VMT for the trip, why only count ground travel in Minnesota and exclude my driving to SFO from my home in Sonoma and back home again?

For details on how GHGs and VMT for the entire trip of visitors to Sonoma can be calculated, see the excerpts below from a letter by Tom Conlon, Transition Sonoma Valley, May 1, 2019, to City of Healdsburg. Used with permission.

Regards,

## RESPONSE TO COMMENT LETTER R2

**Comment R2-1** Summary of Comment: The commenter states that the project is not good for Sonoma, and the RDEIR is not adequate. The commenter also addresses concerns with the size of the hotel and the project's residential component.

Response: The commenter's position regarding the proposed project and size of the hotel component of the project is acknowledged and included in this document for decision-maker consideration. The proposed size of the hotel component and all other details of the proposed project are used as the basis for the detailed analysis presented throughout the RDEIR. Please see Master Response 7 regarding the residential component of the project. Regarding the adequacy of the RDEIR, the RDEIR comprehensively addresses all potentially significant adverse environmental effects associated with the proposed project, includes all potentially feasible mitigation, and examines a broad range of potentially feasible alternatives that address potentially significant adverse environmental effects of the project. In short, the RDEIR is adequate and is further supplemented by this Final EIR.

**Comment R2-2** Summary of Comment: The commenter provides a list of reasons to deny the Use Permit.

Response: Please see Master Response 4 regarding off-site parking and Master Response 7 regarding the residential component of the project. Please see Master Response 6 regarding parking requirements. With regard to the approval of the Use Permit, the City, as the lead agency, has the ability to approve the project, deny it, or approve it with conditions. As the lead agency, the City is required to consider the information in the RDEIR along with any other available information in deciding whether to approve the project. This comment does not address the adequacy of the RDEIR; however, the comment is included in this document for decision-maker consideration.

**Comment R2-3** Summary of Comment: The commenter provides a list of reasons that the RDEIR is inadequate related to on-site loading, the residential component of the project, and off-site parking.

Response: Please see Master Response 1 related to VMT, Master Response 2 related to GHG emissions effects, and Master Response 3 related to the impacts of tourism in the area. The RDEIR evaluates all aspects of the proposed project related to potentially significant adverse environmental effects, including those enumerated in this comment. There is no need for any revision to the RDEIR in response to this comment.

**Comment R2-4** Summary of Comment: The commenter states that the City's character and quality of life are important goals expressed by the City Council. The commenter also addresses concerns with the size of the hotel near the Plaza, the previously proposed hotel limitation measure, as well as General Plan policies relating to these issues.

Response: Regarding the comments on the size of the proposed hotel component, previous limits on hotel use, and policies – the RDEIR was developed to provide a detailed analysis of the proposed project. If a smaller hotel were proposed, this smaller hotel would have been the subject of analysis in the RDEIR. As discussed in Section 4.10 of the RDEIR, the proposed project

demonstrates consistency with the City’s vision for community development as described in the 2020 General Plan, which is to: (1) include pedestrian and bicycle access and amenities in all development (Policy CD 4.4); (2) preserve and enhance the scale and heritage of the community without imposing rigid stylistic restrictions (Policy CD 5.1); and (3) promote higher density, infill development, while ensuring that building mass, scale, and form are compatible with neighborhood and town character (Policy CD 5.5). To break down the overall height, massing, and scale of the hotel, the design staggers the upper floor plates and third floor roof surfaces back from the street and hotel plaza courtyard. In addition, as recommended in the Downtown Sonoma Historic Preservation Design Guidelines, other scale reduction strategies would be implemented as a part of the proposed project, including articulation of the exterior facades with exterior wooden arcades, dormers, balconies, awnings, recessed entry doors, porches, and window seats. The hotel’s street frontage and courtyards would include street trees in planters, fountains, and other landscaping features. Refer to 4.10 of the RDEIR for more detail.

The commenter states that hotel and restaurant jobs are mostly low paying jobs. In general, issues related to the possible wage levels of future employees of proposed projects it outside the purview of CEQA, but the comment is reproduced here for decision-maker consideration.

**Comment R2-5** Summary of Comment: The commenter provides a summary of housing concerns in the City, and states that the project should not be given a reduction on the required residential component with a discussion of City of Sonoma Municipal Code Section 19.10.020(B)(3). The commenter highlights the high walk score of the vicinity of the project site.

Response: The commenter’s position regarding the residential component of the proposed project is reproduced here for decision maker consideration. Regardless of future policy decisions or actions regarding the housing component of the proposed project, the RDEIR accurately and comprehensively addresses potentially adverse physical effects associated with the proposed project. Please see Master Response 7 regarding the residential component of the project. See also Master Response 5 related to the broad range of alternatives examined as a part of the RDEIR, including a smaller hotel and different proportions of residential to non-residential development. See Master Response related to VMT effects.

**Comment R2-6** Summary of Comment: The commenter states that the application for the project provides misleading, unrelated, and irrelevant information. The commenter also states that the project applicant does not discuss incremental costs to the City in road maintenance, Plaza maintenance, or police and fire services.

Response: Refer to Chapter 3 of the RDEIR for a detailed description of the proposed project – this description was used as the basis to comprehensively addresses potentially adverse physical effects associated with the proposed project. Transportation impacts, including roadway and Plaza impacts, are discussed in Section 4.13 of the RDEIR. Police and fire services are discussed in Section 4.12 of the RDEIR. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R2-7** Summary of Comment: The commenter states that the project is too big, and the square footage needs to be reduced to alleviate problems with parking, traffic, and aesthetics. The commenter also states that the project would cause pedestrian safety issues due to the use of the parking lot across the street for employees.

Response: Despite the commenter's sentiment regarding the scale of the proposed project, the details of the project proposal is used as the basis of analysis throughout the RDEIR. Refer to Section 4.10 for an evaluation of the relationship between the proposed project and applicable policies and regulations, including those related to density, development intensity, height, and other matters related to the proposed scale of the project. Regarding changes to the proposed project to address potential impacts related to aesthetics (parking availability and traffic congestion are not environmental effects), refer to Chapter 5 of the RDEIR regarding alternatives and Master Response 5 regarding EIR Alternatives. Please see Master Response 4 regarding off-site parking and pedestrian activity. Transportation impacts, including parking and traffic impacts, are discussed in Section 4.13 of the RDEIR. Aesthetic impacts are discussed in Section 4.2 of the RDEIR. See Section 4.13 of the RDEIR also for a discussion of transportation policy consistency.

**Comment R2-8** Summary of Comment: The commenter states that use of the Bank of Marin parking lot for the hotel project will result in more parking in residential neighborhoods, and the loss of parking spaces for businesses. The commenter discusses the W-Trans parking analysis and the staff report's parking information, and states that the developer's parking analysis fails to take into account any of the reserved parking spaces.

Response: Please see Master Response 4 regarding off-site parking and pedestrian activity. For the shared parking analysis summarized in RDEIR Appendix G, it was assumed that 122 of the 130 on-site spaces would all be available to employees, visitors, and customers associated with the proposed hotel component of the project, as well as existing uses in the Lynch and Sonoma Index Tribune buildings. The eight proposed residential units would each have a designated on-site parking space in a separate parking lot. To accommodate additional demand, nine employees are proposed to be assigned parking spaces in the Bank of Marin lot across the street, which is owned by the applicant. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R2-9** Summary of Comment: The commenter addresses Section 19.42.050, Guidelines for Infill Development, and states that a large room hotel is not consistent in size with other buildings in the historic overlay district.

Response: Please see Response to Comment R2-2. In addition, as discussed in Section 4.10 of the RDEIR, the proposed project would keep existing access points, including the West Napa Street right-of-way, for consistency with Municipal Code Section 19.42.050 (Guidelines for Infill Development). The project proposes primarily subterranean parking, with a relatively small number of surface spaces near West Napa Street and First Street West. The building setback along West Napa Street is essentially the same as neighboring properties and others in the vicinity. Please refer also to Section 4.5 of the RDEIR, which includes a detailed discussion of the proposed project relative to historic buildings near the project site (RDEIR, pages 4.5-15 through 4.5-21).

In addition, as discussed in Section 4.10 of the RDEIR, the project proposes to incorporate materials and decorative elements found in historic buildings in the Downtown District including but not limited to: troweled plaster, natural stained wood, stone veneer-clad walls, board and batten siding, corrugated metal roofing, and split-faced, cut stone features similar to Sonoma City Hall, the Swiss Hotel, and other historic buildings along East Napa Street. To break down the overall height, massing, and scale of the hotel, the design staggers the upper floor plates and third floor roof surfaces back from the street and hotel plaza courtyard. The RDEIR concludes that development of the project would not conflict with the City's zoning in any way that would lead to any adverse physical environmental impacts beyond those identified and addressed in the environmental topic area sections of this RDEIR.

**Comment R2-10** Summary of Comment: The commenter states that there is no mention of grey water recycling, and states that grey water recycling should be required due to hotel laundry use.

Response: The regulations for the design, construction and use of graywater systems can be found in Chapter 15 of the California Plumbing Code (CPC). Permit Sonoma is currently in the process of developing new guidelines for the use of graywater to address the revisions to the CPC and will post these when available (Sonoma Water 2023).<sup>12</sup> This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R2-11** Summary of Comment: The commenter states that waiving the residential component requirement or the project is inconsistent with Measure 4-L1, Mixed-Use Development in City Centers and along Transit Corridors and p. 3-43 of county Climate Action 2020 textbook.

Response: Please see Master Response 7 regarding the residential component of the project, Master Response 1 regarding VMT, and Master Response 2 regarding GHG emissions impacts. The referenced draft GHG reduction measure, Measure 4-L1 is titled "Mixed-Use Development in City Centers and Along Transit Corridors." Regardless of any action related to the proposed residential component by City decision-makers, the RDEIR comprehensively addresses impacts attributable to the project, as proposed. Potential GHG emissions effects attributable to the project are comprehensively addressed in Section 4.7 of the RDEIR, which includes all potentially feasible mitigation needed to address GHG effects of the proposed project.

**Comment R2-12** Summary of Comment: The commenter states that the Planning Commission must deny the application for the project, and should direct the applicant to revise the project to reduce the size of the hotel and include the residential component with affordable housing.

Response: The commenter's position related to the proposed project and Planning Commission action is reproduced here for decision-maker consideration. This comment does not address the adequacy of the RDEIR. See Master Response 5 for a discussion of the alternatives analysis presented in the RDEIR, which includes reducing the size of the hotel component of the proposed project and different proportions of housing.

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<sup>12</sup> Sonoma Water. Graywater. Website: <https://www.sonomawater.org/graywater> (accessed 9/19/23).

**Comment R2-13** Summary of Comment: The commenter provides news articles with quotes related to the demand for affordable housing. The commenter also states that the city needs more affordable housing, and recommends that the Planning Commission must not waive the residential component for the development.

Response: This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R2-14** Summary of Comment: The commenter discusses the affordability gap for the employees of a hotel, including affordable housing and provides recommendations for affordable housing on the project site, as well as additional news articles regarding hotels and residential components.

Response: This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R2-15** Summary of Comment: The commenter states that the developer claims there are few potential commercial development sites, and discusses the March 20, 2016 City Council meeting to note that there are additional opportunities for new development and redevelopment.

Response: This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration. Please see Master Response 5 for information regarding alternatives included in the RDEIR. The An off-site alternative was considered to be infeasible due to the lack of available sites in the Downtown area that could both accommodate the proposed project and meet the basic project objectives. Furthermore, developing the proposed project in a different location that fulfilled the project objective to locate the proposed project in the Downtown area would not avoid or substantially lessen any of the significant environmental effects of the project since the project site does not have sensitive biological or cultural resources, or environmental constraints or impacts that would be avoided by selecting a different site (RDEIR, page 5-2).

**Comment R2-16** Summary of Comment: The commenter introduces comments on greenhouse gas emissions and vehicle miles traveled. The commenter states that the project will be a destination for tourists in Sonoma County. The commenter also states that tourists will travel both domestically and internationally. This will include air travel, and the commenter recommends that air travel should be included in the calculations of VMT and GHGs in the RDEIR.

Response: Please see Master Response 1 regarding VMT, Master Response 2 regarding GHG, and Master Response 3 regarding tourism impacts.

**Comment R2-17** Summary of Comment: The commenter states that the reduction to VMT by existing uses is flawed, and some of the existing uses should not be included in the VMT reduction analysis.

Response: The commenter is incorrect. In order to provide conservative results for air quality, GHG emissions, transportation noise, and transportation impacts, trips associated with existing on-site uses were not subtracted from the total or “netted out.” Please see Master Response 1 regarding VMT.



**Comment R2-18** Summary of Comment: The commenter discusses the 7.5-percent reduction in VMT due to proximity to the Plaza, and suggests that there are inconsistencies with the methodology and calculations provided. The commenter also states that that Appendix V only analyzes trips within the larger Bay Area region, and states that visitors come from all across California, the US, and international locations. The commenter then recommends using methodology discussed in a letter from Transition Sonoma Valley to analyze VMT impacts.

Response: Please see Master Response 1 regarding VMT and Response to Comment R2-17 above. As noted in RDEIR Appendix G, the 7.5-percent reduction in VMT was applied due to the land use context of the project site, or 0.6 trip ends per room and not five as noted in the comment. This level of trip reduction was based on research conducted by the U.S. Environmental Protection Agency (EPA); the VMT reduction is appropriate for the analysis of the project since the VMT did not otherwise account for the expected increase in pedestrian and bicycle trips. Due to the project site's location less than one block from Sonoma Plaza, in an area with a wide variety of land uses, including many dining establishments and services in close proximity of the project site for employees and guests, and a portion of trips associated with the hotel component of the proposed project will be walking trips, and it is reasonable to reflect this reality in the impact assessment. The RDEIR comprehensively reports on trips associated with the proposed project and the project-related VMT. VMT generated by existing, on-site uses was not evaluated. Trip lengths for the VMT analysis were derived from location-based apps on mobile devices. This analysis accounted for the entire trip lengths and did not exclude the portion of trips that may extend beyond the nine-county Bay Area. This approach is consistent with the OPR Technical Advisory. As noted in Section 15064.3 of the CEQA guidelines, VMT, for the purposes of CEQA analysis, is defined as "amount and distance of automobile travel attributable to a project." As further described in the OPR Technical Advisory, VMT for the purposes of transportation impact analysis includes only miles driven by automobile and light duty trucks, and does not consider air travel, so for visitors entering the region by air, VMT would be accounted for from and to the appropriate airport. The air quality and GHG emissions analysis, however, considered impacts related to all types of trips and all vehicle types, including during construction. This comment and the letter from Transition Sonoma Valley has been provided to decision-makers for their consideration.

**Comment R2-19** Summary of Comment: The commenter provides a letter from Transition Sonoma Valley regarding VMT analysis, including trips by airplane and other modes of out-of-boundary travel. The commenter makes reference to the Bay Area Air Quality Management District's 2017 Air Quality Guidelines that identifies airplanes as a mobile source of air pollutant emissions.

Response: Please see Master Response 1 regarding VMT, Master Response 2 regarding GHG emissions effects, and Master Response 3 regarding the impacts of tourism.



## 2.2.5 Comment Letter #R3:

### ROBERT C DEMLER

Date Created	Name	Agenda Item or Subject	Type of Meeting (public)	Meeting Date	Comment
19 Jul 2023 04:46:02 PM	Robert C Demler	6.1 Hotel Sonoma Project	Planning Commission	20 Jul 2023	I trust that the current Chair of the Planning Commission will recuse himself from discussions and any possible action on this item because of his own actions in the past indicate that he could not be impartial about this issue.

R3-1

## RESPONSE TO COMMENT LETTER R3

**Comment R3-1** Summary of Comment: The commenter recommends that the Chair of the Planning Commission recuse himself from discussions of the project.

Response: The City appreciates the commenter's review of the RDEIR. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

2.2.6 COMMENT LETTER #R4:

MICHAEL WEARING

July 24, 2023

Sirs:

My wife, Grazia Bianchi and I  
Michael Wearing wish to express our  
support for the approval and construction  
of the "Hotel Project Sonoma."

R4-1

Michael Wearing

RECEIVED

JUL 26 2023

CITY OF SONOMA

## RESPONSE TO COMMENT LETTER R4

**Comment R4-1** Summary of Comment: The commenter expresses their support for the approval and construction of the project.

Response: The commenter's position on the project is noted. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

## 2.2.7 COMMENT LETTER #R5:

### FRED ALLEBACH

**From:** [Fred Allebach](#)  
**To:** [publiccomment](#); [Rebekah Barr](#); [Kristina Tierney](#)  
**Subject:** public comment for Hotel Project Sonoma  
**Date:** Saturday, July 29, 2023 8:52:12 AM

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Fred Allebach

#### Hotel Project Sonoma RDEIR comments #2

7/29/23

#### CEQA

Planning Commission members pointed out that Project merits and CEQA get mixed up, hard to cleanly disentangle and have a clean order of operations. Why do reasonable people see CEQA order of operations as unreasonable? Is the law fundamentally flawed?

CEQA is supposed to only be environmental impacts but these impacts are contingent on project scope and project scope doesn't get addressed until after, making pressure to approve alternatives, and legal pressure on CEQA EIR consultants to present viable alternatives up front.

If historical and social factors enter into CEQA, can union benefits and the sustainability triple bottom line factors can be part of the impacts as well? There seems to be grey areas in CEQA where "the environment" is also the social and economic environment. Everything is connected, and cumulative for impacts.

If project is changed too much, a new CEQA study will be needed, how could the City and applicant have arrived at a place after 10 years where this is still so up for grabs with project antagonists saying that the current Project CEQA Alternatives themselves are infeasible? Is this just run of the mill, CEQA Kabuki of trying to kill a project by any means possible?

Do the current CEQA alternatives frame valid options under CEQA law? Are the current alternatives a valid scope of possible projects?

How much leeway does the City Council have to waive all or part of the residential component? Regardless of what City Codes are on the books now, can the Council make a decision that goes against the current Code and thereby mandate that the City has to have new Code to conform with their decision?

Upshot: CEQA becomes a battle of those who either want or don't want a project or policy. What is "feasible" then becomes a power struggle, a struggle over primary assumptions of various City cohorts who have or may not have the sophistication to have made the rules to be feasible with. Perhaps the Council can change the rules with one vote, as they are the ultimate arbiters of City rules and Code, as long as the decision does not go against state law.

R5-1



**Observation**

With GHG, VMT, and noise being “significant and unavoidable impacts”, and wastewater/ sewer

being less than significant impact with mitigation, this takes the steam out of many of the biggest anti-project CEQA arguments, thereby leaving dispute over the feasibility of the residential component as the main line of project attack. It looks like that is what we are seeing.

R5-2

Since the residential component is City law and not CEQA law, can the Council waive the residential component and that’s it, end of story? This may come down to elective, non-CEQA horse trading between the City and applicant over the type and quality of residential units.

I encourage the City and applicant to steer towards the recommendations of the Sonoma Valley Collaborative.

**Project Alternatives** Offered to reduce environmental impacts

Alt 1 no project

Alt 2 50/50 hotel/ residential

Alt 3 75/25 hotel/ residential

Alt 4 hotel only

Alt 5 fewer rooms hotel

Here is where the fight is, which is best, appropriate, consistent for who and why?

The Project will have goals and a narrative, too many limits and the applicant will be forced to not achieve their goals. After 10 years you’d think we’d be zeroing in on some valid options by now. Has the EIR consultant blown it by giving unapprovable Alternatives? Or are we early in the game and the consultant and applicant still have cards up their sleeves and tis is all CEQA Kabuki 101? Or are PC members and project antagonists blowing smoke bc whatever the Council approves or waives on appeal ends up becoming the new feasible and consistent?

R5-3

Again, does what the Council says go for CEQA and the residential component?

**Fred’s process call**

August 7 is end of public comment period, how long until staff brings it back to the PC? If the PC votes to seriously stall and cripple the RDEIR process from the applicant’s point of view, the applicant will likely appeal this PC decision to City Council, but unless the RDEOR is reissued, the PC’s call on the RCDEIR is final. This Kabuki looks like showdown at OK corral!

R5-4

What chance is there that the RDEIR will be re-issued? Is that common? Is there precedent to



reissue an RDEIR even after it is already reissued?

**Fred’s Project observations and thoughts for whatever they may be worth**

The PC has signaled some of the core contentious issues that the Council will have to address. here I’ll throw in my comments on what I see as the core issues. There are a few questions in here for the consultant to answer but this is mostly comment aimed at giving fodder for incipient PC and the City Council Project decisions.

City budget: The budget is largely contingent on tourism income and current lack of balanced budget was said to be a big issue. Hotel is a chance to secure City funds *and* to lift up City’s worker equity profile *and* balance the sustainability triple bottom line. City Sustainable Tourism policy is weak anyway, not much concern with tourism congestion, VMT, GHG, or equity. City housing equity policy has languished as well with the PC abdicating responsibility for proactive housing policy and saying it is only a matter of money, and that poor workers should trust property owner commissioners to cover their interests. Will current Council call City’s tourism-GHG Faustian Bargain into question? And if so, what costs and housing assessments will be made on other hotels and transit so as to be consistent with any Hotel Project Sonoma restrictions? Maybe the new TID contract will clip all City hotels harder for housing fees?

R5-5

Sustainability: A “feasible” project has different ways to be feasible: social, economic, environmental. Social, economic, and environmental pillars *are* the sustainability triple bottom line. For full cost accounting of these pillar’s “cumulative (full sustainability paradigm) impacts” to the City, this project’s union aspects would go a long way to lifting up the socio-economic equity pillar that to date, has been seriously lacking. The PC and Council will have to what is feasible to who and why. Can some environmental impacts be tolerated so as to lift up equity and thereby balance the City’s triple bottom line?

City sustainability policy is infeasible and inconsistent because it is not formally full cost accounting; the triple bottom line is missing equity; equity is what the project brings on a union/ living wage angle, which may make up for CEQA impacts and/or consistency arguments over waiving all or part of the residential component. All depends on what kind of horse trading can be done.

Residential component: to what degree can it be waived or modified? The City doesn’t need any more market rate housing anyway. The PC and Council will be under pressure on one hand to adhere to no waiver and for more affordable units and on the other, to grant a waiver and an exception.

R5-6

If the Sonoma PC and Council really cared about new housing and residential housing, IMO we would not have heard so many anti-state law diatribes from the City dais, and the 6th cycle



Housing Element would not have passed the Planning Commission and Council with no rezoning and the City's 65% single family zoning intact, and 88% of Low and Very Low-income 6<sup>th</sup> cycle RHNA would not have been put on only three locations on Hwy 12 that acts to maintain City segregation.

R5-6

Given the above observations about the City Housing Element (HE), is the kerfuffle over the hotel's residential component an example of selective outrage or one that reflects genuine concern about housing issues in Sonoma? Somewhere in-between? Why did the HE get passed with such big equity gaps?

Lawsuits and appeals: An appeal and lawsuit is telegraphed if the Council approves Alt 3 or 4. The former hotel appellant cohort and PC allies have not come this far just to lay down at the end. They are not playing this chess game to lose and have experience with appeals, suits, no reason to assume they won't do it again here. One last lawsuit or two before this all is put to rest one way or another. A lawsuit may also possibly be brought on the same basis that Climate Action 2020 was successfully sued. The applicant may sue the City too, for having this process take so unreasonably long.

R5-7

IMO, the cards do not look like any actors will back down, so look for this to all go through a full iteration of appeals and lawsuits. I may be wrong and the Council and applicant may cut an acceptable deal.

GHG and VMT: Will impacts stay significant and unavoidable or will opponents manage to get them on the table as CEQA poison pills? The City has already gone whole hog on tourism and all the VMT and GHG impacts that implies, and does not seem to really care. The City's Sustainable Tourism page says nothing at all about the scope of its overall tourism carbon footprint or about labor equity and living wages. The City has made a Faustian Bargain with unsustainable tourism and now one project has to pay all the cost while the rest of the wine-tourism-hospitality combine does not? Not fair. Short-term VMT/ GHG sacrifices in CEQA should be made for Project transportation impacts bc transportation overall is moving to electric anyway.

R5-8

Historic resources dark horse: In Sonoma, looking to kill a project or policy eventually gets around to playing the impacts on historical resources card. Look for this to surface at some point. This blends into playing small town character and low-density protectionist cards. IMO, if historical social and cultural factors can be considered in CEQA, so should current union/ living wage impacts on social "character" of the current community. Is this a reasonable CEQA argument?

R5-9

Parking: If the City already has a parking shortage, why not go for the underground parking no matter what Alternative?

R5-10



Cumulative impacts: Where to draw the line? Cumulative impacts get to be used as an argument that nothing should change in the City or Sonoma Valley; make a regulatory wall that keeps change out and maintains Sonoma Valley's Sleepy Hollow stasis for only increasingly wealthy, white, property owners. Those that can't buy in and help burn the bridge to any dense infill changes in the urban service area (USA), are cumulatively displaced. What about City cumulative impacts of too much low wage work and failure to set the table for adequate affordable housing? If calling out SDC and Hanna Projects as negative cumulative transportation impacts stand as a CEQA argument, what does that say about any future dense City infill? Are all Sonoma Valley USA dense infill changes from here in out just too much and Sleepy Hollow stays as is? Is that the preferred plan?

R5-11

Loading dock: Sheila O'Neill was right. The First St. West entry area is problematic and will be congested, *but* the Plaza is already out of control with congestion and the City-backed TID and SVVB keeps telling the whole world to come here. All those visitors need rooms to stay in their destination, not at vacation rentals that take away housing from people at all AMI ranges. Central density gains economies of scale that reduces environmental impacts, not make them greater. New York City is one of lowest per capita GHG impacts places in the world, yet very congested. Central density = congestion; we have to learn to live with it. Sonoma can't stay low-density, wealthy, single-family zoning Sleepy Hollow forever bc that pattern is one of the most wasteful of environmental resources ever, for GHG, VMT, water, etc. etc. This is what makes tony suburban American the Alpha GHG footprint on the world. The pot can't be calling the kettle black on GHG impacts here! If the tourism horse is to pull the equity cart, sacrifices of Sleepy Hollow low density of years past will have to be made.

R5-12

Consistency with Development Code and General Plan: Are City controlling documents living and adaptable; or they frozen and static? What the Council votes to approve is the new City Code, right? The Council is elected, the PC is not, IMO, what the Council decides is the new law and Code, period, staff then has to make changes to account for that.

We as citizens only need to conform to government that we agree to conform to today, based on the exigencies of today. The Council will have to decide to adapt or be Code literalists, to be forward-looking or look to the past; if it wants to go with the Sleepy Hollow Stasis or help make the tourism horse pull the cart of worker equity and union living wage prevalence. Sleepy Hollow Stasis and Code literalism vs. a project that will bring labor equity and help balance the City budget and balance the City's the triple bottom line. Had the City approved this project way back when, the City would have had \$6 million more in its coffers.

R5-13

CEQA and EIR: CEQA is a Kabuki dance that must be done, like Fate in a Greek tragedy, we are headed to a reconciliation of opposing and contradictory forces, and we can't change the course of action. The end game is for the City and Project lawyers to guide how the Council

R5-14

will finesse the issues; a deal has to be made and Project opponents have to try every trick possible to prevent what they don't want.

R5-14

Unions: The union equity angle may give wind to project sails. Whatever affordable housing sweeteners the applicant can add in may help push the project over the top with a modified Alt 2, 3 or 4 being approved.

R5-15

City of Sonoma records, including emails, are subject to the California Public Records Act. Unless exemptions apply, this email, any attachments and any replies are subject to disclosure on request, and neither the sender nor any recipients should have any expectation of privacy regarding the contents of such communications.

## RESPONSE TO COMMENT LETTER R5

**Comment R5-1** Summary of Comment: The commenter expresses concerns with the CEQA process, including project changes and the social and economic environment. The commenter also expresses concerns regarding the project alternatives analysis, as well as the project’s residential component.

Response: The City appreciates the commenter’s review of the RDEIR. Please see Master Response 5 regarding project alternatives and Master Response 7 regarding the residential component of the project. The commenter poses questions regarding CEQA and questions surrounding the merits of the project that are unrelated to the adequacy of the RDEIR for addressing potential environment effects of the project. The commenter discusses the project scope and CEQA analysis. Regardless of any action related to the proposed project by City decision-makers, the RDEIR comprehensively addresses all impacts attributable to the project, as proposed.

**Comment R5-2** Summary of Comment: The commenter discusses the CEQA analysis of the project, including impact conclusions, as it relates to the feasibility of the residential component of the project. The commenter recommends the City and applicant follow the recommendations of the Sonoma Valley Collaborative.

Response: Please see Master Response 7 regarding the residential component of the proposed project. The commenter encourages the City and applicant to follow the recommendations of another commenter. Please see the Responses to Comment letter A2.

**Comment R5-3** Summary of Comment: The commenter expresses concerns regarding the adequacy of the project alternatives, and questions the City Council’s role in modifying and approving the residential component of the project.

Response: Please see Master Response 5 regarding project alternatives. As noted, in addition to the No Project Alternative, Chapter 5 of the RDEIR, “Alternatives,” includes a broad range of potentially feasible alternatives for consideration by responsible agencies, the public and stakeholders, and decision makers. The Alternatives address potentially significant effects attributable to the proposed project.

**Comment R5-4** Summary of Comment: The commenter asks a number of questions regarding the public comment period and potential reissuance of the RDEIR, as well as the Planning Commission schedule for the project.

Response: Regarding re-issuing the RDEIR, as of the writing of this Final EIR, there is no rationale for recirculating the RDEIR – there are no new impacts or impacts that have increased in severity compared to that reported in the RDEIR, and there are no feasible mitigation measures that have been suggested, but that have not been imposed by the RDEIR. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R5-5** Summary of Comment: The commenter provides a summary of the core issues discussed by the Planning Commission related to fiscal considerations, sustainability, and the residential component of the proposed

project, and states that these issues will need to be addressed by the City Council, including City budget and sustainability.

Response: Please see Master Response 7 for information related to the residential component of the proposed project. The RDEIR comprehensively addresses potential impacts attributable to the proposed project, including those that are often characterized using the term “sustainability” (GHG emissions, energy efficiency, etc.).

**Comment R5-6** Summary of Comment: The commenter asks a number of questions regarding the housing component of the project, and provides comments on the City’s housing regulations, including the City’s Housing Element.

Response: Please see Master Response 7 regarding the residential component of the project. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R5-7** Summary of Comment: The commenter addresses concerns regarding lawsuits and appeals.

Response: Please see Master Response 5 related to EIR alternatives. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R5-8** Summary of Comment: The commenter asks a number of questions related to VMT and GHG impacts, and notes a lack of information on the City’s Sustainable Tourism page. The commenter suggests that short-term VMT/GHG sacrifices in CEQA should be made for transportation impacts.

Response: Please see Master Response 1 regarding VMT, Master Response 2 regarding GHG emissions effects, and Master Response 3 regarding the impacts of tourism. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R5-9** Summary of Comment: The commenter expresses concern regarding the impact of historical resources on project approvals, and asks if there is a reasonable CEQA argument for considering union/living wage impacts.

Response: Please refer to Section 4.5 of the RDEIR, which includes a detailed discussion of the proposed project relative to historic buildings near the project site (RDEIR, pages 4.5-15 through 4.5-21). As discussed in Section 4.10 of the RDEIR, the project proposes to incorporate materials and decorative elements found in historic buildings in the Downtown District including but not limited to: troweled plaster, natural stained wood, stone veneer-clad walls, board and batten siding, corrugated metal roofing, and split-faced, cut stone features similar to Sonoma City Hall, the Swiss Hotel, and other historic buildings along East Napa Street. To break down the overall height, massing, and scale of the hotel, the design staggers the upper floor plates and third floor roof surfaces back from the street and hotel plaza courtyard. As discussed in Section 4.10 of the RDEIR, the proposed project demonstrates consistency with the City’s vision for community development as described in the 2020 General Plan, which is to: (1) include pedestrian and



bicycle access and amenities in all development (Policy CD 4.4); (2) preserve and enhance the scale and heritage of the community without imposing rigid stylistic restrictions (Policy CD 5.1); and (3) promote higher density, infill development, while ensuring that building mass, scale, and form are compatible with neighborhood and town character (Policy CD 5.5).

**Comment R5-10** Summary of Comment: The commenter asks a question regarding the City’s parking shortage, and requests consideration of underground parking regardless of which project alternative is chosen.

Response: Please see Master Response 6 regarding parking requirements. The relationship between parking supply and demand is not generally related to an impact evaluated under CEQA. Please see Master Response 5 in relation to alternatives – the City presented a broad range of alternatives that would meet most of the basic project objectives and would address potentially significant impacts attributable to the proposed project. The commenter’s suggestion that all alternatives should include underground parking is reproduced here for decision maker consideration.

**Comment R5-11** Summary of Comment: The commenter asks a number of questions related to the City’s analysis of cumulative impacts, infill projects, and affordable housing.

Response: This comment suggests that CEQA obligations to address cumulative impacts could be used to block development and infill development. While this comment does not address the adequacy of the RDEIR; it is provided here for decision-maker consideration.

**Comment R5-12** Summary of Comment: The commenter addresses concerns with the First Street West entry area and potential traffic issues. The commenter also discusses the relationship between density, VMT, and GHG in cities.

Response: Please see Appendix G, Transportation Impact Study, of the RDEIR. Appendix G provides an analysis of impacts on First Street West to MacArthur Street. The Transportation Impact Study includes a comprehensive analysis of roadway circulation, intersection impacts, collision rates, and a systematic safety analysis. The Transportation Impact Study addresses a total of 6 signalized intersections (including the intersection of West Napa Street [SR 12] and First Street West). No revision is needed in response to this comment.

**Comment R5-13** Summary of Comment: The commenter asks a number of questions related to the process behind changes to the City’s regulations, and states that the City Council will have to adapt to changes in the City or stick to the current City Code.

Response: This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R5-14** Summary of Comment: The commenter discusses the CEQA process and the City Council’s approach to the project issues.

Response: This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R5-15 Summary of Comment:** The commenter discusses union equity and affordable housing, and states that an alternative with additional affordable housing can assist in approval of the project.

Response: Please see Master Response 5 in relation to EIR alternatives.

2.2.8 Comment Letter #R6:

GLADYS

#3 The traffic will be  
 a nite more maybe  
 a pedestruan hite  
 othawise they will  
 stagger across the  
 crosswalks one or two  
 @ a time - Then there  
 will be more Backup  
 on Napa + Broadway -  
 because of the new  
 single lanes - Sonoma  
 Being Sonoma will  
 probably agammake  
 a posv decision  
 end ok this  
 Hotel -  
 Gladys

R6-3



7/29/2023

Dear Mrs Tierney -  
 Just patting my 2  
 cents in. #1 The  
 Hotel is ugly -  
 probably should be  
 more Spanish Tite  
 type #2 Too Big,  
 too much on the  
 land available -  
 I am looking forward  
 to a New restaurant.

R6-1

R6-2

## RESPONSE TO COMMENT LETTER R6

**Comment R6-1** Summary of Comment: The commenter provides an introduction to the letter, and states that the hotel is ugly. The commenter recommends a Spanish style design for the project.

Response: The City appreciates the commenter's review of the RDEIR. As discussed in Section 4.2 of the RDEIR, the proposed project includes the construction of a group of buildings which the applicant has designed with the intent to be consistent with the historic character of the City's Downtown District. The project applicant has incorporated the requirements of Sonoma Municipal Code Section 19.34.020 (Project Planning and Design Standards) into the design of the proposed project. For example, Municipal Code Section 19.34.020(B)(3)(c) states that architectural styles and details that reflect the Sonoma vernacular should be used, and in the Downtown District; examples include stone, stucco, pressed metal, transoms, base tile, and glass block. The use of durable, high-quality materials is encouraged.

The proposed project design draws from three primary Sonoma architectural patterns: the use of gabled thick-walled buildings parallel to the street, layering of exterior wooden arcades at the sidewalk, and overhanging sheltering roofs. Featured building materials include hand troweled plaster, natural stained wood, stone veneer-clad walls, board and batten siding, corrugated metal roofing, and split-faced cut stone features. Building exteriors would include deep-set window reveals finished with thick sills and jambs. Exterior detailing would include custom stone, steel and plaster finishes, timber and precast corbel blocks and miscellaneous running trim. Guest rooms would include exterior custom metal balconies and railing systems. As discussed, the proposed project design considers Sonoma's architectural character. For a detailed assessment of the project's potential impact related to visual character, please see pages 4.2-10 through 4.2-17 of the RDEIR.

**Comment R6-2** Summary of Comment: The commenter states that the project is too large for the project site. The commenter also states that they look forward to a new restaurant on the project site.

Response: Please see Section 3.1 of the RDEIR regarding project design. Regarding the comments on the size of the proposed project – the RDEIR was developed to provide a detailed analysis of the proposed project. If a smaller hotel were proposed, this smaller hotel would have been the subject of analysis in the RDEIR. As discussed in Section 4.10 of the RDEIR, the proposed project demonstrates consistency with the City's vision for community development as described in the 2020 General Plan, which is to: (1) include pedestrian and bicycle access and amenities in all development (Policy CD 4.4); (2) preserve and enhance the scale and heritage of the community without imposing rigid stylistic restrictions (Policy CD 5.1); and (3) promote higher density, infill development, while ensuring that building mass, scale, and form are compatible with neighborhood and town character (Policy CD 5.5). To break down the overall height, massing, and scale of the hotel, the design staggers the upper floor plates and third floor roof surfaces back from the street and hotel plaza courtyard. In addition, as recommended in the Downtown Sonoma Historic Preservation Design Guidelines, other scale reduction strategies would be implemented as a part of the proposed project, including articulation of the exterior facades with exterior wooden arcades, dormers, balconies, awnings, recessed entry doors,

porches, and window seats. The hotel's street frontage and courtyards would include street trees in planters, fountains, and other landscaping features. Refer to 4.10 of the RDEIR for more detail.

**Comment R6-3** Summary of Comment: The commenter addresses concerns related to traffic and safety issues for pedestrians.

Response: Please see Section 4.13 of the RDEIR regarding traffic impacts, and Master Response 4 regarding pedestrian safety.

## 2.2.9 COMMENT LETTER #R7:

### BILL WILLERS

August 5, 2023

Kristina Tierney  
1 The Plaza  
Sonoma, CA 95476

Re: Hotel Project Sonoma Recirculated Draft EIR Comments (RDEIR)

Hi Kristina,

I have synopsized below the comments I made during the review of the Hotel Project Sonoma RDEIR at the Planning Commission meeting of July 20<sup>th</sup>, 2023.

1. There is a phrase used throughout the RDEIR, “plan and code consistency is not itself an adverse physical impact on the environment”. I have enough experience with plan and code consistency and EIR’s to understand what this means but I’d like it to be explained so that the public would understand what that means. R7-1
  
2. In the context of the RDEIR code consistency is misstated on page 4-10 where the Residential Component language of the old ordinance gets mixed with the language of the new ordinance of SMC 3 2023. The Planning Commission per SMC 3 2023 can no longer waive the Residential Component except in very specific cases. The waiver language needs to be removed. This comment appears often in the RDEIR and it’s no longer a valid comment. Similarly, the In Lieu Fee language of SMC 3 2023 limits their applicability to very specific cases. In Lieu Fees are not simply an option to choose to eliminate the Residential Component. R7-2
  
3. In the introduction to the topic of Alternatives on Page 5-1 of the RDEIR, it is stated that, “According to the CEQA Guidelines, the range of alternatives ‘shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts.’” The RDEIR goes on to state that “In defining ‘feasibility,’ CEQA Guidelines Section 15126.6(f)(1) states, in part: ‘Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations...’” R7-3  

**Questions:** Could an alternative that is inconsistent with Sonoma’s General Plan and/or Development Code be considered feasible? Why, under the heading of Land Use and Planning in Table 5-1 on Page 5-38 of the RDEIR does Alternative 2 have a similar level of impact as compared to the Proposed Project if the Proposed Project is out of compliance with Sonoma’s General Plan and Development Code and Alternative 2 complies with these documents?
  
4. The five proposed Alternatives are not analyzed equally. (See the attached Table). For example, as the smallest project by overall building area, Alternative 2 (50% housing/50% commercial) relies on underground parking while Alternative 3 (25% housing 75% commercial), which is almost 15,000 square feet greater in building area than Alternative 2, relies solely on surface parking. R7-4

As analyzed in the RDEIR, underground parking is one of the project’s most significant environmental impacts. If Alternative 3 can rely solely on surface parking, then so can Alternative 2, which only requires 5 additional parking spaces than Alternative 4. This modification would substantially reduce the impact of Alternative 2. I would recommend that Alternative 2 be modified to include only surface parking, and its impacts re-evaluated.



**Question:** Why is underground parking retained in Alternative 2 but not in Alternatives 3 and 5, which are much larger projects than Alternative 2? Moving the parking to the surface in Alternative 2 would reduce most of its impacts as compared to other projects listed in Table 5-1.

R7-5

5. The analyses of Utilities and Service Systems for Alternatives 2 and 3 are inconsistent with one another and draw inexplicable conclusions in Table 5-1 on Page 5-38. In the analysis of Utilities and Service Systems for Alternative 2 on Page 5-17, it is stated that a similar level of redevelopment would occur as compared to the Proposed Project and would therefore have a similar level of impact, though Alternative 2 is roughly 64% of the size of the Proposed Project. In the same analysis of Alternative 3 (Page 5-24), which is roughly 83% of the Proposed Project, it is stated that a smaller amount of redevelopment would occur as compared to the Proposed Project, and it would have a lesser level of impact as compared to the Proposed Project.

R7-6

**Questions:** Why is it stated in the Utilities and Service Systems analysis of Alternative 2 that a similar level of redevelopment and similar impact would occur as compared to the Proposed Project if it is a substantially smaller project than the Proposed Project? Why, in the same analysis, is it stated that Alternative 3 would have a lesser level of impact than the Proposed Project, though it is far larger than Alternative 2?

The analysis of Utilities and Service Systems states that water demand and sewer demand would be reduced by at least 30% in Alternative 2 as compared to the Proposed Project, and that the generation of solid waste would be reduced by 50% in Alternative 2 as compared with the Proposed Project; yet the conclusion under Utilities and Service Systems in Table 5-1 on page 5-38 is that Alternative 2 has a similar level of impact as compared to the Proposed Project.

Conversely, in the same analysis of Alternatives 3,4 and 5 the demand for water and sewer and generations of solid are reduced by "lesser" or a smaller percentage or nearly equal, yet the conclusion in Table 5-1 is that they have a reduced impact as compared with the Proposed Project.

R7-7

**Questions:** Why is the conclusion in Table 5-1 that Alternative 2 has a similar level of impact as the Proposed Project, whereas the same table concludes that Alternative 3, 4, and 5 which reduces its demand for water and sewer and solid waste less than or nearly equal to Alternative 2, have a reduced level of impact compared to the Proposed Project?

Sincerely,

Bill Willers  
Sonoma Planning Commissioner

Proposed Project Alternative Comparison																			
	Hotel				Housing				Parking			Employees		Deliveries	DC Compliant	HGT Stories	Total S.F.		%of PP
	S.F.	Rooms	S.F. Per GR	Rest/Spa	S.F.	DU	% of Comm	S.F. / Unit	#	UG	SP	FT	PT				S.F.	%	
Proposed Project	65,606	62	1,058.16	Yes/Yes	12,963	8	20%	1,620.38	130	113	9	60	30	15	No	3	78,569	100%	
Alt 2 50/50	25,075	34	737.50	No/No	25,075	25	100%	1,003.00	99	99	0	18	9	7	Yes	3	50,150	64%	
Alt 3 75/25	48,750	40	1,218.75	No/No	16,250	16	33%	1,015.63	94	0	94	49	24	11	No	3	65,000	83%	
Alt 4 Hotel Only	66,000	62	1,064.52	Yes/Yes	-	0	-	-	130	113	9	60	30	15	No	3	66,000	84%	
Alt 5 Small Hotel	66,000	48	1,375.00	Yes/Yes	-	0	-	0	94	0	94	50	30		No	3	66,000	84%	

R7-8

Abbreviations  
S.F = Square Feet  
GR = Guest Room  
Rest = Restaurant  
DU = Dwelling Units  
UG = Underground  
SP = Surface Parking  
FT = Full Time  
PT = Part Time  
DC = Development Code  
PP = Proposed Project

## RESPONSE TO COMMENT LETTER R7

**Comment R7-1** Summary of Comment: The commenter states that the phrase “plan and code consistency is not itself an adverse physical impact on the environment” is used throughout the RDEIR, and requests that this phrase is explained to the public to allow for a better understanding of the phrase.

Response: The City appreciates the commenter’s review of the RDEIR. As discussed in Section 5.5 of the RDEIR, lead agencies typically evaluate consistency with plans and code requirements as a part of an EIR, and the City has provided a detailed evaluation of consistency in the RDEIR. However, while the analysis of plan and code consistency is completed within an EIR to mitigate environmental harm, a project that is not consistent City plans or City codes would not necessarily cause harm to the physical environment. While the RDEIR reports in detail on planning and code consistency, under CEQA, the focus must be on the potentially adverse physical environmental effects to air quality, biological resources, water quality, and the other relevant environmental topics. The analysis must also focus on the project that is proposed. If a decision-making body recommends material changes to a project as originally proposed, then the lead agency must consider whether additional analysis is needed to address a revised form of a proposed project. Ultimately, whether a project is consistent with applicable policies and code requirements is a determination that must be made by the decision makers themselves, and while the RDEIR discusses consistency with potentially applicable policies and codes, the RDEIR authors cannot make a final determination of this type.

**Comment R7-2** Summary of Comment: The commenter states that code consistency is misstated, as the Planning Commission can no longer waive the residential component per Ordinance 3-2023, and requests that this language is removed. The commenter also states that this applies to the in lieu fee language of Ordinance 3-2023.

Response: The proposed project would be required to comply with this requirement through the Use Permit process by either providing the required housing or by the Planning Commission granting a reduction or a waiver. A condition of project approval would require that the project comply with the residential component. The RDEIR comprehensively addresses the project as proposed, along with a detailed analysis of several alternatives to the proposed project. The relationship between the proposed project and the Municipal Code on this topic is not germane to the environmental analysis unless a different approach were proposed related to housing (e.g., the project proposed 10 instead of eight dwelling units). See Master Response 7 for a discussion of the residential component.

**Comment R7-3** Summary of Comment: The commenter provides a summary of the project alternatives discussion on page 5-1 of the RDEIR, including citations from the CEQA Guidelines, and asks a number of questions related to the analysis of project alternatives.

Response: Please see Master Response 5 for a discussion of EIR alternatives. An alternative that may potentially be determined in the future by City decision-makers to be inconsistent with Sonoma’s General Plan and/or Development Code can be considered as potentially feasible for analysis as a project alternative. As discussed in Section 5.5.2 of the RDEIR, as compared to the

proposed project, Alternative 2 would better meet the requirements of Sonoma Municipal Code Title 19, Chapter 19.10, Section 19.10.020.B.3, which states that the residential component “shall be equal to 100 percent of the floor area of the commercial component.” However, while lead agencies typically evaluate consistency with plans and code requirements as a part of an EIR, and while the City has provided a detailed evaluation of consistency in this RDEIR, plan consistency is not itself an adverse physical impact on the environment, and there is no adverse physical environmental impact related to plan or code consistency itself under Alternative 2 or the proposed project. As such, Alternative 2 would have a similar level of impact to the proposed project related to plan and code consistency. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R7-4** Summary of Comment: The commenter states that the five project alternatives are not analyzed equally. The commenter also requests Alternative 2 to be modified to include surface parking, and the impacts reevaluated.

Response: Please see Master Response 5 regarding discussion of EIR alternatives. This comment has been provided to decision-makers for their consideration. Alternative 2 envisions a scenario with approximately 25 residential units with a reduced number of spaces provided in an underground parking garage (RDEIR, page 5-3). Alternative 3 would reduce the number of hotel rooms from 62 to 40 and would include 16 dwelling units, with parking provided in surface parking spaces and a reduced size underground garage. Alternative 4 eliminates the residential portion and would provide 130 off-street parking spaces, including a 113-stall underground parking garage. Alternative 5 reduces the number of hotel rooms from 62 to 48, would include no residential component, and would provide surface parking spaces and a reduced size subterranean parking garage. See also Chapter 3 of this Final EIR, “Errata” for minor revisions to the descriptions of the alternatives examined.

**Comment R7-5** Summary of Comment: The commenter asks a number of questions regarding underground parking in the project alternatives. The commenter states that moving parking to the surface in Alternative 2 would reduce additional impacts.

Response: Please see Master Response 5 regarding discussion of EIR alternatives. See also Chapter 3 of this Final EIR, “Errata” for minor revisions to the descriptions of the alternatives examined.

**Comment R7-6** Summary of Comment: The commenter asks a number of questions related to Utilities and Service Systems in the analysis of the project alternatives, and suggests that the analyses of Utilities and Service Systems is inconsistent and provides inexplicable conclusions related to project alternatives 2 and 3.

Response: The City appreciates the commenter’s review of the RDEIR. Table 5-1 has been updated (See Chapter 3, Errata, of this Final EIR) to revise the level of impact to “Reduced” for Utilities and Service Systems under Alternative 2. In addition, Section 5.5.2 of the RDEIR has been revised to change the level of impact. These revisions do not change the validity or findings of significance of the of the analysis in the RDEIR. This comment has been provided to decision-makers for their consideration.

**Comment R7-7** Summary of Comment: The commenter asks a number of questions related to Utilities and Service Systems in the analysis of the project alternatives, and suggests that the analyses of Utilities and Service Systems is inconsistent and provides inexplicable conclusions related to Alternative 2.

Response: The City appreciates the commenter’s review of the RDEIR. Table 5-1 has been updated (See Chapter 3, Errata, of this Final EIR) to revise the level of impact to “Reduced” for Utilities and Service Systems under Alternative 2. In addition, Section 5.5.2 of the RDEIR has been revised to change the level of impact. These revisions do not change the validity or findings of significance of the of the analysis in the RDEIR. This comment has been provided to decision-makers for their consideration. Impacts related to construction of new or expanded water, wastewater, electrical, and natural gas facilities associated with the proposed project would be less than significant due to the project site being an infill property with direct access to existing utilities (RDEIR, page 4.14-9 through 4.14-11). This would also be true for Alternatives 2 through 5, which would also have access to exiting utilities, so in this way, impacts would be similar among the alternatives. Similarly, the proposed project’s water demand can be accommodated with existing supplies and wastewater treatment demand can be accommodated at the existing wastewater treatment facility, and there would be a less-than-significant impact related to water supplies and wastewater capacity (RDEIR, pages 4.14-11 and 4.14-12). Alternatives 2 through 5 water demand and wastewater treatment demand could also be accommodated, and therefore, in this way, the impact would be similar among the alternatives and the proposed project. The proposed project’s solid waste demand can be accommodated by the Central Disposal Site, and there would be a less-than-significant impact related to solid waste (RDEIR, pages 4.14-13 and 4.14-14). Alternatives 2 through 5 solid waste demand could also be accommodated, and therefore, in this way, the impact would be similar among the alternatives and the proposed project.



## 2.2.10 COMMENT LETTER #R8:

CAROL MARCUS

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

August 4, 2023

Sonoma Planning Commission  
1 The Plaza  
Sonoma, CA 95476

Re: Hotel Project Sonoma Recirculated Draft EIR Comments (RDEIR)

Dear Chairman Barnett and Members of the Planning Commission,

The following items on Page 1-1 – 1-2 of the RDEIR: Issues to be Resolved and Areas of Controversy, have not been resolved:

- 1. Consistency with the General Plan and Zoning; Scale of the project considering merging four lots into one; Consistency with development patterns in the historic district** have not been addressed. I disagree with the conclusion in Table 1.1 on Page 1-19 of the RDEIR that Impact 4.10-1 is Less than Significant, on the basis that the aggregation of four parcels into one conflicts with Implementation Measure 4.1.1 in Sonoma's General Plan, which is to "...ensure the provision of appropriate street connections, lot patterns, site designs, building forms...". Section 66412 of the Subdivision Map Act states, "A local agency or advisory agency shall limit its review and approval to a determination of whether or not the parcels resulting from the lot line adjustment will conform to the local general plan, any applicable specific plan...and zoning and building ordinances." The proposed project is out of compliance with Sonoma's General Plan, and therefore has significant environmental impacts. Furthermore, the aggregation of four lots into one creates greater cumulative environmental impacts such as greenhouse gas emissions, energy and water use, waste management, traffic, and parking.
- 2. Historic Resources:** Sonoma has not developed by aggregating lots together, particularly in the historic district, adjacent to the Plaza, where the fine-grained development is what gives the Plaza district its unique character. The proposed project will have a significant environmental impact.
- 3. Interest in a 50 percent housing alternative; Support for additional housing development:** The RDEIR continues to put forward alternatives that are out of compliance with Sonoma's Development Code. The Planning Commission can no longer grant a waiver to the housing requirement in the Commercial Zone. The Residential Component in the Commercial zone requires that there shall be equal parts residential and commercial development. The in-lieu fee may only be requested and granted by the Planning

R8-1

R8-2

R8-3

Commission under a very limited set of circumstances, none of which apply here. The following are the circumstances under which an in-lieu fee may be granted, from the recently amended Sonoma Development Code Section 19.10.020(B)(3): *“the presence of existing uses or conditions incompatible with residential development on or adjacent to the property for which a new development is proposed, and existing property characteristics, including size limitations and environmental characteristics, that constrain opportunities for residential development or make it infeasible, or limitations imposed by the Growth Management Ordinance.”* Thus, the proposed project and all the alternatives aside from the No Project Alternative and Alternative 2, the 50%-50% hotel/housing alternative, do not comply with Sonoma’s Development Code, and therefore have a significant environmental impact.

R8-3

**4. Traffic impacts including peak-period traffic on surrounding streets and proposed loading areas** have not been addressed satisfactorily on 1<sup>st</sup> Street West to MacArthur Street, a local street serving a residential zone.

R8-4

**5. Parking Code Requirements:** The residential and hotel uses would both occupy parking spaces overnight, therefore the shared use parking reduction model is flawed. There are 200 parking spaces required on site, and only 130 are provided.

R8-5

The fact that the RDEIR states that the impacts of being out of compliance with the General Plan and Development Code are less than significant doesn’t make it true. Perhaps the RDEIR comes to this conclusion because the environmental review process assumes that the Planning Commission will bring the project into compliance when it reviews the project. In this case, the responsibility of bringing the project into compliance with these documents rests with you. If the Planning Commission fails to bring the project into compliance with Sonoma’s General Plan and Development Code, there will indeed be environmental impacts.

R8-6

The larger the site area, the larger the project, and the larger the project, the more environmental impacts it has. Both of the alternatives which include housing reduce the environmental impacts relative to the proposed project, and are, thus, superior to it. Residential uses require less water, less parking, less energy use, less waste removal, fewer greenhouse gases being emitted, result in less traffic, and house people in the center of Sonoma, which is envisioned in our General Plan and Development Code. The 50% housing alternative is the only alternative that complies with Sonoma’s General Plan and Development Code.

R8-7

Thank you for taking the time to consider my comments.

Sincerely,

Carol Marcus



## RESPONSE TO COMMENT LETTER R8

**Comment R8-1** Summary of Comment: The commenter states that the project's consistency with the general plan and zoning; the scale of the project, and the project's consistency with development patterns in the historic district have not been addressed in the RDEIR. The commenter also states that they disagree with the less than significant conclusion for Impact 4.10-1.

Response: The City appreciates the commenter's review of the RDEIR. Please see Section 4.10 of the RDEIR for a discussion of the project's consistency with the general plan and zoning. While lead agencies typically provide a discussion of consistency with plans and code requirements as a part of an EIR, and while the City has provided a detailed evaluation of consistency with the City's General Plan and applicable codes in this RDEIR, plan consistency is not itself an adverse physical impact on the environment, and there is no adverse physical environmental impact related to plan or code consistency itself under the proposed project (RDEIR, pages 4.10-12 through 4.10-18 and 4.2-10 through 4.2-17). In addition, Section 6.1 of the RDEIR includes an analysis of cumulative impacts due to the project, including the lot line adjustment. Specific impacts and project consistency issues associated with other resource and issue areas are addressed in each topic area section of this RDEIR. These topic area sections (e.g., air quality, biological and cultural resources, noise, and transportation) analyze other relevant physical environmental effects that could result from implementation of the proposed project, and identify mitigation measures, as necessary, to reduce impacts. Development of the proposed project would not conflict with adopted City General Plan policies, land use designations, or City zoning in any way that would lead to any adverse physical environmental impacts beyond those identified and addressed in the environmental topic area sections of this RDEIR. Inconsistency itself is not a physical environmental effect. The RDEIR is obligated to focus on potential adverse physical environmental effects associated with construction and operation of the proposed project, along with cumulative effects. The proposed project includes physical changes that lead to environmental effects, such as the construction of the project and future vehicular trips to and from the project site, but also approvals that do not have direct physical effects, such as the proposed changes to existing lot lines. The RDEIR is comprehensive in its treatment of all direct and reasonably foreseeable indirect effects attributable to the proposed project and no revision is required to the RDEIR based on this comment.

**Comment R8-2** Summary of Comment: The commenter states that the project will have a significant environmental impact on historic resources within the historic district.

Response: The project site is within the vicinity of the Sonoma Plaza National Historic Landmark, the Sonoma Plaza National Register Historic District, and within the City of Sonoma Historic Overlay Zone. As discussed in Section 4.5 of the RDEIR, while there are historical resources in close proximity to the project site, because of the scale, location, and design, the proposed project would not impair the integrity of setting, feeling, or association of the Sonoma Plaza National Register Historic District, would not alter the setting of historic resources a way that would materially impair their historical significance, and would not alter any individual historical resource in the vicinity of the project site. As such, the project was found to have a less than significant and less than cumulatively considerable historical resources impact

(RDEIR, pages 4.5-15 through 4.5-20 and page 6-5). The proposed project is required to conform to all City Municipal Code requirements (including, but not limited to, Chapter 19.42 (Historic Preservation and Infill in the Historic Zone), Section 19.34.020 (Project Planning and Design Standards), Section 19.40.060 (Landscape Standards), Section 19.40.030 (Exterior Lighting), Section 19.40.130 (Protection of Scenic Vista), and Section 19.54.080 (Site Design and Architectural Review), related to building height, building setbacks, lot coverage requirements, architectural design themes and materials, exterior coatings (to reduce glare), and landscaping, along with a City architectural review before permits are issued, and the conditions of project approval would include these requirements. The proposed exterior finishes, colors, size, scale, massing, and architectural details would be consistent with existing buildings immediately surrounding the project site (RDEIR, page 4.2-17).

**Comment R8-3** Summary of Comment: The commenter states interest in Alternative 2, including support for additional housing development. The commenter also states that the RDEIR provides project alternatives that do not comply with the City's code, and provides background on the recent changes to Sonoma Development Code Section 19.10.020(B)(3).

Response: Please see Master Response 5 regarding EIR alternatives. With regard to the selection of Alternative 2, the City, as the lead agency, has the ability to approve the project, deny it, or approve a project alternative. As the lead agency, the City will consider the information in the RDEIR along with any other available information in deciding whether to approve the project or a project alternative. Please see Master Response 7 for a discussion about compliance with Section 19.10.020(B)(3).

While lead agencies typically evaluate consistency with plans and code requirements as a part of an EIR, and while the City has provided a detailed evaluation of the scale of the project, and its consistency with the City's General Plan in this RDEIR, plan consistency is not itself an adverse physical impact on the environment, and there is no adverse physical environmental impact related to plan or code consistency itself under the proposed project. The comment has been provided to decision-makers for their consideration.

An alternative that may potentially be determined in the future by City decision-makers to be inconsistent with Sonoma's General Plan and/or Development Code can be considered as potentially feasible for analysis as a project alternative. Ultimately, whether a project is consistent with applicable policies and code requirements is a determination that must be made by the decision makers themselves.

**Comment R8-4** Summary of Comment: The commenter states that traffic impacts have not be properly addressed on First Street West to MacArthur Street.

Response: Please see Appendix G, Transportation Impact Study, of the RDEIR. Appendix G provides an analysis of impacts on First Street West to MacArthur Street, and includes a systematic safety analysis as Appendix B.

The transportation impact study conducted to support the City’s review of the proposed project includes a comprehensive analysis of roadway circulation, intersection impacts, collision rates, and a systematic safety analysis. The transportation impact study addresses a total of 6 signalized intersections (including the intersection of West Napa Street [SR 12] and First Street West). The list of study intersections was coordinated and approved by the City, as the majority of project traffic would use these key intersections. Impacts at the intersection of SR 12 and First Street West were determined to be less than significant. As such, it is unlikely there would be a significant impact at First Street West and MacArthur Street, as impacts were determined to be less than significant at SR 12 and First Street West, which is located in closer proximity to the project site. The comment has been provided to decision-makers for their consideration.

**Comment R8-5** Summary of Comment: The commenter states that the shared use parking reduction model is flawed.

Response: Please see Master Response 6 regarding parking requirements. The transportation impact study presents an analysis of peak-period traffic at the study intersections based on City policies. On-street loading would be limited to off-peak hours. Where adverse effects on operation were identified, measures were recommended to achieve acceptable operations. The shared parking analysis included in the transportation impact study assumed that eight spaces would be designated for the exclusive use of the proposed residences and they were therefore not included in the shared parking supply for this analysis. It is noted that while adequacy of the parking supply is related to City requirements for proposed development projects, it is not a CEQA issue.

**Comment R8-6** Summary of Comment: The commenter states that the RDEIR land use impact analysis is not correct, and states that there will be environmental impacts if the project is not in compliance with the City’s General Plan and City code.

Response: Lead agencies include a discussion of consistency with plans and code requirements as a part of an EIR, and the City has provided a detailed evaluation of consistency in the RDEIR. While the RDEIR reports in detail on planning and code consistency, under CEQA, the focus must be on the potentially adverse physical environmental effects to air quality, biological resources, water quality, and the other relevant environmental topics. Inconsistency with a policy or code provision in and of itself is not a physical environmental impact. Ultimately, whether a project is consistent with applicable policies and code requirements is a determination that must be made by the decision makers themselves. The analysis must also focus on the project that is proposed. If a decision-making body recommends material changes to a project as originally proposed – potentially to correct a consistency issue identified by decision makers, then the lead agency must consider whether additional analysis is needed to address this revised form of a proposed project.

**Comment R8-7** Summary of Comment: The commenter states that a larger project causes more environmental impacts, and suggests their support for the project alternatives that include additional housing.

Response: The commenter’s position with regard to a preference for Alternative 2 and the commenter’s observation that Alternative 2 is the only alternative that would comply with the City’s General



Plan and Development Code are noted. Please see Master Response 5 for information about EIR alternatives.

## 2.2.11 COMMENT LETTER #R9:

JJ ABODEELY

**From:** [JJ Abodeely](#)  
**To:** [Kristina Tierney](#)  
**Cc:** [City Council](#); [CityHall Mailbox](#)  
**Subject:** comment on Hotel Project Sonoma EIR  
**Date:** Wednesday, July 26, 2023 12:13:50 PM

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Hi Kristina - I hope all is well. I've added City Council and City Hall for my post-amble comment, but here is my comment for the EIR:

The aversion to hotels in Sonoma is mind boggling as are some of the comments from Planning Commissioners. The concerns that this project will add traffic, and pedestrian congestion to the plaza lacks thoughtfulness. If you spend enough time on the plaza you will see that the vast majority of current use, especially on the weekend, is from day-visiting tourists who come to experience our town and then leave because there are not enough places to stay. The plaza can be packed as can be during these days and then come 6 or 7pm it's nearly empty. We get the burden and impact of these visitors without the revenue- neighboring jurisdictions are feasting on the TOT dollars these visitors generate, while Sonoma subsists on the crumbs of the sales tax revenue. A 62 room hotel will have +/- 120 visitors at full occupancy. This pales in comparison to the THOUSANDS of daily visitors to the plaza on busy weekends.

R9-1

End comment.

As an aside, I've always been shocked nobody counts how many daily visitors we get to Sonoma so a few years ago I ran a proxy analysis using parking and some other data points. I am happy to try to dig it up when I have more time if you're interested.

R9-2

Lastly, the Planning Commission will never be able to make a balanced assessment of a project like this because it does not, by design or tradition, consider the wider economic impact of projects - and correspondingly, the impact those dollars can have on improving the lives of residents Sonoma - whether that's parks and adequate playing fields for kids and adults, addressing affordable housing issues, whatever- it all takes money; money we don't have. That's why I believe it will take a strong City Council and a strong City Manager to actively guide policy and development in Sonoma.

R9-3

Best,  
JJ

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## RESPONSE TO COMMENT LETTER R9

**Comment R9-1** Summary of Comment: The commenter introduces the letter and provides a description of the existing setting of the Plaza on the weekends. The commenter also states that there are not enough places to stay in the city, and the residents are burdened by daily visitors and a lack of revenue from the visitors due to the lack of hotels.

Response: The City appreciates the commenter's review of the RDEIR. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R9-2** Summary of Comment: The commenter refers to proxy data on the number of daily visitors that can be shared with the City.

Response: The City notes the availability of these data and this comment is included here for decision maker consideration.

**Comment R9-3** Summary of Comment: The commenter states that the Planning Commission does not have a tradition of considering the overall economic and fiscal impacts of a project, and that a strong City Council and City Manager is necessary to guide policy and development in the City.

Response: The commenter's perspective is noted.



## 2.2.12 Comment Letter #R10:

DAVID EICHAR

**From:** [Kristina Tierney](#)  
**To:** [Gerken, Matthew](#)  
**Subject:** FW: Hotel Project Sonoma RDEIR - additional comments  
**Date:** Friday, August 11, 2023 4:35:27 PM

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

From: David Eichar <[eichar@sbcglobal.net](mailto:eichar@sbcglobal.net)>  
Sent: Monday, July 31, 2023 9:45 AM  
To: Kristina Tierney <[ktierney@sonomacity.org](mailto:ktierney@sonomacity.org)>  
Subject: Hotel Project Sonoma RDEIR - additional comments

On page 4.7-5 of the RDEIR states:

"The Sonoma County Regional Climate Protection Authority (RCPA) established a baseline communitywide GHG inventory for calendar year 2010 and a back-cast inventory for 1990 as part of the Climate Action 2020 and Beyond (CA2020) for Sonoma County. This included GHG inventories for the City,"

However, after the successful lawsuit by California River Watch (see CRW v. Regional Climate Protection Authority) and subsequent settlement, the baseline in the Climate Action 2020 and Beyond plan cannot be used related to EIRs for development projects. In the Press Democrat article about the settlement, it states, "local jurisdictions will not formally adopt the regional plan and developers cannot rely on it as a vehicle for reducing greenhouse gas emissions related to their projects."

[https://urldefense.proofpoint.com/v2/url?u=https-3A\\_\\_www.pressdemocrat.com\\_article\\_news\\_agency-2Dwont-2Dappeal-2Dsuccessful-2Dlegal-2Dchallenge-2Dof-2Dsonoma-2Dcounty-2Dclimate-2Dact\\_&d=DwlGaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A\\_Cdp gnVfiiMM&r=Plg6C38wsVCiv1doRSwg0yHASa0\\_EhINEoQ0FdNhtqc&m=M4E4bK7nQfJozPj2katHb26O40SBmwd1vNLkp5W7ATkQPEdA0efY0xJbSGkLntQB&s=MviPZm4Vq5IRWF2Vt0oBZdhK8NZtYWW\\_SXyUTWlqgM0&e=](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.pressdemocrat.com_article_news_agency-2Dwont-2Dappeal-2Dsuccessful-2Dlegal-2Dchallenge-2Dof-2Dsonoma-2Dcounty-2Dclimate-2Dact_&d=DwlGaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=Plg6C38wsVCiv1doRSwg0yHASa0_EhINEoQ0FdNhtqc&m=M4E4bK7nQfJozPj2katHb26O40SBmwd1vNLkp5W7ATkQPEdA0efY0xJbSGkLntQB&s=MviPZm4Vq5IRWF2Vt0oBZdhK8NZtYWW_SXyUTWlqgM0&e=)

R10-1

David Eichar

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## RESPONSE TO COMMENT LETTER R10

**Comment R10-1** Summary of Comment: The commenter provides a quote from Section 4.7 of the RDEIR, and states that based on the successful lawsuit by California River Watch, the Climate Action 2020 and Beyond plan cannot be used to analyze development projects within an EIR, as local jurisdictions will not formally adopt the plan.

Response: The City appreciates the commenter's review of the RDEIR. Section 4.7 of the RDEIR includes a detailed GHG analysis for the proposed project, examining all project-related sources of emissions, and comparing those emissions to a significance threshold that is based on the State framework for reducing GHG emissions, which is consistent with precedent case law on this topic. The RDEIR analysis does not rely in any way on the Climate Action 2020 and Beyond plan. Please see Master Response 2 for additional information. There is no need to revise the RDEIR based on this comment.



## 2.2.13 COMMENT LETTER #R11:

### DONNA DAMBACH

Dambach Hotel Project Sonoma RDEIR Comments/Questions

1

Hotel Project Sonoma RDEIR Comments/Questions

From: Donna Dambach, 416 Chase Street, Sonoma, CA 95476

To: Kristina Tierney, Associate Planner  
 Planning Department  
 City of Sonoma  
 No. 1 The Plaza  
 Sonoma, CA 95476

Please accept these questions and comments for consideration on this RDEIR as part of the Final Recirculated EIR (CEQA Guidelines Section 15088.5[f][1]).

RDEIR Section	Associated Statement	Comments / Questions	
Table 1-1. 4.7-1 GHG Emissions Generation	<b>Mitigation Measure 4.7-1a: Minimize the inclusion of natural gas infrastructure and use of natural gas in all buildings and supporting operations.</b> (pg 26/402)  Also See: <b>Impact 4.7-1: GHG Emissions Generation</b> <b>Mitigation Measure 4.7-1b: Implement Mitigation Measure 4.14-a, Transportation Demand Management for Project Guests and Employees.</b>	<b>Question:</b> Will the installation of photovoltaic (solar) panels include the residential component as part of the mitigation measure to decrease GHG?  <b>Comment:</b> Request that installation of photovoltaic (solar) panels be required for the residential component of the project as part of the mitigation recommendation.	R11-1
	<b>Mitigation Measure 4.7-1b: Implement Mitigation Measure 4.14-a, Transportation Demand Management for Project Guests and Employees.</b> (pg 26/402)  Also See: <b>3.1.3 SUPPORTING INFRASTRUCTURE OTHER UTILITIES</b>	<b>Question:</b> Does this refer to 4.13-2a, not 4.14-a?  <b>Comment:</b> Although the City commented the proposed project impact is inconsistent with BAAQMD's recommendation (See Background, Section 4.13-2a, pages 192-194), there is no comment in this section by the City of Sonoma on how the Project Applicant is required to mitigate. Please add a comment or appropriate cross-reference.	R11-2

	<p><b>“The electrical power supply would be augmented by an approximately 8,704-square-foot rooftop photovoltaic (solar) generation system.” (pg 65/402)</b></p>		
Table 1-1. 4.13-1 Transportation	<p><b>Impact 4.13-1a: The project would not conflict with any programs, plans, policies, or ordinances pertaining to pedestrian access.</b></p>	<p><b>Question:</b> where is the analysis of pedestrian – automobile accidents for these intersections?  <b>Comment:</b> Please include an analysis of pedestrian-automobile for these intersections.  <b>Comment:</b> Transportation Impact Study (Appendix G), Alternative Modes Section, Pedestrian Facilities, does not have such an assessment even though there is a collision assessment.</p> <p><b>Question:</b> Why was the recommendation of the Applicant to provide 50% of the cost of pedestrian enhancements not present under the mitigation plans?  <b>Comment:</b> The Transportation Impact Study made a recommendation that the project should contribute to 50% of pedestrian enhancements “since it would otherwise be reasonable to expect the improvements on one of the two westerly corners of the intersection to be constructed as part of the project”. Please consider adding this to this mitigation section as it pertains to pedestrian access and safety. (Appendix G page 26/76)</p>	<p>R11-3</p> <p>R11-4</p>
Table 1-1. 4.13-1 Transportation	<p><b>Impact 4.13-2a: The VMT generated by the project would be potentially significant.</b> (pg 38-39/402)</p> <p><b>Background: Section 4.13-2a (page 192-194) –</b> Regard the following statements:  Page 193, City Comments: “As noted, the City cannot as of the writing of this document provide evidence that the non-residential VMT associated with the proposed project would be 15 percent below the citywide VMT average, and the project design does not include EV infrastructure that</p>	<p><b>Comment:</b> regarding “Visitor-Focused VMT Mitigation Measures: Rental Cars and Transportation Information” – please include additional information about the availability of EV charging stations at the hotel in the informational material – to encourage use of EV cars.</p> <p><b>Comment:</b> as noted on Page 193, “<i>the proposed project are considered to result in a cumulatively considerable contribution to the significant cumulative impact of climate change. Therefore, the impact is cumulatively considerable and significant and unavoidable</i>”. The proposed mitigations are severely insufficient. Thus, additional, more</p>	<p>R11-5</p> <p>R11-6</p>

	<p>would achieve compliance with EV parking infrastructure requirements of the most current CALGreen Tier 2 standards (though this is required through mitigation – please see below). Therefore, the <u>proposed project has the potential to result in long-term emissions associated with operations that are not consistent with BAAQMD’s recommended design features and transportation performance standards.</u> Therefore, GHG emissions attributable to <u>the proposed project are considered to result in a cumulatively considerable contribution to the significant cumulative impact of climate change.</u>” Therefore, the impact is <b>cumulatively considerable and significant and unavoidable.</b></p>	<p>substantive, innovative (think outside the box) and impactful alternatives related to building housing be considered.</p> <p><b>Question:</b> regarding “Employee-Focused VMT Mitigation Measures”. Are these proposed measures monitorable and enforceable by the City?</p> <p><b>Comment:</b> If these are not monitorable and enforceable, then the likelihood of implementation and sustainability may be low.</p> <p><b>Question:</b> Is it feasible/legal to have the Applicant pay a subsidy to support broader Mass Transit to enhance the potential for feasible Mass Transit use by employees as a VMT mitigation measure?</p> <p><b>Comment:</b> The lack of frequency of important routes will severely limit the practical use of the Mass Transit by employees. See Appendix G: Transportation Impact Study Table 4: There is only one bus (30X) at 7:45 PM and 1 bus (34X) in each east (6:45 AM) and west (3:50 PM) directions through Sonoma Valley to Santa Rosa.</p> <p><b>Comment:</b> The conclusion drawn in the Transit section of the Transportation Impact Study (Appendix G) is not supported with existing data in Table 4: “Existing transit routes are adequate to accommodate the project-generated transit trips.” (pg 26/76). Based on the current Mass Transit schedules, the practical feasibility of Mass Transit Travel is highly limited and will likely have minimal impact.</p> <p><b>Comment:</b> Based upon data from DataUSA for Sonoma (datause.io/profile/geo/Sonoma-ca) only 6% of workers carpool and most workers commute 30 minutes to over 1.5hrs; as such the proposed mitigation incentives for carpooling, ridesharing and bicycling are valuable but will only have incremental impact (at most 8% reduction as</p>	<p>R11-6</p> <p>R11-7</p> <p>R11-8</p>
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		<p>and needs to be revised with the appropriate data for a temporary loading zone in the hotel courtyard accessed via West Napa.</p> <p><b>Question:</b> when a large tractor trailer-sized truck is parked in the temporary loading zone in the Hotel Courtyard, will it be blocking the egress of the 7 shared vehicle spaces used for the residences at the Lynch Building?</p> <p><b>Comment:</b> if so, please describe the impact and detailed plans to ensure that Lynch Building residents are not blocked from their normal egress, especially during the AM hours when Lynch Building residents may need to leave.</p>	R11-10
<p>3.1 PROPOSED PROJECT CHARACTERISTICS 3.1.1 ON-SITE LAND USES</p>	<p><b>HOTEL/RESIDENTIAL</b> <b>Eight-Unit Residential (Building B):</b> The proposed 8-unit residential building would total of 21,221 gross square feet of building floor area which would include 8 covered street-level residential parking spaces, and two floors of residences consisting of 2 one-bedroom units, 5 two-bedroom units, and 1 three-bedroom unit. (pg 55/402)</p>	<p><b>Question:</b> Is it feasible for the residential component to be 3 stories (12 units) and moving the dedicated 12 parking spaces to the underground parking area?</p> <p><b>Comment:</b> This would help decrease VMT and provide additional housing and better use of the space. Similar to the proposal for the Lynch Building Shared Parking, these dedicated 12 spaces would be through a shared parking agreement and would be modified to provide for the shared parking and provision of utility easements required to serve the project.</p>	R11-11
	<p><b>HOTEL GUEST ARRIVAL AND DEPARTURE</b></p> <ol style="list-style-type: none"> <li>1. <b>During non-peak traffic periods, departing guests would exit right onto SR 12 (West Napa Street).</b> (pg 61/402)</li> <li>2. <b>...prohibiting full-size buses from passenger pick up or drop off at the hotel auto court</b> (pg 61/402)</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Question:</b> Would this be officially designated “Right Turn Only” by Caltrans or the Project to mitigate traffic safety issues from an attempted left turn onto W. Napa?</li> <li>2. <b>Question:</b> If full-sized buses cannot enter/drop-off in the Hotel Courtyard, where would they pick-up and drop-off passengers and how would this impact traffic flow?</li> </ol> <p><b>Comment:</b> This aspect is not discussed in Appendix G (Transportation Impact Study). Please detail.</p>	R11-12
			R11-13



	<p><b>DELIVERIES AND LOADING</b>                  “..temporary outdoor loading area in the Hotel Plaza Courtyard. This would include large tractor trailer truck deliveries – anticipated to constitute approximately two deliveries per week. An optional delivery zone is proposed for the south side of SR 12 (West Napa Street) in front of the proposed restaurant.” (pg 62/402)</p>	<p><b>Question:</b> Is it physically feasible for a large tractor trailer truck to turn into and back out of the temporary loading area in the Courtyard? (pg 57/402)</p> <p><b>Comment:</b> The Transportation Impact Study and Delivery Plan (Appendices G and B) do not address the feasibility of a large tractor trailer sized truck entering and exiting (backing up onto West Napa).</p> <p><b>Comment:</b> See Comment above (<b>Impact 4.13-3a</b>). Appendices G and B do not detail the traffic impact of a large tractor trailer entering/leaving this temporary delivery zone. Appendix G erroneously makes an inaccurate assumption of the location of the temporary loading zone for the large tractor trailer trucks that is not correct for this project. Therefore, an accurate assessment of impact on traffic on West Napa has not been provide. Please provide in detail a projected impact of impact on the flow of traffic on W Napa when the truck is pulling in and out of the Hotel Courtyard Area.</p> <p><b>Question:</b> Will the Optional Delivery Zone on West Napa also accommodate a large tractor trailer truck?</p>	<p>R11-13</p>
<p>Cumulative Impacts</p>	<p><b>Table 6-1 List of Cumulative Projects</b></p>	<p><b>Question:</b> Why does this list not include proposed Projects including SDC Hotels/Housing; Hanna Center Hotel/Commercial/Housing projects in the assessment?</p> <p><b>Comment:</b> These projects will impact the infrastructure (traffic) and safety (fire, police) in cases of “acute” emergency potentially impacting the ability to evacuate under circumstances that do not allow staged evacuations. These projects, given their proposed sizes, and the limited number of major roadways (Highway 12 and Arnold Drive), for evacuation should be considered.</p>	<p>R11-14</p>

Appendix G: Transportation Impact Study (August 2022)

Section	Associated Statement	Questions / Comments
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<p>Executive Summary</p>	<p>Projected 549 new trips per day: 41 PM peak period weekday; 48 PM peak period weekend</p>	<p>Question: Do these include deliveries, especially of large tractor-trailer sized trucks along West Napa?                  Question: Where are the estimates for the AM peak period weekday/weekend?                  Comment: the impact assessment does not have an assessment for large tractor-trailer trucks entering and exiting from the courtyard onto West Napa. This assessment needs to be completed for the RDEIR.                  Comment: The Impact Study does not define Peak Morning (AM) period. It only defines Peak Evening (PM) period between 6-8pm. Please define the Peak Morning Period and complete this impact study for the AM peak Period and as well, impact on the shared Lynch Building spaces that would be blocked by temporary unloading of a large tractor trailer truck at 10AM or earlier (per Appendix B: Delivery Plan)</p>	<p>R11-15</p>
	<p>“The intersections of West Spain/1<sup>st</sup> Street West, West Napa / 1<sup>st</sup> Street West and West Napa / Broadway would operate at LOS E and F during one or both peak periods, which is considered acceptable under the City’s General Plan policies as intersections along Sonoma Plaza are exempt from LOS standards.”</p>	<p>Question: What constitutes AM peak periods? Please clarify.</p>	<p>R11-16</p>
	<p>“The project includes a delivery plan that would permit only vans and smaller vehicles to enter the site to access loading directly, while a loading zone on 1<sup>st</sup> Street West is being requested to accommodate deliveries from larger trucks, which would be limited to off-peak hours. Therefore....?”</p>	<p>Comment: This statement is no longer accurate for the proposed RDEIR. The Project suggests large trucks would enter from West Napa onto a temporary loading area. Therefore, the impact of the current delivery proposal has not been adequately addressed. Please address.                  Comment: Under the current project, please clarify the impact of blocking in share parking with the Lynch building spaces when a large truck is parked in the courtyard. This is especially pertinent for the AM period when workers may need egress to these spaces.                  Comment: Under the current project, please clarify the impact of entering and exiting the temporary loading in the courtyard for a large tractor trailer during non-peak and peak periods for traffic on West Napa.</p>	<p>R11-17</p>

Alternative Modes	Pedestrian Facilities: Recommendation: the project should contribute to 50% of pedestrian enhancements.	Comment: Please include this recommendation as part of the EIR mitigation under transportation.	R11-18
Transportation Setting	“The driveway connection should, however, be evaluated for operational issues such as adequacy of sight distance, need for turn lanes, <b>and delay that may be relevant in some cases...</b> ”	Comment: Such an assessment has not been completed in the current Transportation Impact Study (Appendix G). Please provide the impact evaluation for the use of the driveway on West Napa for the entry and exit of a large tractor trailer truck on traffic on West Napa.	R11-19
Alternative Modes	Pedestrian Facilities	Question: where is the analysis of pedestrian – automobile accidents for these intersections?	R11-20
Transit	“Existing transit routes are adequate to accommodate the project-generated transit trips.” (pg 26/76)	Comment: based upon the Table 4 data (pg 15), this is not an accurate assessment given the paucity of buses serving the Sonoma Valley and Santa Rose Transit Mall: 30X only 1 bus each day from 7:30pm-9:00pm; 34 only 1 bus in each direction at 6:45am easterly and 3:50pm westerly. It is unrealistic to assume all employees who would otherwise ride these buses will be able to catch them.	R11-21

## RESPONSE TO COMMENT LETTER R11

**Comment R11-1** Summary of Comment: The commenter asks if solar panels will be included as mitigation, and requests that the installation of solar panels is required for the residential component of the project.

Response: The City appreciates the commenter's review of the RDEIR. Please see Section 4.7 of the RDEIR for a detailed analysis of the project's GHG and energy impacts. As discussed on Page 4.7-27 of the RDEIR, the proposed building electrical power supply would be augmented by an approximately 8,704-square-foot rooftop photovoltaic (solar) generation system, increasing reliance on renewable energy sources. This is also made clear in Chapter 3 of the RDEIR, "Project Description" (RDEIR, page 3-17).

**Comment R11-2** Summary of Comment: The commenter asks a question regarding mitigation in Section 4.7 of the RDEIR. The commenter also states that there is no comment in Section 4.7 of the RDEIR on the proposed mitigation due to the project's inconsistency with BAAQMD's recommendation.

Response: The City appreciates the commenter's review of the RDEIR. Table 1-1 has been updated (See Chapter 3, Errata, of this Final EIR) to revise Mitigation Measure 4.7-1b. In addition, Page 4.7-22 in Section 4.7 of the RDEIR has been revised to **Mitigation Measure 4.7-1b: Implement Mitigation Measure 4.14-a4.13-2a, Transportation Demand Management for Project Guests and Employees**. These revisions do not change the validity or findings of significance of the of the analysis in the RDEIR.

As discussed on Page 4.7-24 of the RDEIR, Mitigation Measures 4.7-1a, 1b, 1c, 1d, and 1e would reduce emissions associated with natural gas use, transportation, and electricity consumption associated with proposed project, and support alignment with the BAAMQD-recommended proposed project design features and transportation performance standards, and would ensure that the proposed project contributes its fair-share of emissions reductions toward the State GHG reduction mandates and the State's goal of statewide carbon neutrality. Mitigation Measure 4.7-1f further reduces the proposed project's impacts related to the generation of GHG emissions, as it requires the purchase and retirement of GHG emissions credits based on protocols approved by CARB, consistent with Section 95972 of Title 17 of the California Code of Regulations. Mitigation Measure 4.7-1f also requires the project applicant to provide documentation demonstrating that the mitigation credits are real, additional, quantifiable, verifiable, enforceable, permanent, and consistent with the standards set forth in Health and Safety Code section 38562, subdivisions (d)(1) and (d)(2). Mitigation Measure 4.7-1f would not only offset any remnant GHG emissions associated with the operational use of natural gas and project-generated VMT that would be in excess of the BAAQMD-recommended transportation performance standards, but would also ensure that the project's GHG emissions efficiency would be consistent with that of the State SB 32 regulatory GHG emissions reduction target for 2030. Therefore, with implementation of Mitigation Measures 4.7-1a through 1f, the generation of GHG emissions associated with the proposed project would not result in a substantial contribution to the significant impact of climate change or conflict with an applicable plan, policy, or regulation adopted for the purposes of reduction GHG emissions. However, the City cannot guarantee the availability of emissions credits meeting the standards outlined in the



mitigation presented above. There is no additional feasible mitigation available. Therefore, the impact is cumulatively considerable and significant and unavoidable.

**Comment R11-3** Summary of Comment: The commenter asks a question related to the analysis of pedestrian access. The commenter also requests an analysis of pedestrian-automobile impacts, and states that the Transportation Impact Study is missing this analysis.

Response: Please see Master Response 4 in relation to transportation safety. Collisions were analyzed for the study roadways and intersections in the transportation impact study (RDEIR Appendix G). The analysis concluded that, based on the number and pattern of collisions during the previous five years, there was no indication of an underlying safety concern at the study intersections, including a pattern of pedestrian-involved crashes. The significance threshold cited by the commenter addresses potential conflicts of the proposed project with City programs, plans, policies, or ordinances related to pedestrian access. There are no such conflicts (RDEIR, pages 4.13-15 and 4.13-16). The City's General Plan identifies the need to effectively accommodate both vehicular and non-vehicular traffic. Other General Plan policies, as well as those included in the Sonoma Bicycle and Pedestrian Master Plan express further support for the City's efforts to enhance the transportation network to serve the needs of all users. Pedestrian facilities in the project area are generally well-developed. Sidewalks currently exist along the project frontage and both sides of all streets connecting to the Sonoma Plaza, and marked crosswalks are provided across all legs of each of the six study intersections. Accommodating non-vehicular trips requires both transportation facilities and additional development in locations that can accommodate walking and bicycling trips, such as the Downtown area, a location shown to have relatively low vehicular travel demand. The project does not propose any change to the existing sidewalks on the frontage and does not conflict with any proposed pedestrian enhancements at this intersection or any relevant programs, plans, policies, or ordinances related to pedestrian travel. The Sonoma Bicycle and Pedestrian Master Plan recommends installation of Class II bicycle lanes along West Napa Street, including along the project frontage. The project does not propose any change to the frontage or any other change that would conflict with the installation of this facility. The project's fleet of bicycles for guests and the provision of employee showers, secured employee bicycle parking, and public bicycle racks will support the use of non-vehicle modes of transportation, consistent with the City's General Plan Circulation Element Policies 2.11 and 2.14. Sonoma County Transit Routes 30, 32, 34, and 40 provide access to destinations throughout the city and connections to surrounding communities and all of these routes have a stop at Sonoma Plaza, approximately one block from the project site. The location of the project site in close proximity to existing transit service supports General Plan Circulation Element Policy 3.1, which encourages providing a mix of land uses and density that would support increased transit use.

**Comment R11-4** Summary of Comment: The commenter asks a question related to the analysis and cost of pedestrian enhancements. The commenter also requests that the recommendation from the Transportation Impact Study for the project to contribute to 50% of pedestrian enhancements should be added as mitigation for pedestrian access and safety.

Response: See Master Response 4. The transportation impact study noted that pedestrian crossing enhancements had previously been recommended for the intersection of West Napa Street/First Street West, independent of the project (RDEIR Appendix G, page 22). The need for these improvements was identified prior to the project being proposed. In addition, there is no impact related to pedestrian safety identified in the RDEIR, so while a contribution to these improvements will be required as a condition of approval, it is not appropriate as RDEIR mitigation.

**Comment R11-5** Summary of Comment: The commenter requests additional information related to the availability of EV charging stations on the project site.

Response: Electric vehicle charging infrastructure supports reductions of vehicle-generated greenhouse gas emissions (GHG). However, while the intent of SB 743 was to promote VMT reductions in part to support the state's GHG reduction goals, the significance threshold cited by the commenter is associated with the number of miles traveled; while use of an electric vehicle in-lieu of one with an internal combustion engine would likely reduce the emissions associated with project-related trips, the type of engine would not influence the number of miles driven and would therefore not reduce project-generated VMT. Regarding EV charging, Mitigation Measure 4.7 1c requires California Green Building Standards Code (CALGreen) Tier 2 standards for electric vehicle infrastructure.

**Comment R11-6** Summary of Comment: The commenter states that the transportation mitigation is insufficient, and that additional project alternative that do not including housing should be included.

Response: Please see Master Response 5 regarding EIR alternatives and Master Response 2 related to GHG emissions impacts. See also the Response to Comment R11-5. See also Master Response 1 related to VMT. All feasible mitigation for the VMT impact is included in the RDEIR. The RDEIR includes detailed, multi-part mitigation for VMT effects – some of the mitigation strategies are possible to quantify, while others are not. As noted, the mitigation would achieve an additional VMT reduction of approximately 12 percent (RDEIR, page 4.13). Mitigation Measure 4.13-2a could fully mitigate the hotel's VMT impact by providing at least a 7.5-percent reduction in VMT in addition to the 7.5 reduction attributable to the project site location in the densest part of the city, in an area with a highly diverse mix of land uses, and an area that enables walking or bicycling access to a wide range of destinations and supporting reduced project VMT. However, since neither the City nor the project applicant can directly control the mode nor travel choices of future hotel guests, while the broad and comprehensive mitigation included in the RDEIR will reduce VMT, the RDEIR conservatively determined that the VMT impact would be significant and unavoidable.

**Comment R11-7** Summary of Comment: The commenter asks a question related to the employee-focused VMT mitigation measures. The commenter states that if the mitigation measures are not enforceable, they are unlikely to be implemented.

Response: See also Master Response 1 related to VMT. Please see Master Response 5 related to project alternatives. See the Response to Comment R11-6. The RDEIR includes feasible mitigation

tailored for the proposed project, and focused on reducing both visitor and employee-generated VMT (RDEIR, pages 4.13-19 through 4.13-21). The project does not have the scale, and the City does not have the staffing or expertise to administer an annual monitoring of VMT, and the effectiveness of such monitoring with respect to visitor surveys or other means of measuring visitor-related VMT makes monitoring infeasible. However, the proposed project site is in a VMT-efficient part of Sonoma where destinations are nearby and easily reachable on foot, and the project is consistent with the intent of SB 743. There is no additional feasible mitigation available.

**Comment R11-8** Summary of Comment: The commenter asks a question related to the feasibility of providing a subsidy to mass transit as mitigation for VMT impacts. The commenter states that there is a lack of mass transit options, and carpooling, ridesharing, and bicycling will only have an incremental impact on VMT. The commenter also states that maximizing worker housing in Sonoma will have the most impact on VMT.

Response: See also Master Response 1 related to VMT. The transportation mitigation measures were identified as the most feasible given the nature of the project, type of trips generated, availability of non-vehicle transportation options, and the land use context. As indicated in the RDEIR, 15-percent reduction in VMT outside of urban contexts is generally considered the maximum feasible trip reduction. However, Sonoma's transit service has relatively limited geographic coverage and service frequencies. These service levels do not offer the same potential to reduce trips as could be achieved by deploying TDM measures in a more urbanized context with high-quality transit service. This lack of certainty in the ability of TDM measures to achieve VMT reductions that would result in reducing impacts to less than significant resulted in a determination of significant and unavoidable VMT impacts. There is currently no existing mechanism for developer contributions toward Sonoma County Transit or other transit provider operations. If such a mechanism did exist, given the scale of the project the contribution would not produce more than a nominal enhancement to existing transit service. Therefore, it was determined that the most effective strategy to encourage transit use among employees associated with the project would be to incentivize transit use through a direct transit pass subsidy. This is included as a part of Mitigation Measure 4.13-2a. The potential for including additional housing as part of the project was evaluated in the RDEIR alternatives analysis. Please see Master Response 5 related to project alternatives.

**Comment R11-9** Summary of Comment: The commenter asks where the AM peak assessment data is located. The commenter states that the Transportation Impact Study only defines the hours for PM peak traffic and does not define the peak AM traffic.

Response: The weekday and weekend p.m. peak analysis periods (4 p.m. to 6 p.m.) were selected as they are the periods of highest traffic volumes in Sonoma, and more generally the pattern associated with visitor-serving uses such as the proposed project. Therefore, these periods represent the worst-case conditions and can reasonably be expected to capture any operational effects that might occur during the morning peak period. Traffic counts collected in 2017 indicate that, in the vicinity of the project site on West Napa Street, a.m. peak-period volumes were 31 percent lower than p.m. peak-period volumes. As discussed in the Executive Summary in Appendix G

of the RDEIR, the project is expected to generate an average of 549 new daily trips, including 41 a.m. peak hour trips and 48 p.m. peak hour trips.

**Comment R11-10** Summary of Comment: The commenter states that the analysis within the Transportation Impact Study related to project deliveries and loading areas is inaccurate, and that the Project Description should be revised.

Response: Project deliveries are described in the Project Description and the Delivery Plan (Appendix B to the RDEIR). Access to the project site via the courtyard has been designed to accommodate a wide range of vehicle sizes. The applicant amended the project plans to include a turning diagram, which analyzes a box truck (16 to 19 feet in length), ladder fire truck (40 feet 9 inches in length), and buses (26 to 30 feet in length), and a UPS delivery truck (see Appendix A of this Final EIR). The majority of delivery vehicles would access the site from the West Napa Street driveway. Large semi-trucks could back into the hotel to make deliveries; however, it is unlikely truck drivers would utilize this approach. Current delivery truck practices in Downtown Sonoma include large trucks utilizing on-street loading spaces around the Downtown. As discussed in the Delivery Plan, only one current vendor (Bi Rite) uses a big rig truck with trailer. The majority of the proposed hotel's deliveries will be for the restaurant. Deliveries from this vendor will include paper products, meats, seafood, janitorial supplies, room supplies, soda fountain supplies, and canned goods. Bi Rite currently delivers to Sonoma twice per week on Tuesdays and Thursdays prior to 9 am. This provider currently delivers to The Red Grape adjacent to the proposed project site on Tuesdays and it is anticipated that Bi Rite will combine deliveries to The Red Grape and the proposed project site on the same trip. As a result, it is anticipated that the large delivery trips will be unchanged from current conditions and will take place on First Street West, adjacent to The Red Grape and the eastern edge of the project site. However, the proposed project design can accommodate a big rig truck backing into the project site. A condition of project approval requires the preparation of a Delivery Plan that specifically identifies all vendors, delivery vehicles, and schedules. The Delivery Plan will be subject to the review and approval of the Community Development Director prior to occupancy and will include necessary safety provisions and prohibitions. It is noted that the RDEIR includes an evaluation of the need for a left-turn lane into the West Napa Street driveway, and the turn lane would not be warranted even after accounting for project trips and future growth. See also Master Response 4.

**Comment R11-11** Summary of Comment: The commenter asks a question related to the potential for tractor-trailer sized truck parking issues, and requests that the potential impacts are discussed.

Response: This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration. Loading will be temporary and coordinated with on-site users. A condition of project approval will require the preparation of a detailed Delivery Plan for the review and approval of the Community Development Director.

**Comment R11-12** Summary of Comment: The commenter asks a question related to modifying the size of the residential component of the project, including parking. The commenter states that these modifications would decrease VMT, provide additional housing, and allow for shared parking.



Response: Please see the Response to Comment R11-10. See Master Response 1 for VMT information, Master Response 5 for information on alternatives, and Master Response 6 for parking information.

**Comment R11-13** Summary of Comment: The commenter asks a number of questions related to the discussion of hotel guest arrival and departure, as well as deliveries and loading, as discussed in Section 3.1.1 of the RDEIR. The commenter states that Appendix G does not address impacts related to passenger pick-up and drop-off, as well as impacts related to large tractor trailer truck deliveries.

Response: As noted in the project description, during peak traffic periods, vehicles exiting the project site would use the driveway on First Street West. During off-peak periods, the West Napa Street driveway would be used and only right turns would be permitted for vehicles exiting the site. Buses up to 30 feet in length could be accommodated in the courtyard area. See also Master Response 4. See Response to Comment R11-10, above.

**Comment R11-14** Summary of Comment: The commenter asks a question related to additional projects not listed in the Table 6-1 of the RDEIR. The commenter states that these additional projects will cause cumulative impacts to traffic and safety.

Response: The City appreciates the commenter's review of the RDEIR. The analysis of cumulative impacts includes representative past, present, and probable future projects that relate to impacts of the proposed project. The RDEIR adequately analyzes cumulative impacts based on assumptions of ambient growth rates and all other related past, present, and reasonably foreseeable future projects known at the time of the issuance of the Notice of Preparation (NOP) on August 3, 2021, which established the baseline condition and environmental setting. The list of cumulative projects is listed in Table 6-1 of the RDEIR (RDEIR, page 6-2). In conformance with CEQA, the City, as Lead Agency, has set the issuance of the NOP as the applicable cut-off date to determine baseline conditions, and CEQA does not require a lead agency to continuously update these baseline conditions or a list of related projects.

As defined in Section 15355 of the CEQA Guidelines, cumulative impacts refer to two or more individual effects, which, when considered together, are considerable or which compound or increase other environmental impacts. As set forth in Section 15130 of the CEQA Guidelines, the determination of cumulative impacts is generally a two-step process. The first step is to determine whether or not the combined effects from the proposed project and related projects would result in a potentially significant cumulative impact. If the answer is no, then the EIR only briefly needs to indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. If the answer is yes, then the analysis proceeds to the second step, which is to determine whether the proposed project's incremental effects are cumulatively considerable. Section 15065(a)(3) of the CEQA Guidelines defines "cumulatively considerable" to mean that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The additional projects referenced by the commenter are commercial projects with housing components that may have similar environmental impacts as the proposed project. Both projects are located outside of the City of Sonoma and do not share common roadways, water, or wastewater systems. As of publication of this document, both projects are being considered by Sonoma County and do not have approved entitlements for the projects currently under consideration. Specifically, the Hanna Boys Center Project was unknown when the NOP was released and was therefore not included. Plans for this project were made public in June 2023. The Sonoma Developmental Center (SDC) Specific Plan project is 6.5 miles to the northwest of the proposed project site, would derive access from Arnold Drive, and includes the approval of a Specific Plan and associated programmatic EIR. No development entitlements have been proposed or approved for this site. The Sonoma County Board of Supervisors adopted the Sonoma Developmental Center Specific Plan on December 16, 2022. As stated in the SDC Specific Plan Draft EIR, “[d]evelopment of most of the properties in the Planning Area would be implemented through the market-driven decisions that the selected buyer(s) would make for their properties, and no development rights or entitlements are specifically conferred with the Proposed Plan. Furthermore, given that the majority of future development under the Proposed Plan is residential, varying levels of density bonuses are available under State depending on the level of affordable housing provided. Thus, it is difficult to project the exact amount and location of future development that may result. While the project buildout projection reflects a reasonably foreseeable maximum amount of development for the Planning Area through 2040.” Construction of the proposed project is anticipated to take 18 months and could start in 2024. As noted, the, SDC site is located outside the City of Sonoma, 6.5 miles to the northwest, and does not share common roadways, water, or wastewater systems. Even if these projects were included in the cumulative context in the RDEIR, none of the conclusions of the proposed project cumulative analysis would change and no additional mitigation would be necessary.

All of the projects in the City would be subject to the Sonoma County Emergency Operations Plan (of which the City is a participant), which addresses Sonoma County and incorporated Cities’ evacuation plans and planned responses to emergency situations. As discussed in Section 6.1 of the RDEIR, the City has developed evacuation zones and designated evacuation routes. Development of the other project sites, and redevelopment of the project site, are all subject to design review by the City, including the Sonoma Valley Fire District, for review of appropriate ingress and egress, and are required to comply with the City’s Standard Plans (City of Sonoma 2015) relating to appropriate driveway design to accommodate emergency vehicles and emergency evacuation thoroughfares. The project provides multiple points of emergency access and does not impede access to any of the cumulative projects or any other properties. It was determined that the project’s impact related to interference with emergency evacuation plans would be less than cumulatively considerable. As such, the additional projects referenced by the commenter, when considered together with the project, would not interfere with emergency evacuation plans.

**Comment R11-15 Summary of Comment:** The commenter asks a number of questions related deliveries and AM peak-hour information. The commenter states that impacts related to large tractor trailer truck deliveries and AM peak-hour information is not provided in Appendix G.

Response: See Master Response 4, the Response to Comment R11-10, Response to Comment R11-11, and Response to Comment R11-13.

**Comment R11-16** Summary of Comment: The commenter asks a question related to AM peak-hour analysis.

Response: The morning peak hour is the peak demand period experienced on vehicular transportation facilities in the vicinity of a projects site. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R11-17** Summary of Comment: The commenter states that the analysis of deliveries and the loading zone on First Street West is not accurate. The commenter also states that large trucks would provide deliveries from West Napa Street, and the analysis in Appendix G is not correct. The commenter requests clarification of the delivery information.

Response: See Master Response 4, the Response to Comment R11-10, Response to Comment R11-11, and Response to Comment R11-13. The language in Appendix G regarding loading is out of date, but the presentation of the delivery plan and analysis of environmental effects associated with the delivery plan is up to date and accurate in the RDEIR. Standard trip generation rates include all trips into and out of a project site, so for a hotel they capture trips associated with guests, visitors, staff, deliveries, and all other types of trips. The transportation impact study for the proposed project, included as Appendix G to the RDEIR, was provided for informational purposes, as traffic congestion is not an impact under CEQA. See also response to R11-9 and 10. A condition of project approval requires the preparation of a Delivery Plan that specifically identifies all vendors, delivery vehicles, and schedules. The Delivery Plan will be subject to the review and approval of the Community Development Director prior to occupancy and will include necessary safety provisions and prohibitions.

**Comment R11-18** Summary of Comment: The commenter requests that the pedestrian facilities recommendation listed in Appendix G is included as mitigation.

Response: See Master Response 4. The transportation impact study noted that pedestrian crossing enhancements had previously been recommended for the intersection of West Napa Street/First Street West, independent of the project (RDEIR Appendix G, page 22). The need for these improvements was identified prior to the project being proposed. In addition, there is no impact related to pedestrian safety identified in the RDEIR, so while a contribution to these improvements would be a condition of approval, it is not appropriate as RDEIR mitigation.

**Comment R11-19** Summary of Comment: The commenter states that the analysis of delays due to driveway connections was not completed in Appendix G, and requests that an analysis of impacts due to use of the driveway on West Napa Street is provided.

Response: Please see the Responses to Comments R11-4 and R11-10. This comment does not address the adequacy of the RDEIR; however, the comment has been provided to decision-makers for their consideration.

**Comment R11-20** Summary of Comment: The commenter asks a question related to the analysis of pedestrian and automobile impacts.

Response: See Master Response 4.

**Comment R11-21** Summary of Comment: The commenter asks a question related to the analysis of pedestrian and automobile impacts.

Response: The assessment of transit service is part of the transportation impact study, which was provided for informational purposes only and is not part of the CEQA analysis. The adequacy of the available transit service was determined based on the land use context of the area and access to transit stops, and not the frequency of transit service. From a CEQA perspective, if the project does not conflict with any policies for transit, its impact is less than significant. See also Master Response 1.

## 2.2.14 Comment Letter #R12:

JOHANNA M. PATRI

Johanna M. Patri, AICP  
P. O. Box 604  
Sonoma, CA, 95476  
707 996-6412  
[jmpatri@aol.com](mailto:jmpatri@aol.com)  
July 19, 2023

*Delivered by e-mail*

*Please distribute this letter as noted:*

Planning Commissioners  
City of Sonoma Planning Commission  
City of Sonoma  
No. 1 The Plaza  
Sonoma, CA 95476

**RE: Hotel Project Sonoma Recirculated Draft Environmental Impact Report**

Dear Commissioners:

Please consider the following preliminary comments concerning issues regarding the Hotel Project Sonoma Recirculated Draft Environmental Impact Report (RDEIR).

1. Project Description

There appears to be some discrepancies in the project narrative.

The RDEIR states that the project site comprises the following four parcels:

- ▶ APN 018-251-017: 153 West Napa Street
- ▶ APN 018-251-068: 135 West Napa Street
- ▶ APN 018-251-051: 135 West Napa Street
- ▶ APN 018-251-067: 117 West Napa Street

However, Exhibit 3-2: Project Site Location and the Off-Street Parking narrative imply that there is an additional parcel associated with the project (136 West Napa Street).

“The transportation impact study prepared to support the City’s review of the proposed project recommends that the applicant designate a minimum of nine spaces off-site for use as employee parking for the project, though the project proposed that up to 25 spaces are available, if needed, for staff overflow parking across the street.”

In addition, the project narrative does not discuss the loss of on-street parking.

The project sponsor’s architect states that the applicant is seeking a waiver of the housing requirement per Sonoma Municipal Code Section 19.10.020 (B)(3) but this request is not narrated in the RDEIR. The RDEIR narrative implies that the project sponsor may comply with a

R12-1



partial residential component plus partially satisfied through payment of a residential component fee, subject to approval by the Planning Commission. **(NOTE: It is not clear whether the previous version or the most recently adopted version of Sonoma Municipal Code Section 19.10.020(B)(3) is being applied to this RDEIR.)**

R12-1

## 2. Significant and Unavoidable Environmental Effects

The RDEIR has identified three areas of significant and unavoidable environmental impacts of the proposed project.

- Greenhouse gas emissions (GHG) as it relates to the proposed project's generation of GHG emissions as the city cannot guarantee the availability of emissions credits meeting the emission standards outlined in the RDEIR, with no additional feasible mitigation measures available.
- Construction noise as there are no adequate feasible mitigations that would reduce construction noise impacts.
- Uncertainty of 7.5 percent vehicle miles traveled reduction as they relate to employees and guests.

Section 15123.2(c) of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR describe any significant impacts which cannot be avoided, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated by imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

R12-2

CEQA requires more than preparing environmental documents. The EIR itself does not control the way in which a project can be built or carried out. When an EIR shows that a project could cause significant and unavoidable environmental effects in the environment, the governmental agency must respond to the information by some method, including, but not necessarily limited to:

- (1) Changing a proposed project.
- (2) Imposing conditions on the approval of the project.
- (3) Choosing an alternative way of meeting project objectives. or
- (4) Disapproving the project.

Alternatively, when the EIR identifies significant and unavoidable impacts of the project and the agency chooses to approve the project, then the agency must adopt a statement of overriding considerations that identifies the project benefits that outweigh those unavoidable impacts (CEQA Section 15093).

## 3. Alternative Projects

The RDEIR offers alternatives that could feasibly attain the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project and these alternatives should be pursued.

R12-3

Factors that must be considered include:



- site suitability and environmental compatibility,
- economic viability,
- impacts to infrastructure,
- General Plan consistency,
- Development Code compliance, and
- public benefits.

While it is alleged that the applicant seeks a 5-star Hotel Project, which in and of itself has its own criteria, a small hotel project with a 50% residential component would:

- (a) provide full- and part-time local employment opportunities,
- (b) stimulate the local economy,
- (c) provide aesthetically pleasing architecture in scale with the surrounding community,
- (d) promote economic vitality for the city,
- (e) provide employee housing,
- (f) promote sustainability, and
- (g) be compatible with the historic plaza

R12-3

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.)

"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 FEIR 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*).

CEQA Guideline § 21002 states: "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternative or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effect of the proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects."



4. Housing Component per Sonoma Municipal Code Section 19.10.020(B)(3)

The project proposes in some manner only partial requirement of Sonoma Municipal Code Section 19.10.020(B)(3) whether through a waiver or payment of fees. Logic would have it that under the zoning of the property and in compliance with the Development Code, the primary proposed project would be in compliance with Section 19.10.020 (B)(3) with 50% residential and 50% commercial development.

The RDEIR fails to make compelling reasons to allow the Planning Commission to waive or reduce the 50% required housing and the findings required under which the residential component may be reduced or waived cannot be made.

CEQA's purpose is more than merely preparing environmental documents; it includes providing changes and alternatives to avoid environmental damage (CEQA Guidelines Article 1. Section 15002 General Concepts). CEQA requires decision makers to consider environmental consequences of their actions before approving plans or committing to a course of action on a project. 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. The EIR must contain a meaningful discussion and analysis of project alternatives (*Laurel Heights Improvement Assn v. Regents of the Univ. of Cal.*),

The RDEIR 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 RDEIR 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.”*

R12-4

Furthermore, instead of proposing affordable on-site employee housing to facilitate a decrease in Vehicle Miles Traveled, the RDEIR is requesting a reduction from the residential component requirement.

Given the inadequacy of affordable housing units within the downtown area, there is insufficient data and analysis in the RDEIR as to why the required housing component should be waived. While the applicant may wish for a 62-room hotel, the RDEIR sets forth no substantial, verifiable evidence that a housing component at this site would be incompatible or infeasible.

The RDEIR presumes a reduction from the required housing component will be granted, which is highly speculative. As a result of this speculation and assumption, the RDEIR 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.

Thank you for your consideration.

Respectfully submitted,

Johanna M. Patri

Johanna M. Patri, AICP

## RESPONSE TO COMMENT LETTER R12

**Comment R12-1** Summary of Comment: The commenter introduces the letter and states that there are discrepancies in the project narrative related to project parcel information, on-street parking, and a waiver of the housing requirement.

Response: The City appreciates the commenter's review of the RDEIR. As discussed in Section 3.1.2 of the RDEIR, the property at 136 West Napa Street is located to the north of the proposed hotel and is owned by the project applicant. As part of the proposed project, the project applicant proposes to grant the City an irrevocable offer of dedication for an easement for nine spaces within that lot for the exclusive use of the proposed project, for hotel staff parking (see Exhibit 3-2). No alteration to this property at 136 West Napa Street or any physical change would be required to accommodate the use of a portion of the parking lot for hotel employee parking. In addition, no on-street parking will be lost as part of the project.

In addition, as discussed in Section 3.1.1 of the RDEIR, the City's Municipal Code requires a residential component for new development on commercially zoned properties comprising 100 percent of the floor area of the commercial floor area unless waived or reduced by the Planning Commission. The applicant intends to request a partial waiver of this residential requirement for the residential square footage shortfall. See Master Response 5 for a discussion of alternatives and Master Response 7 for information related to the residential component.

**Comment R12-2** Summary of Comment: The commenter provides a summary of the significant and unavoidable impacts discussed in the RDEIR. The commenter states that when an EIR shows that a project could cause significant and unavoidable environmental effects in the environment, the governmental agency must respond to the information by some method, or the agency must adopt a statement of overriding considerations that identifies the project benefits that outweigh those unavoidable impacts.

Response: For an EIR with one or more significant and unavoidable impacts, a statement of overriding considerations is required that explains the specific reasons why the social, economic, legal, technical, or other beneficial aspects of a proposed project outweigh the unavoidable adverse environmental impacts. See Master Response 5 for a discussion of alternatives.

**Comment R12-3** Summary of Comment: The commenter provides a summary of the project alternatives analysis from the RDEIR. The commenter states their support for a small hotel project with a 50% residential component.

Response: The commenter's preference for Alternative 2 is acknowledged. Please see Master Response 5 regarding EIR alternatives. The commenter's text related to CEQA requirements for alternatives analysis is consistent with the RDEIR.

**Comment R12-4** Summary of Comment: The commenter provides a summary of Sonoma Municipal Code Section 19.10.020(B)(3). The commenter states that the RDEIR fails to make compelling reasons to allow the Planning Commission to waive or reduce the 50% required housing, and that the RDEIR fails to address the affordable housing crises in Sonoma and Sonoma Valley.

Response: The City appreciates the commenter’s review of the RDEIR. While lead agencies typically evaluate consistency with plans and code requirements as a part of an EIR, and while the City has provided a detailed evaluation of the of the housing component of the project, and its consistency with the City’s General Plan in this RDEIR, the lack of affordable housing in the City is not itself an adverse physical impact on the environment, and there is no adverse physical environmental impact related to affordable housing itself under the proposed project. The commenter’s perspective on affordable housing and ongoing challenges in the city and in California related to housing affordability are hereby acknowledged and reprinted here for decision-maker consideration. The RDEIR is obligated to comprehensively address the impacts of the proposed project, and the RDEIR does just this. The RDEIR cannot speculate on whether the proposed project will be approved, denied, or conditioned in some material way, though a broad range of alternatives is included as a part of Chapter 5 of the RDEIR to inform the City’s review of the proposed project. If in the future a different version of the proposed project is forwarded for consideration by the City, the RDEIR will need to be examined to determine whether the analysis, reporting, mitigation, or alternatives need to be updated to address this future version of the proposed project. However, the RDEIR analysis must focus on the proposed project, and it is not the role of the RDEIR to advocate for a waiver by the Planning Commission in relation to housing or to advocate for any other aspect of the proposed project, but rather to provide the comprehensive and dispassionate analysis and reporting that is in the current version of the RDEIR. The RDEIR authors have not, as alleged by the commenter, requested a reduction in housing. Instead, the Alternatives chapter of the RDEIR, Chapter 5, examines the relative environmental effects of alternatives vis-à-vis the proposed project – including alternatives with different amounts of housing (RDEIR, pages 5-5 through 5-38).



## 2.2.15 Comment Letter #R13:

### SUE BARTLETT

**From:** [Sue Bartlett](#)  
**To:** [Kristina Tierney](#)  
**Subject:** Hotel Sonoma  
**Date:** Thursday, July 13, 2023 8:53:04 AM

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I'm ok with the hotel, the redesign looks nice, but this is toooo many rooms for this location, so please consider lowering the number of rooms. I think 40 would be sufficient, for such a small lot, and so close to the plaza. The owners should be able to make plenty of money with less rooms, and also gain more support of the community, if that is a consideration for them.

Thank you for considering my comments. -Sue Bartlett, Sonoma resident

R13-1

City of Sonoma records, including emails, are subject to the California Public Records Act. Unless exemptions apply, this email, any attachments and any replies are subject to disclosure on request, and neither the sender nor any recipients should have any expectation of privacy regarding the contents of such communications.

## RESPONSE TO COMMENT LETTER R13

**Comment R13-1** Summary of Comment: The commenter requests a reduction to the number of rooms proposed at the hotel as part of the project. The commenter also states their approval of the design of the project.

Response: The City appreciates the commenter's review of the RDEIR. The commenter's perspective on the design, the proposed number of rooms, the location, and community support are acknowledged.

## 2.2.16 Comment Letter #R14:

**SANDY HOLLANDER**

**From:** [Sandy Hollander](#)  
**To:** [Kristina Tierney](#)  
**Subject:** Hotel Project Sonoma  
**Date:** Thursday, July 13, 2023 2:07:45 PM

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I would encourage the City to approve this project. Whatever objections to this that may arise cannot compare to living in a neighborhood next to homes operating as short-term rentals. My husband and I have sold two homes for that very reason. Neighborhoods are being diminished by short-term rentals.

Sonoma needs more hotel rooms and fewer areas where short-term rentals are allowed.  
And if fewer homes become short-term rentals more homes will be available for owner occupants or renters.

This is an attractive, well-thought project that seems to meet Sonoma's needs on several levels.

R14-1

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## RESPONSE TO COMMENT LETTER R14

**Comment R14-1** Summary of Comment: The commenter states their approval of the project. The commenter also expresses their concerns regarding short term rentals in the City.

Response: The City appreciates the commenter's review of the RDEIR. The commenter's perspectives that the project should be approved, short-term rentals, the need for additional hotel accommodations, the design, and meeting local needs are hereby acknowledged.



## 2.2.17 COMMENT LETTER #R15:

VICTOR CONFORTI

### Hotel Sonoma Project - Residential Component Comments by Victor Conforti – Architect, July 18, 2023 Hotel Sonoma Project, RDEIR May 2023

Introduction: I would like to comment on the residential housing component. Accepting the project applicants request for a waiver to the **full 50% residential component** will negate all the time and effort devoted to the recently updated Housing Element and the current Residential Component 100% language.

Over the last ten years, since the Sonoma Hotel Project was first proposed, the housing crisis has grown into an existential threat, eliminating the ability of most of our citizens to buy or rent housing. This situation is no longer sustainable when the workforce cannot live in our Valley or in nearby Sonoma County towns. Families are leaving, our schools are struggling and high school graduates are not returning after college. We can't give up. We need to continue working on solving this problem. We created the Development Code's requirement of a Residential Component floor area that is equal to the commercial floor area. Now we need to use it.

The Project Documents list the "EIR Project Narrative Final – Hotel Project Sonoma" dated March 17, 2023. The applicant's analysis for the Residential Component is on pages 12 - 14.

*Comments:*

*The applicant's Project Narrative uses the previous Development Code's language defining the residential component:*

***Below is the language in the previous Development Code:***

In applications for new development on commercially zoned properties larger than one-half acre, a residential component comprising at least **50 percent of the total proposed building area** can be required unless waived or reduced by the Sonoma Planning Commission (Development Code 19.10.020.B.3).

Note that the language does not say **50 percent of the total proposed commercial building area**, as stated in the applicant's narrative)...

***Below is the language in the recently revised Development Code, to clarify the intended meaning of the pervious language. This was approved by the City Council and adopted on March 1, 2023:***

***"The residential component shall be equal to 100 percent of the floor area of the commercial component". This will eliminate the language of "50 percent of the total proposed building area". It results in the same floor area as the previous language. It also makes most of the applicant's residential component calculations inaccurate, such as the following:***

*The total Hotel floor area is listed as 65,606 SF (see Narrative, Table III top of page 7). The proposed Residential floor area is listed as 21,221 SF, for a "total proposed*

R15-1

building area" of 86,827 SF. Thus "50 percent of the total proposed building area" would be 43,413 SF Residential. This results in the 21,221 SF proposed residential being only 24% of the "total proposed building area".

Applicants Project Narrative continued:

The Project proposes to provide eight residential units and requests a partial waiver of the Residential Component.

**Comments:**

*The proposed residential component is required to be "50 percent of the total proposed building area" of 86,827 SF, which would require a 43,413 SF residential component. Compared to the 21,221 SF residential component proposed, which is 24% of the total proposed building area, far less than required 50%.*

*The correct use of "the total proposed building area" makes the applicants analysis no longer accurate. The "total proposed building floor area" is 86,827 SF (see above). But, the calculations in Table VI claiming that the project is only "4,654 SF short of the residential housing component requirement" are not accurate. The Code requires a residential component of 43,413 SF (see above). The 21,168 SF of proposed residential floor area, represents a 22,245 SF short fall of the required housing component, not the 4,654 SF short fall as stated.*

R15-1

Applicants Project Narrative continued:

**Circumstances in Which the Residential Component May be Reduced or Waived**

Circumstances in which the residential component may be reduced or waived under Sonoma Municipal Code Section 19.10.020(B)(3), include-but are not limited-to the following:

3. Property characteristics, including size limitations and environmental characteristics, that constrain opportunities for residential development or make it infeasible.

The Project requests this waiver based on exception #3 above as the parcel size and height limitations do not provide adequate space for more residential development while still meeting the Project objectives.

**Comments:**

*This section #3 requires **property characteristics**... that constrain opportunities for residential development or **make it infeasible**. There are no "property characteristics" that "constrain opportunities". What makes it infeasible is the size of the hotel portion of the project. The applicants claim that the property does "not provide adequate space for more residential development while still meeting the Project objectives". Given a total proposed Hotel floor area of 65,606 SF, there is indeed not enough space left over to provide for a reasonable housing component.*



*Agreeing with this request would set a precedent for future applicants to simply propose large projects maximizing their desired objectives, at the expense of the housing component, and claiming that makes it infeasible.*

*We would be undermining one of the few tools we have to solve our housing crisis. A half acre parcel provides space to design a hotel project with a compliant residential component. One just needs to look at the Alternate Project 50%/50% description for the solution.*

R15-1

Applicants Project Narrative continued:

### **Proposed Measures to Offset the Housing Component Space Shortfall**

The Project Sponsor proposes the following possible measures to offset the square footage shortfall from the housing component. These measures could be used in combination to achieve the required square footage.

1. The conversion of seven existing market rate apartments totaling approximately 4,570 square feet at 135 West Napa Street to low-income units. These units would convert as current tenants terminate their leases.
2. The purchase of existing low-income housing units in the City of Sonoma that are scheduled to expire and will become market rate. The applicant would renew the low-income requirement on the proposed purchased units.
3. The purchase of current market rate apartments and converting them to low income.
4. The payment of a per square foot in lieu fee to be used by the City of Sonoma for the development of low-income housing.

R15-2

#### *Comments:*

*#1 Converting the Lynch Building's seven apartments is not that productive. I was the architect and designed the building to have 7 small units for local tenants. There are six 450 SF studio units and one junior 1 bedroom unit. Being small they are already affordable by design, so there is not a housing benefit.*

*#2 & #3 are good ideas and they would maintain some affordable unit or convert some market rate housing into affordable units, but they do not build more housing, which ultimately is what is needed.*

*Item #4 the in-lieu fee is available now, but the fee is a fraction of the cost of to actually build a unit. Thus, the opportunity for a project with a full housing component is lost. We can do better than that.*

*Thanks you for your continuing efforts to make the Residential Component for commercial development a part of the solution to our housing problems.*

*Victor Conforti - Architect*

## RESPONSE TO COMMENT LETTER R15

**Comment R15-1** Summary of Comment: The commenter provides an introduction to the letter, and addresses concerns with the housing component of the project. The commenter states their disagreement regarding the project applicant's request for a waiver for the residential component of the project, and provides a list of comments regarding the project narrative's description of the residential component of the project.

Response: The City appreciates the commenter's review of the RDEIR. Please see Master Response 5 regarding EIR alternatives and Master Response 7 regarding the residential component.. The commenter's perspectives on the housing crisis, the ability to live in the place of employment, the ability to age in place, and the support for housing at the project site is acknowledged. Section 4.10 of the RDEIR for a detailed discussion of City General Plan and code requirements, which has been amended for clarification regarding the applicable code for the residential component (RDEIR, pages 4.10-12 through 4.10-18). The RDEIR comprehensively addresses the proposed project. If the project is revised in the future based on housing policy or any other factor, the RDEIR will be examined to determine whether revisions are needed to address such a future revised version of the proposed project. While Chapter 5 presents a detailed analysis of relative impacts of a wide variety of alternatives, including those with different amounts of housing, the RDEIR authors are unable to speculate on whether there will be a future, revised version of the proposed project, and whether that future revised version of the proposed project would propose different amounts of housing.

**Comment R15-2** Summary of Comment: The commenter provides a list of the measures to offset the square footage shortfall from the housing component. The commenter also lists their concerns with the measures proposed by the project applicant.

Response: Please see the Response to Comment R15-1. The commenter's perspective on proposed aspects of the project is acknowledged.

### 3 ERRATA

This chapter identifies revisions to the Recirculated Draft EIR (RDEIR). The changes are presented in the order in which they appear and identified by page number. Text deletions are shown in ~~strikeout~~ and additions are underlined. These edits provide clarifications or additional supportive information and do not change the analysis or conclusions of the RDEIR.

## 3.1 EXECUTIVE SUMMARY

### 3.1.1 REVISION TO EXECUTIVE SUMMARY TABLE 1-1

#### RDEIR, PAGE 1-12:

The following change to a numbering reference in Mitigation Measure 4.7-1b have been made to Table 1-1 in the Executive Summary:

**Table 1-1. Summary of Project Impacts and Mitigation Measures**

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>4.7 GREENHOUSE GAS AND ENERGY</b>			
<b>Impact 4.7-1: GHG Emissions Generation</b>	CC	<p><b>Mitigation Measure 4.7-1a: Minimize the inclusion of natural gas infrastructure and use of natural gas in all buildings and supporting operations.</b></p> <p>The City of Sonoma shall require the project applicant to prohibit natural gas infrastructure for the residential portion of the proposed project; limit natural gas infrastructure for the hotel portion of the proposed project to that which is necessary to meet the requirements of backup generators required for the proposed hotel operations; and minimize the use of natural gas in restaurant operations, including requiring the use of electric powered pumps for any water heating requirements. Natural gas infrastructure and operational equipment that would requiring the use of natural gas shall be submitted to the City for review prior to the issuance of any demolition or grading permit.</p>	CC and SU
		<p><b>Mitigation Measure 4.7-1b: Implement Mitigation Measure <del>4.14-a</del><u>4.13-2a</u>, Transportation Demand Management for Project Guests and Employees.</b></p>	



## 3.2 PROJECT DESCRIPTION

### 3.2.1 REVISIONS TO MUNICIPAL CODE REQUIREMENTS FOR THE RESIDENTIAL COMPONENT

#### RDEIR PAGE 3-7:

The discussion in the Project Description has been revised to clarify the version of the City's Municipal Code that applies to the proposed project.

3. Residential Component. 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. Circumstances in which the residential component may be reduced or waived include, but are not limited to, the following:

1. The replacement of a 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 limitations 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. 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 shall be required, except in either of the following circumstances:

~~a. The replacement of a commercial use within an existing tenant space with another commercial use.~~

~~b. Additions up to 30 percent of existing historic structures that are listed, or eligible to be listed, on the National Register of Historic Places, the California Register of Historical Resources and/or the City of Sonoma Inventory of Historic Sites and Structures where the addition would not impact the historic designation.~~

~~A residential component shall be equal to 100 percent of the floor area of the commercial component. The residential component may be wholly or partially satisfied through payment of a residential component fee, subject to approval by the Planning Commission. The residential component fee shall be paid per square foot of required residential component and shall be established by resolution of the City Council and paid into the Housing Trust Fund. Circumstances in which the residential component may be wholly or partially satisfied by the residential component fee include, but are not limited to, the following:~~

~~a. The presence of existing uses or conditions incompatible with residential development on or adjacent to the property for which a new development is proposed.~~

b. Existing property characteristics, including size limitations and environmental characteristics, that constrain opportunities for residential development or make it infeasible.

c. Limitations imposed by other regulatory requirements, such as the Growth Management Ordinance.

### **3.2.2 REVISIONS TO MUNICIPAL CODE REQUIREMENTS FOR THE RESIDENTIAL COMPONENT**

#### **RDEIR PAGE 3-9:**

The discussion in the Project Description has been revised to clarify the version of the City’s Municipal Code that applies to the proposed project.

As noted, the City’s Municipal Code requires a residential component for new development on commercially zoned properties comprising at least 50 percent of the total proposed building area ~~100 percent of the floor area of the commercial floor area~~ unless waived or reduced by the Planning Commission. The applicant intends to request a partial waiver of this residential requirement for the residential square footage shortfall.

### **3.3 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES**

#### **3.3.1 DRAFT EIR SECTION 4.7, GREENHOUSE GAS EMISSIONS AND ENERGY**

##### **RDEIR, PAGE 4.7-22:**

Mitigation Measure 4.7-1b has been corrected to reference Mitigation Measure 4.13-2a, Transportation Demand Management for Project Guests and Employees.

Mitigation Measure 4.7-1b: Implement Mitigation Measure ~~4.14-a~~4.13-2a, Transportation Demand Management for Project Guests and Employees.

#### **3.3.2 REVISIONS TO CLARIFY THE APPLICATION OF THE CITY’S MUNICIPAL CODE**

##### **RDEIR, PAGES 4.10-4 THROUGH 4.10-6**

The land use section of the RDEIR has been revised to clarify the application of the City’s Municipal Code to the proposed project.

#### **City of Sonoma Development Code—Commercial Zoning District and Residential Component**

The purpose of the City’s Development Code ~~was adopted in May of 2003 and last updated in May of 2023.~~ ~~Its purpose is to~~ implement ~~reinforce~~ the policies of the General Plan by regulating the uses of land and structures within the City. Overall, the purpose of the Development Code is to guide growth that is compatible with the community’s unique natural and historical character, and that reflects the residents’ desire for enhancing the City’s livability.

Chapter 19.10 (Zones and Allowable Uses) of the City’s Municipal Code establishes the zoning districts within the City. The project site is zoned Commercial (C) within a Historic Overlay District. As stated in Section 19.10.020.B.1 of the Municipal Code, the Commercial zoning district is applied to areas appropriate for a range of commercial land uses, including retail, tourist, office, and mixed uses. The Historic Overlay District is intended to preserve structures that are historically or culturally significant.

The proposed project was originally submitted in 2012 and various iterations of the project have been subject to review since the original submittal, with final modifications to the land use permits requested submitted in June 2021. Section 19.01.040.F of the Municipal Code requires that a land use permit application be processed according to the provisions of the Development Code in effect when the application was accepted as complete. As a result, the below analysis is based on the Code in place on when the project application was accepted as complete.

In applications for new development on commercially zoned properties 0.5 acres or larger and for which a discretionary permit is required, a residential component is required, unless waived by the City Planning Commission. Section 19.10.020.B.3 of the City’s Municipal Code addresses this requirement, as follow:

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. Circumstances in which the residential component may be reduced or waived include, but are not limited to, the following:

1. The replacement of a 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 limitations 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.

~~Residential Component. 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 shall be required, except in either of the following circumstances:~~

- ~~a. The replacement of a commercial use within an existing tenant space with another commercial use.~~
- ~~b. Additions up to 30 percent of existing historic structures that are listed, or eligible to be listed, on the National Register of Historic Places, the California Register of Historical Resources and/or the City of Sonoma Inventory of Historic Sites and Structures where the addition would not impact the historic designation.~~

~~A residential component shall be equal to 100 percent of the floor area of the commercial component. The residential component may be wholly or partially satisfied through~~

~~payment of a residential component fee, subject to approval by the Planning Commission. The residential component fee shall be paid per square foot of required residential component and shall be established by resolution of the City Council and paid into the Housing Trust Fund. Circumstances in which the residential component may be wholly or partially satisfied by the residential component fee include, but are not limited to, the following:~~

~~a. The presence of existing uses or conditions incompatible with residential development on or adjacent to the property for which a new development is proposed.~~

~~b. Existing property characteristics, including size limitations and environmental characteristics, that constrain opportunities for residential development or make it infeasible.~~

~~c. Limitations imposed by other regulatory requirements, such as the Growth Management Ordinance.~~

Compliance with this section of the Municipal Code will be determined as part of the Use Permit process as it relates solely to policy and therefore there are no potentially significant environmental impacts based on this zoning code section not already discussed in this RDEIR.

### **3.3.3 REVISIONS TO CLARIFY THE APPLICATION OF THE CITY'S MUNICIPAL CODE**

#### **RDEIR, PAGES 4.10-14 THROUGH 4.10-16**

The land use section of the RDEIR has been revised to clarify the application of the City's Municipal Code to the proposed project.

#### **Development Code**

**Use:** The proposed project site is located in the Commercial zoning district, which is intended for a range of uses, including retail, tourist, office, and mixed uses. The project proposes a hotel, restaurant, spa, and eight residential units, which is allowed in the Commercial zoning district with a Use Permit. As described in detail in this RDEIR Section 3.4 and Table 3-3, the proposed project would be consistent with the Commercial zoning district in the City's Municipal Code and the site's Commercial land use designation in the City's 2020 General Plan (City of Sonoma Municipal Code Title 19, Chapter 19.10, Division II (Community Design); City of Sonoma 2006).

**Residential Component:** As described in detail in this RDEIR Chapter 3 (Project Description), in applications for new development on commercially zoned properties 0.5 acre or larger and for which a discretionary permit is required, a residential component is required, unless this requirement is waived by the City Planning Commission. The residential component should normally comprise at least 50 percent of the total proposed building area. Hotel Project Sonoma proposes the development of a 65,606 square foot hotel, restaurant /bar, and spa building and a 21,221 square foot residential building containing eight-unit



residential units. The total project combined building area is approximately 86,827 square feet.<sup>1</sup> Pursuant to the applicable version of Municipal Code Section 19.10.020.B.3, the residential component for the proposed project should be at least 43,414 square feet, which is 50 percent of the total proposed building area of 86,827 square feet. As proposed, the residential building would total 21,221 square feet, resulting in a residential component deficit of 22,193 square feet. The Planning Commission has the discretion to waive or reduce the residential component in some circumstances. Circumstances in which the residential component may be reduced or waived include, but are not limited to, the following:

1. The replacement of a 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 limitations and environmental characteristics, that constrain opportunities for residential development or make it infeasible.
4. Limitations imposed by other regulatory requirements, such as the Growth Management Ordinance.

The applicant is requesting this residential component requirement be reduced and is proposing eight residential units to meet the proposed project objectives and has included a number of recommended measures in their project narrative to compensate for the 22,193 square feet of residential component not included onsite. Potential measures include:

1. The conversion of seven existing market rate apartments totaling approximately 4,570 square feet at 135 West Napa Street to low-income units. These units would convert as current tenants terminate their leases.
2. The purchase of existing low-income housing units in the City of Sonoma where the low-income restriction scheduled to expire and become market rate. The applicant would renew the low-income restriction on the proposed purchased units.
3. The purchase of current market rate apartments and conversion to low income.
4. The payment of an in lieu fee to be used by the City of Sonoma for the development of low-income housing.

As discussed above, compliance with this section of the Municipal Code will be determined as part of the Use Permit process as it relates solely to policy and therefore there are no potentially significant environmental impacts based on this zoning code section not already discussed in this RDEIR. This code compliance issue may be addressed by the Planning Commission with a waiver or reduction of the residential component or applicable condition of approval.

~~The residential component is required to be equal to 100 percent of the floor area of the commercial component. The residential component may be wholly or partially satisfied through payment of a~~

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<sup>1</sup> Section 19.92.020 (Definitions) of the Municipal Code does not define "building area". The closest definition would be "floor area", which means the total of the gross horizontal areas of all floors, excluding basements, cellars, attics, and below-grade parking, within the outer surfaces of the exterior walls of buildings, or the center lines of party walls separating buildings or portions thereof. Section 19.10.020 of the Development Code was amended in April 2023 to eliminate this ambiguity. The recent amendment modified the term "building area" in Municipal Code Section 19.10.020 to refer "floor area" to address this issue.

~~residential component fee, subject to approval by the Planning Commission. The residential component fee shall be paid per square foot of required residential component and shall be established by resolution of the City Council and paid into the Housing Trust Fund. However, the residential component would be also limited on dwelling unit basis according to the allowable density for the zoning district, which is 20 units per acre. At the maximum allowable density of 20 units per acre (1.24 acres x 20 units per acre = 24 units), a total of 24 residential units could be developed at the project site. The applicant is requesting this requirement be reduced and is proposing eight residential units to meet the proposed project objectives. As currently codified as of the publishing of this RDEIR, the Planning Commission has the ability to waive or reduce the residential component. Circumstances in which the residential component may be reduced or waived include, but are not limited to, the following:~~

- ~~a. The presence of existing uses or conditions incompatible with residential development on or adjacent to the property for which a new development is proposed.~~
- ~~b. Existing property characteristics, including size limitations and environmental characteristics, that constrain opportunities for residential development or make it infeasible.~~
- ~~c. Limitations imposed by other regulatory requirements, such as the Growth Management Ordinance.~~

~~The proposed project would be required to comply with this requirement through the Use Permit process by either providing the required housing or by the Planning Commission granting a reduction or a waiver or payment of a fee.~~

**Development Standards:** The proposed project would comply with the quantified zoning standards applicable to new development in the Downtown District as follows:

### 3.3.4 REVISIONS TO SPELL OUT ABBREVIATION

#### RDEIR, PAGE 4.10-18

The land use section of the RDEIR has been revised to spell out an abbreviation and clarify that an in-lieu parking fee is an option.

In addition to the 130 on-site parking spaces, the applicant has proposed to satisfy the parking requirement with the dedication of 9 spaces of the available 25 off-site parking spaces within an existing parking lot, located across West Napa Street approximately 50 feet north of the project site, for the exclusive use of the hotel. The parking lot subject to the offer of dedication lies within 300-feet of the project site, which is consistent with the location requirements of the City's parking standards (SMC Sonoma Mun. Code § 19.48.050.B). Based upon the foregoing, the Planning Commission may find that the amount of off-street parking complies with the requirements of the Development Code, pursuant to Section 19.48.050.B.

With the proposed on-site and off-site parking spaces, the proposed project would provide 139 parking spaces, which is consistent with the parking demand estimated using the ULI methodology but less than the 164 parking spaces required by Development Code. A condition of project approval would require the preparation of a Parking Management Plan to oversee the management of parking at the hotel and provide

a plan for accommodating parking during peak season and for large events. Additionally, the proposed project ~~w~~ould require payment of an in lieu parking fee. Under Municipal Code Section 19.48.050.C (In-Lieu Parking Fee), a developer need not provide all of the parking spaces required for a commercial use if an in-lieu fee is approved by the Planning Commission and contributed by the developer to a parking improvement trust fund. A condition of project approval ~~c~~ould require payment of the in-lieu fee prior to issuance of an occupancy permit.

### **3.3.5 REVISIONS TO CLARIFY MECHANISM FOR AFFORDABLE HOUSING**

#### **RDEIR, PAGE 4.10-20**

The land use section of the RDEIR has been revised to clarify the mechanism by which affordable housing could be required.

Affordable Housing: The project proposes the construction of eight residential units. The proposed project would be required to comply with Chapter 19.44 (Affordable Housing and Density Bonuses), which requires 25 percent of the units to be deed restricted affordable housing units in perpetuity through conditions of project approval.

## **3.4 ALTERNATIVES**

### **3.4.1 CHANGE TO CODE REQUIREMENT FOR RESIDENTIAL COMPONENT AND TENURE UNDER ALTERNATIVE 2**

#### **RDEIR PAGE 5-3**

Under Alternative 2, the residential component could be for sale or for rent. Reference to “rented” has been removed. The description of Alternative 2 has also been revised to reference the Municipal Code requirement for the residential component.

This alternative was developed to provide an expanded housing component as compared to the proposed project. Sonoma Municipal Code Title 19, Chapter 19.10, Section 19.10.020.B.3 requires incorporation of residential development as a part of commercial projects on parcels zoned commercial that are over 0.5 acre in size. The residential component should normally comprise at least 50 percent of the total proposed building area ~~is required to be 100 percent of the floor area of the commercial component~~. This alternative was also developed to reduce air quality, greenhouse gas emissions and energy, noise and vibration, and transportation impacts compared to the proposed project.

Based on a project site area of 54,000 square feet (or 1.24 acres), 25 residential units would be the maximum number of units permitted under the applicable Commercial Zoning District, which allows 20 units per acre. At an average of 800 square feet per unit, this is 20,000 square feet of space for residential development and a gross square footage of approximately 25,075 square feet (including hallways and other non-~~rented~~ occupied space). This alternative assumes 12 two-bedroom units and 13 one-bedroom units. Assuming 50 percent of the building ~~floor~~ area is available for hotel use, this would accommodate approximately 34 hotel rooms. The 60 full-time and 30 part-time employees required for the proposed project would be reduced to 18 full-time and 9 part-time employees under Alternative 2.

### **3.4.2 CHANGE TO PARKING DEMAND AND PARKING SCENARIO UNDER ALTERNATIVE 3**

#### **RDEIR, PAGE 5-4**

The parking demand under Alternative 3 has been revised and a revision has been made to clarify that Alternative 3 is assumed to require a smaller underground parking structure compared to the proposed project.

Under the Hotel/Residential (75%-25%) Alternative, the number of hotel rooms would be reduced from 62 to 40. This alternative would provide 16 dwelling units and a restaurant, bar, and spa. The total building square footage under Alternative 3 would be approximately 65,000 (including residential and non-residential components), and the building is assumed to be three stories. The 60 full-time and 30 part-time employees required for the proposed project would be reduced to 49 full-time and 24 part-time employees under Alternative 3. Rather than underground parking, the approximately ~~94~~ 100 parking spaces needed under this alternative would be provided in surface parking spaces and an underground garage that would be reduced in size compared to the proposed project. The anticipated number of truck deliveries per week would be reduced from 15 to 11. This alternative was developed to reduce air quality, greenhouse gas emissions and energy, noise and vibration, and transportation impacts compared to the proposed project.

### **3.4.3 CLARIFICATION TO LOADING AREA SCENARIO UNDER ALTERNATIVE 4**

#### **RDEIR, PAGE 5-4**

The description of Alternative 4 has been clarified to note that instead of the residential area, there would be a larger space for loading, as compared with the proposed project.

Under Alternative 4, the Hotel Only Alternative, the number of hotel rooms would be maintained at 62, and the alternative would also include an 80-seat restaurant and bar, a spa with 6 treatment rooms, raised swimming pool veranda, 130 off-street parking spaces (consisting of a 113-stall underground parking garage, 9 surface parking spaces). There would be no residential component under this alternative. The total building square footage under Alternative 4 would be approximately 66,000, and the building is assumed to be three stories with the same footprint as the hotel building under the proposed project. The 60 full-time and 30 part-time employees required for the proposed project would be the same for Alternative 4. Instead of the dwelling units contemplated as a part of the proposed project, this alternative would include additional space for loading area on-site. The anticipated number of truck deliveries per week would be approximately 15 as under the proposed project. This alternative was developed to reduce air quality, greenhouse gas emissions and energy, and noise and vibration impacts compared to the proposed project.

### **3.4.4 CHANGE TO PARKING SCENARIO UNDER ALTERNATIVE 5**

#### **RDEIR, PAGE 5-4**

A revision has been made to clarify that Alternative 5 is assumed to require a smaller underground parking structure compared to the proposed project.

Under this alternative, the number of hotel rooms would be reduced from 62 to 48. There would be no residential component. This alternative would also include an 80-seat restaurant and bar, a spa with 6 treatment rooms, raised swimming pool veranda, 94 surface parking spaces, and ~~no a~~ a subterranean parking garage that would be smaller than under the proposed project. The total building square footage under Alternative 5 would be approximately 66,000, and the building is assumed to be three stories with the same footprint as the hotel building under the proposed project. This alternative would maintain the same building square footage as the hotel building proposed under the proposed project, but a fewer number of hotel guest rooms, with some rooms using a suite or other larger square footage format. The 60 full-time and 30 part-time employees required for the proposed project would be reduced to 50 full-time and 30 part-time employees under Alternative 5. Instead of the dwelling units contemplated as a part of the proposed project, this alternative would include a loading area on-site. This alternative was developed to reduce air quality, greenhouse gas emissions and energy, and noise and vibration impacts compared to the proposed project.

### **3.4.5 CHANGE TO CLARIFY THE CODE REQUIREMENT FOR HOUSING**

#### **RDEIR, PAGE 5-15**

A revision has been made to clarify what the Municipal Code requires for housing in the discussion of Alternative 2.

Under Alternative 2, 50 percent of the project site's developable area would consist of residential land uses. As compared to the proposed project, Alternative 2 would better meet the requirements of Sonoma Municipal Code Title 19, Chapter 19.10, Section 19.10.020.B.3, which states that the residential component "should normally comprise at least 50 percent of the total proposed building area ~~shall be equal to 100 percent of the floor area of the commercial component.~~" However, while lead agencies typically evaluate consistency with plans and code requirements as a part of an EIR, and while the City has provided a detailed evaluation of consistency in this RDEIR, plan consistency is not itself an adverse physical impact on the environment. and there is no impact under this Alternative 2 or the proposed project.

### **3.4.6 REVISION TO A SENTENCE CHARACTERIZING THE UTILITY IMPACT OF ALTERNATIVE 2**

#### **RDEIR, PAGE 5-17:**

Redevelopment of the project site with the land uses proposed under both Alternative 2 and the proposed project would increase the amount of solid waste that would be generated, from both construction and operation, as compared to the existing, on-site uses. Based on the reduced number of employees but increased number of residents, the demand for solid waste would be reduced by approximately 50 percent.<sup>2</sup> Because Alternative 2 would result in a reduced water demand, reduced sewer demand, and reduced demand for solid waste, this alternative would result in a lesser level of impact as compared to the proposed project. ~~Because Alternative 2 would result in a similar level of new development as~~

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<sup>2</sup> Assuming the 2020 solid waste generation rate provided by CalRecycle for the Sonoma County Waste Management Agency of 4.7 pounds per day per residential population and 11.4 pounds per day per employee.



~~compared to the proposed project, Alternative 2 would result in a similar generation of solid waste and therefore would have a similar level of impact as compared to the proposed project.~~

### **3.4.7 REVISION TO RELATIVE AIR QUALITY IMPACT OF ALTERNATIVE 3**

#### **RDEIR, PAGE 5-18**

A revision has been made to note that Alternative 3 would include underground parking, but in a smaller amount than provided under the proposed project.

Alternative 3 occupies a smaller project footprint, and would not include the construction of a separate residential building. The duration of construction could be somewhat reduced under this alternative, limiting construction-related air pollutant emissions to a relatively shorter window compared to the proposed project. Alternative 3 and the proposed project would use similar types of construction equipment, but emissions could be reduced due to the reduced need for excavation since this alternative would provide ~~surface a smaller rather than~~ subterranean parking area. Alternative 3 would result in reduced impacts associated with potential generation of temporary, short-term, construction-related emissions of criteria pollutants and precursors, when compared with the proposed project.

### **3.4.8 REVISION TO RELATIVE CULTURAL RESOURCES IMPACT OF ALTERNATIVE 3**

#### **RDEIR, PAGE 5-19**

A revision has been made to note that Alternative 3 would include underground parking, but in a smaller amount than provided under the proposed project.

Since the project site has been previously developed and is almost completely covered with impervious surfaces, ground-disturbing activities associated with the prior construction likely already disturbed or resulted in the discovery of any archeological resources, including Native American human remains, that may have existed on the site. If any previously unknown resources were encountered during construction activities associated with either Alternative 3 or the proposed project, implementation of Mitigation Measure 4.5-2, along with required compliance with California Health and Safety Code sections 7050.5 and 7052 and California Public Resources Code section 5097, would reduce the impacts under both Alternative 3 and the proposed project to a less than significant level. Because Alternative 3 would have a smaller construction footprint and would ~~not~~ include a smaller subterranean parking garage, this alternative would have a lesser level of potential impact to previously unknown buried archaeological resources, including Native American human remains, as compared to the proposed project.

### **3.4.9 REVISION TO RELATIVE GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES IMPACT OF ALTERNATIVE 3**

#### **RDEIR, PAGES 5-19 AND 5-20**

A revision has been made to note that Alternative 3 would include underground parking, but in a smaller amount than provided under the proposed project.

The project site is in a seismically active area. Alternative 3 would involve demolition of the existing structures and redevelopment with a single building with hotel, restaurant, and residential uses, ~~that~~ and would employ surface parking rather than any have a smaller subterranean parking garage compared to the proposed project. Both Alternative 3 and the proposed project must comply with the California Building Code, which requires that measures to reduce damage from seismic effects be incorporated in structural design, such as ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. Like the proposed project, Alternative 3 would require compliance with standards designed to avoid seismic hazards and issues related to soil constraints and therefore have a similar level of impact.

The potential for soil erosion resulting from construction of both Alternative 3 and the proposed project would be reduced through implementation of the required SWPPP and associated BMPs specifically designed to reduce stormwater runoff and associated sediment transport. Because the amount of construction under Alternative 3 would be reduced as compared to the proposed project, this alternative would have a lesser level of impact related to potential soil erosion as compared to the proposed project.

Most of the project site is composed of unstable artificial fill, which would be addressed under both Alternative 3 and the proposed project by excavating the unstable material and replacing it with engineered, properly compacted fill. Because construction footprint under Alternative 3 would be reduced as compared to the proposed project, this alternative would have a lesser level of impact related to construction in unstable soil as compared to the proposed project.

Paleontologically sensitive Pleistocene-age alluvial deposits are present at the project site below the artificial fill, to depths of at least 40 feet below the ground surface. Excavation in these paleontologically sensitive materials could destroy unique paleontological resources. Implementation of Mitigation Measure 4.6-4 would reduce the impacts under both Alternative 3 and the proposed project to a less than significant level. Because the construction footprint under Alternative 3 would be reduced as compared to the proposed project, and because Alternative 3 would ~~not~~ involve excavation for a smaller subterranean parking garage, this alternative would have a lesser level of impact related to potential destruction of unique paleontological resources as compared to the proposed project.

### **3.4.10 REVISION TO RELATIVE GREENHOUSE GAS EMISSIONS IMPACT OF ALTERNATIVE 3**

#### **RDEIR, PAGE 5-20**

A revision has been made to note that Alternative 3 would include underground parking, but in a smaller amount than provided under the proposed project.

With the reduced footprint and amount of building construction, and ~~the elimination of a need for a reduced amount of~~ excavation for a smaller subterranean parking garage, the total amount of greenhouse gas emissions during construction would be substantially reduced compared to the proposed project.

### 3.4.11 REVISION TO RELATIVE HAZARDS IMPACT OF ALTERNATIVE 3

#### RDEIR, PAGE 5-21

A revision has been made to note that Alternative 3 would include underground parking, but in a smaller amount than provided under the proposed project.

The project site is on the Cortese list as a result of leaking underground storage tanks that previously resulted in soil and groundwater contamination. Groundwater contaminant levels have been reduced through remedial activities and continue to attenuate over time, and most of the contaminated soil was previously removed and replaced with clean artificial fill. Because Alternative 3 would involve a smaller construction footprint and would ~~not~~ involve a smaller subterranean parking garage, there would be a reduced potential for human contact or environmental exposure to contaminated soil or groundwater. Therefore, Alternative 3 would have a lesser level of impact as compared to the proposed project.

### 3.4.12 REVISION TO DISCUSSION OF CODE REQUIREMENT FOR HOUSING

#### RDEIR, PAGE 5-22

A revision has been made to update the discussion of Municipal Code requirement for housing in the discussion of Alternative 3.

Under Alternative 3, approximately 75 percent of the total building space would be devoted to non-residential use and approximately 25 percent of the building space would be allocated for 16 dwelling units. In applications for new development on commercially zoned properties that are 0.5 acre or larger and for which a discretionary permit is required, a residential component is required. Sonoma Municipal Code Section 19.10.020.B.3 addresses this requirement. The residential component should normally comprise at least 50 percent of the total proposed building area~~shall be equal to 100 percent of the floor area of the commercial component~~ according to the Municipal Code. Alternative 3 would require a portion of the residential component to be satisfied through a condition of project approval. This alternative provides twice as many dwelling units as the proposed project~~the payment of an in lieu fee; however, it would include more housing than is proposed as a part of the proposed project~~. While lead agencies typically evaluate consistency with plans and code requirements as a part of an EIR, and while the City has provided a detailed evaluation of consistency in this RDEIR, plan and code consistency is not itself an adverse physical impact on the environment and both this Alternative 3 and the proposed project have no impact.

### 3.4.13 REVISION TO RELATIVE NOISE AND VIBRATION IMPACT OF ALTERNATIVE 3

#### RDEIR, PAGE 5-22

A revision has been made to note that Alternative 3 would include underground parking, but in a smaller amount than provided under the proposed project.

Noise and vibration associated with demolition, site preparation, grading, excavation, and construction would be reduced under Alternative 3 compared to the proposed project. There ~~is~~ would be a reduced need

for excavation ~~for with a smaller~~ subterranean parking garage ~~since surface parking would be provided instead~~ under Alternative 3 compared to the proposed project. The building square footage would be reduced by approximately 24 percent compared with the proposed project and since there is only one building included as a part of Alternative 3, it is possible that the duration of construction could be shorter, reducing the duration of temporary construction-related noise and vibration. Just as with the proposed project, Alternative 3 would implement Mitigation Measures 4.11-1 and 4.11-3, which would reduce temporary construction noise and vibration impacts. Overall, temporary noise and vibration impacts would be reduced under Alternative 3 compared with the proposed project.

### **3.4.14 MINOR LANGUAGE REVISION RELATED TO THE RESIDENTIAL COMPONENT OF ALTERNATIVE 3**

#### **RDEIR, PAGE 5-23**

A revision has been made to language related to the residential component of Alternative 3.

#### TRANSPORTATION

Under Alternative 3, the hotel component would be reduced compared to the proposed project and the residential portion would be increased. This would result in an increase in daily trips associated with residential units and a decrease in daily vehicle trips associated with hotel guests and employees. Under Alternative 3, total VMT would be reduced by approximately 21 percent compared to the proposed project. VMT can be an indicator of an adverse physical environment, such as criteria air pollutant emissions, greenhouse gas emissions, or transportation noise. Alternative 3, like the proposed project, would be consistent with the intent of SB 743 to better align transportation impact analysis and mitigation outcomes with the State's goals to reduce GHG emissions, encourage infill development, and improve public health through more active transportation. Alternative 3 would represent an infill project in the mostly densely developed part of Sonoma with a diverse set of surrounding land uses, adjacent to transit service. Alternative 3 would increase the number of residential units ~~residential component~~ compared with the proposed project. And, as detailed in Section 4.13 (Transportation) the project site is in a traffic analysis zone shown to have residential vehicular travel demand that is 15 percent less per capita compared to the Citywide average. Therefore, increasing the amount of housing in an area that is shown to provide relatively efficient transportation options (15 percent less VMT per capita compared to the Citywide average in the traffic analysis zone that includes the project site) would help to improve transportation efficiency compared to the proposed project. See Section 4.13 of this RDEIR for a more detailed explanation of residential generated travel demand. Alternative 3 would reduce non-residential daily VMT by approximately 35 percent, when compared with the proposed project. As detailed in RDEIR Section 4.13, while mitigation imposed on the proposed project would substantially reduce non-residential VMT, the City cannot demonstrate with available evidence at this time that the reduction would decrease non-residential VMT by 15 percent relative to a comparison hotel of the same size. Since VMT effects are evaluated according to the relative transportation efficiency, Alternative 3 would reduce this impact when compared with the proposed project.

### **3.4.15 A TYPO HAS BEEN FIXED IN THE DISCUSSION OF UTILITIES EFFECTS OF ALTERNATIVE 3**

#### **RDEIR, PAGE 5-24**

A typo has been fixed.

Redevelopment of the project site under both Alternative 3 and the proposed project would result in environmental impacts related to demolishing the existing on-site infrastructure and redeveloping the on-site utilities infrastructure to serve the new development. Under Alternative 3, a smaller amount of redevelopment of the site would occur as compared to the proposed project, and therefore Alternative 3 would have a lesser level of impact, as compared to the proposed project, related to the relocation or the construction of new or expanded utilities and service systems facilities, the construction of which could cause significant environmental effects.

### **3.4.16 THE DISCUSSION OF MUNICIPAL CODE REQUIREMENTS FOR HOUSING HAS BEEN REVISED FOR ALTERNATIVE 4**

#### **RDEIR, PAGE 5-29**

The land use and planning discussion related to Alternative 4 has been revised to update the requirements for housing.

#### LAND USE AND PLANNING

Under Alternative 4, no residential land uses would be developed. In applications for new development on commercially zoned properties that are 0.5 acre or larger and for which a discretionary permit is required, a residential component is required. Sonoma Municipal Code Section 19.10.020.B.3 addresses this requirement. The residential component should normally comprise at least 50 percent of the total proposed building area shall be equal to 100 percent of the floor area of the commercial component according to the Municipal Code. Alternative 4 would not provide any on-site housing. The Planning Commission could address this issue through a waiver or reduction of the residential component or applicable condition of approval and therefore would require approval by the Planning Commission for the residential component to be satisfied through the payment of an in lieu fee. However, while lead agencies typically evaluate consistency with plans and code requirements as a part of an EIR, and while the City has provided a detailed evaluation of consistency in this RDEIR, plan and code consistency is not itself an adverse physical impact on the environment and this Alternative 4 and the proposed project will have no impact.

### **3.4.17 REVISION TO RELATIVE AIR QUALITY IMPACT OF ALTERNATIVE 5**

#### **RDEIR, PAGE 5-32**

A revision has been made to note that Alternative 5 would include underground parking, but in a smaller amount than provided under the proposed project.



Alternative 5 occupies a smaller total building footprint and would not include the construction of a residential building. The duration of construction could be slightly shorter under this alternative, but demolition and construction would involve similar types of equipment. Due to the elimination of the residential component, and the reduced need for excavation since there would be ~~no~~ a smaller subterranean parking garage, Alternative 5 would have slightly reduced impacts associated with potential generation of temporary, short-term, construction-related emissions of criteria pollutants and precursors, when compared with proposed project.

### **3.4.18 REVISION TO RELATIVE CULTURAL RESOURCES IMPACT OF ALTERNATIVE 5**

#### **RDEIR, PAGE 5-33**

A revision has been made to note that Alternative 5 would include underground parking, but in a smaller amount than provided under the proposed project.

Since the project site has been previously developed and is almost completely covered with impervious surfaces, ground-disturbing activities associated with the prior construction likely already disturbed or resulted in the discovery of any archeological resources, including Native American human remains, that may have existed on the site. If any previously unknown resources were encountered during construction activities associated with either Alternative 5 or the proposed project, implementation of Mitigation Measure 4.5-2, along with required compliance with California Health and Safety Code sections 7050.5 and 7052 and California Public Resources Code section 5097, would reduce the impacts under both Alternative 5 to a less than significant level. Because Alternative 5 would have a smaller construction footprint, minus the residential building, and because Alternative 5 would ~~not~~ have a smaller underground ~~require a parking~~ garage, this alternative would have a reduced potential impact on previously unknown buried archaeological resources, including Native American human remains, as compared to the proposed project.

### **3.4.19 REVISION TO RELATIVE GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES IMPACT OF ALTERNATIVE 5**

#### **RDEIR, PAGE 5-33**

A revision has been made to note that Alternative 5 would include more space for loading compared to the proposed project.

The potential for soil erosion resulting from construction of both Alternative 5 and the proposed project would be reduced through implementation of the required SWPPP and associated BMPs specifically designed to reduce stormwater runoff and associated sediment transport. Without the residential building, the amount of construction under Alternative 5 would be reduced, including the construction of a smaller subterranean parking garage ~~though with the addition of on site loading and surface parking compared to the proposed project.~~ However, as both Alternative 5 and the proposed project require implementation of a SWPPP and associated BMPs to reduce stormwater runoff and associated sediment transport, the impact related to soil erosion would be similar to that under the proposed project.

## **RDEIR, PAGE 5-34**

A revision has been made to note that Alternative 5 would include underground parking, but in a smaller amount than provided under the proposed project.

Paleontologically sensitive Pleistocene-age alluvial deposits are present at the project site below the artificial fill, to depths of at least 40 feet below the ground surface. Excavation associated with both Alternative 5 and the proposed project would occur in these paleontologically sensitive materials and could destroy unique paleontological resources. Implementation of Mitigation Measure 4.6-4 would reduce the impacts under both Alternative 5 and the proposed project to a less than significant level. Because Alternative 5 would ~~not~~ require a reduced amount of excavation ~~for~~ with a smaller a subterranean parking garage, this alternative would have a reduced level of impact related to potential destruction of unique paleontological resources as compared to the proposed project.

### **3.4.20 REVISION TO RELATIVE GREENHOUSE GAS EMISSIONS IMPACT OF ALTERNATIVE 5**

## **RDEIR, PAGE 5-34**

A revision has been made to note that Alternative 5 would include underground parking, but in a smaller amount than provided under the proposed project.

Alternative 5 includes only hotel uses with fewer hotel rooms. With the reduced amount of building construction and ~~the elimination of a~~ smaller subterranean parking garage, the total amount of greenhouse gas emissions during construction would be reduced compared to the proposed project.

### **3.4.21 REVISION TO RELATIVE HAZARDS IMPACT OF ALTERNATIVE 5**

## **RDEIR, PAGE 5-35**

A revision has been made to note that Alternative 5 would include underground parking, but in a smaller amount than provided under the proposed project.

The project site is on the Cortese list as a result of leaking underground storage tanks that previously resulted in soil and groundwater contamination. Groundwater contaminant levels have been reduced through remedial activities and continue to attenuate over time, and most of the contaminated soil was previously removed and replaced with clean artificial fill. Because Alternative 5 would ~~not~~ include a reduced amount of excavation for a smaller subterranean parking garage, there would be a reduced potential for human contact or environmental exposure to contaminated soil or groundwater as compared to the proposed project.

### **3.4.22 THE DISCUSSION OF MUNICIPAL CODE REQUIREMENTS FOR HOUSING HAS BEEN REVISED FOR ALTERNATIVE 5**

#### **RDEIR, PAGE 5-35**

The land use and planning discussion related to Alternative 5 has been revised to update the requirements for housing and to correct the reference to Alternative 5.

#### LAND USE AND PLANNING

Under Alternative 5, no residential land uses would be developed. In applications for new development on commercially zoned properties that are 0.5 acre or larger and for which a discretionary permit is required, a residential component is required. Sonoma Municipal Code Section 19.10.020.B.3 addresses this requirement. The residential component should normally comprise at least 50 percent of the total proposed building area ~~shall be equal to 100 percent of the floor area of the commercial component according to the Municipal Code.~~ Alternative 4 5 would not provide any on-site housing and therefore would require approval by the Planning Commission for the residential component to be satisfied through ~~the payment of an in-lieu fee or a waiver or applicable condition of approval.~~ However, while lead agencies typically evaluate consistency with plans and code requirements as a part of an EIR, and while the City has provided a detailed evaluation of consistency in this RDEIR, plan and code consistency is not itself an adverse physical impact on the environment and this Alternative 4 5 and the proposed project will have no impact.

### **3.4.23 REVISION TO RELATIVE NOISE AND VIBRATION IMPACT OF ALTERNATIVE 5**

#### **RDEIR, PAGE 5-35**

A revision has been made to note that Alternative 5 would include underground parking, but in a smaller amount than provided under the proposed project.

Noise and vibration associated with demolition, site preparation, grading, and construction would be reduced under Alternative 5 compared to the proposed project. The scale of development is reduced, there ~~is~~ would be a smaller ~~no~~ subterranean parking garage, and there would be a reduced need for building construction. The building square footage would be reduced by approximately 24 percent compared with the proposed project and it is possible that the duration of construction could be slightly shorter, reducing the duration of temporary construction-related noise and vibration. Just as with the proposed project, Alternative 5 would implement Mitigation Measures 4.11-1 and 4.11-3, which would reduce temporary construction noise and vibration impacts. Overall, temporary noise and vibration impacts would be reduced under Alternative 5 compared with the proposed project.

### **3.4.24 REVISION TO UTILITIES IMPACT OF ALTERNATIVE 5**

#### **RDEIR, PAGE 5-38**

A revision has been made to fix a minor typo and add clarity.

Both Alternative 5 and the proposed project would result in an increased demand for wastewater conveyance capacity compared to baseline conditions as a result of project site redevelopment, and

therefore would result in a similar requirement to consult with SVCSD and to provide evidence of availability of wastewater conveyance capacity to the City prior to issuance of building permits. Implementation of Mitigation Measure 4.14-3 would reduce the impacts for both Alternative 5 and the proposed project to a less-than-significant level. Based on the reduced number of employees and the lack of permanent residents under Alternative 5, the wastewater demand would be reduced by approximately 32 percent compared with the proposed project. Because Alternative 5 would result in a reduced demand for sewer conveyance capacity as compared to the proposed project, Alternative 5 would have a reduced level of impact.

### 3.4.25 REVISION TO ALTERNATIVES SUMMARY TABLE 5-1

#### RDEIR, PAGE 5-38:

The conclusion for Alternative 2 utilities impact has been changed from similar to reduced.

**Table 5-1. Comparison of Impacts of the Alternatives to the Proposed Project**

Environmental Topic Area	Alternative 1: No Project	Alternative 2: Hotel/Residential (50%/50%)	Alternative 3: Hotel/Residential (75%/25%)	Alternative 4: Hotel Only Alternative	Alternative 5: Fewer Hotel Rooms Alternative
<b>Aesthetics</b>	Reduced	Similar	Similar	Similar	Similar
<b>Air Quality</b>	Reduced	Reduced	Reduced	Reduced	Reduced
<b>Biological Resources</b>	Reduced	Similar	Similar	Similar	Similar
<b>Cultural and Tribal Cultural Resources</b>	Reduced	Similar	Reduced	Reduced	Reduced
<b>Geology, Soils, and Paleontological Resources</b>	Reduced	Similar	Reduced	Similar	Reduced
<b>Greenhouse Gas Emissions and Energy</b>	Reduced	Reduced	Reduced	Reduced	Reduced
<b>Hazards and Hazardous Materials</b>	Reduced	Similar	Reduced	Reduced	Reduced
<b>Hydrology and Water Quality</b>	Reduced	Similar	Reduced	Reduced	Reduced
<b>Land Use and Planning</b>	Similar	Similar	Similar	Similar	Similar
<b>Noise and Vibration</b>	Reduced	Reduced	Reduced	Reduced	Reduced
<b>Public Services</b>	Reduced	Similar	Similar	Similar	Similar
<b>Transportation</b>	Reduced	Reduced	Reduced	Increased	Increased
<b>Utilities and Service Systems</b>	Reduced	<del>Similar</del> Reduced	Reduced	Reduced	Reduced

Environmental Topic Area	Alternative 1: No Project	Alternative 2: Hotel/Residential I (50%/50%)	Alternative 3: Hotel/Residential I (75%/25%)	Alternative 4: Hotel Only Alternative	Alternative 5: Fewer Hotel Rooms Alternative
<b>Total Reduced Impact Topics</b>	12	4	9	7	8

Source: Data Compiled by AECOM in 2023

## 3.5 OTHER CEQA CONSIDERATIONS

### 3.5.1 REVISION TO ABBREVIATION FOR TOXIC AIR CONTAMINANTS

#### RDEIR, PAGE 6-8:

The abbreviation for toxic air contaminants has been changed from “TOC” to “TAC.”.

#### Hazardous Materials Within One-Quarter Mile of a School

There is one existing K–12 school within 0.25 mile of the project site, and there may be schools within 0.25 mile of the other projects considered in this cumulative analysis. The primary exposure pathway of concern for children at nearby schools is through the inhalation of air contaminants, such as particulate matter. As discussed above, hazardous materials used during construction and operation of both the proposed project and the related cumulative projects must be managed in accordance with applicable laws and regulations, and since none of the projects would involve the use of acutely hazardous materials, a hazard to human health including school children would not occur. Furthermore, given the small size of the proposed project, it was determined that construction-generated toxic air contaminants (~~TOCs~~TACs) would not represent a hazard at a distance of 0.2 mile from the project site where the St. Francis Solano Catholic School is located. Given the relatively small size of the other projects considered in this cumulative analysis, even if those project sites are within 0.25 mile of a school, it is unlikely they would result in the generation of enough ~~TOCs~~TACs to represent a human health hazard. Therefore, a cumulatively significant impact would not occur, and the project’s impact related to use or emissions of hazardous materials within 0.25 mile of a school would be less than cumulatively considerable.

### 3.5.2 CORRECTION OF A TYPO

#### RDEIR, PAGE 6-9:

The word “be” has been added to correct a typo.

#### HYDROLOGY AND WATER QUALITY

The geographic context for hydrology and water quality consists of the Fryer Creek subwatershed, which discharges south into Nathanson Creek and then into Sonoma Creek. The project site is approximately 1.24 acres located in the developed urbanized Downtown area of Sonoma. The site is currently almost completely covered with impervious surfaces consisting of existing buildings and paved parking lots. The proposed redevelopment at the project site would result in a similar amount of impervious surfaces as compared to existing conditions, and therefore would not increase stormwater runoff or result in reduced groundwater recharge. The existing on-site stormwater drainage system would be reconfigured to serve



the proposed redevelopment, and would include biofiltration planters and a rainwater catchment system. The project site is not in a flood zone, and because the amount of impervious surfaces would not increase, the proposed project would not increase the potential for on-site or off-site flooding. Project-related construction activities must comply with the SWRCB's NPDES Construction General Permit, which requires development of a SWPPP and implementation of BMPs specifically designed to reduce erosion and prevent pollutant transport, thereby protecting water quality. All of the other projects considered in this cumulative analysis are also required to comply with the SWRCB's NPDES Construction General Plan and to design and operate individual projects in compliance NPDES MS4 permit requirements. Therefore, the project's cumulative impacts related to hydrology and water quality would be less than cumulatively considerable.

### **3.5.3 CHANGE REFERENCE TO LAW ENFORCEMENT INSTEAD OF FIRE PROTECTION**

#### **RDEIR, PAGE 6-13:**

The reference to fire protection services has been corrected to law enforcement services.

#### Law Enforcement Services

The geographic context for fire protection services consists of the Sonoma Police Department (SPD) service area. The proposed project, in combination with other development within the SPD service area, would incrementally increase the demand for law enforcement ~~fire protection~~ services. Law enforcement services are funded by property taxes, development impact fees, and potentially other mechanisms. The City reviews development impact fees yearly and adjusts as necessary to adequately fund police protection services. The proposed project has been reviewed by SPD, which has indicated that the project would not require the SPD to construct new facilities or expand existing facilities in order to accommodate the project's demand for police protection services and maintain acceptable service ratios, response times, or other performance objectives. Therefore, the proposed project would have a less than cumulatively considerable impact related to law enforcement services.

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Appendix A  
Radius Turn Diagrams



**HOTEL PROJECT  
SONOMA**

Sonoma, CA

**Kenwood  
Investments LLC**

REVISIONS

No.	Description	Date

**PROJECT SUBMITTAL  
SEPTEMBER 20, 2023**

ORIGINALLY SUBMITTED AUGUST 2021,  
UPDATED MARCH, MAY AND  
SEPTEMBER 2023

Sheet Title

**RADIUS TURN  
DIAGRAMS**

Drawn By Author Checked By Checker

Scale:

Date:  
09/20/2023

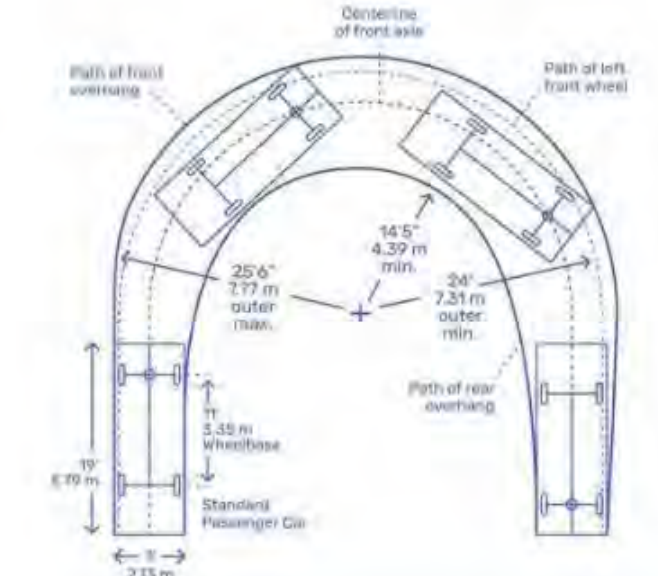
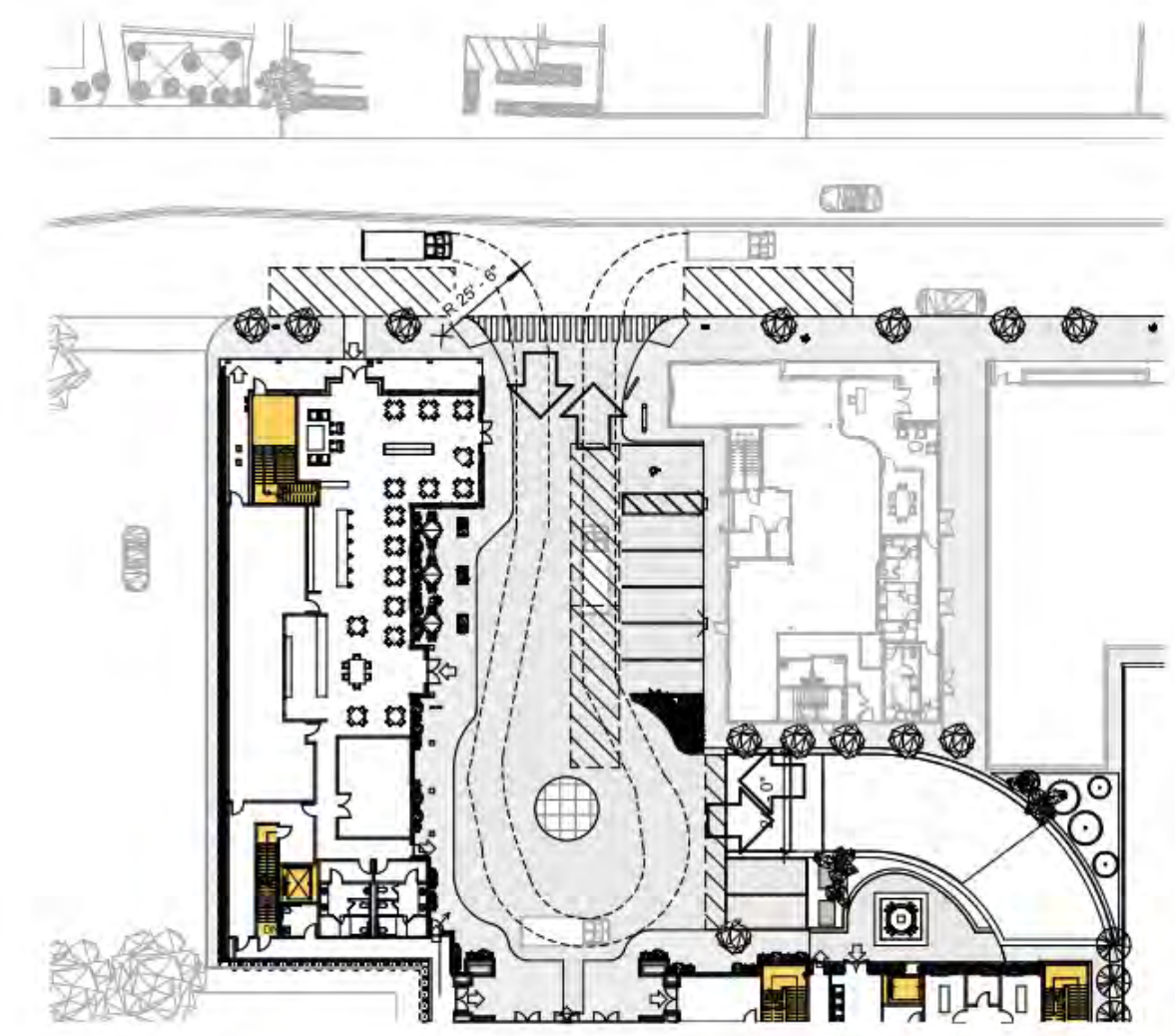
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**A4.01**

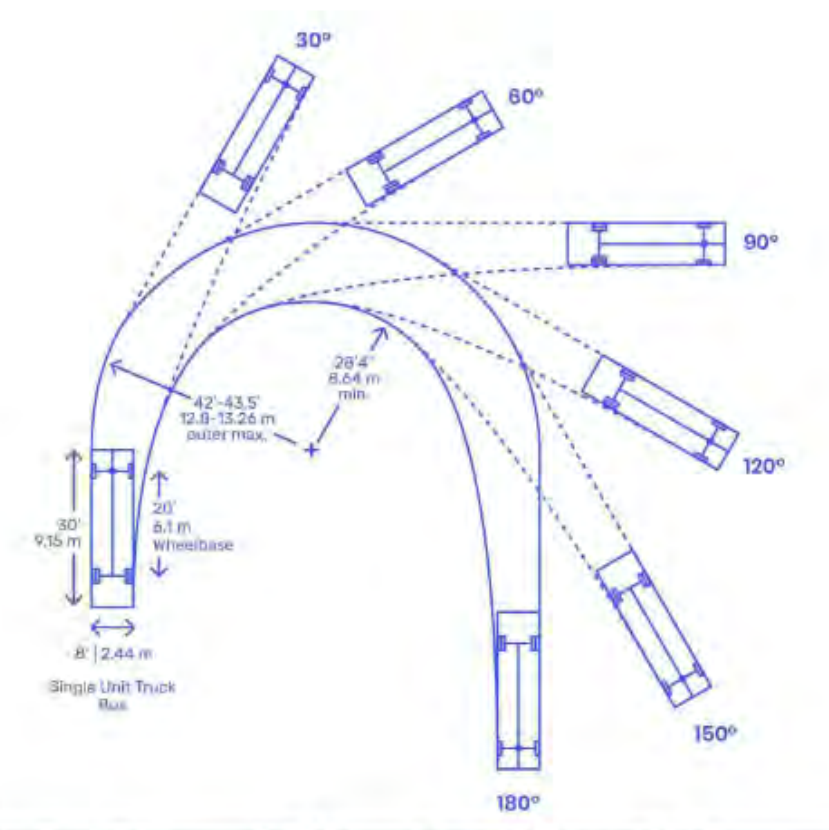
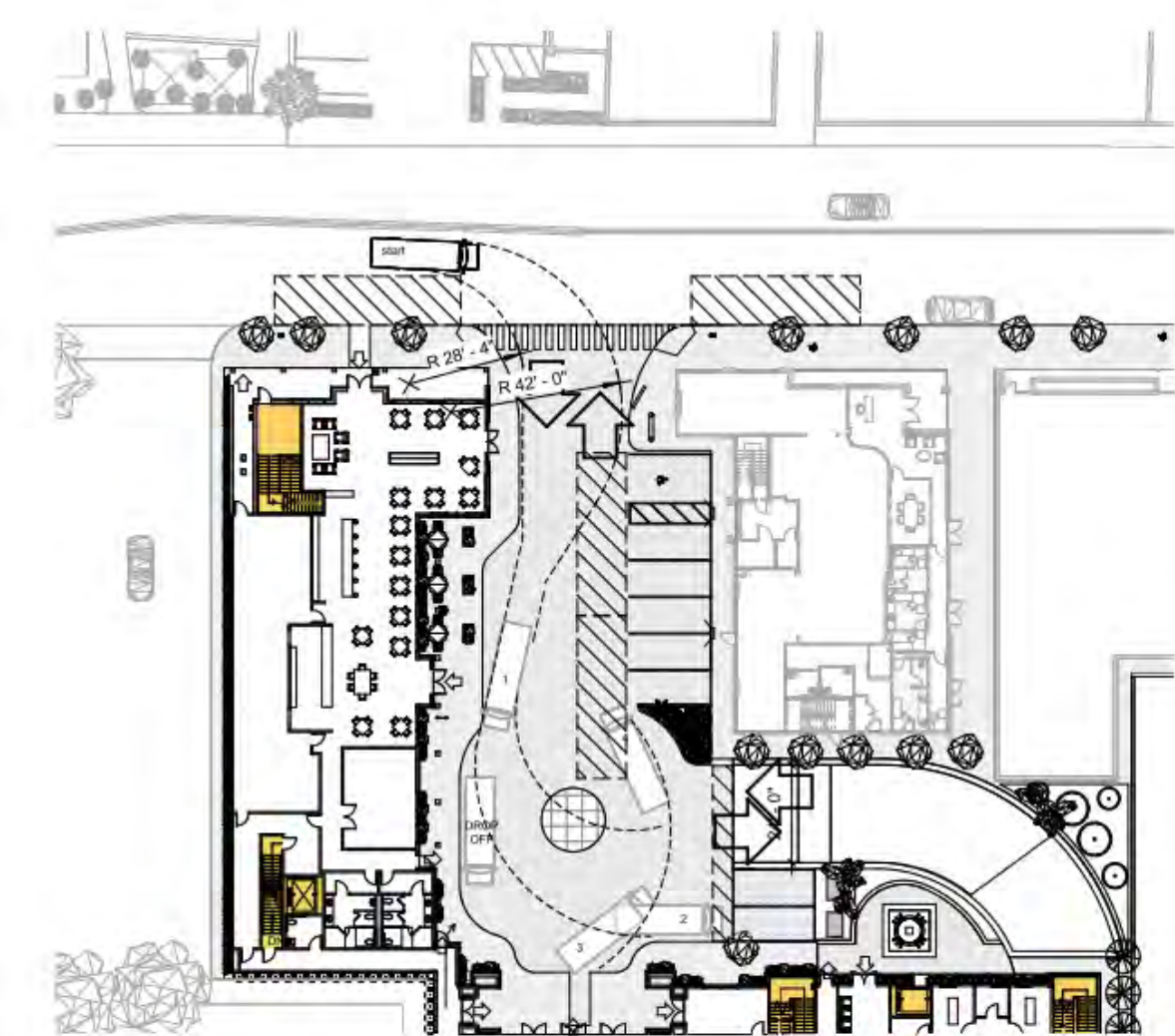
Drawing No.

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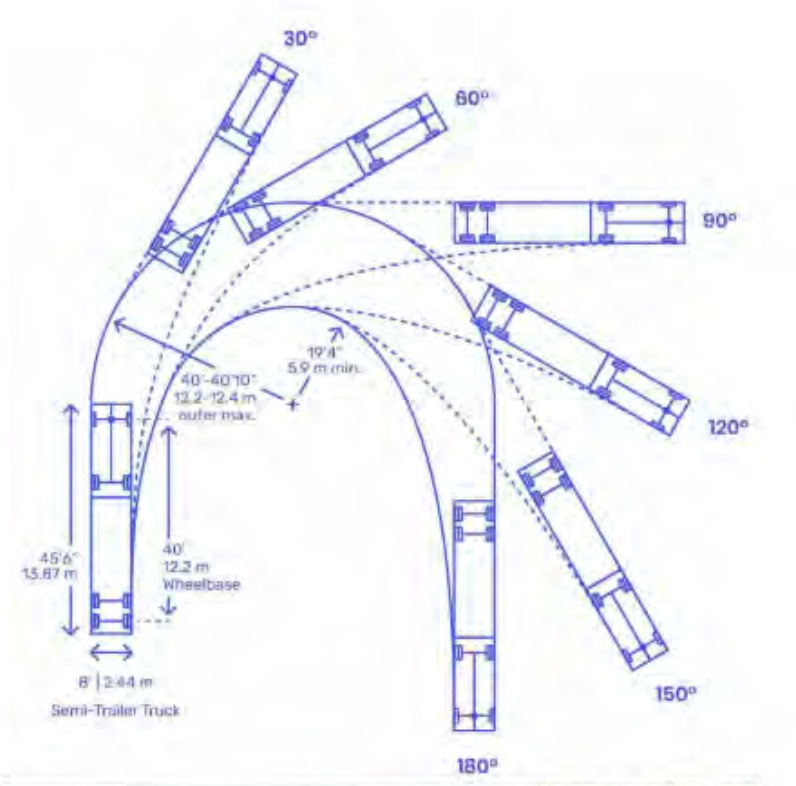
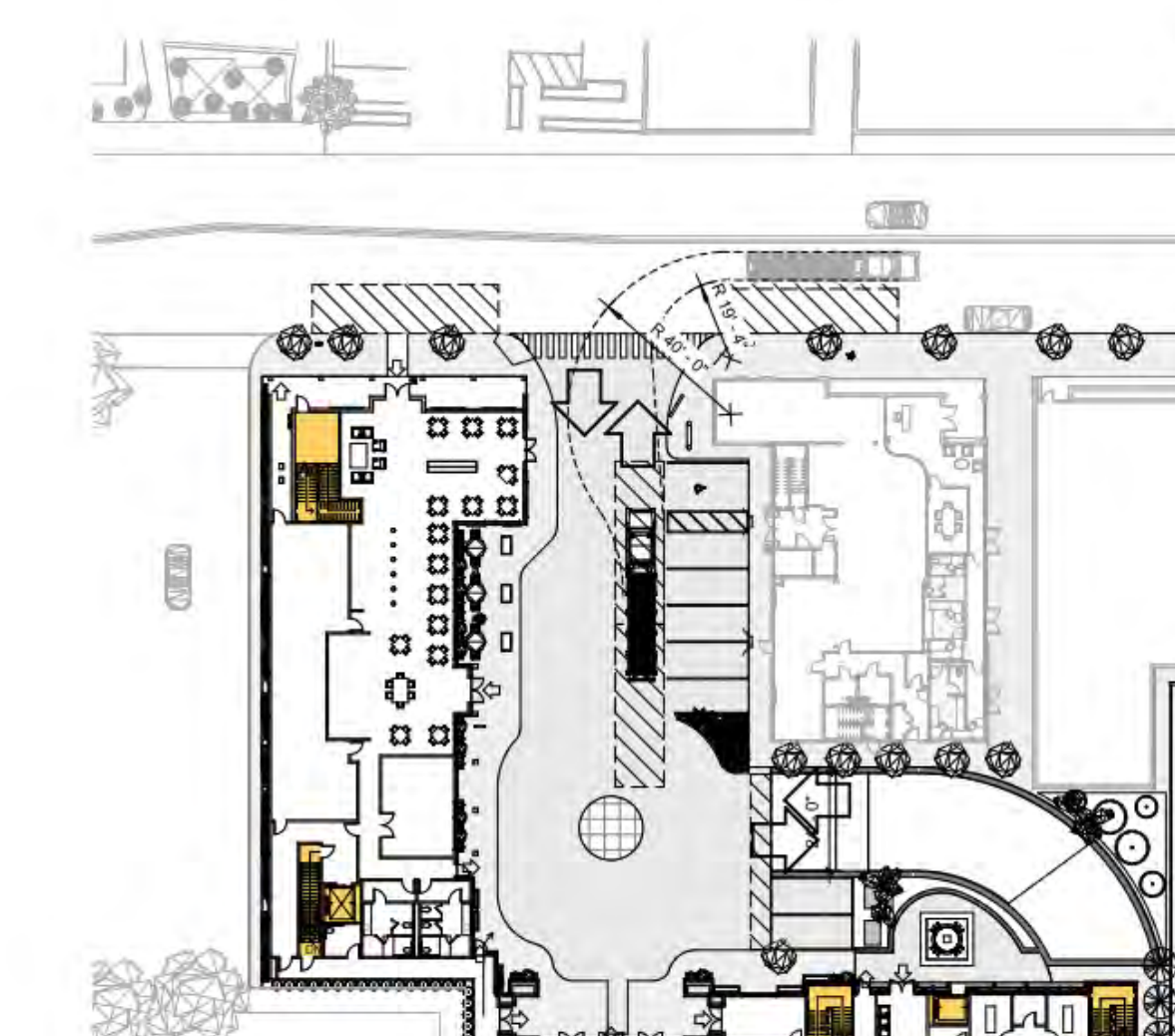
Not For Construction



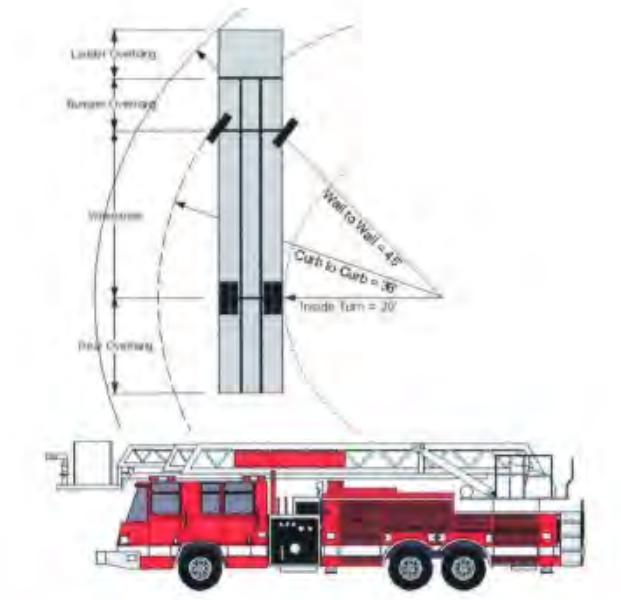
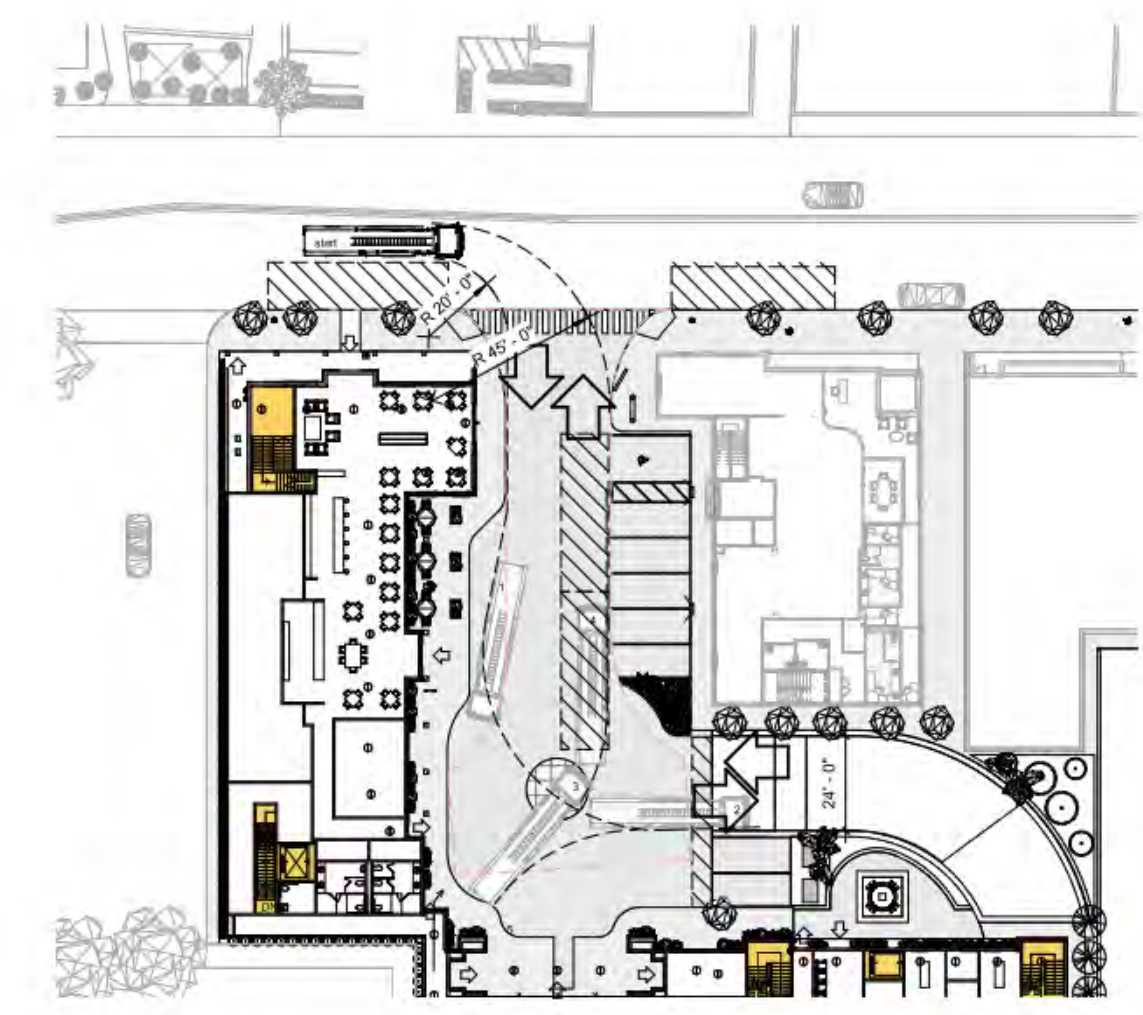
19' BOX TRUCK



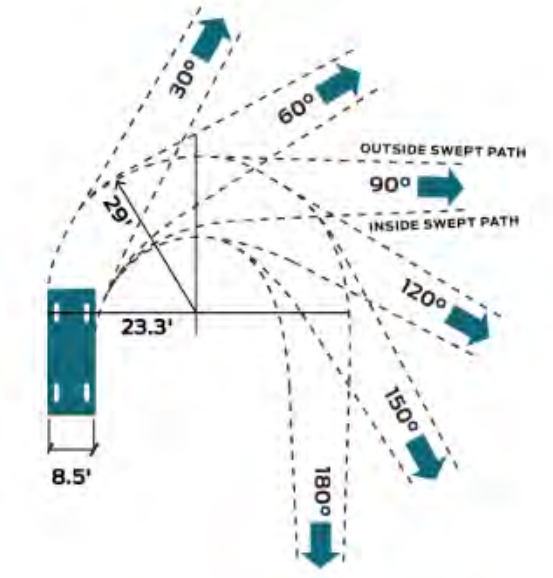
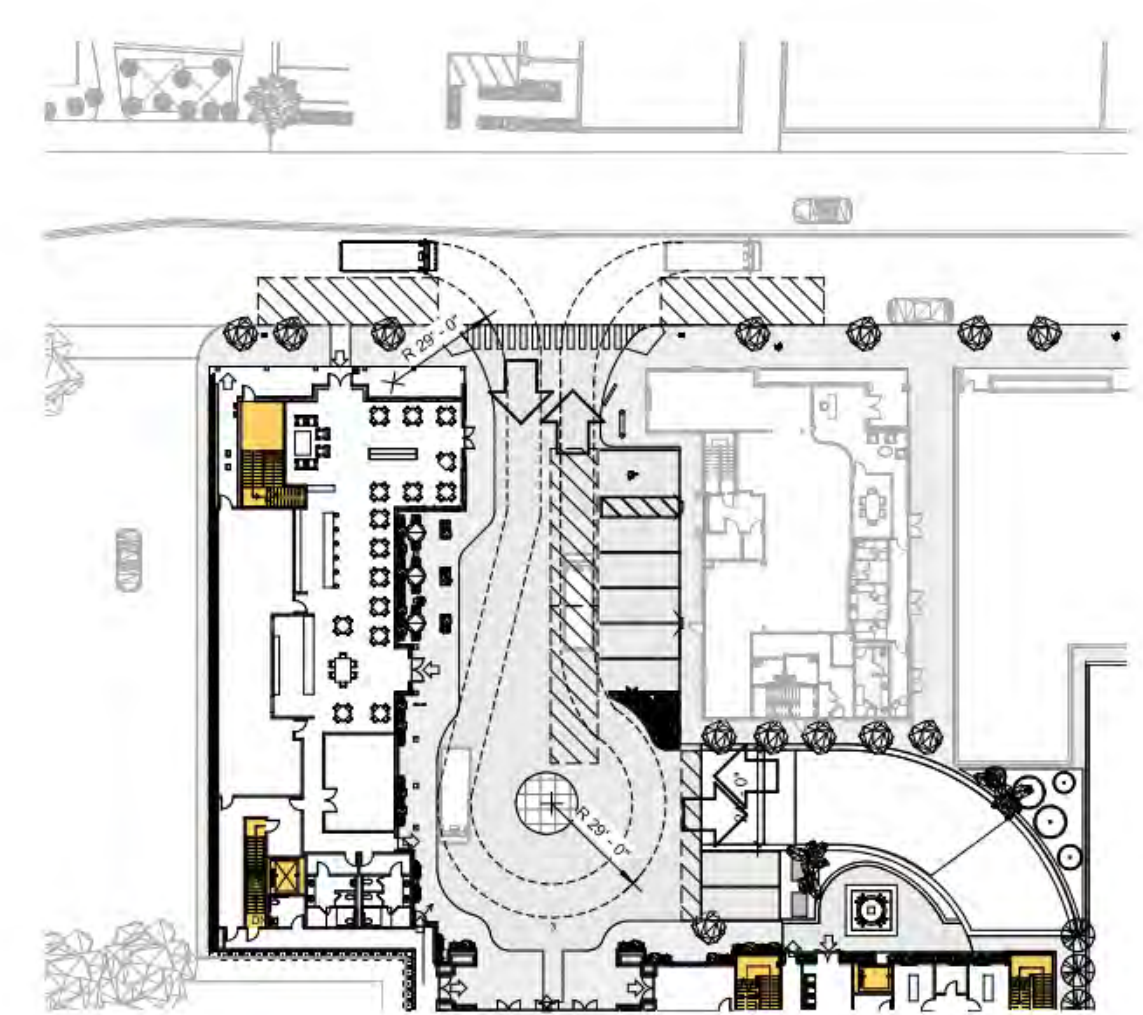
27' - 30' BUS



42' SEMI-TRUCK



LADDER TRUCK



UPS TRUCK