

City of Sonoma

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September 22, 2022

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County of Sonoma
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RE: Comments on the Specific Plan and Draft Environmental Impact report (DEIR) for the Sonoma Developmental Center (SDC)

Thank you for the opportunity to comment on the Specific Plan and related Draft Environmental Impact Report for the Sonoma Developmental Center, both dated August 2022.

On behalf of the City of Sonoma, we provide the following comments as you finalize the Specific Plan document and Final Environmental Impact report (FEIR):

1. The City of Sonoma continues to support a robust affordable housing plan for the project and a supportive non-housing development program. The non-residential component of the project should include institutional, research and development, office, and other creative uses focused on sustainability and climate solutions-focused enterprises, non-profit organizations, and businesses. Small-commercial uses—such as restaurants, cafés, and small retail uses—to support neighborhood needs and walkable lifestyles are also supported by the City.
2. The City of Sonoma supports visitor and community-serving uses such as meeting and event facilities (conference center, etc.,) **but does not support** a hotel use or Hospitality Overlay Zone as this type of use does not provide living wage jobs and increases the Valley's dependence on low wage workers who have little potential for finding housing which in turn exacerbates traffic impacts. The City of Sonoma supports economic generators in the project that provide a substantially better base for employment and that can generate follow-on businesses locally and throughout the state (i.e., provide quality jobs and serve the people of Sonoma Valley and California).
3. The City of Sonoma supports public, and community uses, such as a museum honoring the legacy of the site and Sonoma's Native People, community center or gathering and recreational spaces, emergency command center, fire station, educational uses, and social support services. As such, the City supports the environmentally superior alternative analyzed in the DEIR - the "Historic Preservation Alternative". This should be the project approved in the Specific Plan by the Board of Supervisors as it achieves a "higher level of historic preservation with a focus on adaptively reusing existing buildings to the maximum extent while achieving the goals for co-locating housing and employment and limiting development to within the current footprint of the SDC facility (Core Campus)". Further, the Historic Preservation Alternative incorporates existing sustainable features of the Proposed Plan and does not include a new connection to Highway 12. Adoption of the Historic

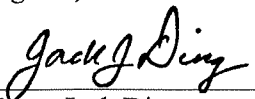
Preservation Alternative “could result in a slightly lower VMT per capita than the Proposed Plan, thereby modestly reducing the significant VMT impact. Without the new roadway and associated lane miles, there would be no potential for induced travel and VMT associated with increases in roadway capacity. As a result, the significant impact associated with induced VMT would be eliminated. The Historic Preservation Alternative would lessen VMT impacts by eliminating the potential for induced travel and may also modestly reduce the projected residential VMT per capita”.

4. Based on the requirements of CEQA, the analysis of transportation impacts in the DEIR is limited to the analysis of Vehicle Miles Travelled (VMT) in and around the project site (which is in and of itself a “Significant and Unavoidable impact” based on the Proposed Project). Level of Service (LOS) is no longer the test to analyze traffic impacts. The City of Sonoma still does not know and understand the traffic impacts upon our community regardless of the development plan chosen by the Board of Supervisors. This is because there is no “street segment” or “intersection” analysis for the City to review in the DEIR (for the reasons previously explained) as there was in the “Alternatives Report”, dated November, 2021. And even with such analysis provided in the Alternatives Report, the nearest segment analysis to the City limits along Highway 12 was from Boyes Boulevard to Verano Avenue, which currently operates at LOS E and will worsen to LOS F with any project developed at the SDC. The Alternatives Report states the following on page 64:

“The segment of SR 12 between Boyes Boulevard and Verano Avenue, however, currently operates poorly in the LOS E range and would be expected to fall to the LOS F range with all three alternatives. This roadway segment passes through the Springs communities, serving as their main street, and has high levels of pedestrian and bicycle activity as well as vehicular movements to and from side streets. Neither Caltrans nor the County of Sonoma intend to widen the corridor to increase auto capacity and are instead focusing efforts on shifting more auto travel to non-auto modes including walking, biking, and transit.” We request the Specific Plan call for other measures to reduce traffic to and from SDC- like shuttle and like developing Arnold Drive with bike lanes, walking paths etc.

The County Board of Supervisors must understand that under any development scenario chosen for the SDC, the City of Sonoma will be impacted. But to what extent we do not know. The City respectfully requests that the Board of Supervisors approve the environmentally superior alternative and eliminate the hotel overlay zone component as presently constituted.

Regards,



Mayor Jack Ding
City of Sonoma

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