



filed via e-mail

November 8, 2023

Attn. Eric Gage, Planner
County of Sonoma Permit and Resource Management Department
2550 Ventura Avenue, Santa Rosa, CA 95403
email: Eric.Gage@sonoma-county.org

RE: Comments on PLP23-0021 Referral Packet for Hanna Center

Dear Mr. Gage,

The Valley of the Moon Alliance (VOTMA) has reviewed the PLP23-0021 Completeness Referral Packet (Packet) dated October 25, 2023 regarding the proposed Hanna Center project and submits the following comments and requests for your consideration.

Overall Size and Density of the Project

In general, VOTMA believes the project is too large in its context with the surrounding area. Additionally, its housing component is too dense. The average number of housing units per net acre within the 5 lots of this project is 16.82 units/net acre. That is very dense living which will bring excessive traffic, congestion, interference with wildfire evacuations, noise, etc. and is not compatible with the surrounding uses.

Traffic

Item 3.F in Section A of the Proposal Statement indicates that there would be 4,398 vehicle trips on weekdays. Combined with the vehicle traffic from the redevelopment of the Sonoma Developmental Center (SDC) and regular residential daily traffic, this addition of 4,398 vehicles per day is a lot. Because a cumulative traffic study has not been made available, VOTMA is unable to put the 4,398 trips in context to the increased traffic that will be generated at this project.

It is unclear what the aggregate population of this development is projected to be.

This is relevant, both with respect to the types of commercial uses planned (markets and pharmacies in particular), and to the vehicle miles travelled demands.

The Circulation Plan in Section B calls for ten entrance/exit driveways along the two fronts, with three of them located very close to the roundabout. Consequently, we can envision a rather congested area at the roundabout with many cars entering and exiting near the southwest corner of the development.

The memory care and assisted living area component is also likely to experience a lot of visits from the closest fire department at the Hwy 12-Agua Caliente Road intersection. There would be no area for those emergency vehicles to easily stage their responses without blocking traffic on Arnold Drive or West Agua Caliente Road. That is a common issue for senior residential units and it does not seem to have been addressed in the Proposal Statement. These concerns also apply to the adult day care site.

VOTMA requests that the traffic and wildfire evacuation study, including its assumptions for development at SDC, be made available for our review.

Water Supply

Item 3.I in Section A of the Proposal Statement does not mention whether the water supply demand from redevelopment at the SDC was considered in the Valley of the Moon Water District's (VOMWD) determination that it also would be capable of supplying water to the Hanna Center project. The water supply needs for existing VOMWD customers should be prioritized and guaranteed before the needs of new customers, such as those at this Hanna Housing project, are considered.

Wastewater Treatment

Item 3.K in Section A of the Proposal Statement does not explicitly mention whether the sewage treatment demand from redevelopment at the SDC was considered in the Sonoma Valley County Sanitation District's (SVCSD) and Sonoma Water's determinations that their systems would have adequate hydraulic and treatment capacity for sewage generated at the Hanna Center project. The sewage treatment needs for existing Sonoma Water customers should be prioritized and guaranteed before the needs of new customers, such as those at this Hanna Housing project, are considered.

Builder's Remedy

We understand that Hanna has submitted this project as a "Builder's Remedy" project under SB330. The Builder's Remedy is sometimes used as a way for developers to bypass zoning laws and to override the safeguards put in place by members of the community. SB330 shortens the timeline for public review but it does not preclude members of the community from commenting on the potential impacts of applying the builder's remedy. Hanna's assertion that its proposed project conforms to SB330 needs to be confirmed by the County. Has it been approved under SB330 and on what basis?

Zoning

Presently, the entire property is zoned PF - Public Facility. Based on the Proposal Statement, it appears that none of the development proposed is designed to be a public facility, such that the entire venture would be a for-profit establishment. Or would the property be divided up and rezoned? We are particularly interested in who will own the buildings on the property in areas zoned as PF and which buildings will be owned by Hanna Center. We understand that Hanna has no experience with for-profit uses and that the project is intended only to enhance Hanna's finances, which warrants that the project goals be refined.

Onsite Wetlands

The Tree & Wetland Protection Plan in Section B shows the setbacks for the wetlands that would be preserved. In some cases (e.g., wetlands SW-9, SW-19 and SW-20), there is little or no setback shown for parts of those wetlands. Since those wetlands may be partly supported by sheet-flow runoff into the wetlands from their adjacent uplands, the wetland's hydrology could be adversely affected. We recommend that the project footprint be revised to accommodate an adequate setback.

We have the following comments on the wetland delineation component of the Biological Assessment (BA) (Attachment H of Section A):

- 1) **U.S. Army Corps of Engineers Jurisdiction.** The extent of Waters of the United States including wetlands that is regulated by the U.S. Army Corps of Engineers (USACE) under the Clean Water Act has changed since the preliminary jurisdictional determination (found in Attachment C of the BA) was issued for the project site in September 2018. The most recent among these changes is the definition of Waters of the United States as described in the January 18, 2023 Federal Register. Since the extent of the USACE regulation under the current definition of Waters of the United States may

- have changed since the 2018 preliminary jurisdictional determination was issued, we recommend that the wetland delineation map be reviewed and revised as needed and, if necessary, a revised jurisdictional determination be requested from the USACE.
- 2) **State Water Resources Control Board Jurisdiction.** Around the time that the BA was prepared, the State Water Resources Control Board (SWRCB) generally relied on wetland delineation maps prepared for federal Clean Water Act permitting as a proxy for the extent of state wetland jurisdiction, since at the time there was no single accepted definition of wetlands at the state level. However, in April 2019, the State Water Board adopted Resolution No. 2019-0015, "State Wetland Definition and Procedures [Procedures] for Discharges of Dredged or Fill Material to Waters of the State". As there are differences between the regulated extent of wetlands under the Procedures and the current definition of Waters of the United States, we recommend that a revised wetland delineation map showing both USACE-regulated Waters and SWRCB-regulated wetlands be prepared and that a revised jurisdictional determination be requested from the USACE, and that concurrence of the mapping be obtained from the Regional Water Quality Control Board.
 - 3) **Small Parcel West of Arnold Drive.** The small parcel on the western side of Arnold Drive was not included in the BA, nor is it included on the USACE preliminary jurisdictional determination map in Attachment C of the BA. Aerial photo evidence suggests that a seasonal wetland may exist in the eastern side of that parcel. This observation is confirmed by a mapped wetland shown on various map sheets in the Proposal Statement, such as Sheet B4. Accordingly, VOTMA recommends that the USACE/SWRCB wetland delineation map be revised to include any wetlands on that parcel and, if necessary, a revised jurisdictional determination be requested from the USACE and SWRCB.

Thank you for considering VOTMA's comments.

Kathy Pons, President
Valley of the Moon Alliance
Board of Directors