

**Johanna M. Patri
P. O. Box 604
Sonoma, CA, 95476**

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Delivered via email to: Brian Oh, Comprehensive Planning Manager, Brian.Oh@sonoma-county.org

Please Distribute

TO: Permit Sonoma, Sonoma County Planning Commissioners, and Board of Supervisors

RE: Comment Letter on the Adequacy of the Sonoma Developmental Center Specific Plan Draft Environmental Impact Report

Introduction

Please address the following questions and issues regarding the analyses contained in the Sonoma Developmental Center Specific Plan Draft Environmental Impact Report (DEIR) and its compliance with the California Environmental Quality Act (CEQA).

Project Description

While the DEIR may satisfy Section 15124 of the CEQA Guidelines under Section 2 Project Description, the project description is the foundation upon which environmental analysis is constructed and the DEIR project description is inadequate.

The DEIR project description does not contain enough detailed information or all of the components of the project as identified in the Specific Plan as required by CEQA provisions and case law to allow the public, reader, or decision makers to understand thoroughly the components of the project and the types and intensities of the project's environmental effects and impacts.

How does the DEIR adequately address all the components and potential environmental impacts of the project as the DEIR project description contains only conceptual and board-stroked project concepts?

Explain why most of the DEIR project description refers to historical facilities, data, infrastructure, conditions and assumptions, including, but not limited to: e.g.

2.1.2.2 Transportation: Does not include any project description for proposed or additional local or regional public transportation to serve the proposed total buildout of approximately 2,400 residents and 940 jobs – approximately twice the population of current Glen Ellen, CA.

2.1.2.4 Utility Infrastructure:

- Wastewater: ends with “assuming that additional connections can be made to the main sewer line at the south side of the site” with no verifiable conclusions;
- Stormwater: refers to “additional measures will ensure” is speculative without describing what those measures are or would be;
- Natural Gas and Electricity: refers to a system of distributed energy resourced (DERS) that could include solar, wind, geothermal, and methane gas co-generation is

speculative without specifics; such facilities as wind machines, solar arrays, and geothermal systems cannot be evaluated, quantified, or analyzed.

2.1.3.1 SDC Core Campus: If all new development is proposed to be located in the already previously developed Core Campus, where in the project description are activities associated with demolition including a demolition plan, travel routes for off-haul, disposable sites, recycling, etc.?

The DEIR does not have sufficient information in the project description about the actions and activities that would occur under the proposed project and is misleading and incomplete to enable the public and decision makers to understand the logic and facts that link the proposed project to the intensity of the project and the environmental impact conclusions contained in the DEIR.

When is construction of the proposed project expected to be initiated; how long will it take to complete construction; when would project operations, occupancy, use begin?

What is the quantitative measure of the intensity of each component? e.g.

- square footage of commercial space;
- width and linear feet of new roadways;
- number and size of windmills or solar arrays;
- limits and quantities of grading, including material imported or exported

What is the expected schedule and details for the phases of build-out?

Hotel Overlay Zone Allowing for a 120-room Hotel

Where in the DEIR is the project description and analysis of the proposed 120-room hotel, including, but not necessarily limited to:

VMT Analysis: The DEIR states: "Given the programmatic nature of the Proposed Plan, all potential future development within the Proposed Plan boundaries is included in the VMT analysis." Where is the analysis and data for tourist traffic?

Housing Allocations and Build-out Population

The DEIR states: "According to the Final 2023-2031 RHNA, ABAG has determined that unincorporated Sonoma County's fair share of regional housing needs for the 2023 to 2331 period would be 3,881 units. Approximately 1,632 of these units would be allocated as housing affordable to very low- and low-income households." This is a ratio of approximately 42% of housing needs allocated to very low- and low-income households as determined by ABAG.

The Specific Plan proposes a total buildout of 1,000 housing units, but it appears that only 283 units are designated as low-income housing units or a ratio of approximately 28% units are low-income housing units. How does the DEIR justify this allocation given the counties need for housing very low- and low-income households?

How does the DEIR justify a build-out population of 2,400, twice the size of the current population of Glen Ellen?

Future and Additional Environmental Review Analysis Under CEQA Provisions with Mitigation Measures and a Verifiable Mitigation Monitoring Plan

The proposed Sonoma Developmental Center Specific Plan provides a vision for the future possibilities of development in the defined planning area and utilizes a Programmatic EIR. While Government Code section 65457 may exempt from further CEQA requirements, subject to certain exceptions, residential development projects if they are consistent with a specific plan for which an EIR has been certified, it does not exempt other types of development such as commercial and recreational development.

What additional environmental review will be required for all the commercial, retail, educational, medical, office, administration, tourist-serving, and recreational development components as proposed in the Sonoma Developmental Center Specific Plan?

Provisions and Analyses of Adequate Alternatives to the Project.

While CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed, an EIR must describe a reasonable range of alternatives to the project that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project. The DEIR fails to provide and evaluate a reasonable range of alternatives with meaningful detail analysis.

Why is an alternative project that best fits the Glen Ellen and Sonoma Valley communities not evaluated? This would consist of a smaller project with a more robust equation of affordable housing units over market-rate housing, elimination of any hotel project and reducing commercial development as these types of development exist in nearby communities.

While tourism may seem to have a positive impact on employment opportunities and revenue to governmental jurisdiction coffers, the effects of the tourist industry as it regards the distribution of revenue among the different social groups must be analyzed. The DEIR fails to analyze the impacts of tourism on the environment, the wildlife resources and income inequality.

An Alternative Project must be presented and analyzed with more educational and community facilities and benefits resulting in higher-paying job opportunities with the goal of effective economic distribution policies designed to improve the living standards of the work force.

How does the DEIR justify a development model, which consists primarily of lower-income paying jobs with no provisions that ensure employee housing on the Sonoma Development Center campus and would require those workers to live outside of the community and commute long distances, as a worthy or sustainable model.

Why are not:

- a reduced Development Alternative project with a minimum of 50% affordable housing; and
- an Historic Preservation Alternative Project

prepared with a sufficient degree of analyses to provide decision makers with information that enables them to evaluate and review environmental, aesthetic and community-oriented superior projects thoroughly? Where is the substantiated, quantifiable, and verifiable evidence, data, and analyses in the DEIR that the project objectives cannot be met with reduced development and robust historic preservation of the existing campus?

Are not the outlined objectives broad enough that a reasonable, less impacting range of alternative projects can be analyzed?

Travel Demand Management Plan (TDMP)

Transportation Mobility and Access Goal 3-1 and Policy 3-4.2 are totally inadequate to address the provisions for an effective TDMP.

The DEIR does not provide an adequate and verifiable Travel Demand Management Plan (TDMP) with Best Employer-Based Practices and Implementations as encouraged by Caltrans to significantly reduce Vehicle Miles Traveled (VMT) and reduce green-house gases and improve air quality by providing employees with:

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

Evaluation of Vehicle Miles Traveled (VMT) for Hotel Visitors

The Technical Advisory on Evaluating Transportation Impacts in CEQA (April 2018) makes a clear distinction between “Trip-based” and “Tour-based” assessments of Vehicle Miles Traveled (VMT). The DEIR fails to assess VMT of Hotel Visitors. “A tour-based assessment counts the entire home-back-to-home tour that includes the project... a tour-based assessment of VMT is a more complete characterization of a project’s effect on VMT. The DEIR fails to make any attempt to use such “tour-based” methods for hotel visitors.

Because the proposed Specific Plan would enable a new hotel project, the DEIR must include and analyze all visitor trips from their beginning, ending at the hotel, and back home, as these trips are 100% “project induced”.

The DEIR fails to address the job-housing-vehicle miles traveled crises of Sonoma Valley, which is an example of why the State passed in 2013, SB743. It reflects a State Legislative mandate to more appropriately address the regional picture of traffic congestion management related to development and reduction of GHG emissions because of Vehicle Miles Traveled.

The DEIR fails to analyze Vehicle Miles Traveled (VMT) and promote the State’s smart mobility goals, thereby aligning with the County’s long-range transportation plans and reduction of greenhouse gases.

The DEIR fails to analyze traffic and the increase in VMT in sync with Caltrans’ mission, vision, and goals to reduce statewide vehicle miles traveled (VMT) and to promote the State’s smart mobility goals with only the availability of Arnold Drive, which bisects the Town of Glen Ellen.

Conclusion

The DEIR does not adhere to the basic principal of CEQA, which is simple: design, shape, and analyze the total project and sufficient alternatives to avoid significant impacts before deciding to certify an EIR and subsequently approve a project.

The DEIR fails CEQA provisions which require the analysis and shaping of a project in quantifiable terms, not assumptions. Figuring it out later after certification of an EIR is neither a sound approach for the decision makers, the Lead Agency, the State, nor likely a defensible approach under CEQA.

Thank you for your consideration and responses.

Respectfully submitted,

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