

October 2016 | Final EIR



Hotel Project Sonoma Final EIR

for the City of Sonoma

October 2016 | Final EIR

Prepared By:

PlaceWorks

1625 Shattuck Avenue, Suite 300

Berkeley, California 94709

510.848.3815

510.848.4315 (f)

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for the City of Sonoma

SCH # 2015062041

In Association With:

CSW/ Stuber-Stroeh Engineering Group

H.T. Harvey and Associates

Knapp Architects

Tom Origer and Associates

W-Trans Traffic Engineering Consultants

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1. Introduction

1.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

This document provides responses to comments received on the Draft Environmental Impact Report (Draft EIR) for the proposed Hotel Project Sonoma. The Draft EIR identified significant impacts associated with the proposed Plan, and examined alternatives and recommended mitigation measures that could avoid or reduce potential impacts.

This document, together with the Draft EIR, will constitute the Final EIR if the City of Sonoma Planning Commission certifies it as complete and adequate under the California Environmental Quality Act (CEQA).

1.2 ENVIRONMENTAL REVIEW PROCESS

According to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a proposed project, and to provide the general public with an opportunity to comment on the Draft EIR. This Final EIR has been prepared to respond to comments received on the Draft EIR. A Notice of Preparation of an EIR was issued by the City on June 15, 2015 for a required 30-day review period. The Draft EIR was made available for public review from January 26, 2016 through March 10, 2016. The Draft EIR was distributed to local, regional, and State agencies and the general public was advised of the availability of the Draft EIR. Copies of the Draft EIR were made available for review to interested parties at:

- City Hall at No. 1 The Plaza, Sonoma
- Sonoma Valley Regional Library, 744 West Napa Street, Sonoma
- The City's website at <http://www.sonomacity.org/News.aspx>

The 45-day public comment period ended on March 10, 2016. Copies of all written comments received on the Draft EIR are contained in this document. These comments and responses to these comments are laid out in Chapter 5, Comments and Responses, of this Final EIR.

The Final EIR will be presented to the City of Sonoma for potential certification as the environmental document for the Project. All persons who commented on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearing before the City.

All response to comments submitted on the Draft EIR by agencies will be provided to those agencies at least 10 days prior to the final action on the Project. The Planning Commission will make findings

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regarding the extent and nature of the impacts as presented in the Final EIR. The Final EIR will need to be certified as complete by the City prior to making a decision to approve or deny the Project. Public input is encouraged at all public hearings before the City.

After the Planning Commission certifies the Final EIR, it will also consider the Project itself, which it may approve, deny, or approve with conditions. The Planning Commission may require the mitigation measures specified in this Draft EIR as conditions of Project approval, and it may also require other feasible mitigation measures. Alternatively, the Planning Commission may find that the mitigation measures are outside of the jurisdiction of the City to implement, or that there is no feasible mitigation measure(s) for a given significant impact. In the latter case, the Planning Commission may nonetheless determine that the Project is necessary or desirable due to specific overriding considerations, including economic factors, and may approve the Project despite an unavoidable, significant impact.

1.3 REPORT ORGANIZATION

This document is organized into the following chapters:

- **Chapter 1: Introduction.** This chapter discusses the use and organization of this Response to Comments Document.
- **Chapter 2: Executive Summary.** This chapter is a summary of the conclusions of the Draft EIR and the Response to Comments Document.
- **Chapter 3: Revisions to the Draft EIR.** Additional corrections to the text and graphics of the Draft EIR are contained in this chapter. Underline text represents language that has been added to the EIR; text with ~~striethrough~~ has been deleted from the EIR.
- **Chapter 4: List of Commenters.** Names of agencies and individuals who commented on the Draft EIR are included in this chapter.
- **Chapter 5: Comments and Responses.** This chapter lists the comments received from agencies and the public on the Draft EIR, and provides responses to those comments.
- **Appendices.** The appendices for this document contain the following supporting documents:
 - Appendix N: Comment Letters
 - Appendix O: Phase I Environmental Site Assessment
 - Appendix P: Trip Generation Study
 - Appendix Q: Photo Simulations and Peer Review Memorandum

2. Executive Summary

This summary presents an overview of the proposed Hotel Project Sonoma, herein referred to as “Project.” This executive summary also provides a summary of the alternatives to the Project, identifies issues to be resolved, areas of controversy, and conclusions of the analysis contained in Chapters 4.1 through 4.11, of this Draft Environmental Impact Report (Draft EIR). For a complete description of the Project, please see Chapter 3, Project Description, of this Draft EIR. For a discussion of Project Alternatives, please see Chapter 6, Alternatives to the Project.

This Draft EIR addresses the environmental effects associated with the implementation of the Project. The California Environmental Quality Act (CEQA) requires that local government agencies, prior to taking action on projects over which they have discretionary approval authority, consider environmental consequences of such projects. An EIR is a public document designed to provide the public, local, and State governmental agency decision-makers with an analysis of potential environmental consequences to support informed decision-making.

This Draft EIR has been prepared pursuant to the requirements of CEQA¹ and the State CEQA Guidelines² to determine if approval of the identified discretionary actions and related subsequent development could have a significant impact on the environment. The City of Sonoma, as the Lead Agency, has reviewed and revised as necessary submitted drafts, technical studies, and reports to reflect its own independent judgment, including reliance on applicable City technical personnel and review of all technical subconsultant reports. Information for this Draft EIR was obtained from on-site field observations; discussions with affected agencies; analysis of adopted plans and policies; review of available studies, reports, data, and similar literature in the public domain; and specialized environmental assessments (e.g. air quality, greenhouse gas emissions, noise, geotechnical and transportation and traffic).

2.1 ENVIRONMENTAL PROCEDURES

The Draft EIR has been prepared to assess the environmental effects associated with implementation of the Project, as well as anticipated future discretionary actions and approvals. The six main objectives of this document as established by CEQA are:

¹ California Public Resources Code, Division 13, Section 2100, et seq.

² Title 14 of the California Code of Regulations, Division 6, Chapter 3, Section 15000, et seq.

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- To disclose to decision-makers and the public the significant environmental effects of proposed activities.
- To identify ways to avoid or reduce environmental damage.
- To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
- To disclose to the public reasons for agency approval of projects with significant environmental effects.
- To foster interagency coordination in the review of projects.
- To enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation identified in the CEQA statute and in the CEQA Guidelines. It provides the information needed to assess the environmental consequences of a proposed project, to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts. An EIR is also one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the lead agency must consider the information contained in the EIR, determine whether the EIR was properly prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a Statement of Overriding Considerations if the proposed project would result in significant impacts that cannot be avoided.

2.2 REPORT ORGANIZATION

2.2.1 DRAFT EIR DOCUMENT ORGANIZATION

The Draft EIR is organized into the following chapters:

- **Chapter 1: Executive Summary.** Summarizes Project location, overview, and environmental consequences that would result from implementation of the Project, describes recommended mitigation measures, and indicates level of significance of environmental impacts before and after mitigation.
- **Chapter 2: Introduction.** Provides an overview of the Draft EIR document.
- **Chapter 3: Project Description.** Describes the Project in detail, including the Project site location and characteristics, Project objectives, and the structural and technical elements of the proposed action.

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- **Chapter 4: Environmental Analysis.** Provides a description of the existing environmental setting, an analysis of the potential direct, indirect, and cumulative environmental impacts of the Project, and presents recommended mitigation measures intended to reduce their significance.
- **Chapter 5: Significant and Unavoidable Adverse Impacts.** Describes the significant unavoidable adverse impacts of the Project.
- **Chapter 6: Alternatives to the Project.** Considers three alternatives to the Project, including the CEQA-required “No Project Alternative.”
- **Chapter 7: CEQA Mandated Sections.** Discussed growth inducement, unavoidable significant effects, and significant irreversible changes as a result of the Project.
- **Chapter 8: Organizations and Persons Consulted.** Identifies the preparers of this Draft EIR.
- **Appendices.** The appendices for this document contain the following supporting documents:
 - Appendix A: Notice of Preparation and Scoping Comments
 - Appendix B: Initial Study
 - Appendix C: Arborist Report
 - Appendix D: Air Quality and Greenhouse Gas Modeling
 - Appendix E: Health Risk Assessment
 - Appendix F: Bat Roosting Habitat Assessment and Impact Report
 - Appendix G: Historic Resource Evaluation
 - Appendix H: Sonoma Hotel Records Search
 - Appendix I: Design Level Geotechnical Investigation
 - Appendix J: Noise Monitoring and Modeling Data
 - Appendix K: Technical Traffic Appendix
 - Appendix L: Water Analysis
 - Appendix M: Sewer Analysis

2.2.2 FINAL EIR DOCUMENT ORGANIZATION

This Final EIR document is organized into the following chapters:

- **Chapter 1: Introduction.** This chapter discusses the use and organization of this Response to Comments Document.
- **Chapter 2: Executive Summary.** This chapter is a summary of the conclusions of the Draft EIR and the Response to Comments Document.
- **Chapter 3: Revisions to the Draft EIR.** Additional corrections to the text and graphics of the Draft EIR are contained in this chapter. Underline text represents language that has been added to the EIR; text with ~~strikethrough~~ has been deleted from the EIR.
- **Chapter 4: List of Commenters.** Names of agencies and individuals who commented on the Draft EIR are included in this chapter.

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- **Chapter 5: Comments and Responses.** This chapter lists the comments received from agencies and the public on the Draft EIR, and provides responses to those comments.
- **Appendices.** The appendices for this document contain the following supporting documents:
 - Appendix N: Comment Letters
 - Appendix O: Phase I Environmental Site Assessment
 - Appendix P: Trip Generation Study
 - Appendix Q: Photo Simulations and Peer Review Memorandum

2.3 TYPE AND PURPOSE OF THIS EIR

This EIR has been prepared in accordance with the California Environmental Quality Act (CEQA) with the City of Sonoma as the Lead Agency. This Draft EIR assesses the potential environmental consequences of implementing the Project, and identifies Mitigation Measures and Alternatives to the Project that would avoid or reduce significant impacts. This Draft EIR is intended to inform City decision-makers, other responsible agencies, and the general public as to the nature of the Project's potential environmental impacts.

2.4 PROJECT LOCATION

In general, the Project site is located near the southwest corner of the Sonoma Plaza in the City of Sonoma, California, approximately 40 miles north of San Francisco. The Project is located within the block bounded by Highway 12 (West Napa Street) to the north, First Street West to the east, Andrieux Street to the south, and Second Street West to the west, with regional vehicular access to the Project site provided via West Napa Street.

2.5 PROJECT SUMMARY

Kenwood Investments, LLC (Project Applicant) is proposing a 62-room hotel, 80-seat restaurant, and spa, along with 115 on-site parking spaces, located on West Napa Street in Sonoma, California, on a 54,000-square-foot lot (1.24 acres). At build-out, the Project would include a total hotel building area of 67,478 square feet,³ a 37,655-square-foot basement parking garage, and 26,962 square feet of exterior courtyards, surface parking areas, and patio areas. Additionally, the Project would include landscaped street trees in raised planters along West Napa Street, First Street West, and throughout the Project site, as well as raised planter beds.

³ Excludes square footage of basement parking garage and exterior courtyards.

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The principle components of the Project are listed below. A detailed description of the project, including maps and figures is included in Chapter 3, Project Description:

- **Demolition and Site Preparation.** The existing metal warehouse, 153 West Napa Street building, ancillary structures (i.e. sheds), and existing parking lots would be demolished and removed to accommodate the Project. In total, approximately 15,412 square feet of building space would be demolished, and approximately 30,000 square feet of existing hardscape would be removed consisting of surface lots and other paved surfaces.
- **Hotel-Restaurant Building.** The hotel restaurant building would consist of a three-story, 21,281-square-foot building fronting West Napa Street and would include an 80-seat ground floor restaurant with two upper floors consisting of 20 guestrooms.
- **Main Hotel Building.** The main hotel building would consist of a three-story, 44,417-square-foot building constructed around two exterior garden courtyards. This building would include a public lobby, guest reception, two upper floors consisting of 39 guestrooms, a spa with six treatment rooms, three first-floor accessible guestrooms, and a fitness center.
- **First Street West Service Support Building.** The 1,780-square-foot building would include the swimming pool mechanical room, the emergency generator room, one service elevator to the garage, a pool refreshment service counter, storage, and exit stairs.
- **Hotel Basement Parking Garage/Surface Parking.** The 37,655-square-foot basement parking garage would include parking for 94 vehicles utilizing a managed valet parking system, and provide other building support, such as delivery and storage space. Additionally, the Project would include 21 on-site surface parking spaces, for a total parking capacity of 115.
- **Exterior Courtyard.** The Project would be constructed around three exterior courtyards, including the hotel plaza courtyard, a sheltered lobby courtyard, and a raised swimming pool veranda area. The courtyards would be landscaped with raised planting beds, and tree wells would be irrigated with captured, stored, and recycled rain water.
- **Pedestrian Circulation.** The Project is planned to be pedestrian oriented by encouraging hotel guests to park their vehicles for the duration of their stay and walk or bike in and around the Sonoma Plaza area. Guest vehicles would enter the site via West Napa Street, and drop-off would occur in an area set back from West Napa Street to avoid the potential for traffic back up along West Napa Street. During non-peak traffic periods, departing guests would exit right onto West Napa Street, and during weekday evening peak traffic periods (4:00 p.m. and 6:00 p.m.) and weekend midday peak hours (12:00 noon and 2:00 p.m.) guests would depart via a one-way vehicle ramp from the parking garage onto First Street West.
- **Architectural Design.** The Project is expected to complement Sonoma's vernacular style and character by incorporating three primary Sonoma architectural patterns, including the use of gabled thick walled buildings parallel to the street, the creation of exterior timber arcades at the sidewalk, and overhanging sheltered roofs. Please see Chapter 3, Project Description, of this Draft EIR for more details on architectural design, including materials and scale and height of the Project.

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- **Sustainable LEED Certified Design.** The Project would be constructed to meet Leadership in Energy and Environmental Design (LEED) Certification requirements by incorporating several sustainability components throughout construction and operation of the Hotel. Please see Chapter 3 of this Draft EIR for a list of sustainability components which could be incorporated into the design.

- **Parking and Deliveries.** The Project would provide a total of 115 on-site vehicle parking spaces, consisting of 94 parking spaces in the basement parking garage, (31 of which would be managed by valet staff), and 21 surface parking spaces. Parking capacity in the basement parking garage will be maximized through the use of a combination of 90 degree stalls, and stacked tandem spaces.

Large truck deliveries would be staged from the street on First Street West, similar to how other businesses in the area receive deliveries.

Small truck or van deliveries would take place inside the basement parking garage at the service core receiving area. Three service elevators are provided in the hotel to efficiently facilitate the vertical transfer of deliveries inside the hotel. Designation of a truck loading zone on First Street West located adjacent to the basement parking garage entry is being requested as part of the Project's Use Permit Application.

- **Landscaping.** The Project proposes three exterior courtyards, including the hotel courtyard plaza, a courtyard adjoining the hotel lobby, and a courtyard where the swimming pool and spa pool are located. Additional landscaping includes street trees in raised planters along West Napa Street, First Street West, and throughout the Project site, as well as raised planter beds. In order to accommodate the Project, mature trees are proposed to be removed; however, they would be replaced on a one-for-one basis. More detail is provided in Chapter 3 of this Draft EIR.
- **Stormwater.** The Project site would remain connected to the City's storm drain system, and is expected to capture, store and reuse rainwater to support landscape irrigation.
- **Water Supply.** Potable water will be provided to the Project site through existing connections.
- **Sanitary Sewer Service.** Sanitary sewer service would continue to be provided through existing connections.
- **Utilities and Services.** Electricity and natural gas would be supplied to the Project site by Pacific Gas & Electric (PG&E). Solid waste recycling service for the City of Sonoma is provided by Sonoma Garbage Collectors.

2.6 SUMMARY OF ALTERNATIVES TO THE PROJECT

2.6.1 NO-PROJECT ALTERNATIVE

Consistent with Section 15126.6(e)(2) of the CEQA Guidelines, under the No Project Alternative, the Project site would remain in its existing condition and the existing layout would remain unchanged.

2.6.2 NO RESTAURANT ALTERNATIVE

Under the No Restaurant Alternative, the Project components would remain the same as described in Chapter 3, Project Description; however, the 80-seat restaurant would no longer be constructed. Under this alternative, the square-footage, location, number of hotel rooms, and general layout of the Project would remain similar as proposed by the Project. Although uses for the area where the restaurant would have been constructed have not been refined, the general use would likely be utilized for hotel operations or additional lobby space.

2.6.3 MITIGATED PROJECT ALTERNATIVE

Under the Mitigated Project Alternative, the Project would incorporate mitigation measures identified throughout the analyses found in Chapters 4.1 through 4.11 of this Draft EIR to lessen the environmental impacts.

2.7 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR identify issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the Project, the major issues to be resolved include decisions by the City of Sonoma, as Lead Agency, related to:

- Whether this Draft EIR adequately describes the environmental impacts of the Project.
- Whether the proposed land use changes are compatible with the character of the existing area.
- Whether the identified mitigation measures should be adopted or modified.
- Whether there are other mitigation measures that should be applied to the Project besides those identified in the Draft EIR.
- Whether there are any alternatives to the Project that would substantially lessen any of the significant impacts of the Project and achieve most of the basic objectives.

2.8 AREAS OF CONTROVERSY

The City of Sonoma issued a Notice of Preparation (NOP) for the EIR on June 15, 2015 and held a public scoping meeting on June 25, 2015 to receive scoping comments. The scoping period for this EIR ran from June 15, 2015 through July 14, 2015, during which time responsible agencies and interested members of the public were invited to submit comments as to the scope and content of the EIR. The comments received focused primarily on aesthetics, air quality, biological resources, groundwater supply, and energy

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conservation. Comments received during the public scoping meeting are included in Appendix A of this Draft EIR.

To the extent that these issues have environmental impacts and to the extent that analysis is required under CEQA, they are addressed in Chapters 4 through 7 of this Draft EIR.

2.9 SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Under CEQA, a significant impact on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance.

The Project has the potential to generate significant environmental impacts in a number of areas. Table 2-1 summarizes the conclusions of the environmental analysis contained in this Draft EIR and presents a summary of impacts and mitigation measures identified. It is organized to correspond with the environmental issues discussed in Chapters 4.1 through 4.11. The table is arranged in four columns: 1) environmental impacts, 2) significance prior to mitigation, 3) mitigation measures, and 4) significance after mitigation. For a complete description of potential impacts, please refer to the specific discussions in Chapters 4.1 through 4.11.

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
AESTHETICS			
AES-1: The Project would not substantially degrade the existing visual character or quality of the site and its surroundings.	LTS	N/A	N/A
AES-2: The Project, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to aesthetics.	LTS	N/A	N/A
AIR QUALITY			
AIR-1: The Project would result in fugitive dust generated during construction activities.	S	<p data-bbox="911 740 1713 826">AIR-1: The Project’s construction contractor shall comply with the following BAAQMD Best Management Practices for reducing construction emissions of PM₁₀ and PM_{2.5}:</p> <ul style="list-style-type: none"> <li data-bbox="911 834 1713 976">▪ Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible. <li data-bbox="911 984 1713 1065">▪ Pave, apply water twice daily or as often as necessary, to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. <li data-bbox="911 1073 1713 1154">▪ Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer). <li data-bbox="911 1162 1713 1243">▪ Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, with water sweepers all paved access roads, parking areas and staging areas at the construction site to control dust. <li data-bbox="911 1252 1713 1333">▪ Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material. <li data-bbox="911 1341 1656 1365">▪ Hydroseed or apply non-toxic soil stabilizers to inactive construction areas. <li data-bbox="911 1373 1665 1416">▪ Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed 	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		stockpiles (dirt, sand, etc.). <ul style="list-style-type: none"> ▪ Limit vehicle traffic speeds on unpaved roads to 15 mph. ▪ Replant vegetation in disturbed areas as quickly as possible. ▪ Install sandbags or other erosion control measures to prevent silt runoff from public roadways. 	
AIR-2: The Project would result in construction-related air quality impacts related to fugitive dust and exhaust emissions.	S	AIR-2: Implementation of Mitigation Measure AIR-1 and AIR-3.	LTS
AIR-3: The Project would expose sensitive receptors to elevated concentrations of TACs and PM _{2.5} .	S	AIR-3. The construction contractor shall use construction equipment fitted with Level 3 Diesel Particulate Filters (DPF) for equipment of 50 horsepower or more. The construction contractor shall maintain a list of all operating equipment in use on the Project site for verification by the City of Sonoma Building Department official or their designee. The construction equipment list shall state the makes, models, and number of construction equipment onsite. Equipment shall properly service and maintain construction equipment in accordance with the manufacturer’s recommendations. The construction contractor shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with CARB Rule 2449. Prior to issuance of any construction permit, the construction contractor shall ensure that all construction plans submitted to the City of Sonoma Planning Department and/or Building Department clearly show the requirement for Level 3 DPF for construction equipment over 50 horsepower.	LTS
AIR-4: The Project would contribute to cumulative air quality impacts in the SFBAAB.	S	AIR-4: Implementation of Mitigation Measure AIR-1 and AIR-3.	LTS
BIOLOGICAL RESOURCES			
BIO-1: Implementation of the proposed Project would not have a substantial adverse effect on special status bat species.	LTS	N/A	N/A
BIO-2: Implementation of the proposed Project would not contribute to cumulative impacts in the area related to special status bat species.	LTS	N/A	N/A

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
CULTURAL RESOURCES			
CULT-1: Construction of the Project could alter the historical significance of the Index-Tribune building.	S	CULT-1: To ensure the Index-Tribune building retains its historical significance, the design of the altered rear (south) elevation after demolition of the warehouse additions shall conform to the Secretary of the Interior’s Standards for Rehabilitation. A consultant who meets the Secretary of the Interior’s Professional Qualification Standards for Historic Architecture shall prepare a report on conformance of the design to the Secretary’s Standard. The report and the architectural drawings and specifications for shall be reviewed by the Planning Department and Planning Commission to confirm conformance before final planning approval is granted.	LTS
CULT-2: Construction of the Project could adversely change the significance of an archaeological resource.	S	<p>CULT-2A: The Project shall comply with the following measures during construction of the Project:</p> <ul style="list-style-type: none"> ▪ Once the surface is cleared but before the commencement of construction, a cultural resources survey shall be completed by an archaeologist who meets the Secretary of the Interior’s professional qualifications standards. Additionally, limited subsurface explorations shall be completed through a series of auger hole borings. ▪ If archaeological remains are found, work at the place of discovery shall be halted immediately until a qualified archaeologist can evaluate the finds (Section 15064.5 [f]). <ul style="list-style-type: none"> – Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. – Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps). ▪ If archaeological remains are found and judged potentially significant, a treatment plan shall be developed and executed. ▪ All cultural materials recovered as part of the Hotel Sonoma project shall be 	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		subject to scientific analysis and a report prepared according to current professional standards.	
		CULT-2B: If any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, all work within 50 feet of the resources shall be halted and a qualified archaeologist shall be consulted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, representatives from the City and the archaeologist would meet to determine the appropriate avoidance measures or other appropriate mitigation. All significant cultural materials recovered shall be, as necessary and at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the City shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, Project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) would be instituted. Work may proceed on other parts of the Project site while mitigation for historical resources or unique archaeological resources is being carried out.	
CULT-3: Construction of the Project could directly destroy a unique paleontological resource or site or unique geologic feature.	S	CULT-3: In the event that fossils or fossil-bearing deposits are discovered during construction, excavations within 50 feet of the find shall be temporarily halted or diverted. The contractor shall notify a qualified paleontologist to examine the discovery. The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 1995), evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the Project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the Project based on the qualities that make the resource important. The plan shall be submitted to the City for review and approval prior to implementation.	LTS
CULT-4: The Project would not disturb any human remains, including those interred outside of formal cemeteries.	LTS	N/A	N/A

EXECUTIVE SUMMARY**TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
CULT-5: The Project, in combination with past, present, and reasonably foreseeable projects, would not result in less than significant cumulative impacts with respect to aesthetics.	LTS	N/A	N/A
GEOLOGY, SOILS, AND SEISMICITY			
GEO-1: The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	LTS	N/A	N/A
GEO-2: The Project, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to geology, soils, and seismicity.	LTS	N/A	N/A
GREENHOUSE GAS EMISSIONS			
GHG-1: The Project would not generate greenhouse gas emissions either directly or indirectly, that may have a significant impact on the environment.	LTS	N/A	N/A
GHG-2: The Project, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to GHG emissions.	LTS	N/A	N/A
HYDROLOGY AND WATER QUALITY			
HYDRO-1: The Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would not drop to a level which would not support existing land uses or planned uses for which permits have been granted).	LTS	N/A	N/A

EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
HYDRO-2: The Project, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to hydrology and water quality.	LTS	N/A	N/A
NOISE			
NOISE-1: The Project would expose people to or generate noise levels in excess of standards established in the General Plan and/or the applicable standards of other agencies.	S	NOISE-1: Prior to obtaining building permits, the Project applicant shall submit an acoustic study to the satisfaction of the City planning director to ensure that the Project includes design features to meet the 45 dBA CNEL noise standard at all hotel rooms. The noise study shall estimate the future long-range noise levels at the building façade and calculate the exterior to interior noise reduction at all hotel rooms based on specific construction plans including grading plans, building footprints and architectural plans. The study shall describe specific windows and wall assemblies design and materials so all hotel rooms meet the 45 dbA CNEL noise standard due to exterior noise sources. The project applicant/developer shall implement all recommended design features.	LTS
NOISE-2: Implementation of the Project could result in the exposure of persons to or generation of excessive groundborne vibration during portions of project construction.	S	NOISE-2: During site preparation, demolition, and construction activities , the following controls to reduce potential vibration impacts shall be implemented: <ul style="list-style-type: none"> ▪ The use of vibratory rollers would be prohibited. The construction contractor shall identify alternative soil compaction methods such as static rollers. ▪ To the extent possible, the constructor contractor shall utilize small- to medium-sized bulldozers would produce less vibration than using large bulldozers. ▪ To the extent possible, vibration-intense construction activities should take place during times when nearby sensitive receptors, such as hotels, meeting rooms, and residences are at their lowest utilization/occupancy. ▪ Prior to the issuance of building permits the applicant and/or construction contractor shall inspect and report on the current structural condition of the existing buildings within 50 feet from where vibratory rollers, large bulldozers, and the like would be used. ▪ During construction, if any vibration levels cause cosmetic or structural damage to existing buildings in close proximity to a project site, the applicant shall immediately issue “stop-work” orders to the construction contractor to prevent further damage. Work shall not restart until the building is stabilized and/or 	LTS

EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		<p>preventive measures are implemented to relieve further damage to the building(s).</p> <p>With implementation of the mitigation measures listed above, the Project would reduce potential vibration impacts to less than significant levels.</p>	
<p>NOISE-3: Implementation of the Project would result in a substantial permanent increase in traffic noise levels in the vicinity of the Project site above levels existing without the Project.</p>	<p>LTS</p>	<p>N/A</p>	<p>N/A</p>
<p>NOISE-4: Construction activities associated with buildout of the Project would result in substantial temporary or periodic increases in ambient noise levels in the vicinity of the Project site above existing levels.</p>	<p>S</p>	<p>NOISE-4: The Project shall implement the following measures.</p> <ul style="list-style-type: none"> ▪ Construction equipment shall be well maintained and used judiciously to be as quiet as practical. Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible; ▪ Utilize “quiet” models of air compressors and other stationary noise sources where such technology exists. Select hydraulically- or electrically-powered equipment and avoid pneumatically powered equipment where feasible. Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project demolition or construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used. Quieter procedures shall be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures; ▪ Locate stationary noise-generating equipment as far as possible from sensitive receptors that adjoin construction sites. Construct temporary noise barriers or partial enclosures to acoustically shield such equipment where feasible; ▪ Prohibit unnecessary idling of internal combustion engines; ▪ Prior to initiation of on-site construction-related demolition or earthwork activities, a minimum 12-foot-high temporary sound barrier shall be erected along the Project property line abutting adjacent operational businesses, residences or other noise-sensitive land uses. These temporary sound barriers 	<p>LTS</p>

EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		<p>shall be constructed with sound shielding properties and shall be constructed so that vertical or horizontal gaps are eliminated. These temporary barriers shall remain in place through the construction phase in which heavy construction equipment, such as excavators, dozers, scrapers, loaders, rollers, pavers, and dump trucks, are operating within 50 feet of the edge of the construction site by adjacent sensitive land uses. This measure could lower construction noise levels at adjacent, ground-floor residential units by up to 8 dB, depending on topography and site conditions;</p> <ul style="list-style-type: none"> ▪ To the maximum extent feasible, route construction-related traffic along major roadways and away from sensitive receptors; ▪ Notify all businesses, residences or other noise-sensitive land uses within 500 feet of the perimeter of the construction site of the construction schedule in writing prior to the beginning of construction and prior to each construction phase change that could potentially result in a temporary increase in ambient noise levels in the Project vicinity; ▪ Signs shall be posted at the construction site that include permitted construction days and hours, a day and evening contact number for the job site, and a day and evening contact number for the on-site complaint and enforcement manager, and the City’s Building Official, in the event of problems; ▪ An on-site complaint and enforcement manager shall be available to respond to and track complaints. The manager will be responsible for responding to any complaints regarding construction noise and for coordinating with the adjacent land uses. The manager will determine the cause of any complaints (e.g., starting too early, bad muffler, etc.) and coordinate with the construction team to implement effective measures (considered technically and economically feasible) warranted to correct the problem. The telephone number of the coordinator shall be posted at the construction site and provided to neighbors in a notification letter. The manager shall notify the City’s Building Official of all complaints within 24 hours. The manager will be trained to use a sound level meter and should be available during all construction hours to respond to complaints; and ▪ A pre-construction meeting shall be held with the Building Official and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, 	

EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		etc.) are fully operational. The above mitigation measures shall be identified in construction contracts and acknowledged by the contractor.	
NOISE-5: This Project, in combination with past, present, and reasonably foreseeable projects, would result in less than significant impacts with respect to noise.	LTS	N/A	N/A
PUBLIC SERVICES			
PS-1: The proposed Project would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.	LTS	N/A	N/A
PS-2: The proposed Project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to fire protection services.	LTS	N/A	N/A
PS-3: The proposed Project would not require expanded facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police services.	LTS	N/A	N/A
PS-4: The proposed Project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to police services.	LTS	N/A	N/A
TRANSPORTATION AND TRAFFIC			
TRANS-1A: The Project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of	LTS	N/A TRANS-1A: The following shall be implemented: <u>The improvements of the intersection of First Street West/West Napa identified in the recently adopted update of the Circulation Element, which calls for curb</u>	N/A LTS

EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
transportation, including mass transit, non-motorized travel, and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. <u>The Project would add vehicular and pedestrian trips to an intersection that is already operating at an unacceptable level of service during the weekend midday peak period</u>		<u>extensions, striping modifications, and/or other similar facilities, shall be constructed in conjunction with the project.</u>	
TRANS-2: The Project would not conflict with an applicable congestion management program, including, but not limited to, level of service standards, travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	LTS	N/A	N/A
TRANS-3: The Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.	LTS	N/A	N/A
TRANS-4: The Project would not increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	LTS	N/A	N/A
TRANS-5: The Project would not result in inadequate emergency access.	LTS	N/A	N/A
TRANS-6A: The Project would add pedestrian trips to an intersection that has been identified by the City's Traffic Committee as needing improvements to accommodate pedestrian travel safely and efficiently.	S	TRANS-6A: The following shall be implemented: <u>Implement Mitigation Measure TRANS-1A.</u> * Improvements to the intersection of West Napa Street/First Street West, identified by the City of Sonoma as part of the General Plan Update process, and which may include curb extensions, striping modifications, and/or other similar facilities, should be constructed in conjunction with the project.	LTS

EXECUTIVE SUMMARY**TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
TRANS-6B: The Project would generate bicycle trips on adjacent streets.	S	TRANS-6B: The following shall be implemented: <ul style="list-style-type: none"> ▪ Bicycle storage facilities should be provided on-site as proposed. ▪ Should the project include any changes to the existing frontage on West Napa Street, such changes must accommodate planned future bike lanes. 	LTS
TRANS-7: The proposed Project, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to transportation and traffic.	LTS	N/A	N/A
UTILITIES AND SERVICE SYSTEMS			
UTIL-1: The Project would have sufficient water supplies available to serve the project from existing entitlements and resources, or new or expanded entitlements needed.	LTS	N/A	N/A
UTIL-2: The Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	LTS	N/A	N/A
UTIL-3: Implementation of the Project, in combination with past, present, and reasonably foreseeable projects, would not result in a significant cumulative impacts with respect to water supply or services.	LTS	N/A	N/A
UTIL-4: The project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	LTS	N/A	N/A
UTIL-5: The project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environment effects.	LTS	N/A	N/A
UTIL-6: Construction of the proposed Project would adversely affect the carrying capacity of the sanitary sewer system.	S	UTIL-6: The Project Applicant shall coordinate with the Sonoma Valley County Sanitation District (SVCS D) to upgrade the capacity of the local sanitation collection system, such that the additional flows generated by the project shall be fully accommodated, specifically during peak wet weather flows. This shall be	LTS

EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		<p>accomplished using one of the following means, or combination thereof, of which the final determination of the means to use shall be at the discretion of the SVCSO:</p> <ul style="list-style-type: none"> ▪ Payment of In-Lieu Fee: The Project Applicant shall pay an in-lieu fee into the SVCSO Water Conservation Program, specifically, the Direct Installation Plumbing Program, which promotes the installation of high efficiency plumbing fixtures (toilets, urinals, faucet aerators, showerheads) for SVCSO commercial and residential customers. The amount of the fee, which shall be determined by the SVCSO, shall be sufficient to fund identified conservation measures within the collection system area that would offset flows generated by the project (38.44 ESD). ▪ Holding Tank: The Project Applicant shall install a holding tank near the downstream end of the new on-site sewer service lateral. The tank is to be sized to store a minimum of 8 hours of wastewater originating from the project and discharge at a rate and time approved by SVCSO. The final calculations for the required size to accommodate 8 hours of storage shall be verified during plan check. Design details shall be established during plan check, and the tank shall be installed and operational prior to occupancy of the Project site. The Project Applicant shall develop an operations and maintenance plan for the holding tank to ensure that the holding tank operates correctly and leaks are prevented or repaired. <p>To address any potential secondary impacts, all standard construction provisions that apply to the project shall be met, including compliance with the noise ordinance, traffic safety provisions (flaggers and signage), and stormwater control to protect water quality.</p> <p>Completion of improvement or implementation of conservation measures shall be required prior to final occupancy of the project. Enforcement Responsibility; Sonoma Valley County Sanitation District, City Engineer; City of Sonoma Public Works Department.</p>	
UTIL-7: Development of the project would adversely affect capacity of the sewer conveyance system that serves the project site.	S	UTIL-7: Implement Mitigation Measure UTIL-6.	LTS
UTIL-8: Implementation of the Project would result in an increase in energy consumption.	LTS	N/A	N/A

EXECUTIVE SUMMARY

TABLE 2-1 **SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
UTIL-9: The proposed Project would not contribute to cumulative natural gas and electrical service demands.	LTS	N/A	N/A

EXECUTIVE SUMMARY

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3. Revisions to the Draft EIR

This chapter presents text revisions to the Draft EIR that have been made in response to public and agency comments, as well as staff-directed changes. These text revisions include typographical corrections, insignificant modification, amplifications and clarifications of the Draft EIR. In each case, the revised page and location on the page is presented, followed by the textual, tabular, or graphical revision. Underline text represents language that has been added to the EIR; text with ~~strike through~~ has been deleted from the EIR.

None of the revisions constitutes significant new information as defined in CEQA Guidelines Section 15088.5; therefore, this EIR does not need to be recirculated.

REVISIONS TO CHAPTER 4.1, AESTHETICS

The impact discussion on pages 4.1-7 and 4.1-8 of the Draft EIR is hereby amended as follows:

During the construction phase of the Project, construction activities and equipment on-site would be inconsistent with the site’s surroundings. However, these potential impacts would be temporary and as such, less than significant.

REVISIONS TO CHAPTER 4.10, TRANSPORTATION AND TRAFFIC

Table 4.10-4 on page 4.10-13 of the Draft EIR is hereby amended as follows:

TABLE 4.10-1 SUMMARY OF EXISTING PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection <i>Approach</i>	Existing Conditions			
	PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS
1. W Napa St/Second St W	25.8	C	21.0	C
2. W Napa St/First St W	23.4	A	3.3**	A
<i>Northbound Approach</i>	16.8 <u>16.9</u>	C	15.7 <u>10.9</u>	C
<i>Southbound Approach</i>	16.8 <u>20.2</u>	C	16.3 <u>**</u>	C
3. Napa St/Broadway	32.9	D	20.4	C

REVISIONS TO THE DRAFT EIR

TABLE 4.10-1 SUMMARY OF EXISTING PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection <i>Approach</i>	Existing Conditions			
	PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; ** = Delay in excess of 120 seconds
Results for minor approaches to two-way stop-controlled intersection are indicated in *italics*.

The text on page 4.10-16 of the Draft EIR is hereby amended as follows:

Total Project Trip Generation

Based on application of these assumptions, the proposed project is expected to generate a total of 507 trips daily, including 37 during the p.m. peak hour and 45 during the weekend midday peak hour. After deducting trips associated with existing uses to be removed, the project has an average trip generation of 310 new weekday daily trips, of which 23 trips would occur during the p.m. peak hour. During weekends, 27 new trips are expected during the midday peak hour. These results are summarized in the Table 4.10-5.

The text and Tables 4.10-6 and 4.10-7 beginning on page 4.10-17 of the Draft EIR are hereby amended as follows:

Trip Generation Distribution

The pattern used to allocate new project trips to the street network was based on existing travel patterns within the study area. Because of the limited number of new trips, 10 percent was considered to be the minimum distribution. The applied distribution assumptions and resulting trips both for the net new trips as well as the total project trips are shown in Table 4.10-6.

TABLE 4.10-6 TRIP DISTRIBUTION ASSUMPTIONS

Route	Percent	Weekday Daily Trips	PM Trips	Midday Trips
West Napa St to/from the West	30%	93 <u>(152)</u>	7 <u>(11)</u>	8 <u>(14)</u>
East Napa St to/from the East	20%	62 <u>(101)</u>	5 <u>(7)</u>	5 <u>(9)</u>
Broadway to/from the South	40%	124 <u>(203)</u>	9 <u>(15)</u>	11 <u>(18)</u>
First St W to/from the South	10%	31 <u>(51)</u>	2 <u>(4)</u>	3 <u>(4)</u>
Total	100%	310 <u>(507)</u>	23 <u>(37)</u>	27 <u>(45)</u>

Note: Distribution assumptions for total trips, or those at the driveways, are shown in parentheses.

REVISIONS TO THE DRAFT EIR

Existing plus Project Conditions

Upon the addition of project-related traffic to the Existing volumes, the study intersections are expected to continue to operate acceptably during the weekday p.m. peak period and the weekend midday peak period except at West Napa Street/First Street West, which would continue to operate with excessive delays. These results are summarized in Table 4.10-7.

Significance Without Mitigation: Less than significant.

Impact TRANS-1A: The Project would add vehicular and pedestrian trips to an intersection that is already operating at an unacceptable level of service during the weekend midday peak period.

Mitigation Measure TRANS-1A: The following shall be implemented:

Improvements identified by the City of Sonoma through the General Plan Circulation Element Update process, including curb extensions and, striping modifications, shall be constructed prior to or in conjunction with the project.

Significance With Mitigation: Less than significant. Implementation of TRANS-1A would reduce the time during which pedestrians are in conflict with vehicular traffic, thereby increasing vehicular capacity. This would reduce the Project impact to less than significant.

TABLE 4.10-7 SUMMARY OF EXISTING AND EXISTING PLUS PROJECT PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection Approach	Existing Conditions				Existing plus Project Conditions			
	PM Peak		Midday Peak		PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. W Napa St/Second St W	25.8	C	21.0	C	25.8	C	21.1	C
2. W Napa St/First St W	23 <u>24</u>	A	3.3 <u>**</u>	AF	23 <u>27</u>	A	3.3 <u>**</u>	AF
Northbound Approach	16.8 <u>16.9</u>	C	15.7 <u>10.9</u>	CF	17 <u>20.4</u>	C	15.9 <u>**</u>	CF
Southbound Approach	16.8 <u>20.2</u>	C	16.3 <u>**</u>	CF	17 <u>24.3</u>	C	16.4 <u>**</u>	CF
3. Napa St/Broadway	32.9	D	20.4	C	34.8	D	21.0	C

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; ** = Delay in excess of 120 seconds
Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*.

REVISIONS TO THE DRAFT EIR

The text on page 4.10-21 of the Draft EIR is hereby amended as follows:

Future peak hour volumes, including project-generated traffic, as well as safety criteria were reviewed in evaluating the need for turn lanes at the project driveway on West Napa Street. It was conservatively assumed that all of the traffic coming from the east and south would enter via the driveway. Under these future conditions, which represent a worst-case scenario, with 60 percent of project-generated inbound traffic turning left, a left-turn lane is not warranted on West Napa Street at the project driveway during either of the peak periods evaluated. Likewise, a right-turn lane is not warranted at the project driveway.

The text on page 4.10-22 of the Draft EIR is hereby amended as follows:

Pedestrian Facilities

Given that the proposed project is located within Downtown Sonoma, it is reasonable to assume that some project patrons and employees will want to walk, bicycle, and/or utilize transit to reach the hotel. Sidewalks currently exist along the project frontage connecting to the Sonoma Plaza. The proposed project would not modify these existing sidewalks. Marked crosswalks are provided across all legs of the three study intersections.

Existing pedestrian crossing distances are long on the east and north legs at the intersection of West Napa Street/ First Street West at approximately 60 to 75 feet. This intersection, which provides the most direct pedestrian connection between the site and Downtown destinations, also encounters high pedestrian crossing volumes during busy periods, resulting in high crosswalk use that tends to create traffic congestion along West Napa Street. The primary philosophy typically applied in considering improvements for pedestrian safety is to reduce pedestrian crossing distances as much as possible. It is also desirable to reconfigure the northern and eastern crosswalks to be perpendicular to the street, which further reduces the crossing distance. Additional enhancements to pedestrian safety may be determined by the City through their ongoing investigations of safety conditions.

The existing network of sidewalks and crosswalks are generally adequate to serve pedestrian traffic associated with the proposed Sonoma Hotel, though modifications are needed at West Napa Street/First Street West to safely serve the additional pedestrians that would be generated by the project.

Impact TRANS-6A: The Project would add pedestrian trips to an intersection that has been identified by the City's Traffic Committee as needing improvements to accommodate pedestrian travel safely and efficiently.

Mitigation Measure TRANS-6A: ~~The following shall be implemented:~~ Implement Mitigation Measure TRANS-1A.

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- ~~Improvements to the intersection of West Napa Street/First Street West, identified by the City of Sonoma as part of the General Plan Update process, and which may include curb extensions, striping modifications, and/or other similar facilities, should be constructed in conjunction with the project.~~

Significance With Mitigation: Less than significant. Implementation of TRANS-6A1A would improve pedestrian access, which would reduce the Project impact to less than significant.

Text and Table 4.10-9 beginning on page 4.10-24 has been amended as follows:

The intersection of Napa Street/Broadway is expected to operate at LOS F during the p.m. peak hour and LOS E during the weekend midday peak hour. Ongoing consideration is being given to modifications to improve operation; however, under existing policies all improvements must be consistent with the historic character of Sonoma. The City has ~~specifically previously~~ determined that certain types of improvements at the intersection of Napa Street/Broadway, such as a traffic signal, improvements could be harmful to the historic character is at the intersection of Napa Street/Broadway of the Plaza, so the City has accepted deficient operations at this location in its General Plan (Table CE-4, footnote 5). This long-standing policy has been carried forward and extended in the recently-adopted update of the Circulation Element to exempt all five intersections adjoining the Plaza from LOS standards (see Policy 1.5).

LOS F operation is experienced at West Napa Street/First Street West under existing volumes during the mid-day peak period, and would continue to increase as volumes of both vehicles and pedestrians increase. Through the recently-adopted Circulation Element update, the City has identified an option for improvements to this intersection that would reduce crossing distances for pedestrians and thereby the time during which they are in conflict with vehicular traffic, as well as potential means of controlling pedestrian crossing movements. As discussed above, any changes to be made would need to be in keeping with the historic character of the Plaza, which may result in continued poor service levels in the future despite improvements being made.

TABLE 4.10-9 SUMMARY OF FUTURE PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection	PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS
1. W Napa St/Second St W	36.2	D	28.0	C
2. W Napa St/First St W	2.62.7	A	4.3**	AF
Northbound Approach	20.320.4	C	19.1**	CF
Southbound Approach	20.024.3	C	21.4**	CF
3. Napa St/Broadway	58.2	F	46.2	E

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TABLE 4.10-9 SUMMARY OF FUTURE PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection	PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS
<i>Approach</i>				

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; ** = Delay in excess of 120 seconds
Results for minor approaches to two-way stop-controlled intersection are indicated in *italics*

Future plus Project Conditions

Upon the addition of project-related traffic to the Future volumes developed as indicated above, all of the study intersections are expected to continue operating at the same levels of service, with increases in delay of 0.3 seconds or less except at West Napa Street/First Street West, where the increase in delay would be greater than 5.0 seconds. The project does not result in direct or cumulatively significant intersection impacts under the standards applied with the implementation of Mitigation Measure TRANS-1A. These results are summarized in Table 4.10-10.

Significance ~~Without~~ After Mitigation: Less than significant.

TABLE 4.10-10 SUMMARY OF FUTURE AND FUTURE PLUS PROJECT PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection	Future Conditions				Future plus Project Conditions			
	PM Peak		Midday Peak		PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. W Napa St/Second St W	36.2	D	28.0	C	36.4	D	28.2	C
2. W Napa St/First St W	26.7	A	4.3**	A	2.6	A	4.3**	A
<i>Northbound Approach</i>	20.3 <u>20.4</u>	C	19.1**	E	20.5 <u>18.5</u>	C	19.4**	E
<i>Southbound Approach</i>	20.0 <u>24.3</u>	C	21.4**	E	20.1 <u>22.4</u>	C	21.7**	E
3. Napa St/Broadway	58.2	F	46.2	E	58.2	F	46.3	E

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; ** = Delay in excess of 120 seconds
Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*

REVISIONS TO APPENDIX B, INITIAL STUDY CHECKLIST

Impact discussion d.) on page 51 of the Initial Study (Appendix B of the Draft EIR) is hereby amended as follows:

Although the Project includes no residential component and would not bring any new residents to Sonoma, it potentially would bring some new employees. However, as mentioned previously, the increase in employment associated with the Project is unlikely to be substantial. Additionally, although

REVISIONS TO THE DRAFT EIR

hotel guests would likely utilize parks in the area during their stay, any increases in demand to parks would be negligible since the Project would not increase the population in the city of Sonoma beyond regional growth projections which are used for other planning efforts and given the hotel only has 62-guestrooms. Therefore, potential impacts would be *less than significant*, and this will not be analyzed as part of the EIR.

REVISIONS TO THE DRAFT EIR

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4. List of Commenters

Comments on the Draft EIR were received from the following agencies and private individuals and organizations. Each comment letter has been assigned a number, as indicated below.

AGENCIES AND SERVICE PROVIDERS

- A01 Patricia Maurice, District Branch Chief, Local Development - Intergovernmental Review, Department of Transportation
- A02 Scott Morgan, Director, State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

PRIVATE INDIVIDUALS AND ORGANIZATIONS

- B01 Larry Barnett
- B02 Bob Edwards
- B03 David Eichar
- B04 Fred Allebach
- B05 Georgia Kelly
- B06 Thomas Jones
- B07 Johanna Patri
- B08 Mary Martinez
- B09 Jerry Bernhaut
- B10 Robert Demler
- B11 Trish Hunter
- B12 Patricia List and Eugene Mai
- B13 Bonnie Brown
- B14 Bill Hooper
- B15 Vicki Hill

LIST OF COMMENTERS

B16 Karla Noyes
B17 Regina Baker
B18 Kristi Black
B19 Kent Iverson
B20 Carol Collier
B21 Laurie Sebesta
B22 Anna Gomez

PUBLIC HEARINGS

C01 Planning Commission Hearing, February 25, 2016

5. Comments and Responses

5.1 INTRODUCTION

This chapter includes a reproduction of, and responses to, each significant environmental issue raised during the public review period. Comments are presented in their original format in Appendix N, Comment Letters, of this Final EIR, along with annotations that identify each comment number.

Responses to those individual comments are provided in Table 5-1 alongside the text of each corresponding comment. Letters follow the same order as listed in Chapter 4, List of Commenters, of this Response to Comments Document and are categorized by:

- Agencies and Service Providers
- Private Individuals and Organizations
- Public Hearings

Letters are identified by category and each comment is labeled with the comment reference number in the margin.

During the review period for the Draft EIR, members of the public submitted several comments that related to the details of the proposed Project itself, convey the commenter's opinion of the proposed Project, or address the relative consequences or benefits of the proposed Project (referred to here as "merits of the proposed Project"), rather than the adequacy of the environmental analysis in the EIR. It is important for a Lead Agency in its decision-making process to consider both the adequacy of the EIR and the merits of the proposed Project. However, a Lead Agency is only required by CEQA to respond in its Final EIR to comments related to significant environmental issues raised in the comments. See CEQA Guidelines Sections 15088(c) and 15204(a).

Section 15204 of the CEQA Guidelines provides direction for parties reviewing and providing comment on a Draft EIR, as follows:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.

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Section 15204(a) states in relation to the role of the Lead Agency in responding to comments:

When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

Although comments related to merits of the proposed Project do not require responses in the Response to Comments Document, they do provide important input to the decision-making process. Therefore, comments addressing the merits of the proposed Project are included in the Response to Comments Document in order to make them readily available to the decision-makers when considering whether to approve the proposed Project.

Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response requires revisions to the Draft EIR, the revisions are explained and shown in Chapter 3 of this Final EIR document.

5.1.1 MASTER RESPONSES

Several issues were addressed by multiple commenters. The following “Master Responses” consolidate information on these subjects to ensure a more comprehensive response. Responses to individual comments will reference the following master responses.

Master Response 1 – Pedestrian/Bicyclist Impacts

Numerous comments were made relative to existing issues with pedestrian/bicyclist safety and access as well as the potential for the project to increase pedestrian activity and the impacts associated with such an increase. The potential for the project to increase pedestrian/bicyclist traffic was identified in the DEIR, and the need for improvements was included as Mitigation Measure TRANS-6A. However, as noted, the specific improvements to be made were being considered by the City as part of the General Plan Circulation Element Update process, so details could not be provided in the DEIR.

Preliminary concepts for reducing the crossing distance and improving pedestrian/bicycle access at West Napa Street/First Street West are currently under consideration by City staff. By narrowing the street, the distance through which pedestrians would present a conflict with vehicular traffic would be reduced, which would have the benefit of reducing the delay associated with pedestrian crossings, even for pedestrians who are taking their time to make the crossing. While consideration is being given to various types of warning devices, installation of a traffic signal was specifically not considered as this type of control device is considered inconsistent with the character of the Plaza and therefore undesirable. The recently-adopted Circulation Element update calls for this intersection to be improved with curb

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extensions and restriping to enhance pedestrian safety. Mitigation Measure TRANS-1A would require this improvement to be implemented prior to or in conjunction with the development of the project. In addition, design and construction of pedestrian safety improvements at the intersection of West Napa Street and First Street West has been added to the City's 5-year Capital Improvement Plan, which will result in a project for project-related impact fees to be used to assist in the funding of this improvement.

By constructing improvements at West Napa Street/First Street West, conditions would be better than what exists today, even with additional pedestrian trips generated by the project. Although conditions may still be less than ideal, they would be better with the project than without it, reducing the impact to a level of less than significant.

While pedestrian trips will also be distributed to other intersections around the Plaza, impacts at these other locations will be less impactful for several reasons. First, beyond this immediately adjacent intersection the trips will disperse, resulting in considerably fewer added trips at any single location. Second, all of the other intersections around the Plaza are all-way stop-controlled, unlike West Napa Street/First Street West where drivers on West Napa Street have to make a stop just for the pedestrian. Finally, with the exception of West Napa Street/Broadway, which was evaluated for the EIR with impacts of pedestrian traffic considered, the remaining intersections around the Plaza have substantially lower volumes, resulting in less conflict between pedestrians and vehicular traffic and a lesser impact.

See also Master Response 2, Traffic Operation Impacts.

Master Response 2 – Traffic Operation Impacts

Many comments were received regarding the operational analysis and perceptions that operation was considerably worse than presented in the DEIR. Further, some commenters indicated that it appeared the DEIR found no impact due to the project, or that the impact identified should be considered significant. While the DEIR identifies that the project will have an impact, or add to the delay at each of the intersections evaluated, based on the methodologies applied and the standards adopted by the City, the impacts were considered less-than-significant.

While the impacts of pedestrians were accounted for in the analysis of Napa Street/Broadway, the methodology used to evaluate West Napa Street/First Street West did not include delays associated with pedestrian crossings. In order to respond more fully respond to the comments on the DEIR, the analysis of West Napa Street/First Street West was updated to use a more recent methodology that was not widely used when the analysis for the initial Sonoma Hotel project was prepared. While the older methodology did not account for pedestrians, the newer methodology does. Pedestrian counts were obtained at West Napa Street/First Street West on a Saturday afternoon in October during an art show in the Plaza, so peak activity was captured for the weekend peak period. No pedestrian data was available

COMMENTS AND RESPONSES

for the weekday p.m. peak hour, but pedestrian counts obtained at Napa Street/Broadway during the weekday evening peak hour for the General Plan Update were used along with the weekend counts to estimate pedestrian volumes for the weekday evening peak hour.

With the change in methodology to account for pedestrian volumes, it was determined that operation is currently acceptable during the weekday p.m. peak period, but unacceptable during the weekend midday peak, especially when there is an event at the Plaza, with excessive delays on the stop-controlled movements that translate to an overall LOS F for the intersection. Upon adding project-generated trips, including pedestrians, the project's impact would remain less-than-significant during the weekday p.m. peak hour. The project would further exacerbate the already poor operation experienced during the weekend midday peak period. It is noted that the poor operation is expressly due to the high volume of pedestrian traffic, as stated by numerous commenters both in the written comments and during the public hearing on the EIR.

The City is currently considering various options for improving conditions at West Napa Street/First Street West, with the intent of addressing pedestrian safety issues as well as capacity for vehicular traffic. Each of the options under consideration would reduce pedestrian crossing distances. Reducing crossing distances and crossing time improves pedestrian safety and reduces traffic congestion. Though a final design has not yet been developed, as noted in Master Response 1, Pedestrian/Bicyclist Impacts, the DEIR includes a mitigation measure that would require construction of the improvements selected by the City through the recently-completed Circulation Element update as part of the project. Since conditions with the project including this mitigation would then be better than without the project, these impacts would be reduced to a level of less-than-significant.

The following text and tables have been modified, as shown below and in Chapter 3 of this Final EIR.

Table 4.10-4 on page 4.10-13 has been amended as follows:

TABLE 4.10-1 SUMMARY OF EXISTING PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection <i>Approach</i>	Existing Conditions			
	PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS
1. W Napa St/Second St W	25.8	C	21.0	C
2. W Napa St/First St W	23 <u>24</u>	A	33 <u>**</u>	AF
<i>Northbound Approach</i>	16.8 <u>16.9</u>	C	15.7 <u>10.9</u>	CF
<i>Southbound Approach</i>	16.8 <u>20.2</u>	C	16.3 <u>**</u>	CF
3. Napa St/Broadway	32.9	D	20.4	C

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Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; ** = Delay in excess of 120 seconds
Results for minor approaches to two-way stop-controlled intersection are indicated in *italics*.

Text and Table 4.10-7 on page 4.10-17 has been amended as follows:

Existing plus Project Conditions

Upon the addition of project-related traffic to the Existing volumes, the study intersections are expected to continue to operate acceptably during the weekday p.m. peak period and the weekend midday peak period except at West Napa Street/First Street West, which would continue to operate with excessive delays. These results are summarized in Table 4.10-7.

~~Significance Without Mitigation:~~ Less than significant.

Impact TRANS-1A: The Project would add vehicular and pedestrian trips to an intersection that is already operating at an unacceptable level of service during the weekend midday peak period.

Mitigation Measure TRANS-1A: The following shall be implemented:

Improvements identified by the City of Sonoma through the General Plan Circulation Element Update process, including curb extensions and, striping modifications, shall be constructed prior to or in conjunction with the project.

Significance With Mitigation: Less than significant. Implementation of TRANS-1A would reduce the time during which pedestrians are in conflict with vehicular traffic, thereby increasing vehicular capacity. This would reduce the Project impact to less than significant.

COMMENTS AND RESPONSES

TABLE 4.10-7 SUMMARY OF EXISTING AND EXISTING PLUS PROJECT PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection <i>Approach</i>	Existing Conditions				Existing plus Project Conditions			
	PM Peak		Midday Peak		PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. W Napa St/Second St W	25.8	C	21.0	C	25.8	C	21.1	C
2. W Napa St/First St W	2.3 <u>2.4</u>	A	3.3 <u>**</u>	A <u>F</u>	2.3 <u>2.7</u>	A	3.3 <u>**</u>	A <u>F</u>
<i>Northbound Approach</i>	16.8 <u>16.9</u>	C	15.7 <u>10.9</u>	E <u>F</u>	17 <u>20.4</u>	C	15.9 <u>**</u>	E <u>F</u>
<i>Southbound Approach</i>	16.8 <u>20.2</u>	C	16.3 <u>**</u>	E <u>F</u>	17 <u>24.3</u>	C	16.4 <u>**</u>	E <u>F</u>
3. Napa St/Broadway	32.9	D	20.4	C	34.8	D	21.0	C

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; ** = Delay in excess of 120 seconds
Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*.

Text and Table 4.10-9 beginning on page 4.10-24 has been amended as follows:

The intersection of Napa Street/Broadway is expected to operate at LOS F during the p.m. peak hour and LOS E during the weekend midday peak hour. Ongoing consideration is being given to modifications to improve operation; however, under existing policies all improvements must be consistent with the historic character of Sonoma. The City has specifically previously determined that certain types of improvements at the intersection of Napa Street/Broadway, such as a traffic signal, improvements could be harmful to the historic character is at the intersection of Napa Street/Broadway of the Plaza, so the City has accepted deficient operations at this location in its General Plan (Table CE-4, footnote 5). This long-standing policy has been carried forward and extended in the recently-adopted update of the Circulation Element to exempt all five intersections adjoining the Plaza from LOS standards (see Policy 1.5).

LOS F operation is experienced at West Napa Street/First Street West under existing volumes during the mid-day peak period, and would continue to increase as volumes of both vehicles and pedestrians increase. Through the recently-adopted Circulation Element update, the City has identified an option for improvements to this intersection that would reduce crossing distances for pedestrians and thereby the time during which they are in conflict with vehicular traffic, as well as potential means of controlling pedestrian crossing movements. As discussed above, any changes to be made would need to be in keeping with the historic character of the Plaza, which may result in continued poor service levels in the future despite improvements being made.

COMMENTS AND RESPONSES**TABLE 4.10-9 SUMMARY OF FUTURE PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS**

Study Intersection	PM Peak		Midday Peak	
	Delay	LOS	Delay	LOS
1. W Napa St/Second St W	36.2	D	28.0	C
2. W Napa St/First St W	2.6 <u>2.7</u>	A	4.3 <u>4.3</u> **	A <u>F</u>
<i>Northbound Approach</i>	20.3 <u>20.4</u>	C	19.1 <u>19.1</u> **	C <u>F</u>
<i>Southbound Approach</i>	20.0 <u>24.3</u>	C	21.4 <u>21.4</u> **	C <u>F</u>
3. Napa St/Broadway	58.2	F	46.2	E

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; ** = Delay in excess of 120 seconds
Results for minor approaches to two-way stop-controlled intersection are indicated in *italics*

Future plus Project Conditions

Upon the addition of project-related traffic to the Future volumes developed as indicated above, all of the study intersections are expected to continue operating at the same levels of service, with increases in delay of 0.3 seconds or less except at West Napa Street/First Street West, where the increase in delay would be greater than 5.0 seconds. The project does not result in direct or cumulatively significant intersection impacts under the standards applied with the implementation of Mitigation Measure TRANS-1A. These results are summarized in Table 4.10-10.

Significance Without After Mitigation: Less than significant.

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TABLE 4.10-10 SUMMARY OF FUTURE AND FUTURE PLUS PROJECT PEAK HOUR INTERSECTION LEVEL OF SERVICE CALCULATIONS

Study Intersection	Approach	Future Conditions				Future plus Project Conditions			
		PM Peak		Midday Peak		PM Peak		Midday Peak	
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1.	W Napa St/Second St W	36.2	D	28.0	C	36.4	D	28.2	C
2.	W Napa St/First St W	2.6 <u>2.7</u>	A	4.3 <u>4.3</u> **	A <u>F</u>	2.6	A	4.3 <u>4.3</u> **	A <u>F</u>
	<i>Northbound Approach</i>	20.3 <u>20.4</u>	C	19.1 <u>19.1</u> **	E <u>F</u>	20.5 <u>18.5</u>	C	19.4 <u>19.4</u> **	E <u>F</u>
	<i>Southbound Approach</i>	20.0 <u>24.3</u>	C	21.4 <u>21.4</u> **	E <u>F</u>	20.1 <u>22.4</u>	C	21.7 <u>21.7</u> **	E <u>F</u>
3.	Napa St/Broadway	58.2	F	46.2	E	58.2	F	46.3	E

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; ** = Delay in excess of 120 seconds
Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
A AGENCIES AND SERVICE PROVIDERS			
A01	3/8/16	Patricia Maurice, District Branch Chief, Local Development - Intergovernmental Review, Department of Transportation	
A01-01		<p>Dear Mr. Goodison:</p> <p>Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Hotel Project Sonoma development. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system, in which we seek to reduce statewide vehicle miles traveled (VMT) and increase non-auto modes of active transportation. Caltrans plans to increase non-auto mode shares by 2020 through tripling bicycle, and doubling both pedestrian and transit. Also, these targets support the Metropolitan Transportation Commission's Sustainable Communities Strategy, which promotes the increase of non-auto mode shares by ten percentage points and a decrease in automobile VMT per capita by ten percent. Our comments seek to promote the State's smart mobility goals and are based on the Draft Environmental Impact Report (DEIR).</p> <p><i>Project Understanding</i></p> <p>The proposed project would demolish the existing 153 West Napa Street building, metal warehouse, ancillary structures, and parking lot to construct a three-story 67,478 square foot (sf) hotel. The proposed building would include 62 guestrooms an 80-seat restaurant and on-site parking for 115 vehicles (94 underground garage spaces and 21 surface level spaces). As the project would add pedestrian trips to the State Route (SR) 12 (West Napa Street)/First Street West intersection, the DEIR has identified improvements that would be constructed in conjunction with the project at this location. These improvements include curb extensions striping modifications, and/or other similar facilities. Vehicular access would be gained via two existing driveways located on SR 12 and First Street West along the project site frontage.</p> <p><i>Lead Agency</i></p> <p>As the lead agency, the City of Sonoma (City) is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.</p>	<p>This comment provides and an introduction to the comment letter and does not question the adequacy of the analysis of the EIR. The comment further points out that as lead agency, the City must identify the proposed Project's fair share contribution, financing, scheduling, implementation responsibilities, and lead agency monitoring for all of the proposed mitigation measures. Responsibility for the implementation of proposed mitigation measures will be identified in the Mitigation Monitoring and Reporting Program (MMRP) that will be considered for adoption when the City considers certifying the EIR. No further response is required.</p>
A01-02		<p><i>Transportation Impacts</i></p> <p>Please revise the DEIR with the information below, so that the environmental document accurately represents the project's impact on the adjacent transportation network. The</p>	<p>Text on page 4.10-16 has been modified, as shown in Chapter 3 of this Final EIR.</p>

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		proposed project would result in 507 total average daily trips with 37 trips during the Weekday PM Peale Hour and 45 during the Weekend Midday Peak Hour, an increase of 310 new average daily trips from existing uses.	
A01-03		<ul style="list-style-type: none"> Total Project Trip Generation (p. 4.10-16): Change "... an average of 310 weekday daily trips ... " to "... an average of 310 new weekday daily trips " The total weekday average daily trips should be 507, rather than using 310 trips. 	Text on page 4.10-16 has been modified, as shown in Chapter 3 of this Final EIR.
A01-04		<ul style="list-style-type: none"> Trip Distribution Table (p. 4.10-17): Include the trip distribution table and provide a diagram showing the turning movements at both driveways in consideration of 507 average daily trips. 	Text and Table 4.10-6 on page 4.10-17 has been modified, as shown in Chapter 3 of this Final EIR.
A01-05		<ul style="list-style-type: none"> Left-Turn Lane Warrants (p. 4.10-20): Provide an updated analysis of the left-turn lane warrant in consideration of 507 average daily trips. 	Text on page 4.10-21 has been modified, as shown in Chapter 3 of this Final EIR. Copies of the spreadsheets indicating the analysis are provided in Appendix K of the Draft EIR.
A01-06		<p><i>Multimodal Planning</i></p> <p>The project should be conditioned to ensure connections to existing bike lanes and multi-use trails to facilitate walking and biking to nearby jobs, neighborhood services, and transit. Providing these connections with streets configured for alternative transportation modes will reduce VMT by promoting usage of nearby public transit lines. Mitigation to reduce VMT should include funding the proposed bike paths identified in the Sonoma Bicycle and Pedestrian Master Plan (2014). These paths include a Class II on SR 12 from Riverside Drive to The Plaza, a Class III on Andrieux Street from 5th Street West to SR 12, and a Class III on East Napa Street from The Plaza to 2nd Street East.</p>	<p>The project is a visitor-serving use located near visitor-serving attractions, thereby encouraging trips by walking. Bicycles will be made available to guests for trips to nearby destinations to encourage trips by bicycle.</p> <p>Further, the City has completed an update of the General Plan Circulation Element, which includes policies that would require development to pay its share towards providing facilities for alternative modes, as well as to establish a traffic impact fee to implement this policy. Any project moving forward would then be required to pay the traffic impact fee to provide the City with funding to implement planned infrastructure improvements and programs.</p>
A01-07		<p>We also encourage you to develop Travel Demand Management (TDM) policies to encourage smart mobility and the use of nearby Sonoma County Transit routes 30, 32, 34X, 38 and Vine Transit route 25. To reduce regional VMT and traffic impacts to the State Highway System please consider the TDM options listed below:</p> <ul style="list-style-type: none"> Project design to encourage walking, bicycling, and convenient transit access; Dedicated carpool parking spaces; Designated bicycle parking; Formation of a Transportation Management Association (TMA) in partnership with other developments in the area; Adoption of an aggressive trip reduction target with Lead Agency monitoring and enforcement; Reducing headway times for adjacent transit routes; and Providing transit passes to employees on a continuing basis. 	The project site will provide bicycle parking. Other measures included in a TDM program have not been proposed, but may be considered. In particular, subsidy of transit passes and dedicated carpool parking would appear to be applicable to this project and may be considered by the applicant.
A01-08		<p><i>Encroachment Permit</i></p> <p>Please be advised that any work or traffic control that encroaches onto the State right-of-way (ROW) requires an encroachment permit that is issued by Caltrans. To apply a</p>	This comment does not question the adequacy of the analysis in the EIR, and instead provides requirements for obtaining an encroachment permit. No response is required for this comment.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address: David Salladay District Office Chief Office of Permits California Department of Transportation District 4 P.O. Box 23660 Oakland CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website linked below for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits	
A01-09		Should you have any questions regarding this letter or require additional information please contact Cole Iwamasa at (510) 286-5534 or cole.iwamasa@dot.ca.gov . Sincerely PATRICIA MAURICE District Branch Chief Local Development - Intergovernmental Review	This comment serves as a closing remark. The comment is noted and requires no further action.
A02	03/11/2016	Scott Morgan, Director, State Clearinghouse	
A02-01		Dear David Goodison: The State Clearinghouse submitted the above named Draft EIR to select state agencies for review. On the enclosed Document Details Report please note that the clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 10, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly. Please note that Section 21104(c) of the California Public Resources Code states that: "A responsible or other public agency shall only may substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation." These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if	This comment acknowledges that the City has complied with the State Clearinghouse review requirements for draft environmental documents, and does not question the adequacy of the analysis included in the EIR. No response is required.

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>you have any questions regarding the environmental review process.</p> <p>Sincerely,</p> <p>Scott Morgan Director, State Clearinghouse</p>	
B PRIVATE AGENCIES AND CITIZENS			
B01	2/20/16	Larry Barnett	
B01-01		<p>Background The EIR Scoping Session neglected to identify "Hazards" and "Hazardous Materials" as an area of evaluation to be included in the EIR. I believe this was a serious mistake, an oversight which needs to be corrected by including such evaluation in the EIR process. Because of this omission, the Draft EIR provides no data or information about possible soil and aquifer contamination, yet as a printing plant, the property undoubtedly used a number of highly toxic chemicals during its many decades of operation.</p> <p>Lacking any documentary evidence of such evaluation, it is therefore impossible to determine whether or not risks to public health are significant and in need of remediation. In the absence of such information, the risks must be considered significant until proven otherwise using scientific and properly conducted tests.</p> <p>As detailed in the comments below, the certainty of use of hazardous materials in the industrial facility (printing plant) in the past makes evaluation of the risks due to possible contamination of soils and sub-surface water imperative.</p>	<p>The comment serves as an introduction to the letter and suggests that there would be potential hazards related to soil contamination caused by the past use of the Project site as a printing plant. Furthermore, the comment suggests that the Draft EIR failed to include an evaluation of this potential.</p> <p>Please refer to Appendix B of the Draft EIR which contains the Initial Study Checklist that was prepared for the proposed Project. Impact discussion d.) in section 8, Hazards and Hazardous Materials, references the Phase I Environmental Site Assessment (Phase I) that was prepared for the proposed Project. The purpose of this Phase I was to identify Recognized Environmental Conditions (RECs) at or near the Project site. The Phase I concluded that while there are low levels of soil and groundwater contamination on-site, adherence to measures contained in the Soil and Groundwater Management Plan (SGMP) prepared by AECOM in June 2014, and included in Appendix O, would ensure proper soil disposal and implementation of worker safety measures. Moreover, based on the findings of the Phase I analysis, no Phase II investigation was recommended. In addition, as described in impact discussion d.) in section 8, Hazards and Hazardous Materials, of the Initial Study checklist the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. These facts were the basis for the determination that there would not be a significant impact related soil contamination and demonstrate that risks due to possible contamination of soils and sub-surface water were studied. This determination in the Initial Study Checklist justified scoping out Hazards and Hazardous Materials from the Draft EIR.</p>
B01-02		<p>Significant Risks of Contamination Research indicates that the Index-Tribune printing plant was in operation for approximately 40-50 years, discontinuing printing in the year 2008. During much of this time, there was an absence of OSHA rules or oversight and a lack of regulations pertaining to the use and disposal of a large number of highly toxic chemicals and solvents.</p> <p>Historically, the printing industry has employed a variety of chemicals in its operations; among these were oil-based inks, solvents, cleaners and particularly a highly-toxic class of VOC (volatile organic compound) customarily referred to as a "degreasing" agent used to</p>	<p>This comment notes the history of the Project site and contains information about Trichloroethylene (TCE). While the commenter asserts that during much of the time Index-Tribune printing plant was in operation there was less environmental regulation, the commenter does not provide substantial evidence to suggest that TCE is present on the Project site. Moreover, as discussed above in the response to comment B01-01, the Phase I performed for the Project site concluded that there are low levels of soil and groundwater contamination on-site, but no HVOCs, including TCE, were detected within the project site as it relates to former printing operations or gas station operations. The comment is noted and requires no further action.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>clean metal and other parts on printing presses. This type of chemical solvent does not dissolve well in water, binds with and remains in the soil, is prone to vaporize over time, and can migrate a considerable distance underground and have been known to contaminate underground aquifers. Among such degreasing agents is the VOC Trichloroethylene (TCE). As this excerpt from Wikipedia (see citations at bottom of this letter) indicates, the troubled history of TCE is particularly notable:</p> <p>"Due to concerns about its toxicity, the use of trichloroethylene in the food and pharmaceutical industries has been banned in much of the world since the 1970s. Legislation has forced the substitution of trichloroethylene in many processes in Europe as the chemical was classified as a carcinogen carrying an R45 risk phrase, May cause cancer. Many degreasing chemical alternatives are being promoted such as Ensolv and Leksol; however, each of these is based on n-propyl bromide which carries an R60 risk phrase of May impair fertility, and they would not be a legally acceptable substitute.</p> <p>Groundwater contamination by TCE has become an important environmental concern for human exposure.</p> <p>In 2005 it was announced by the United States Environmental Protection Agency that the agency had completed its Final Health Assessment for Trichloroethylene and released a list of new TCE toxicity values.[5] The results of the study have formally characterized the chemical as a human carcinogen and a non-carcinogenic health hazard. A 2011 toxicological review performed by the EPA continues to list trichloroethylene as a known carcinogen.[6]"</p> <p>As concerning effects on human health, the following is noted (Wikipedia):</p> <p>"When inhaled, trichloroethylene produces central nervous system depression resulting in general anesthesia. Its high blood solubility results in a less desirable slower induction of anesthesia. At low concentrations it is relatively non-irritating to the respiratory tract. Higher concentrations result in tachypnea. Many types of cardiac arrhythmias can occur and are exacerbated by epinephrine (adrenaline). It was noted in the 1940s that TCE reacted with carbon dioxide (CO2) absorbing systems (soda lime) to produce dichloroacetylene and phosgene.[11] Cranial nerve dysfunction (especially the fifth cranial nerve) was common when TCE anesthesia was given using CO2 absorbing systems. These nerve deficits could last for months. Occasionally facial numbness was permanent. Muscle relaxation with TCE anesthesia sufficient for surgery was poor. For these reasons as well as problems with hepatotoxicity, TCE lost popularity in North America and Europe to more potent anesthetics such as halothane by the 1960s.[12]</p>	

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Comment #	Date	Comment	Response
		<p>The symptoms of acute non-medical exposure are similar to those of alcohol intoxication, beginning with headache, dizziness, and confusion and progressing with increasing exposure to unconsciousness.[13] Respiratory and circulatory depression can result in death.</p>	
		<p>Much of what is known about the human health effects of trichloroethylene is based on occupational exposures. Beyond the effects to the central nervous system, workplace exposure to trichloroethylene has been associated with toxic effects in the liver and kidney.[13] Over time, occupational exposure limits on trichloroethylene have tightened, resulting in more stringent ventilation controls and personal protective equipment use by workers.</p>	
		<p>Research from Cancer bioassays performed by the National Cancer Institute (later the National Toxicology Program) showed that exposure to trichloroethylene is carcinogenic in animals, producing liver cancer in mice, and kidney cancer in rats.[13][14]</p>	
		<p>The National Toxicology Program’s 11th Report on Carcinogens categorizes trichloroethylene as “reasonably anticipated to be a human carcinogen”, based on limited evidence of carcinogenicity from studies in humans and sufficient evidence of carcinogenicity from studies in experimental animals.[15]</p>	
		<p>One recent review of the epidemiology of kidney cancer rated cigarette smoking and obesity as more important risk factors for kidney cancer than exposure to solvents such as trichloroethylene.[16] In contrast, the most recent overall assessment of human health risks associated with trichloroethylene states, “[t]here is concordance between animal and human studies, which supports the conclusion that trichloroethylene is a potential kidney carcinogen”.[17] The evidence appears to be less certain at this time regarding the relationship between humans and liver cancer observed in mice, with the US NAS suggesting that low-level exposure might not represent a significant liver cancer risk in the general population.</p>	
		<p>Recent studies in laboratory animals and observations in human populations suggest that exposure to trichloroethylene might be associated with congenital heart defects[18][19][20][21][22] While it is not clear what levels of exposure are associated with cardiac defects in humans, there is consistency between the cardiac defects observed in studies of communities exposed to trichloroethylene contamination in groundwater, and the effects observed in laboratory animals. A study published in August 2008, has demonstrated effects of TCE on human mitochondria. The article questions whether this might impact female reproductive function.[23]</p>	

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		Occupational exposure to TCE was reported to correlate with development of symptoms of Parkinson's Disease in three laboratory workers.[24] A retrospective twin study of pairs discordant for Parkinson's showed a six-fold increase in Parkinson's risk associated with TCE workplace exposure.[25]	
		The health risks of trichloroethylene have been studied extensively. The U.S. Environmental Protection Agency (EPA) sponsored a "state of the science" review of the health effects associated with exposure to trichloroethylene.[26] The National Academy of Sciences concluded that evidence on the carcinogenic risk and other potential health hazards from exposure to TCE has strengthened since EPA released their toxicological assessment of TCE, and encourages federal agencies to finalize the risk assessment for TCE using currently available information, so that risk management decisions for this chemical can be expedited.[17]	
		In Europe, the Scientific Committee on Occupational Exposure Limit Values (SCOEL) recommends for trichloroethylene an occupational exposure limit (8 hour time-weighted average) of 10 ppm and a short-term exposure limit (15 min) of 30 ppm.[27]"	
		Human exposure "Some are exposed to TCE through contaminated drinking water. With a specific gravity greater than 1, trichloroethylene can be present as a dense nonaqueous phase liquid if sufficient quantities are spilled in the environment. Another significant source of vapor exposure in Superfund sites that had contaminated groundwater, such as the Twin Cities Army Ammunition Plant, was by showering. TCE readily volatilizes out of hot water and into the air. Long, hot showers would then volatilize more TCE into the air. In a home closed tightly to conserve the cost of heating and cooling, these vapors would then recirculate.	
		The first known report of TCE in groundwater was given in 1949 by two English public chemists who described two separate instances of well contamination by industrial releases of TCE.[28] Based on available federal and state surveys, between 9% to 34% of the drinking water supply sources tested in the U.S. may have some TCE contamination, though EPA has reported that most water supplies are in compliance with the maximum contaminant level (MCL) of 5 ppb.[29]	
		In addition, a growing concern in recent years at sites with TCE contamination in soil or groundwater has been vapor intrusion in buildings, which has resulted in indoor air exposures, such is in a recent case in the McCook Field Neighborhood of Dayton,	

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Comment #	Date	Comment	Response
		<p>Ohio.[30] Trichloroethylene has been detected in 852 Superfund sites across the United States,[31] according to the Agency for Toxic Substances and Disease Registry (ATSDR). Under the Safe Drinking Water Act of 1974, and as amended[32] annual water quality testing is required for all public drinking water distributors. The EPA'S current guidelines for TCE are online.[33] It should be noted that the EPA's table of "TCE Releases to Ground" is dated 1987 to 1993, thereby omitting one of the largest Superfund cleanup sites in the nation, the North IBW in Scottsdale, Arizona. Earlier, TCE was dumped here, and was subsequently detected in the municipal drinking water wells in 1982, prior to the study period.[34]</p> <p>In 1988, the EPA discovered tons of TCE that had been leaked or dumped into the ground by the United States military and semiconductor industry (companies including Fairchild Semiconductor, Intel Corporation, and Raytheon Company)[35] just outside NASA Ames in Moffett Field, Mountain View, California.[36]"</p> <p>In 2013, it was publicly revealed that workers at a Google facility were being exposed to TCE vapors inside the facility. This made national headlines: http://www.sfgate.com/business/article/Google-workers-at-Superfund-site-exposed-4368421.php</p>	
B01-03		<p>Specific Draft EIR Requests</p> <p>The possible "dumping" and/or improper disposal of toxic solvents such as TCE demands the highest level of scrutiny. In-ground "dumping" may have occurred many years ago, before the risks of such chemicals to human health and the environment were well-understood. However, even if evidence shows this was not the case, any cracks or leaks which existed in the sink piping or other pipes running underground and used to convey such chemicals to a public sewer or wastewater treatment facility, which is highly likely given the age of the facility, may have resulted in soil and water table contamination discovered.</p> <p>Accordingly, due to the serious public health risks associated with the possibility of the presence of such VOC chemicals such as TCE, and the City's absolute requirement to protect the health and welfare of the public, the Draft EIR should be modified to include the following information and require procedures specifically designed to test for these chemicals and to remediate any significant contamination discovered.</p> <p>Therefore, the following is requested to become part of the EIR process and documentation:</p>	<p>This comment suggests without substantial evidence that there could be soil contamination on the Project site that was not properly analyzed in the Draft EIR. This comment serves as an introduction to a list of requested revisions to the Draft EIR. A Phase I Environmental Site Assessment prepared for the project site is included in Appendix O of this Final EIR. The research, analysis, and findings included in the Phase I do not change the conclusions of the Initial Study, as they show no evidence of dumping or leakage.</p>
B01-04		<p>1. (A) Copies of all existing records pertaining to past chemical use at the former printing</p>	<p>As noted in response to Comment B01-03, a Phase I Environmental Site Assessment prepared for the</p>

TABLE 5-1 RESPONSE TO COMMENTS

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		plant, describing in detail the names, uses, and volumes consumed in production of all toxic chemicals; (B) evidence of proper disposal, and disposal records thereof; (C) description of disposal methods used in the past; (D) evidence of compliance with OSHA or other governmental regulations on such use; and (E) any other information pertaining to solvents, VOCs or other toxic chemical agents employed during the plant's many years of operation.	project site is included in Appendix O of this Final EIR, and the findings included in the Phase I do not change the conclusions of the Initial Study.
B01-05		2. Copies of results of any and all soil testing, past and present, under and around the printing facility building, dates of tests, lists of chemicals for which tests were conducted and evidence that such testing included testing for the presence of specific VOCs, including TCE and its customary chemical solvent replacements In the printing industry.	Soil testing was completed and documentation is provided in a Phase I Environmental Site Assessment prepared for the project site is included in Appendix O of this Final EIR. The findings included in the Phase I do not change the conclusions of the Initial Study.
B01-06		3. Copies of any and all in-building air testing results and dates of testing past and present, for the presence of VOC vapors, including TCE.	Air testing was completed and documentation is provided in a Phase I Environmental Site Assessment prepared for the project site is included in Appendix O of this Final EIR. The findings included in the Phase I do not change the conclusions of the Initial Study.
B01-07		4. Requirements for periodic and ongoing additional air, soil and water table testing as construction proceeds.	A Phase I Environmental Site Assessment prepared for the project site is included in Appendix O of this Final EIR, and includes recommendations that include compliance with applicable regulations to address low level soil and groundwater contamination. The findings included in the Phase I do not change the conclusions of the Initial Study.
B01-08		5. Specific plans for dealing with evidence of contamination from hazardous materials during construction by TCE or other toxic VOC due to high evaporation and vaporization characteristics.	Please refer to the response to Comment B01-07.
B01-09		6. Requirements for HVAC specifications for any buildings potentially affected, in case TCE or another toxic VOC is found in the soils and deemed impossible to remove or effectively remediate.	No recommendations were provided in the Phase I Environmental Site Assessment pertaining to HVAC specifications. No further response is required.
B01-10		Thank you for attending to this matter. Sincerely, Larry Barnett List of Citations	This comment provides a closing to the comment letter, and no response is required.
B02	2/21/16	Bob Edwards	
B02-01		Please consider the following comments regarding the Draft EIR for the Sonoma Hotel project on W. Napa St. While there are numerous insufficiencies in the voluminous DEIR, because of time constraints I will limit my comments to its treatment of traffic impacts.	This comment serves as an introduction and generally suggests that the Draft EIR is deficient. The comment is noted and requires no further action.
B02-02		As a useful point of reference and departure for considering these comments, the Draft EIR states at 4.10-10: "Based on the traffic engineering analysis performed in the DEIR, the volume of traffic	This comment contains excerpts from the Draft EIR which are meant to preface subsequent comments. The comment is noted and requires no further action.

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Comment #	Date	Comment	Response
		<p>generated by the project would not significantly change the operation of any of the intersections in the study area (West Napa/Second Street West; West Napa/First Street West; West Napa/Broadway). All of the intersections would continue to operate in a manner that meets or exceeds the City’s adopted Level of Service standards. As noted in the DEIR, although it would expected that a hotel project in a downtown setting would result in a number of trips being made on foot or bicycle, rather than by vehicle, no deductions in this regard were made in order to ensure a conservative analysis.”</p> <p>The Executive Summary further notes that:</p> <p>TRANS-7: The proposed Project, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to transportation and traffic.</p>	
B02-03		<p>General</p> <p>As the above-cited portion of the DEIR indicates, in its focus on vehicular traffic it completely overlooks and/or diminishes very significant Project traffic impacts in the downtown/Plaza area that would result from the hotel’s pedestrian and bicycle traffic which, ironically and according to the Project description, the hotel intends to deliberately encourage as a way of mitigating any objections to its otherwise significant vehicular traffic impacts.</p> <p>As discussed <i>infra</i>, that pedestrian/cyclist impact on downtown/Plaza area vehicular traffic will not only be felt at the W. Napa St. and 1st St. W. intersection but at all intersections around the Plaza, as well as the W. Napa St./ 2nd St. W. intersection.</p>	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.
B02-04		To the extent other intersections are even mentioned, if any serious traffic study update were conducted a number of them would likely be rated at a LOS level of D or worse, with the City’s signature intersection at Broadway & Napa St. already a notorious F.	The analysis included in the Draft EIR addressed impacts at the three intersections most likely to experience a significant impact: namely, West Napa-Napa Street at Second Street West, First Street West and Broadway. As indicated on Page 4.10-25 of the Draft EIR, “The project does not result in direct or cumulatively significant intersection impacts under the standards applied.” Please refer to Master Response 2, Traffic Operation Impacts.
B02-05		<p>In that regard, the Draft notes:</p> <p>“The existing network of sidewalks and crosswalks are generally adequate to serve pedestrian traffic associated with the proposed Sonoma Hotel, though modifications are needed at West Napa Street/First Street West to safely serve the additional pedestrians that would be generated by the project. . . .</p> <p>Mitigation Measure TRANS-6A: The following shall be implemented:</p>	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>§ Improvements to the intersection of West Napa Street/First Street West, identified by the City of Sonoma as part of the General Plan Update process, and which may include curb extensions, striping modifications, and/or other similar facilities, should be constructed in conjunction with the project.</p> <p>Significance With Mitigation: Less than significant. Implementation of TRANS-6A would improve pedestrian access, which would reduce the Project impact to less than significant.”</p>	
B02-06		While the sidewalks and crosswalks in the Project and intersection area should – in total isolation from other material factors – arguably be physically/dimensionally adequate to accommodate additional pedestrian/cyclist traffic generated by the hotel, to suggest that curb modifications and re-striping will mitigate the Project’s increased pedestrian/cyclist impact on vehicular traffic to “less than significant” would be charitably described as fanciful at best by any resident who has ever traversed the 1st St. W. intersection by car or on foot.	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts.
B02-07		Consider that a single pedestrian in any of the several crosswalks (there are currently five, three of which link to a 5 x5 curbed safety island precariously perched in the middle of W. Napa) immediately slows or halts traffic on the traversed street (W. Napa or 1st St. W.) When vehicles execute turns at the intersection, traffic at the entire intersection can, depending on the direction of the turn, be halted or slowed by a single pedestrian in any of the crosswalks.	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.
B02-08		<p>Furthermore, it is well known that without any hotel nearby, pedestrians (residents and wandering tourists alike) step into and dawdle in the crosswalks at this particular intersection incessantly throughout the day and evening, especially during weekends and daily in the tourist season which, because of incessant promotions by the Tourism Improvement District, is or soon will be nearly year-round.</p> <p>Most significantly, the completed hotel will (at intended capacity and assuming two persons to a room) add at least 124+ additional pedestrians crossing that intersection at least twice daily (going from and to the hotel), plus an additional unknown but likely significant number of non-guests attending meetings, events or visiting friends and health or café facilities in the hotel.</p>	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.
B02-09		<p>The foregoing observations are more than realistic if one assumes, as the DEIR must, that the hotel will be successfully operated as planned to maximize its profits.</p> <p>They become even more so considering that guests and visitors walking or cycling between the hotel and the Plaza - or any of the shops and restaurants around it - <i>must</i></p>	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts.

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		cross at least one street at this intersection, which is also on a major state thru-highway.	
B02-10		<p>To suggest the added hotel pedestrian/cycle impact on vehicular at this intersection can or will be reduced to “less than significant” by “curbing, striping and/or other similar facilities” ignores the settled science of geometry, physics and human behavior, and is ludicrous on its face.¹</p> <p>The hotel will multiply by several orders of magnitude the pedestrian/cyclist impact on vehicle traffic at this intersection. The DEIR neither cites any credible evidence to the contrary nor proposes any credible study that might demonstrate otherwise.</p>	The volume increase in pedestrian traffic is not expected to be sufficiently substantial to multiply the impact of pedestrian traffic on vehicular traffic by “several orders of magnitude.” Please refer to Master Response 1, Pedestrian/Bicyclist Impacts.
B02-11		<p>Other Plaza and Downtown Intersections.</p> <p>The DEIR also essentially views the Project’s pedestrian/cyclist traffic impacts through the prism of a single intersection, failing to address the significance of its domino effect on vehicular traffic in adjacent area streets and intersections.</p> <p>The age-old question: “Why does the chicken cross the road?” is relevant, as the increased pedestrian/cyclist traffic from the hotel will not simply cross the W. Napa/1st St. W. intersection for the pleasure of it, and stop.</p> <p>Throughout the day and evening the hotel’s 124+ pedestrian/cyclists – tourists all -- will traverse the 1st St. W. intersection to and fro other destinations around the Plaza (e.g., the Mission, restaurants, tasting rooms, etc.). Inevitably they will traverse a number if not all of the Plaza intersections on a single outing from the hotel, resulting in a multiplier effect on pedestrian/cyclist-induced vehicular traffic delays at the other Plaza intersections and at the mid-block crosswalk on Spain St.²</p>	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.
B02-12		¹ The DEIR fails to contemplate the possible if not likely need for traffic lights at this intersection to facilitate pedestrian and vehicle traffic, foster safety and thus mitigate the inevitable negative traffic impacts that will result from the comings and goings of 124+ additional pedestrians daily through a major downtown commercial intersection on a state highway.	A traffic signal was not considered in compliance with City policy. Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.
B02-13		² At each location, vehicular traffic is already paralyzed numerous times daily virtually year-round by pedestrians in the crosswalks, as well as delivery trucks parked mid-street and an endless flow of cars circling the Plaza in search of parking.	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.
B02-14		The DEIR fails to evaluate or even acknowledge the impact of the hotel’s pedestrian/cyclist contribution to the broader existing Plaza-area vehicular/pedestrian traffic mash-up. While some of that mash-up results from north-south thru-traffic on State Hwy 12, a very significant portion of it is the result of deliberate civic intent and planning by the City, the Visitors Bureau and the Tourism Improvement District to draw	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.

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Comment #	Date	Comment	Response
		ever-more people to the historic Plaza's tourist-trapping commercial venues. ³	
B02-15		Beyond the extent that 124+ additional pedestrians/cyclists will further impede traffic at W. Napa and 1st St. W., it hardly needs noting that such backups already can (and frequently do) jam the traffic at the 2nd St. W. intersection (current LOS Level D) and at Broadway, where pedestrians crossing north/south or east/west already create a LOS Level F vehicular nightmare as they hurry – or more often not - across four (4) lanes of traffic to reach opposite curbs. ⁴	The service levels reported in the comment are inconsistent with those in the DEIR and the <i>Circulation Element Update Background Report</i> , W-Trans, October 8, 2014, both of which indicate that Broadway/Napa Street is operating at LOS D during the p.m. peak hour, not LOS F as stated. The intersection of West Napa Street/Second Street West is signalized, so pedestrians cross with adjacent traffic traveling along the same route rather than creating a conflict.
B02-16		As City residents and commuters know well, rush hour traffic on W. Napa St. presently backs between 1st St. W. and 5th St. W. and often far beyond, in both opposing lanes. Likewise, back-ups at 1st St. W. back westbound traffic to Broadway and 1st St. E., which in turn routinely jams the short bloc of E. Napa St. to 2nd St. E. As residents of 2nd St. E. can attest, Plaza traffic is turning their previously quiet residential street into a major north/south detour for traffic seeking to escape congestion at the Plaza.	The circulation issues identified are more appropriately addressed through the City's General Plan Circulation Element Update process as they are not specific to the proposed project.
B02-17		³ It is inconceivable that the DEIR would ignore or dismiss the hotel's pedestrian/cyclist impact on all Plaza area intersections, when the very reason an alleged commercially viable hotel is being constructed at the location in question is precisely to add volumes of tourists and visitors to the pedestrian commercial traffic in the downtown/Plaza business district.	The impacts of pedestrian traffic were neither ignored nor dismissed, though they have been expanded upon. Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.
B02-18		⁴ Though beyond the scope of this DEIR, the traffic (vehicular and pedestrian) at these intersections is at intolerable levels in large part because of the failure by Caltrans, County and City representatives to seriously discuss re-routing State Hwy. 12 which passes through the very heart of a City and Valley that invite, and indeed economically depend upon, leisurely tourism traffic fueled by wine and beer, with the well-documented attendant impacts on traffic and public safety.	This comment provides an opinion about traffic on Highway 12. No response is required.
B02-19		Already such traffic situations are routinely and visibly aggravated by pedestrian/cyclist crossings at those intersections, and the planned hotel will unavoidably and significantly worsen the situation.	This comment has been noted. Please refer to Master Response 2, Traffic Operation Impacts.
B02-20		Cumulative Impacts Finally, contrary to the executive summary's conclusion in TRANS 7, the Project will unavoidably result in 'significant cumulative impacts' not only vis a vis current conditions in the area but with several planned nearby hotel & housing projects which are not only foreseeable but are in fact before the Planning Commission in various stages and iterations of the existing approval process. ⁵ Major among them are the FSE hotel/housing project on 1st St E., an office/housing	The Cumulative analysis was based on projected volumes that reflect anticipated build-out of the City along with regional growth beyond the City. While specific development applications were not incorporated, the overall volume increases obtained from a model reflect a greater degree of development than would be estimated using only known or reasonably foreseeable projects. The analysis of Cumulative conditions is therefore more conservative than would be projected based on these development proposals. Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.

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		<p>complex behind the Mercado off E. Spain St., and a major housing complex at Broadway and MacArthur, all within minutes walking distance of the Sonoma Hotel project.</p> <p>The TRANS 7 conclusion that the increased pedestrian/cyclist traffic from the hotel will not hugely contribute to the negative cumulative traffic impacts of these projects on downtown/Plaza area and adjacent streets in the foreseeable future is patently absurd to anyone familiar with Sonoma’s long-neglected traffic challenges.</p>	
B02-21		<p>Summation A credible EIR must assume that the project in question, as with any business enterprise, will operate and succeed as the Applicants intend, and that in order to maximize profits the hotel will make every effort to maximize the guests and visitors using its facilities year-round, including those available to both guests and the general public.</p>	This comment does not question the adequacy of the analysis included in the EIR, and no response is required.
B02-22		<p>⁵ I submit that any project known to the Planning Dept. via formal application or informal inquiry by an applicant is, by definition, “foreseeable” and not mere gossip or speculation. Given the customary length and rigor of the existing process, years often pass between an applicant’s initial contact with Planning and the commencement of construction.</p> <p>The addition of 124+ additional pedestrian/cyclists daily from the hotel (or any significant fraction of that number) is therefore a realistic and minimum baseline expectation from which to appreciate the hotel’s impacts on traffic, both vehicular and pedestrian/cyclist. Its contribution to increased pedestrian/cyclist traffic cannot help but materially worsen the vehicular traffic and pedestrian safety environment of the entire Plaza/downtown area and would require substantial mitigation if the hotel’s pedestrian/cyclist impacts on traffic are to be reduced to ‘less than significant.’</p> <p>Yet the DEIR fails to acknowledge even a need for a credible in-depth study of the impacts resulting from the project’s plan to sharply increase pedestrian and bicycle traffic in the indisputably congested downtown/Plaza area.</p> <p>Indeed, its authors are oblivious to the irony that the Project will intentionally foster that increase in order to mitigate what it essentially concedes would otherwise be the hotel’s significant vehicular traffic impacts, not only on Plaza-area streets and intersections but on the narrow, high-density, mixed-used 1st St. W, southbound from W. Napa all the way to MacArthur Blvd.</p> <p>Bob Edwards 310 E. Napa St. Sonoma CA</p>	This comment summarizes the comments included in the comment letter and does not directly question the analysis included in the EIR. No further response than those provided above are required.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B03	2/21/16	David Eichar	
B03-01		This document contains my comments on the Hotel Project Sonoma (also known as West Napa Hotel) Draft EIR.	The comment serves as an introductory statement. The comment is noted and requires no further action.
B03-02		<p>Major Concern, Residential Component</p> <p>My major concern of the EIR is what is missing. First and foremost is the fact that the EIR assumes that the project will get a waiver of the residential component requirement from the Sonoma Planning Commission and City Council. I believe this is unlikely, given the major concern for affordable housing by both bodies.</p> <p>According to the Sonoma Municipal Code, 19.10.020 Zoning districts established, B. Commercial Zoning Districts, paragraph 3:</p> <p>3. Residential Component. In applications for new development on properties of one-half acre¹ 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:</p> <p>a. The replacement of a commercial use within an existing tenant space with another commercial use.</p> <p>b. The presence of uses or conditions incompatible with residential development on or adjacent to the property for which a new development is proposed.</p> <p>c. Property characteristics, including size limitations and environmental characteristics, that constrain opportunities for residential development or make it infeasible.</p> <p>d. Limitations imposed by other regulatory requirements, such as the Growth Management Ordinance.</p> <p>It does not appear that the Planning Commission would be able to make the findings to waive the residential component requirement in the SMC.</p> <p>Chapter 7.2 of the EIR states, "Section 15126.2(d) of the CEQA Guidelines requires that</p>	<p>The comment questions the likelihood that the Project Applicant would get the waiver necessary for the Project to not include a residential component, as required by the City of Sonoma Municipal Code (SMC). Since the Project would not be constructed as proposed without this waiver, the assumption that the Project would receive this waiver does not detract from the adequacy of the Draft EIR. If the Planning Commission does not make the findings necessary for approval of the waiver, then analysis would have to be done to determine if changes in the Project description would be substantial.¹ If the Project description is substantially revised, then the Draft EIR would need to be modified to address the change and recirculation of the Draft EIR could be necessary.</p>

¹ See CEQA Guidelines Section 15088.5 for a definition of "substantial" in this context.

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		<p>an EIR discuss the ways in which a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”</p> <p>Additionally, the EIR references Senate Bill 375 and Plan Bay Area’s housing requirements. There are few available buildable sites in the city of Sonoma, so every opportunity to build housing should be taken.</p>	
B03-03		<p>The EIR includes alternatives; however, the alternatives do not include a project with a residential component. The EIR must contain an alternative with housing to be complete.</p>	<p>The commenter suggests that the Draft EIR must have an alternative that includes housing in order for it to be complete. According to CEQA Guidelines section 15126.6, “(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.” Therefore, there is no requirement that an alternative with a residential component be analyzed. The comment is noted and requires no further action.</p>
B03-04		<p>Environmental Impact Resource Categories Missing from EIR There are some specific environmental impact resource categories which were identified in the Initial Environmental Initial Study Checklist as not required to be addressed in the EIR. The EIR should include these environmental impact resource categories</p> <ul style="list-style-type: none"> • Public Services – Parks; • Recreation – Parks; • Greenhouse Gas Emissions – b) Conflict with policy or regulation for reducing emissions of greenhouse gases. 	<p>This comment serves as an introduction to the comments that follow. Please see responses to comments B03-05, B03-06, B03-07, B03-08, B03-09.</p>
B03-05		<p>Public Services & Recreation Public Services – Parks; Recreation – Parks were not included in the EIR. How can the Initial Environmental checklist just say that 62 guest rooms would only have a negligible impact on parks, such that it is excluded from the EIR. We know there are already issues with overuse of the Plaza.</p>	<p>The comment suggests that the Initial Study for the proposed Project wrongly determined that the impact of the proposed Project on parks in the area would be negligible and asks how this determination was made. Furthermore, the commenter suggests that the Plaza is overused.</p> <p>Please refer to section 15, Recreation, of the Initial Study that was prepared for the proposed Project (included as Appendix B of the Draft EIR). In this section it is explained that “the Project would not increase the population in the City of Sonoma beyond regional growth projections which are used for other planning efforts.” This was the reasoning behind the determination that the Project’s contribution to the use of local parks would be negligible in this respect. In order to clarify the analysis in the Initial Study Checklist, text in the Public Services section of the Initial Study has been revised to carry over this justification to that section. These revisions are included in this Final EIR in track changes format to show where edits were made.</p>
B03-06		<p>In addition, the Sonoma Overlook Trail and the Montini Open Space Preserve are already seeing an increase in hikers. Further increase in hikers on these trails may adversely impact wildlife and the ecosystem. The environmental impact on these 3 parks should be</p>	<p>Please refer to section 15, Recreation, of the Initial Study that was prepared for the proposed Project (included as Appendix B of the Draft EIR). In this section it is explained that “the Project would not increase the population in the City of Sonoma beyond regional growth projections which are used for</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		included in the EIR.	<p>other planning efforts.” This was the reasoning behind the determination that the Project’s contribution to the use of parks would be negligible in this respect. Since the commenter does not offer any evidence related to the increase in hikers in the Montini Open Space Preserve, no further response can be provided.</p> <p>Potential impacts to biological resources, like the wildlife and ecosystem described by the commenter, were scoped out in the Initial Study (Appendix B of the Draft EIR) and this comment does not provide substantial evidence to suggest that any of the analysis in that section is inadequate.</p>
B03-07		<p>Greenhouse Gas Emissions The category Greenhouse Gas Emissions – b) Conflict with policy or regulation for reducing emissions of greenhouse gases was excluded. The Checklist looked at the "Project Consistency with Sonoma County’s Community Climate Action Plan", which includes:</p> <ul style="list-style-type: none"> • Transportation and Land Use • Solid Waste 	This comment serves as an introduction to the comments that follow. Please see responses to comments B03-08 and B03-09.
B03-08		<p>Transportation and Land Use Action Plan Solution #9 – includes mixed use being encouraged, but the Project will not include any new housing.</p>	<p>Please refer to page 32 of the Initial Study that was prepared for the proposed Project (included as Appendix B of the Draft EIR).</p> <p>The comment suggests that since the proposed Project is not mixed use, it is in conflict with the Sonoma County Community Climate Action Plan. Solution #9 from the Sonoma County Community Climate Action Plan does not require that all projects be mixed use. The solution states the following: “Strengthen city-centered, transit-oriented development. Continue to emphasize urban revitalization and infill, mixed-use, and transit-oriented development along major transportation and transit corridors.” This shows that the solution is encouraging infill, mixed use, and transit-oriented development, but a single project need not have all of these qualities. As described in the consistency analysis on page 32 of the Initial Study, “(t)he Project is an infill project that would be pedestrian oriented by encouraging hotel guests to walk or bike in and around the Sonoma Plaza. The Project is also proximate to Sonoma County Transit bus routes on Highway 12 and West Second Street.” This means that the proposed Project would not be in conflict with the Sonoma County Community Climate Action Plan and no further response is necessary.</p>
B03-09		<p>Solid Waste Action Plan Solution #3 – includes "Recycle or compost discards including products, packaging, and organic matter. Make recycling and composting systems mandatory for large waste generators." The checklist states, "The Project would comply with the recycling requirement of the City of Sonoma." However, the City of Sonoma does not require composting or recycling of biodegradable waste for restaurants or hotels.</p> <p>Kenwood Investments, the developer of the Project, owns Ramekins, a cooking school, event site and caterer. Ramekins does not recycle their biodegradable waste, despite the</p>	Please refer to page 32 of the Initial Study that was prepared for the proposed Project (included as Appendix B of the Draft EIR). Sonoma Garbage Collectors, the solid waste collection company that serves the project site, has a food waste program that allows for organic waste to be recycled and the City may choose to require participation in this program as a condition of approval.

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>biodegradable waste constituting more than half of their total waste. (Biodegradable waste at restaurants can comprise 50% to 70% of their total waste by weight.)</p> <p>Since the Initial Environmental Report’s conclusions are suspect, the Project should be required to recycle or composting of biodegradable waste as a mitigation.</p>	
B03-10		<p>EIR Reliance on Sonoma Municipal Code In chapter 4.1 AESTHETICS, page 4.1.8, the EIR references parts of the Sonoma Municipal Code (SMC). The EIR for AES-1 states “adherence to the SMC sections listed above would ensure a less-than-significant impact with respect to visual character, upon Project approval.”</p> <p>But the municipal code allows the planning commission to grant waivers and exceptions. If the planning commission grants waivers or exceptions to the project, and the EIR cited the code and/or general plan in its determination that a category’s impact is less-than-significant, does this require the EIR be updated to re-evaluate the category? Does this prohibit the Planning Commission from granting such waivers or exceptions?</p>	<p>The commenter questions the EIR’s reliance on provisions of the City of Sonoma Municipal Code (SMC) to reduce potential impacts related to visual character to a less-than-significant level. While the commenter is correct to note that the SMC allows for exceptions, these exceptions can only be approved if required findings are made. As shown in SMC section 19.54.050(F), “Any exception granted shall be subject to conditions that will ensure that the exception is compatible with adjacent properties.” This provision would further ensure that potential impacts related to visual character would be less than significant upon Project approval. This provision would also ensure that updating or re-evaluating the impact of the Project on visual character would not be necessary regardless of whether or not the Planning Commission allows for an exception. In any event, the project applicants have not proposed any waivers or exceptions with respect to building height, setbacks, coverage, or Floor Area Ratio.</p> <p>The EIR for the Project is intended to inform governmental decision makers about the potential, significant environmental effects of proposed activities and would not prevent the Planning Commission from exercising the authority given to them in the SMC.</p>
B03-11		<p>Consistency with Surrounding Area Multiple sections of the EIR refer to the General Plan, Municipal Code and Development Code’s statements of preserving the historic character of Sonoma. Page 4.1-3 of the EIR quotes the Sonoma Municipal Code:</p> <p>“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.”</p> <p>A 62 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.</p>	<p>Please refer to impact discussion AES-1 on pages 4.1-7 and 4.1-8 of the Draft EIR. As described, “Section 19.54.080(G)(1) provides the basic findings that must be made. These include the following, “The project responds appropriately to the context of adjacent development, as well as existing site conditions and environmental features.” In addition to these findings, in accordance with Section 19.54.080(G)(2), for projects that are within the Historic Overlay District, like the proposed Project, the following findings would also be required prior to Project approval:</p> <ul style="list-style-type: none"> ▪ The project will not impair the historic character of its surroundings; ▪ The project substantially preserves the qualities of any significant historic structures or other significant historic features on the site; ▪ The project substantially complies with the applicable guidelines set forth in Chapter 19.42 SMC (Historic Preservation and Infill in the Historic Zone); and ▪ The project substantially complies with any applicable preservation plan or other guidelines or requirements pertaining to a local historic district as designated through SMC Section 19.42.020.” <p>Since the City would be required to make the findings listed above in order for the proposed Project to be approved, upon Project approval, the proposed Project would be determined to be consistent with its surroundings. The commenter’s opinion that the hotel would not be consistent with other buildings in the historic overlay district will be forwarded to the City of Sonoma for consideration prior to approval of the project.</p> <p>These findings do not specify any particular threshold or limitation regarding the number of hotel rooms</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B03-12		<p>Greenhouse Gas Emissions and Traffic On page 4.6-14, the EIR states Senate Bill 375's "intention is to reduce GHG emissions from light-duty trucks and automobiles (excluding emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce VMT and vehicle trips."</p> <p>In chapter 7.2, I am not sure how the EIR came to the conclusion that there is less-than-significant impact on greenhouse gas emissions when 90% of workers in Sonoma do not live in Sonoma. Some of the low paid hospitality workers commute from far away cities, such as Vallejo. With low unemployment in the city of Sonoma, lower than the county, and affordable housing not to be found, most employees will not be living close enough to bicycle to work.</p> <p>This impacts traffic as well as GHG emissions. The additional commuters into Sonoma should be considered when evaluating the impacts on GHG emissions and traffic.</p>	<p>that may be proposed.</p> <p>Please refer to Table 4.6-5 in Chapter 4.6 of the Draft EIR. In this table, existing and projected GHG emissions from on-road mobile sources are listed. As shown, the projected GHG emissions from traffic generated by the Project would generate 271 million metric tons of carbon dioxide equivalent (MTCO₂e) per year over existing conditions. However, as described on page 4.6-22 of the Draft EIR, "the net increase GHG emissions generated by the operational phase of the Project would be nominal and would not exceed BAAQMD's bright-line significance criteria of 1,100 MT of CO₂e per year."</p> <p>The driving distances of employees are unknown; however, the site is served by transit lines that would allow employees to take the bus to work. The traffic impacts of the project as evaluated include trips associated with employees based on typical hotel operations and trip levels.</p>
B03-13		<p>Vehicular and Pedestrian Traffic On page 4.10-18, the EIR states, "the project has the potential for reducing VMT (vehicle miles of travel) and the associated GHG (greenhouse gas emissions) by allowing its guests to make the majority of their trips as pedestrians."</p> <p>In a recent planning commission meeting, the operator of a B&B by the Plaza stated that while the guests of the B&B do walk to the Plaza, they only spend a few hours on the Plaza, and typically take driving trips to wineries and other sites away from the Plaza. In addition, there are numerous weddings in the valley at wineries and other event sites. The wedding guests, who stay at hotels, usually drive, take a taxi or Uber from their hotels to the event site. So, besides the additional pedestrians around the Plaza, you also have an increase in vehicles on weekends from tourists traveling to wineries and other locations in the Sonoma Valley. Assuming that hotel guests will park their cars and walk or bike the remainder of their stay is a fallacy.</p>	<p>The trip generation assumptions applied in the analysis were based on typical hotel activity, which includes driving to nearby attractions. While some of the guests may walk to the Plaza and nearby for shopping, dinner, and other events, it is anticipated that guests will also drive to wineries, weddings and other attractions. No deductions were made to the trip generation to reflect any anticipated walking trips to the Plaza, nor was it assumed that guests would walk or bike to destinations and not use their vehicles.</p>
B03-14		<p>Pedestrian Impacts on Traffic The traffic study in chapter 4.10 fails to take into account that a major reason for traffic backup around the Plaza is due to motorist waiting for pedestrians to cross the street. As stated in the EIR and in the hotels own documents and presentations, it expects many of its guests to walk to the businesses on the Plaza.</p> <p>On 4.10.22, the EIR states, "Impact TRANS-6A: The Project would add pedestrian trips to an intersection that has been identified by the City's Traffic Committee as needing</p>	<p>To be conservative, the analysis was based on the assumption that all of the study intersections would remain in their current configuration. This does not, however, negate the potential that improvements will be identified and constructed, and in fact, Mitigation Measures TRANS-1A and TRANS-6A require the project to construct improvements at West Napa Street/First Street. Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.</p>

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>improvements to accommodate pedestrian travel safely and efficiently.”</p> <p>On page 4.10-23, the EIR states, “Mitigation Measure TRANS-6A: The following shall be implemented:</p> <ul style="list-style-type: none"> • “Improvements to the intersection of West Napa Street/First Street West, identified by the City of Sonoma as part of the General Plan Update process, and which may include curb extensions, striping modifications, and/or other similar facilities, should be constructed in conjunction with the project.” <p>What happens to the project if improvements to the intersection of West Napa Street/First Street West are not implemented? Must the EIR be updated to provide a new mitigation measure?</p> <p>Especially since on page 4.10-24, the EIR states: “At this time, there are no funded improvements at any of the study intersections; however, the City of Sonoma is considering identifying long-range improvements at Napa Street/Broadway and West Napa Street/First Street West to alleviate congestion and improve pedestrian safety. Since no specific improvements have been approved and no funding programmed, it was assumed that there would be no changes to the future roadway network for analysis purposes.” This invalidates the Mitigation Measure TRANS-6A.</p>	
B03-15		<p>Traffic Study Dates</p> <p>Page 4.10-13 of the EIR states, “Volume data was collected in Spring 2015 while local schools were in session, which also coincides with average tourist activity within the Sonoma Valley”</p> <p>Spring has the average tourist activity, not the peak season. Lodging occupancy in Sonoma over the past 5 years averages 19.3% higher in peak months in summer and early fall, compared to spring. The traffic study should be done during peak tourist season to obtain the true impact of increased traffic.</p>	<p>As the commenter notes, Spring reflects average conditions for tourism; this is also what the DEIR stated. However, it typically reflects peak activity system-wide due to the differences in traffic patterns when school is in session versus during the summer when it is not and many residents are on vacation. It is noted that the pedestrian counts used for analysis of weekend conditions at West Napa Street/First Street East were obtained during an October event in the Plaza. This count likely represents peak conditions as it captures traffic on a day with good weather, during harvest, when there was an event and during the school year when fewer local residents are typically traveling.</p>

TABLE 5-1 RESPONSE TO COMMENTS

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Source: DeAnna Hilbrants, Finance Director, City of Sonoma

03-16	<p>Incomplete Traffic Study</p> <p>The EIR states, “weekend midday peak hours (12:00 noon and 2:00 p.m.) guests would depart via a one-way vehicle ramp from the parking garage”. And later in the EIR, “Large truck deliveries would be staged from the street on First Street West.” The traffic study did not include 1st St West, south of the project. Since vehicles must turn right from northbound First Street West onto West Napa Street, most drivers heading north, east or south, will head south onto First Street West to drive around the block. The EIR should include the impact of this traffic on First Street West. There are residences along this street, including an apartment building with children on the corner of First Street West and Andrieux. What pedestrian safety issues are there with the increase in vehicular traffic, including large delivery trucks?</p>	<p>As indicated on Page 4.10-17 of the Draft EIR, 10 percent of the project’s trips were assumed to travel via First Street West south of the project site. Applied to the total project trip generation rather than the net new trips (see Response to A01-04), this results in a total of 51 daily trips along this roadway, including 4 hourly trips during the weekday and weekend p.m. peaks. This change in the traffic volumes is less than the variation experienced on a day-to-day basis due to seasonal changes and personal adjustments to travel habits. Because this number of new trips on an hourly basis is so minimal, additional analysis would reasonably be expected to show that the impact is less-than-significant; hence no further analysis was performed.</p>
B03-17	<p>Also, two of the worst intersections on the Plaza for traffic delays are West Napa Street at First Street West and East Napa Street at First Street East. These should have been included in the traffic study.</p>	<p>The intersection of West Napa Street/First Street West was studied. East Napa Street/First Street East was not studied because the project would add such a limited number of trips at this location. Further, the project has a less-than-significant impact at Napa Street/Broadway, which has much higher volumes and the same controls, so it is reasonable to anticipate a similar finding for East Napa Street/First Street East.</p>
B03-18	<p>Outdated and Inaccurate Information</p> <p>Table 4.1 CURRENT AND REASONABLY FORESEEABLE DEVELOPMENTS IN THE CITY OF</p>	<p>Although the Planning Commission has reviewed some preliminary development concepts for that site in a study session format, no application has been filed. However, Table 4-1 of the Draft EIR shows the site</p>

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		SONOMA, does not include the development of 3.4 acres of land on First Street East and Second Street East, just north of the Plaza. The property is mixed use and will contain a number of residential housing units.	(identified as “Peterson”) as having received 53 residential Growth Management allocations. The baseline traffic projections used in the EIR assume the development of 53 residences on a 2-acre portion of the referenced site.
B03-19		Chapter 4.8.1.3, page 4.8-12 states, “Broadway/SR-12, approximately 500 feet east of the site, is a four-lane road with a posted speed limit of 35 miles per hour.” This is incorrect. The speed limit at the north end of Broadway is 25 MPH. The 25 MPH zone runs between 678 Broadway (mid-block between Andrieux and Maple) and the Sonoma Plaza. It is 35 MPH south of this. This error of the facts raises the question about what other statement of facts are incorrect.	This comment has been noted, and page 4.8-12 has been amended to reflect this comment.
			
		Broadway, looking north. From Google Maps street view.	
B04	2/22/16	Fred Allebach	
B04-01		EIR Public Comment for West Napa Street Hotel Development Comment by Fred Allebach, 19550 8th Street East, Sonoma, CA 95476 2/22/16 In my EIR comment I intend to address potential project environmental issues of greenhouse gas emissions, water, transportation and traffic congestion. In the course of this comment I hope to make a general case that the EIR process itself is not adequate to measure cumulative and aggregate impacts. Project environmental impacts certainly appear significant to the man on the street when considered along with the following aggregate effects:	This comment serves as an introduction. While this comment generally states that the Draft EIR is deficient with respect to cumulative impact analysis and lists several factors which the commenter suggests contribute to the deficiency of the Draft EIR, the comment does not provide specific information regarding the content of the Draft EIR; therefore, no further response can be provided. Please see responses to comments B04-02 through B04-22 for more specific responses to the issues raised in this comment letter.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>-the Plaza has a continuous stream of events and promos -unregulated buses, vans, limos are constantly coming to the Plaza</p> <p>-the TID is telling the whole world to come here</p> <p>-the City has a goal to advance 365 day a year tourism</p> <p>-a statewide economic upturn is especially pronounced in the Bay Area with Silicon Valley wealth and wine hype driving a local gentrification trend and tourism bonanza</p> <p>-North Bay population is expected to increase by 2 million people in the next 20 years</p> <p>-49 single family units, 180 multi family units and 68 (+ 50) possible hotel rooms are slated for current and foreseeable development in the immediate area of the hotel project.</p> <p>The sum total of the above factors arrives at what many others and I consider significant environmental effects for this project.</p>	
B04-02		<p>Project GHG and CO2 footprint</p> <p>The total transportation GHG footprint of the proposed hotel project has regional and global environmental impacts that are measurable, have consequences, yet seem to be ignored by the EIR process.</p> <p>Project EIR measurements of air quality are focused only on the Bay Area Basin. The atmosphere however is a whole system, a world system. GHG caused climate change is not limited to this basin only.</p> <p>Do BAAQMD GHG regulations adhere to standards needed to reverse global warming or not? A critical question here is: will true cost accounting be applied to the total GHG transportation footprint of hotel travel, or will it seek to be delimited to the hotel proper and immediate environs only?</p>	<p>This comment suggests that the Draft EIR did not consider a large enough scale with respect the greenhouse gas emissions (GHGs). As described on page 4.6-1 of the Draft EIR, “(b)ecause no single project is large enough individually to result in a measurable increase in global concentrations of GHG emissions, climate change impacts of a project are considered on a cumulative basis.” Furthermore, the impact discussion on page 4.6-22 states that “GHG emissions related to the proposed Project are not confined to a particular air basin but are dispersed worldwide.” With these considerations in mind, as shown in Table 4.6-5 the proposed Project would not exceed BAAQMD’s bright-line threshold and therefore, would generate a nominal increase in GHG emissions.</p> <p>Additionally, this comment asks whether BAAQMD regulations adhere to standards needed to reverse global warming. To answer this question, please refer to page 31 of the Initial Study prepared for the Project (included as Appendix B of the Draft EIR). As shown, BAAQMD’s Scoping Plan is intended to help achieve the goals set forth by Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 set the goal to reduce GHG emissions in California to 1990 levels by 2020 — a reduction of approximately 15 percent below emissions expected under a “business as usual” scenario. According to the California Air Resources Board, “The full implementation of AB 32 will help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste.”² This means that achieving the goals of AB 32 would help to counteract the impacts of climate change; however, given global warming takes place on a global scale, actions taken in California would be unlikely to reverse global warming on their own.</p>
B04-03		<p>How is a “project” measured? By pollutants generated on site or by cumulative transportation and construction GHG footprint? The Project is within a “1000’ evaluation</p>	<p>According to CEQA Guidelines section 15064(d), “In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be</p>

² California Environmental Protection Agency, Air Resources Board, Assembly Bill 32 overview, <http://www.arb.ca.gov/cc/ab32/ab32.htm>, accessed April 8, 2016.

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		zone". Is the <i>environment</i> not systemic and rippling effects need to be taken account of?	caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project." As described in Chapter 4.2 and Chapter 4.6 of the Draft EIR, impacts of the proposed Project with respect to air quality and GHGs are not limited to pollutants and emissions generated on-site. For example, the potential for new local carbon monoxide hotspots as a result of additional vehicle trips generated by the proposed Project is evaluated in Chapter 4.2. Additionally, with respect to GHGs, the impact of vehicle trips generated by the proposed Project are evaluated in Table 4.6-5.
B04-04		<p>"Based on the Initial Study, it was determined that the Project could result in a significant greenhouse gas emissions impact if it would: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment."</p> <p>The project would indirectly result in a large CO2 footprint for air travel alone. This is a glaring omission: airline emissions for the hotel guests; the hotel is not in a vacuum, global warming is systemic to the whole planet; how many airline flights and vehicle trips will result from this project? Airports are 1.5 hours away from the project, through congested traffic. What is the projected CO2 and GHG total footprint of this transportation environmental impact created by the project, over a year?, over 5 years? What is the GHG footprint per customer who flies in on a per-miles-flown and driven basis?</p>	It is not anticipated that the project would generate aircraft trips. Although some guests may utilize air travel to reach the City of Sonoma, the project itself is not likely to be the only reason for aircraft travel to be utilized. As described in impact discussion GHG-2 on pages 4.6-22 and 4.6-23 of the Draft EIR, "(a)s identified in Impact GHG-1, Table 4.6-5 shows that the proposed Project would not exceed BAAQMD's bright-line threshold and therefore would generate a nominal increase in GHG emissions. Consequently, GHG emissions impacts of the Project are not cumulatively considerable, and therefore would be <i>less than significant</i> ."
B04-05		<p>A true cost accounting of the systemic effects has to be made, or the full cost of the project's GHG emissions footprint is avoided.</p> <p>There is methodological trouble with "significant" being narrowed to a scope that does not measure the true cost of transportation CO2 footprint; scope is narrowed to an unreasonably small area, and then it is asserted there is no significant impact.</p>	Please refer to response to comment B04-03, which demonstrated that the Draft EIR does not limit its analysis to on-site impacts. Since this comment does not cite a specific deficiency in the Draft EIR, no further response can be provided.
B04-06		The EIR makes an attempt to address cumulative impact. "A cumulative impact is created as a result of the combination of the Project together with other reasonably foreseeable plans and projects causing related impacts. Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts of a project when the Project's incremental effect is "cumulatively considerable." Where the incremental effect of a project is not "cumulatively considerable," a lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. Where the cumulative impact caused by the project's incremental effect and the effects of other projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant. The CEQA Guidelines provide two approaches to analyzing cumulative impacts. The first is the "list approach," which requires a listing of past, present, and reasonably anticipated future projects producing related or cumulative impacts. The second is the projections-based approach wherein the	This comment serves as an introduction to comment B04-07. Please see the response to comment B04-07.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		relevant growth projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions are summarized. A reasonable combination of the two approaches may also be used.”	
B04-07		Could the city, the lead agency please “briefly describe its basis for concluding that the incremental effect is not cumulatively considerable”? Do we not have a global climate problem from GHG emissions that we can’t just keep adding more effects to? How do we go about business as usual and ignore the cumulative transportation GHG effects of a 62-room hotel and 80-seat restaurant that will be drawing tourists from all over the world?	As described in impact discussion GHG-2 on pages 4.6-22 and 4.6-23 of the Draft EIR, “(a)s identified in Impact GHG-1, Table 4.6-5 shows that the proposed Project would not exceed BAAQMD’s bright-line threshold and therefore would generate a nominal increase in GHG emissions. Consequently, GHG emissions impacts of the Project are not cumulatively considerable, and therefore would be <i>less than significant</i> .” The other questions in this comment do not raise specific concerns about the adequacy of the analysis in the Draft EIR and no further response is required.
B04-08		<p>Water Use For water, city and county citizens have worked hard to conserve water and now Kenwood Investments LLC is going to take up this water as a subsidy for private profit? This amounts to taking of a common pool resource with no tangible public benefit other than economic advances that accrue to the 1%.</p> <p>Certainly this project will increase overall water use from the city’s SCWA entitled but finite Russian River system water allotment. If there is enough water, why is the public being encouraged to conserve by the state, county and city?</p>	This comment expresses concerns about the Project’s potential use of water. Since this comment does not raise specific concerns about the adequacy of the analysis in the Draft EIR, no further response is required. Nonetheless, this comment will be forwarded to City decision makers for consideration.
B04-09		<p>Traffic and Transportation First I will review some points from the “Circulation Element Update, First Draft Policy Review. Under Goal 1: Maintain a Citywide Roadway System the Provides for the Safe and Efficient Movement of People and Goods to All Parts of Sonoma, policy to be added: “The five intersections surrounding the historic Sonoma Plaza shall be exempt from vehicle LOS (Level of Service) standards in order to maintain the historic integrity of the Plaza and prioritize non-auto modes.”</p> <p>This means the worst intersections in town are proposed to be exempt from LOS traffic impact measurement. This amounts to a Get Out of Jail Free card for the hotel developer because obvious high impacts that everyone can see won’t be accounted for no matter what the EIR says. Given the historic overlay area and public pressure to not change anything about the Plaza, it is conceivable that no traffic controls will be put downtown at all, not a stoplight or pedestrian controlled crosswalk. This means higher traffic and pedestrian usage levels will be added with no mitigation.</p>	This comment expresses an opinion about the City’s update of its Circulation Element and does not provide specific examples regarding inadequacy of the analysis. No response is required.
B04-10		If the public doesn’t want any traffic controls, and not much to change on the Plaza, why would they want a 62-room hotel and 80-seat restaurant that is going to increase existing traffic and pedestrian congestion and by implication, force traffic control changes to the	This comment poses a question about the merits of the project and does not question the adequacy of the analysis included in the EIR. No responses is required.

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		historic Plaza?	
B04-11		To document how bad Plaza area traffic really is would require that studies be done that do not pass over the proposed Circulation Element exempt status of Plaza intersections. The worst intersections, First Street East and Napa, First Street East and Spain and First Street West and Napa, First Street West and Spain are not even rated in the study table of PM peak hour LOS! Broadway and Napa Street is currently Level of Service D and moving to F-rated. Fifth Street West and Spain is LOS D moving to E. Fifth Street West and West Napa is LOS D moving to E.	The commenter suggests that the project’s impacts at a number of additional intersections around the Plaza should have been studied. It is noted that the impacts were studied at the three most critical intersections along West Napa Street/Napa Street at Second Street West, First Street West and Broadway. The number of trips that the project would add to an intersection decreases for each block further from the site, the highest volumes in the area are experienced on Napa Street, and the project’s impact was determined to be less-than-significant at two of the three critical intersections studied, with impacts at West Napa Street/First Street West significant because of the extremely high pedestrian volume at that location coupled with the high volumes on Napa Street. It is therefore reasonable to conclude that the project’s impact would be less at these further removed intersections than at Napa/Broadway, and therefore still less-than-significant, at the additional intersections identified.
B04-12		However, a city planning goal is “Reinforce the historic, small-town characteristics that give Sonoma its unique sense of place”. If consistent with historic small town character means scale, less congested, how does ramping up Plaza use and a new big hotel project fit? It doesn’t. The exempt Plaza intersections are at D, E and F level wait times and queues already, throw in endless events and endless tourists and the project will clearly booger up an already bad situation.	This comment expresses an opinion about the merits of the project and potential impacts related to increased traffic. This comment does not directly question the adequacy of the analysis included in the Draft EIR. Please refer to Master Response 2, Traffic Operation Impacts.
B04-13		<p>The city has a problem here with critical General Plan goals being at cross-purposes. This project and its EIR presumably have to fit into existing General Plan goals.</p> <p>General Plan (Section 19.34.010(B), Desired Future, states that... “The primary objectives for the Downtown district are to preserve and enhance its historic character and to retain and promote its economic vitality as a commercial, cultural, and civic center attractive to residents and visitors.” Additionally, this section states that new construction should build upon the established character of Downtown.</p> <p>CD-5 and CD-5.1 “Reinforce the historic, small-town characteristics that give Sonoma its unique sense of place. Preserve and enhance the scale and heritage of the community...”</p> <p>CD-5.2 “promote positive community interaction through provision of attractive public spaces.”</p> <p>“Local Economy Element of General Plan LE-1, LE-1.5, LE-1: Support and enhance the local economy in a manner consistent with Sonoma’s character and in furtherance of its quality of life. Promote and accommodate year-round tourism that is consistent with the historic, small-town character of Sonoma. Preserve and enhance the historic Plaza area as a unique, retail-oriented commercial and cultural center that attracts both residents and visitors.”</p>	This comment expresses an opinion about the internal consistency of the City’s General Plan. This comment does not question the adequacy of the analysis included in the Draft EIR, and no response is required.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		The General Plan sets goals that are in complete tension; there is not a clear policy. Business interests are in clear conflict with the interests of residents. "This development code is adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents, and businesses in the city." "The primary objectives for the desired future of the Downtown district are to preserve and enhance its historic character and to retain and promote its economic vitality as a commercial, cultural, and civic center attractive to residents and visitors."	
B04-14		<p>An attractive public space that is so crowded you can't park, can't drive to, can't enjoy the atmosphere because there is too much congestion, how does this fit all the pronouncements about small town character, historical value and scale? This hotel project represents economic General Plan values being out of balance with stated cultural and residential values concerning the Plaza's historic, small town environment.</p> <p>And now, we have an EIR for a <i>62-room hotel, an 80-seat restaurant, spa/fitness center, swimming pool, and 115 off-street parking</i> just off the Plaza where somehow, against all public perception, against realities of aggregate and cumulative effects, it is being asserted that this project, in the building and finished stages, will not add to an already bad situation and make it worse, it will not create a significant impact!?</p>	It should be clarified that the Draft EIR clearly identifies that the project will have an impact, or add to the delay; and that further analysis as presented in Master Response 2, Traffic Operation Impacts, details the operational impacts associated with increased pedestrian activity at West Napa Street/First Street West. Where impacts were deemed significant, mitigation measures have been identified to reduce the impact to a level that is less-than-significant.
B04-15		<p>All the hotel traffic and truck delivery will enter from and exit onto or be immediately collected by Napa Street West. This projected hotel vehicular traffic plus all hotel pedestrian traffic will all originate on the southwest corner of the Plaza, an acknowledged already bad pedestrian and traffic area.</p> <p>Napa Street West already has 14,000 – 15,0000 cars a day coming into town. Hotel guests will be encouraged to walk and bike everywhere and certainly with this hotel at projected levels, pedestrian trips will be intensified at an intersection needing safety and efficiency improvements. I don't believe it is possible for the hotel to require guests to walk and bike everywhere, so full vehicular traffic effects on the Plaza may be much larger than the EIR projects.</p>	While guests can be expected to walk or bike as convenient, they were not assumed to walk or bike everywhere. Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.
B04-16		<p>Allow me to touch in parking issues for a moment: A parking survey by the city showed that 44% of Plaza use is from residents and that 50% of people have trouble parking, and 50% of people think there is a parking problem on the Plaza. Almost 70% of people think there is not enough parking spaces and 80% see this parking problem as Plaza-area wide, i.e. the Plaza is in high demand. Parking problem in real terms? The Plaza is too congested for residents to enjoy their own town. More use keeps being brought in and thus environmental quality in terms of traffic and pedestrian experience stands to suffer.</p> <p>Yet, the EIR says: "The proposed Project, in combination with past, present and</p>	Parking will be provided for hotel guests, who are then likely to become patrons of local shops and restaurants. By bringing these guests to a location where they can walk to the Plaza rather than having to drive to it, the project can reasonably be expected to have a beneficial impact on the demand for parking at the Plaza.

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		reasonably foreseeable projects, would not result in significant cumulative impacts with respect to transportation and traffic.”	
B04-17		<p>The EIR method of measuring impacts appears to be equivalent to measuring carbon pollution only one car at a time. At small incremental levels exhaust can be mitigated but it is the aggregate effect that creates the serious and objective problem of global warming. This is the same as with traffic and more pedestrians in an already crowded and popular area.</p> <p>I am making an emergent property argument, of aggregate effects, where the whole is larger than the sum of its parts. This exact same scenario has qualified the Sonoma Valley groundwater basin to be classed as at risk by the state Department of Water Resources, and to be required to develop a sustainable groundwater plan.</p>	This comment does not directly question the adequacy of the analysis included in the EIR. Please also refer to Master Response 2, Traffic Operation Impacts.
B04-18		I have to conclude, as result of introducing a large hotel complex with large restaurant just off the Plaza, that it is unreasonable to assert that Plaza traffic and pedestrian environmental effects will not be significant. At some point you can’t mitigate your way out of over-use scenarios or you fatally degrade all of the city-stated quality of life General Plan values	Please refer to Master Response 2, Traffic Operation Impacts.
B04-19		<p>Conclusion In Sonoma a notion of limited environmental carrying capacity, in terms of small town and historic public space valued by residents, has been in clear tension with development and growth pressures from projects such as this and the Rosewood Hotel, the FSE hotel project and wine tasting on the Plaza with no use permits required.</p> <p>By not looking past unrealistically proscribed measurements for traffic, pedestrian, water and GHG impacts, what we get is a systemic progression towards a J-curve crash of all the small town and historic qualities the city claims it is trying to preserve.</p> <p>In EIR section “1.5 ISSUES TO BE RESOLVED, Section 15123(b)(3) of the CEQA Guidelines requires that an EIR identify issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the Project, the major issues to be resolved include decisions by the City of Sonoma, as Lead Agency, related to: Whether this Draft EIR adequately describes the environmental impacts of the Project. Whether the proposed land use changes are compatible with the character of the existing area. Whether the identified mitigation measures should be adopted or modified.”</p> <p>I submit that this draft EIR has not adequately described the environmental impacts of the project: traffic and pedestrian congestion, GHG footprint and water use footprint.</p>	This comment serves as a conclusion to the comments above. Please see responses to comments B04-01 through B04-18. In addition to the issues addressed in these comments, this comment generally suggests that other portions of the Draft EIR are deficient. However, since this comment does not cite specific deficiencies in the analysis in the Draft EIR, no further response can be provided.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>And that the hotel project land use changes are not compatible with the character of the existing area and, that mitigation measures should be adopted and modified to meet the concerns I have outlined in this public comment.</p> <p>This hotel project is inappropriate for the Plaza precisely because of its traffic and pedestrian impacts; it will forever alter the Plaza and make it a super congested place that will lower the quality of visitor and residential experience, irrevocably alter the historic character of the Plaza and negatively effect the small town character of Sonoma in general, to a point at which the Plaza will overall become an undesirable place to visit. This project, more than any other because of its location in the historic overlay zone, will have the effect of killing the goose that laid the golden egg of Sonoma's unique historical and social attributes as recognized in the General Plan.</p>	
B04-20		The project will also have GHG emissions impacts, particularly with air travel, that in aggregate become part of an unacceptable environmental impact because of their addition to serious systemic problems.	Please refer to the response to comment B04-04 which addresses this issue.
B04-21		To properly mitigate the effects of this project, the intensity of use needs to be reduced drastically, to the level of the Ledson Hotel. The No Restaurant Alternative should be taken as well. If the scale of the hotel project ends up being large, so as to require a large support staff, affordable housing should be integrated into hotel buildings at max levels able to be prescribed by the Planning Commission. This will mitigate future GHG employee transportation impacts and address actual social sustainability issues.	This comment suggests modifications to the proposed Project, which the commenter suggests would properly mitigate the effects of the Project. Since no justification is provided to suggest that without these mitigation measures, a significant impact would result; no changes to the Draft EIR are required.
B04-22		To fit the Plaza at its current and projected levels of use, and to address cumulative environmental negative externalities from tourism, mitigations need to be put in place to scale this project way back. Otherwise it will be increasingly difficult for residents to come to the Plaza, drive through the Plaza and be able to enjoy their own town. This hotel project as proposed qualifies as a significant driver of negative environmental effects: aggregate GHG emissions, taking publicly conserved water for private profit, increased traffic and increased pedestrian uses all in a circulation area already recognized by the city as bad.	This comment serves as a conclusion to the comments above. Please see responses to comments B04-01 through B04-21. This comment suggests that the proposed Project qualifies as a significant driver of negative environmental effects related to GHG, water, and transportation/traffic. Additionally, the commenter generally suggests that additional mitigation is needed to scale the project back. However, since the commenter does not provide specific reasons why the Draft EIR improperly assesses the environmental impact of the Project, no further response is required.
B05	2/19/16	Georgia Kelly, Director, Praxis Peace Institute	
B05-01		<p>Hi Everyone</p> <p>I won't be able to make the meeting on Monday -- unless it lasts past 8:00 pm -- but I would like to express my thoughts about this.</p> <p>Building a hotel of this size on the plaza has always been problematic. In Europe, when hotels are on the main square, the surrounding streets are pedestrian only. Cars and</p>	This comment suggests that the proposed Project would cause traffic problems. Please refer to Chapter 4.10 of the Draft EIR. In this chapter it is shown that all of the potential traffic impacts evaluated would result in less-than-significant impacts. Since this comment does not question the analysis in the Draft EIR, no further response is required.

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>buses are routed on streets at least one block from the square on all sides. And, unless our city wants to build a road above Spain St., all this building near the plaza is going to cause unbelievable traffic problems. Pedestrians and bicycles will cause long delays, accidents, frustration and probably even road rage.</p> <p>I think the article in The Sun this week captures the real problems. The wine and tourist industries are running the show. It's time to reverse their power paradigm. They are creating a Disneyland for wine drinkers and tourists and ignoring the residents and the needs of a residential community. ~ Georgia Kelly</p> <p>On Feb 19, 2016, at 3:42 PM, Will Shonbrun wrote:</p> <p>This is the most important story the Sonoma Valley Sun has ever done. Perhaps it's one of the most important news stories any county paper has done as it gets to the heart of what I'd call a corrupt and rigged system of the interrelationship of the County's elected leadership and the County's most powerful economic engine, the wine industry. http://sonomasun.com/2016/02/19/under-the-influence-how-the-wine-industry-dominates-sonoma-county-election-campaigns/</p>	
B06	2/23/16	Thomas M Jones	
B06-01		<p>I have followed, with great interest, the proposal for the “West Napa Street hotel development”. I do not live within the city limits of Sonoma; however, virtually all of my weekly household and business activities are conducted within the city limits, as are a significant portion of my leisure time activities. I travel by the proposed location for the West Napa Street hotel development multiple times during any week of the year. I am, thus, acutely aware of potential issues that are painstakingly detailed in the draft EIR for this project, which I reviewed at: http://www.sonomacity.org/getattachment/8fb5ba80-07b6-45c0-931d-e165b2de5ecf/Hotel_Project_Sonoma_DEIR.pdf.aspx#page=1&zoom=auto,-99,798</p> <p>The draft EIR confirms my beliefs that the project:</p> <ul style="list-style-type: none"> • Will be harmonious with, and add to, the historic nature of the Plaza • Will have a negligible impact on automobile traffic volume in downtown Sonoma • Will not add ambient noise to any significant degree, once construction is completed • Will not add any additional public safety hazards • Will not have a significant impact on water supply for the city • Includes mitigations to successfully address issues with wastewater disposal 	<p>This comment provides support for the proposed Project and the Draft EIR. No further response is required.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>While full-time and part-time residents of the city often visit businesses located on or near Sonoma Plaza, these businesses would not survive without patronage from visitors from outside our region. Locating additional hotel space for visitors, when sensitively planned, is forward-thinking and makes more environmental sense than locating such facilities so far away that automobile transport is required to visit the Plaza and its businesses. Bicycle and pedestrian traffic is preferable to automobile traffic.</p> <p>I urge the Planning Commission and the City Council to support the project.</p>	
B07		Johanna M. Patri, AICP	
B07-01		<p>Dear Mr. Goodison and Commissioners;</p> <p>Following are my concerns and comments regarding the information contained in the Hotel Project Sonoma (Project) Draft Environmental Impact Report (DEIR).</p>	This comment serves as an opening remark. Please see responses to comments B07-02 through B07-23.
B07-02		<p><u>Section 4.10 Transportation and Traffic</u> Table 4.10-1 enumerates the City of Sonoma General Plan Goals and Policies relevant to transportation and traffic. These include: supporting bicycling as an alternative mode of transportation with plans to extend the bike facility network; increasing bike storage; addressing conflicts between bicycles, vehicles, and pedestrians; and minimizing vehicle trips while ensuring safe and convenient access to activity centers and maintaining Sonoma’s small-town character [page 4.10-2].</p> <p>The DEIR further states that Chapter 19.34.010 of the City of Sonoma Municipal Code (MC) requires “new construction and new uses should build upon the established character of the downtown including pedestrian–friendly design and infrastructure that influence residents and tourists to utilize alternative modes of transportation and reduce automobile dependence.....In terms of traffic improvements, West Napa Street between First Street West and Second Street West may need to be reconfigured as a three-lane street section (Ord. 2003-02 & 3, 2003)” [page 4.10-3].</p>	This comment provides an introduction to the following comments, and does not question the adequacy of the analysis included in the Draft EIR. No response is required.
B07-03		1. Under MC Chapter 19.34.010 requirements for new construction and new uses, how does the proposed Project in any way influence residents and tourists to utilize alternative modes of transportation and reduce automobile dependence? How does the proposed Project in any way build upon or add to pedestrian or bicycle infrastructure for either residents or tourists?	By locating a tourist-serving project near the Plaza, and providing hotel rooms within a walkable distance of other attractions such as restaurants, shopping, and civic events, the project has a component that would influence visitors to make some trips by walking rather than having to drive to the Plaza from outlying hotels.
B07-04		2. While the analysis study “does not assume any modifications to the existing and planned internal roadway network as part of the Project, except as necessary to accommodate the Project components” [page 4.10-9], what assurance is there that West Napa Street between First Street West and Second Street West will not be reconfigured	Although it serves as a primary local arterial, West Napa Street is a State Highway, and therefore a Caltrans facility. There are currently no known plans under consideration that would result in reconfiguration of West Napa Street between Second Street West and First Street West to provide a third travel lane. In addition, the traffic analysis of the EIR concludes that a turn-lane on West Napa Street would not be

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		to three lanes as a result of the proposed Project?	necessary to accommodate the project.
B07-05		<p>3. Segments of the Project description relative to traffic include:</p> <ul style="list-style-type: none"> • “encourage guests to park their vehicles for the duration of their stay” – how is this to be implemented? • “provide fleet of bicycles” – but without any contribution to bicycle lanes? • “encourage hotel employees to use bicycles for transportation to and from the hotel” – how is this to be implemented? Where will employees be living? How far (or vehicle miles traveled) will they have to travel? How feasible is this? 	<p>By providing bicycles that guests can use, travel by bicycle will be made more convenient and therefore attractive to guests. While guests cannot be required to use the bicycles, they are much more likely to do so with the guest fleet than they would otherwise. This program and the project’s location near the Plaza make it possible for guests to leave their vehicles parked for a good portion of their stay; something that is not as easy to accomplish if the site is located far from visitor attractions such as restaurants and shopping. While it is unknown where hotel employees will live, by providing facilities to accommodate bicycling to work, it is reasonable to anticipate that some employees will do so.</p>
B07-06		<p>While the DEIR [page 4.10.12] notes that Senate Bill (SB 743) will alter how transportation and traffic impacts will be analyzed under State CEQA Guidelines once the required amendments are adopted, the DEIR fails to inform the public what this alteration entails.</p> <p>Passed in 2013, SB 743 reflects a State Legislative policy to more appropriately address the bigger picture of traffic congestion management related to infill development and reduction of greenhouse gas emissions and requires revisions to the California Environmental Quality Act (CEQA) Guidelines for determining the significance of transportation impacts.</p> <p>SB 743 requires that the CEQA Guidelines be amended to provide an alternative to using level of service (LOS) standards for evaluation of transportation impacts. The DEIR uses the 2014 CEQA Guidelines, and therefore, relies on the standard of using LOS to determine potential transportation impacts.</p> <p>In January 2016, the Governor’s Office of Planning and Research (OPR) released the latest draft of proposed new CEQA Guidelines amendments replacing LOS measurements with assessment of overall Vehicle Miles Traveled (VMT). VMT data provides a measure of a project’s effect on overall travel. The objective of VMT represents the changing priorities of the State and County and regional traffic implications to encourage projects that provide for multi-modal transportation, decrease vehicle miles traveled, and increase bicycle lanes and pedestrian paths. A net increase in total VMT can indicate a significant transportation impact.</p>	<p>As noted in the comment, SB 743 reflects a shift in the way that traffic operation is to be evaluated, with Vehicle Miles Traveled (VMT) to be used as the metric for assessing project impacts rather than service level. However, as of this date, the State has yet to adopt this policy and there are no standards against which to measure the results if VMT were to be measured. Before VMT can be used in evaluating a project’s impacts it will be necessary for the City to establish the threshold for significance relative to any increase in VMT associated with a development project. Until such time as these steps are taken, discussion of VMT is premature.</p>
B07-07		<p>4. How does the proposed Project, of which the primary purpose is to serve the tourist industry and out-of-town clientele, comply with SB 743 in the use of public transportation and multi-modal transportation, thus reducing VMTs and reducing greenhouse gas emissions?</p>	<p>The location of a hotel near other visitor-serving destinations, such as the Plaza and its surrounding restaurants and retail outlets, could reasonably be expected to result in fewer trips by automobile than would be expected if the hotel were located in an area where there are no visitor destinations within walking distance. These walking trips by hotel patrons would reduce greenhouse gas emissions compared to conditions that might normally exist for a hotel that is not located within walking distance of such</p>

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			visitor-serving enterprises.
B07-08		5. Based on VMT metrics and given the shortage and cost of housing, as well as the scarcity of public transportation in Sonoma, what will be the traffic impacts and driving distances of employees working at the Project and what are the mitigation measures to reduce the VMT?	The driving distances of employees are unknown; however, the site is served by transit lines that would allow some employees to take the bus to work. The traffic impacts of the project as evaluated include trips associated with employees based on typical hotel operations and trip levels and does not assume extensive transit use.
B07-09		6. Total travel time can be reduced by bringing housing and jobs closer together. Therefore, a greater portion of the Project must consist of a variety of housing units for employees of the Project with a smaller portion of the Project serving tourists. Mitigation Measures to reduce the VMT should include providing public transit, incorporating affordable housing into the Project, and requiring the Project sponsor to increase the pedestrian and bicycle networks of Sonoma, consistent with City goals, policies, and regulations.	This comment provides a comment on the merits of the project and does not question the adequacy of the analysis included in the EIR. No response is required.
B07-10		<p><u>Sections 4.1 Aesthetics, 4.1.2 Standards of Significance, and 4.1.3 Impact Discussion</u></p> <p>Both the Staff Report under A. Aesthetics (Visual quality of site and surroundings) and the DEIR (page 4.1-8) conclude that <u>deferring</u> the aesthetic analysis to later City approvals is acceptable. The Staff Report states “that the normal implementation of the City’s Use Permit and Design Review procedures would ensure that impacts in this area would be less than significant, both with respect to the Project and on a cumulative basis”.</p> <p>Under DEIR Section 4.1.2, the Initial Study determined that the Project could result in a significant aesthetic impact if it would:</p> <ul style="list-style-type: none"> • Substantially degrade the existing visual character or quality of the site and its surroundings. 	This comment restates portions of the text in the Aesthetics section but does not specifically question any of the analysis in the Draft EIR. For a discussion of the commenter’s reference to deferring analysis, please see response to comment B07-11.
B07-11		<p>Section 4.1.3 purports to analyze potential Project-specific and cumulative impacts as they relate to aesthetics.</p> <p>7. Section 4.1.3 fails to analyze the potential Project-specific impacts relative to aesthetics. It merely restates elements of the project description. It further describes the City’s review process and concludes that since “findings would need to be made by the City prior to Project approval, the City would be required to determine that the Project would fit in with the visual character of the site’s surroundings or it would not be approved.” In CEQA and legal language, this is referred to as “improper deferral” and “improper deferral of CEQA mitigation”. CEQA requires environmental review of discretionary projects at the earliest meaningful stage to serve the purpose of public participation and informed decision-making.</p>	<p>Please refer to section 4.1.1.2 and section 4.1.3 of the Draft EIR. These sections provide a detailed description of the site and its surroundings under existing conditions as well as a detailed description of how the proposed Project would change conditions relative to aesthetics on the Project site.</p> <p>The significance of aesthetic impacts is a judgment call for the City of Sonoma. The comment notes that CEQA requires environmental review of discretionary projects at the earliest meaningful stage to serve the purpose of public participation and informed decision-making. Given the subjective nature of aesthetic impacts and the findings required by the City of Sonoma Municipal Code, the Planning Commission’s review of the proposed Project would be the earliest meaningful stage. Moreover, given the nature of the findings required by the City of Sonoma, which include performance standards, the proposed Project could not be approved if it would substantially degrade the existing visual character or quality of the site and its surroundings. This means that the findings required by the City of Sonoma would occur prior to project approval and would preclude a significant impact in this respect. Since there is no potential for a</p>

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			significant impact, mitigation measures cannot be legally imposed. For these reasons, the analysis in the Draft EIR would not constitute improper deferral.
B07-12		8. In other words, CEQA requires the analysis and shaping of the Project in quantifiable terms, not speculative, to reduce or avoid environmental impacts before determination of the merits of the project. The failure of the DEIR to analyze the aesthetic aspects of the Project within the contents of CEQA constitutes improper deferral of the objectives of CEQA. The Project DEIR must thoroughly analyze the aesthetics of the proposed Project and put forth Mitigation Measures to assure that the design, siting and layout, scale, form, height, bulk, massing, façade composition, style, density, exterior materials, etc. of the Project preserve and reinforce the historic and small town character of the surrounding streetscape, the historic plaza, and the City of Sonoma, that give Sonoma its unique sense of place (City of Sonoma General Plan Goal CD-5). (Please refer to DEIR Section 4.4.3 Impact Discussion for further reference.) The Project sponsor must be required to provide 3-D modeling plans in order for the public and decision makers to better understand the aesthetics of the Project.	<p>Please refer to the response to comment B07-11. As described in that response, the significance of aesthetic impacts is a judgment call for the City of Sonoma. The required findings described in section 4.1.3 of the Draft EIR would ensure that, prior to approval of the Project, the potential for the Project to be inconsistent with the City’s design values, as codified in the City of Sonoma Municipal Code, would be evaluated. Moreover, if the City determines that the Project would not respond appropriately to the context of adjacent development, as well as existing site conditions and environmental features, the Project would not be approved as proposed. This means that the findings required by the City of Sonoma would occur prior to project approval and would preclude a significant impact in this respect. Since there is no potential for a significant impact, mitigation measures cannot be legally imposed. For these reasons, the analysis in the Draft EIR would not constitute improper deferral.</p> <p>This comment also suggests that the Project sponsor is required to provide 3-D modeling plans in order for the public and decision makers to better understand the aesthetics of the Project. This is not a requirement of CEQA and the commenter does not provide a specific reason why the lack of 3-D modeling would invalidate any of the analysis in the Draft EIR. While the commenter states that 3-D modeling would help the public and decision makers better understand the aesthetics of the Project, it is unclear what specific understanding is deprived by the lack of 3-D modeling. Photo simulations were prepared by the project applicant, and an independent peer review was conducted to verify proper scale as it relates to the proposed project’s height, siting, and massing. The photo simulations and peer review memorandum are included as Appendix Q of this Final EIR.</p>
B07-13		9. The DEIR (page 4.4-10) states that “the proposed Project would result in changes to the Project site that would alter the overall setting of the National Register District to a small degree (<i>not quantified</i>) given that the new structures are not expected (<i>speculative</i>) to be out of scale with adjacent buildings within proximity of the Project site” and goes on to state that “the proposed Project would have a <i>less-than-significant</i> impact on the Sonoma Plaza National Historic District.” Because there has been no quantifiable analysis of the aesthetics of the proposed Project within the DEIR, this conclusion is most speculative and not acceptable in the scope of a project DEIR under CEQA.	This comment cites a section of the analysis of the Project in the Draft EIR relevant to cultural resources and suggests that because there has been no quantifiable analysis of the aesthetics of the proposed Project, the cultural resources conclusion in section 4.4.3 of the Draft EIR is speculative and not acceptable in the scope of a project DEIR under CEQA. Please refer to Appendix G of the Draft EIR, Historic Resources Evaluation. This appendix contains the Historic Resources Evaluation prepared for the proposed Project by historical resources experts, Knapp Architects. The analysis in section 4.4.3 of the Draft EIR is based on the analysis in this Historic Resources Evaluation. The CEQA statute and guidelines do not require a quantitative analysis of aesthetic impacts. Therefore, the commenter’s suggestion that the lack of quantitative aesthetics analysis means the conclusion is speculative and not acceptable in the scope of a project DEIR under CEQA, is inconsistent with the requirements of CEQA.
B07-14		<u>Sections 4.4 Cultural Resources, 4.4.2 Standards of Significance, Section 4.4.3 Impact Discussion, and Index-Tribune Building 117 West Spain Street</u> The DEIR states “a significant impact would occur if the proposed Project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines. The DEIR concludes that the Index-Tribune building (northern portion) is eligible for the California Register under criteria one and	The portion of Mitigation Measure CULT-1 that would eliminate the potential for a significant impact with respect to the potential for a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines, is the requirement that the design of the altered rear (south) elevation after demolition of the warehouse additions must conform to the Secretary of the Interior’s Standards for Rehabilitation. The second half of the mitigation measure which requires a consultant who meets the Secretary of the Interior’s Professional Qualification Standards for Historic

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		<p>two. The DEIR finds that the “construction of the Project could alter the historical significance of the Index-Tribune building” and puts for Mitigation Measure CULT-1.</p> <p>10. Mitigation Measure CULT-1 constitutes improper deferral of CEQA mitigation by requiring the pertinent study outside of the DEIR when a potential significant impact has been identified. The City should require that a study and report be prepared and submitted by an independent consultant who meets the Secretary of the Interior’s Professional Qualification Standards for Historic Architecture on the conformance of the design of the Index-Tribune building with the Secretary of the Interior’s Standards for Rehabilitation with architectural drawings and specifications as part of the DEIR.</p>	<p>Architecture to prepare a report on conformance of the design to the Secretary’s Standards, is an aspect of mitigation monitoring. The pertinent study to determine the potential for a significant impact with respect to standard of significance 1 in section 4.4.2 of the Draft EIR was done as a part of the EIR and is contained in Appendix G of the Draft EIR. As expressed in Mitigation Measure CULT-1, this study determined that conformance with the Secretary of the Interior’s Standards for Rehabilitation would reduce the potential for a significant impact in this respect to a less-than-significant level. Therefore, Mitigation Measure CULT-1 does not constitute improper deferral of mitigation and no further response is necessary.</p>
B07-15		<p><u>Parking Requirements, Underground Parking Garage, and Segmenting the Project</u></p> <p>While “Parking” in and of itself may have been eliminated from CEQA review, not to know definitively from the Project description the scope of the on-site parking requirements and size and space to be allotted to required parking facilities constitutes segmenting the Project. CEQA Guidelines define a project as “the whole of the action”. Sixty-two guest rooms require 62 parking spaces. An 80-seat restaurant requires 20 parking spaces.</p>	<p>Please refer to section 3.4.1.2 of the Draft EIR. In this section under the heading, Parking and Deliveries, it is explained that the Project would provide a total of 115 on-site vehicle parking spaces. A total of 94 parking spaces would be located in the basement parking garage, 31 of which would be managed by valet staff. Parking capacity in the basement parking garage would be maximized through the use of a combination of 90-degree stalls and stacked tandem spaces. Additionally, the description notes that there would be 21 surface parking spaces and Figure 3-3 show where some of the parking facilities needed to serve the Project would be located. This shows that the parking component of the Project was clearly explained. Additionally, as shown in impact discussion TRANS-4 and TRANS-5 in Chapter 4.10 of the Draft EIR, the parking component of the Project was analyzed as part of the proposed Project. This shows that the parking component of the Project was adequately explained and analyzed as part of the Project. While City of Sonoma regulations relevant to parking are contained in section 4.10.1.1 of the Draft EIR, the absence of an explanation of these regulations, in and of itself, would not constitute segmenting. The commenter is correct to note that the CEQA Guidelines call for lead agencies to consider the whole of an action; however, parking requirements are not the action, the parking component is. And as described above, the parking component of the Project was adequately explained and analyzed as part of the Project.</p>
B07-16		<p>City parking regulations require one parking space for every two employees on the largest shift. What are the parking and space requirements for employees?</p>	<p>As described in section 3.4.1.2 of the Draft EIR, the Project would provide a total of 115 on-site vehicle parking spaces. A total of 94 parking spaces would be located in the basement parking garage, 31 of which would be managed by valet staff. Parking capacity in the basement parking garage will be maximized through the use of a combination of 90-degree stalls and stacked tandem spaces. There would be 21 surface parking spaces. Though adequacy of the parking supply is not considered an environmental impact under the current CEQA checklist, the City’s Municipal Code provides minimum requirements for various land uses, including hotels, and the adequacy of project parking will be evaluated by the Planning Commission as part of the use permit review process.</p>
B07-17		<p>What are the parking and space requirements for the auxiliary uses?</p>	<p>Please see response to comment B07-16.</p>
B07-18		<p>Are the fitness center, pool, spa and other areas open to the public and what on-site parking space is allotted for these uses?</p>	<p>Please see response to comment B07-16.</p>

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B07-19		Is the future of the built environment for Sonoma to be underground parking, thereby allowing larger and more massive structures above ground?	This comment does not question the adequacy of the analysis in the EIR, and no response is required.
B07-20		What are the cumulative impacts of larger, more massive structures to the small town of Sonoma and how will this phenomenon and Project concept change the small town, historic character of Sonoma forever?	Please refer to the cumulative impacts sections in Chapters 4.1 through 4.11 of the Draft EIR. These sections analyze the impact of the proposed Project together with other reasonably foreseeable plans and projects causing related impacts.
B07-21		<p>Alternatives The DEIR must be required to consider additional alternative projects including, but not necessarily limited to:</p> <ol style="list-style-type: none"> 1. Devoting a portion of the Project to a variety of housing units restricted to employees of the Project and reducing the portion of the Project serving tourists. 2. Decreasing the number of hotel rooms, the size of the restaurant, and the massing, scale and density of the overall development. 3. Locating the proposed Project in an area that already exhibits low VMT and near public transit. 	As described in CEQA Guidelines section 15126.6, "(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." This comment does not provide reasoning why the range of alternatives analyzed in Chapter 6 of the Draft EIR was not reasonable. Therefore, no further response is necessary.
B07-22		<p><u>Summary</u> The City must require a peer review of the Traffic Study and Analysis. The DEIR's Traffic Study must provide data and analysis of VMT. The City must require the DEIR to include a thorough analysis of the aesthetics, including design and massing, of the proposed Project to assure its compatibility with, and preservation of, Sonoma's small town, historic character. The City must require the DEIR to address area, spacing, and siting of all parking requirements of the proposed Project and the use of underground parking, thereby encouraging and allowing a more massive Project. The City must require a thorough analyze of alternative projects including the inclusion of employee housing in the Project and reducing the over-all density of the Project</p>	This comment is a summary of the comments in this comment letter. Please refer to the responses to comments B07-01 through B07-21.
B07-23		<p>The City of Sonoma policy makers faces a series of challenges in terms of managing new development and facilities that are geared to increasing and enhancing tourism while maintaining Sonoma's small-town, rural historic character and charm, with first consideration for permanent residents.</p> <p>Thank you for your consideration. Johanna M. Patri, AICP</p>	This comment serves as a closing remark and does not question the adequacy of the analysis in the EIR. No further response is required.
B08	03/01/2016	Mary Martinez	
B08-01		<p>To the Commissioners:</p> <p>The following issues have not been adequately addressed in the DEIR Report. It has been several years since the initial presentation of this project. Many conditions in Sonoma</p>	This comment provides an introduction to the comment letter and states the opinion that the EIR is not adequate based on outdated information. This comment does not provide specific examples and does not require a response.

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		and California have changed that have not been acknowledged in the DEIR. The DEIR is currently out-of-date for today's conditions in the City of Sonoma. The preparers should be instructed to revise the DEIR to provide specific answers to the following items:	
B08-02		1. <u>PARKING</u> : No exception should be granted for the required onsite parking for the project. Congestion on surrounding residential streets and Highway 12 (Napa Street) must be the first consideration. The parking provided for this project is currently UNDER-parked. There is no provision made for this shortfall.	Though adequacy of the parking supply is not considered an environmental impact under the current CEQA checklist, the City's Municipal Code provides minimum requirements for various land uses, including hotels, and the adequacy of project parking will be evaluated by the Planning Commission as part of the use permit review process.
B08-03		2. <u>Transportation and TRAFFIC</u> : What access will be used for construction deliveries and what access will the trucks use? Once the project is completed, what provisions will be made for the continual flow of hotel traffic? Current traffic studies should be updated to reflect the IMPACT of additional traffic for a project of this magnitude.	Although construction plans are not available it is expected that large deliveries during the construction phase would be parked on either First Street West or West Napa Street for loading/unloading. Short-term deliveries were addressed in the discussion of Impact TRANS-4, on 4.10-21 of the Draft EIR. In addition, the analysis of Impact TRANS-4 also addresses deliveries during the operation phase and states that small truck or van deliveries would take place inside the basement parking garage at the service core receiving area. Three service elevators are provided in the hotel to efficiently facilitate the vertical transfer of deliveries inside the hotel. It is expected that large vans and smaller, single-unit delivery trucks (up to 20 feet in length) would be able to drive through the parking lot, even with the implementation of proposed valet parking; trucks up to 25 feet long could negotiate the area as long as the valet spaces are vacant. Larger delivery trucks with trailers would not be able to drive through the site, with or without valet parking. Therefore, it would be necessary for these trucks to be parked on either First Street West or West Napa Street for loading/unloading, which appears to be a common practice within downtown Sonoma, including the nearby Red Grape and Sonoma Grille restaurants. The project as proposed would have off-site delivery activity conducted at the First Street West garage entrance, with delivery products transported by foot and hand carts to the garage receiving area. Such deliveries would be limited to off-peak periods, which would minimize impacts on downtown circulation which is generally busiest during the afternoon. Designation of a truck loading zone on First Street West located adjacent to the basement parking garage entry is being requested as part of the Project's Use Permit Application.
B08-04		3. <u>SAFETY</u> : What measures will be taken to protect pedestrian and vehicle safety on Hwy. 12 and 1st St. West during construction given the huge number of trucks and equipment, as well as crew vehicle traffic, on the site? Provisions must be made to insure pedestrian and vehicular safety during construction and operation of the facility on this city street and STATE HIGHWAY. What does CalTrans require given the site's proximity to Hwy. 12?	Please refer to impact discussion TRANS-4, starting on page 4.10-18 of the Draft EIR. This discussion addresses safety issues associated with operation of the proposed Project. This analysis determined that a less-than-significant impact would result with respect to hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). With respect to safety concerns during construction, adherence to construction best management practices and traffic safety laws and regulations would minimize this potential risk.
B08-05		4. <u>DUST and AIR POLLUTION</u> : What control will be used to keep the dust under control from construction and excavation? Consideration for adjacent businesses in operation and adjacent to the project must be a great concern during the construction of the project.	Please refer to Mitigation Measure AIR-1 on pages 4.2-25 and 4.2-26. This mitigation measure would require the construction contractor to comply with Bay Area Air Quality Management District best management practices. Some of these best management practices include the following: <ul style="list-style-type: none"> ▪ Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should

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			<p>be used whenever possible.</p> <ul style="list-style-type: none"> ▪ Pave, apply water twice daily or as often as necessary, to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. ▪ Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer). ▪ Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, with water sweepers all paved access roads, parking areas and staging areas at the construction site to control dust. <p>Implementation of Mitigation Measure AIR-1 was determined to reduce this impact to a less-than-significant level.</p>
B08-06		5. <u>WATER</u> : Due to the severity of the 4 year drought in California, the City of Sonoma is required to reduce water consumption by 28%. How will a project of this size effect that goal? Reclaimed water should be required as a mitigation.	The water analysis, included as Appendix L of the Draft EIR estimated the gallons of water that the project would demand each year to be a gross increase of 8.2 million gallons per year (mgal/year) and after projected conservation savings through the use of low flow faucets, high efficiency toilets, and other operational practices, the project would result in a net increase of 5.7 mgal/year. The calculations provided in this comment (a range between 100 and 400 gallons per room per day), help to identify potential impacts, but the calculations on water demand were prepared by an engineering firm independent of the project applicant. The calculations for water demand are shown in Attachment 1 of the Appendix L of the Draft EIR, and are considered accurate by the City of Sonoma.
B08-07		6. <u>SOIL REPORT</u> : The printing plant building which will be removed may well be subject to ground pollution from printing-related chemicals. Soil testing should be required. Tests should be done, and the results included in the EIR.	As discussed above in the response to comment B01-01, the Phase I performed for the Project site (included in Appendix O of this Final EIR) concluded that there are low levels of soil and groundwater contamination on-site related to the former gas station. The findings included in the Phase I do not change the conclusions of the Initial Study.
B08-08		7. <u>TREES</u> : What trees on the site will be removed? How will that removal be mitigated? Replacement trees equal to those removed?	Figure 3-2 in the Draft EIR demonstrates which existing trees would be removed as a part of the Project. As described in Section 3.4.1.2 of the Draft EIR, "(a)lthough mature trees are proposed to be removed, they would be replaced on a one-for-one basis, either on site or through a City sponsored in lieu payment to support tree planting elsewhere within the City, consistent with the requirements of Tree Ordinance contained in Sonoma Municipal Code Chapter 12.08."
B08-09		8. <u>Sonoma's Historic Plaza</u> : What provision has been made to INSURE that the status and integrity of the Plaza will not be jeopardized as a result of this project and the traffic impact? TRAFFIC LIGHTS on our National Historic Landmark are NOT an option.	<p>Please refer to section 4.4 of the Draft EIR. With respect to historical resources, it was determined that implementation of mitigation measure CULT-1 would ensure a less-than-significant impact. This mitigation measure has been copied here:</p> <p>Mitigation Measure CULT-1: To ensure the Index-Tribune building retains its historical significance, the design of the altered rear (south) elevation after demolition of the warehouse additions shall conform to the Secretary of the Interior’s Standards for Rehabilitation. A consultant who meets the Secretary of the Interior’s Professional Qualification Standards for Historic Architecture shall prepare</p>

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			a report on conformance of the design to the Secretary's Standard. The report and the architectural drawings and specifications for shall be reviewed by the Planning Department and Planning Commission to confirm conformance before final planning approval is granted.
			Potential impacts to the Sonoma Plaza National Register District were addressed in impact discussion CULT-1. This analysis concluded that "although the design of the proposed Project would not match the buildings in the district, it would be similar enough to it so that it would not impair the integrity of setting, feeling, or association of the District." Based on this and adherence to Mitigation Measure CULT-1, it was determined that the Project's impact on surrounding historical resources would be less than significant.
B09		Jerry Bernhaut, Esq.	
B09-01		Larry, I tried to submit the following comments through the City's website and I ran into a cycle where it kept asking me for different security codes. Can you submit this for me with you superior computer skills? Thanks, Jerry	This is unrelated to the comment letter. No response is necessary.
B09-02		Comments On Sonoma Hotel Draft EIR I have concerns regarding the following deficiencies in the Hotel Project Sonoma Draft EIR:	This comment serves as an introduction to the comments that follow. Please see responses to comments B09-03 through B09-06.
B09-03		1. The trip generation analysis is obviously defective in that it is based on standard rates in an industry Trip Generation Manual without factoring in the dominant model of local tourism, i.e. trips to wineries, tasting rooms, event centers to various venues in Sonoma Valley, Napa Valley, Healdsburg and other widely advertised venues. The high likelihood that hotel guests would engage in these typical wine country tourism patterns also calls into question the effectiveness of "Circulation efficiencies associated with mixed uses in downtown areas" as an effective mitigation measure. The assumption that hotel guests would confine a significant portion of their activities to bicycle and pedestrian trips is highly unlikely.	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.
B09-04		2. The impact on traffic congestion that will be experienced by local residents is obscured by the discussion of thresholds of significance for air quality impacts that finds it less than significant that "the project would not increase traffic volumes at affected intersection to more than 44,000 vehicles per hour". Also the analysis of traffic impacts understates the effect on residents that the City of Sonoma has determined that a level of service less than LOS D, which already involves substantial congestion, would be acceptable at the intersection of Napa Street/Broadway, because traffic improvements would not be consistent with Sonoma's historic character.	Please refer to Master Response 2, Traffic Operation Impacts.

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B09-05		3. Of greatest importance, the Draft EIR's analysis of greenhouse gas emissions is grossly understated because it disregards the thousands of miles traveled by hotel guests to reach their vacation destination, as well as understating trip generation and the emissions related to increased congestion.	As described in impact discussion GHG-2 on pages 4.6-22 and 4.6-23 of the Draft EIR, "(a)s identified in Impact GHG-1, Table 4.6-5 shows that the proposed Project would not exceed BAAQMD's bright-line threshold and therefore would generate a nominal increase in GHG emissions. Consequently, GHG emissions impacts of the Project are not cumulatively considerable, and therefore would be <i>less than significant</i> ." Due to the relatively small size of the hotel, GHG emissions would not be generated in such quantities to result in significant impacts.
B09-06		As a practicing environmental attorney, I don't believe this Draft EIR would survive a legal challenge under CEQA without significant changes to address the above concerns. Jerry Bernhaut, Esq.	This comment serves as a closing remark. No response is required.
B10	03/03/2016	Robert Demler	
B10-01		Two concerns that should be addressed in final EIR:	This comment serves as an introduction to the comments that follow. Please see responses to comments B10-02 through B10-03.
B10-02		1. Impact of traffic on first street west.	Please refer to section 4.10 of the Draft EIR. Potential impacts related to traffic, including traffic on First Street, associated with implementation of the Project are addressed. As shown, implementation of the mitigation measures described would reduce all potential traffic related impacts to a less-than-significant level.
B10-03		2. Impact on sewer line on first street west Thanks- Robert Demler 03-03-16	Sewer facilities that would serve the Project site are discussed in section 4.11.2 of the Draft EIR. As shown in impact discussions UTIL-4, UTIL-5, UTIL-6, and UTIL-7, implementation of the mitigation measures shown in that section would result in a less-than-significant impacts related to sewer service.
B11	03/03/2016	Trish Hunter	
B11-01		Good Morning, We live at 154 Spain St and are extremely concerned about additional traffic that will be caused by the proposed hotel on W. Napa St. Often it is impossible for us to turn left out of our driveway and when construction begins on W. Napa St, where will W. Napa traffic go – W. Spain St. This is already a too highly congested area.	Please refer to Master Response 2, Traffic Operation Impacts.
B11-02		And I still wonder – would this project ever have gotten passed by voters had the debate lawn placards that read "vote no" really meant no instead of the very misleading "vote yes"!!! Sincerely Trisha Hunter	This comment is unrelated to the environmental analysis contained in the Draft EIR. Therefore, no further response is required.
B12	03/21/2016	Patricia List and Eugene Mai	
B12-01		Mr. Goodison:	This comment serves as an introduction and generally states that the Draft EIR is missing substance.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>For the most part, the Draft EIR document seems to be an EIR-lite, i.e., missing substance.</p> <p>Also as a general comment, a larger hotel, such as this, does not fit in with the general plan and is out of character, and inconsistent with, Sonoma's desirable small town nature. It is much larger than the hotels in the Plaza area, will stand out, and will do nothing to preserve or enhance the small-town character of the downtown area that visitors and residents love.</p> <p>Specifically, we want to address three areas: traffic, water and pollutants/sewage.</p>	<p>Additionally, this comment reflects the commenter's general opposition to the proposed Project because the commenter does not believe that the Project would be in keeping with the character of the area. Please see responses to comments B12-02 through B12-10 for responses to environmental issues raised in this comment letter.</p>
B12-02		<p>TRAFFIC</p> <p>If the authors of the EIR dismiss traffic concerns as "insignificant," then they have not spent much time on 1st St. West or the intersection of 1st St. West at Napa St. Many or most of the additional daily 300+ vehicles exiting the hotel onto 1st St. West would likely want to head north to reach Hwy. 12/Napa St. Currently only a right-hand turn is allowed from 1st St. West (but that is not always/usually enforced). Since east bound Napa St. traffic doesn't have to stop, it's likely quite a backup of cars turning left from the sole hotel exit onto 1st St. West would occur unless left hand turns from the hotel onto 1st St. West are forbidden--and the ban enforced. The Red Grape and Bank of America also generate an on-going stream of traffic between the proposed exit and Napa St. throughout the day and into the evening.</p> <p>First St. West south of Napa St. is already an extremely busy street. Between Napa St. and McArthur, there are approximately 230 residences with driveways opening out onto the street plus several commercial .sites to the south with parking opening onto 1st St. West (U.S.Postal Service, Williams-Sonoma, Hopmonk, copy place, etc.). Our own exit onto 1st St. West is via a steep driveway from an underground garage and it's already dicey to try to get out onto 1st St. without being hit. Most weekdays and Saturdays all the parking slots between Napa St. and Andrieux are taken by residents, shoppers, diners and U.S. Postal employees. The side streets off 1st St. West are also filled during weekdays and Saturdays.</p>	<p>This comment provides anecdotal evidence regarding traffic operations and congestion on streets near the project site. Although the comment identifies areas of concern, the analysis included in the EIR is still adequate and provides a quantitative analysis for weekday and weekend traffic operations. No further response is required.</p>
B12-03		<p>For some reason, the authors seems to think that most hotel guests would walk to the Plaza and leave their cars at the hotel for the day. This seems shortsighted. Guests might walk to the Plaza for a couple of hours for a meal or shopping, but, likely, they will be taking out their vehicles on a daily basis (or more often) to visit wineries, Napa, Cornerstone, etc. It's not hard to imagine how bad the traffic will become with over 300 extra cars exiting on a daily basis from one driveway.</p>	<p>As stated on page 4.10-16 of the Draft EIR, although circulation efficiencies associated with mixed uses can occur in downtown areas where trips to adjacent or nearby uses would be made by walking and potentially bicycling, to provide a conservative analysis, no deductions were taken for internal capture or mixes of uses. The project would result in an average trip generation of 310 new weekday daily trips, of which 23 trips would occur during the p.m. peak hour. During weekends, 27 new trips are expected during the midday peak hour. Please also refer to Master Response 2, Traffic Operation Impacts.</p>

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B12-04		We walk through the intersection of 1st St. West and Napa St. on a daily basis and it's already dangerous for foot traffic even when one is careful. Many cars don't stop or slow down even when they see you. It's a wonder pedestrians haven't already been hit.	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts.
B12-05		Even if Napa St. is re-configured as a three-lane street, drivers turning into the hotel from Napa St. will likely generate even worse traffic. Currently, when driving east on Napa St. from 5th St. West, often drivers have to wait for more than one signal to make it through Second St. West and then 1st St. West to approach Broadway. Many times this traffic back-up is caused by numerous sequential pedestrian crossings within a time frame of several minutes, which will only get worse with additional foot traffic.	The project does not propose reconfiguring West Napa Street between First Street West and Second Street West. If reconfiguring does occur, additional analysis will be required to identify potentially significant impacts that could result from altering the number of lanes.
B12-06		<p>The big truck deliveries are supposed to be restricted to "off-peak periods" but what that means is unclear. Clearly having gigantic delivery trucks taking up currently available parking spaces for deliveries will create problems, even if the huge trucks are not parking in the middle of the street as they do around the Plaza. With the steady stream of traffic generated by the Bank of America and the Red Grape, will emergency vehicles be able to get through when the trucks are unloading? The "off-peak hours" should be designated as between 10 p.m. and 5:00 a.m. and noise restrictions enforced.</p> <p>How do you envision these large trucks approaching and lining up for the loading dock? Will they be scheduled so there won't be huge backups in front of the Red Grape and it's parking entrance?</p>	The analysis of Impact TRANS-4, starting on page 4.10- 21 of the Draft EIR, addresses deliveries during the operation phase and states that small truck or van deliveries would take place inside the basement parking garage at the service core receiving area. It is expected that large vans and smaller, single-unit delivery trucks (up to 20 feet in length) would be able to drive through the parking lot, even with the implementation of proposed valet parking; trucks up to 25 feet long could negotiate the area as long as the valet spaces are vacant. Larger delivery trucks with trailers would not be able to drive through the site, with or without valet parking. Therefore, it would be necessary for these trucks to be parked on either First Street West or West Napa Street for loading/unloading, which appears to be a common practice within Downtown Sonoma. The project as proposed would have off-site delivery activity conducted at the First Street West garage entrance, with delivery products transported by foot and hand carts to the garage receiving area. Such deliveries would be limited to off-peak periods, which would minimize impacts on downtown circulation which is generally busiest during the afternoon. Designation of a truck loading zone on First Street West located adjacent to the basement parking garage entry is being requested as part of the Project's Use Permit Application. As discussed beginning on page 4.10-21 of the Draft EIR, emergency access would not plans submitted to the City would be reviewed by the Fire Department for compliance with applicable standards and requirements. The Project would be designed to ensure adequate emergency vehicle access, including requirements for aerial fire apparatus access.
B12-07		There is a big deficit of parking spaces in the hotel plan. The hotel should be required to provide the requisite number of spaces per zoning requirements. It's also unrealistic to expect workers to bicycle to work; they will need parking places just like anybody else.	Please refer to responses to Comments B07-15 and B07-16.
B12-08		Have you considered the effect on local traffic if the Bank of America site is turned into a hotel as has been previously proposed?	Table 4-1 included on page 4-4 of the Draft EIR lists current and reasonably foreseeable developments in the City of Sonoma at the time the Draft EIR was published. The Bank of America site, 35 West Napa Street, is not included in the table because no proposal has been made to redevelop it as a hotel or for any other purpose; therefore, it is not included as part of the analysis.
B12-09		<p>WATER</p> <p>It's hard to justify allowing a profit-making business to exist that will take and use an</p>	Please refer to section 4.11, Utilities, of the Draft EIR. This section contains an analysis of the environmental impact of the proposed Project with respect to water use. As described in impact

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		estimated 5.7 million gallons of water a year when local residents have been requested (or demanded) to reduce their water consumption by large percentages. It is also hard to believe that using this much water will not have a significant impact on our dwindling water supply. Have our local/county/state water regulators been consulted and asked to contribute their expertise? Sonoma groundwater decline is worsening, a long term, issue, and we are still in a drought situation. The EIR author should use current information rather than reports that are over 10 years old.	discussions UTIL-1 and UTIL-2, City officials were contacted in order to confirm that projected water deliveries analyzed in the 2010 Urban Water Management Plan account for the increased water demand that would result from the proposed Project. Additionally, please refer to Appendix L of the Draft EIR which contains a water analysis report dated September 3, 2015. All potential impacts related to water supply were determined to be less than significant, based on the availability of existing and projected water supplies and the payment of water connection fees.
B12-10		<p>POLLUTANTS/SEWAGE</p> <p>The area of and near the printing plant should be thoroughly examined for any and all pollutants and removal of contaminated areas required. It's Inconceivable to think this wouldn't be an automatic requirement.</p> <p>Failing sewage Infrastructure on Broadway and 1st St. West needs to be evaluated by a reputable environmental agency and remediated, as necessary and required. An unhappy sewage failure/backup into a residence already occurred on 1st St. West not so long ago.</p> <p>We hope you will take our thoughts and concerns under consideration.</p>	<p>As discussed above in the response to comment B01-01, the Phase I performed for the Project site (included in Appendix O of this Final EIR) concluded that there are low levels of soil and groundwater contamination on-site. The findings included in the Phase I do not change the conclusions of the Initial Study.</p> <p>Please refer to the response to Comment B13-06 with respect to impacts to the sanitary sewer system.</p>
B13	03/04/2016	Bonnie Brown	
B13-01		<p>Underground parking lot requiring de-watering of aquifer.</p> <p>Because farmers in California's central valley have had to have water wells drilled to keep their crops going, the aquifers are being drained ("de-watered") and the space where the water used to be is collapsing. Once the space collapses, no water can occupy that space in the future because the ground above falls into the space. Land has fallen several feet in some places. I request that the DEIR have a geologist and hydrologist study the plan for this site to have an underground parking lot, and to guarantee that the land and buildings will not sink, and to report on the consequences this action would have on water supply and quality of deeper aquifers. Explain where the water would go when "de-watered" from the aquifer. Where would the oil and gas residue from the parking garage run to?</p>	<p>Please refer to Appendix I of the Draft EIR, Design Level Geotechnical Report. It is described on page 7 of this report that the Project is feasible from a geotechnical standpoint. Construction dewatering is a temporary withdrawal from the shallow aquifer and would not impact the water supply or quality of the deeper aquifer or result in land subsidence. The groundwater extracted during construction dewatering is typically discharged to the storm drain system. A geotechnical engineer will design the dewatering system for construction and if needed a post-construction dewatering system to ensure that there are no on-site or off-site impacts to structures and that subsidence does not occur.</p> <p>Additionally, please refer to Draft EIR section 4.7, Hydrology and Water Quality. In impact discussion HYDRO-1 of this section it is explained that construction dewatering most likely would be required during construction. There are two options for managing shallow groundwater after construction. One option is to floodproof the lower portion of the building that sits in the groundwater. With implementation of this option, no permanent dewatering system would be required. If it is determined that permanent dewatering is necessary, the second option is to install a subsurface drainage system under the garage floor and backdrains behind the basement walls. The drainage system and sump pump system would be installed completely beneath the sealed concrete floor of the garage and there would be no contact with oil and gas contaminants from vehicles. Moreover, all dewatering activities would be required to comply with Waste Discharge Requirements (WDRs) and obtain a permit from the San Francisco Bay Regional Water Quality Control Board as per Order No. R1-2009-0045. As part of the permit, the discharger must</p>

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
			also submit a Best Management Practices/Pollution Prevention (BMP/PP) Plan that identifies and implements measures to reduce the discharge of waste and pollutants into receiving waters. Sampling may be required for discharges to inland surface waters, enclosed bays, estuaries, or the ocean. Compliance with Waste Discharge Requirements would minimize impacts to the maximum extent practicable. All impacts related to geology, soils, seismicity, and hydrology were determined to be less than significant.
B13-02		<p>Trees on the site I request that the DEIR have a licensed arborist and respected naturalist inspect and report on the viability of the live oaks and redwoods on the site and their significance to wildlife habitat. To say that these trees can be cut down and habitat for birds is not significant because there are other trees in town is bizarre reasoning. Trees are an important asset to any town, especially redwoods and oaks which are associated with historic old California.</p>	Please refer to Appendix C of the Draft EIR, Arborist Report. This report was prepared by James MacNair, who is a certified arborist. This report determined that tree removals, planned as a part of the Project, could be mitigated with new landscape plantings and street trees. Additionally, please refer to section 4, Biological Resources, of Appendix B, Initial Study Checklist. This section contains an analysis of potential impacts to birds and bird habitat as a result of removal of trees on the Project site as a part of the proposed Project. As shown, this analysis determined that potential impacts to birds and bird habitat would be less than significant.
B13-03		<p>Historic significance of 153 W. Napa Street The DEIR will establish the date the building on this lot was built, the past owners and the businesses that were at the site and make the report public. The existing building may be the last free-standing corrugated metal building in Sonoma, has historic character, and is of historical design significance. The project plans to demolish the building and to have the site become a restaurant with two stories of hotel rooms over it. Historically, most restaurants in town have an outdoor dining area in back. The current outdoor patio would fit in with this historic style and the existing building can be remodeled with no rooms over it once the hotel is sized down to accommodate adequate parking. This option should be included.</p>	This comment suggests a modification to the Project that would not demolish the building at 153 West Napa Street and reduce the size of the proposed Project. With respect to the assertion that the building at 153 West Napa Street has historical significance, please refer to Appendix G of the Draft EIR, Historic Resources Evaluation. This evaluation determined that the building at 153 West Napa Street does not possess historical significance, in part because the building was “designed in a modest commercial or light industrial style with few distinctive details by means of typical construction methods...does not express aesthetic ideals or design concepts more fully than other properties of its type.” ³ Additionally, please refer to Chapter 6 of the Draft EIR, Alternatives. This section contains an analysis of potentially feasible alternatives to the proposed Project and discusses alternatives that were considered as well as alternatives that were considered infeasible. Section 15126.6 of the CEQA Guidelines specifies that “(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.” This means that the lack of analysis of the requested project modification in the Draft EIR does not mean the Draft EIR is inadequate.
B13-04		<p>Toxics There has been criticism of a request to include a toxic study of the consequences of digging up ground to create an underground parking lot. This is an important issue to be included in the DEIR. Example: The former Fairchild Semiconductor site in Marin County did have toxics underground from long-term dumping of chemicals from the plant before it was known to be damaging. The owner was required to install an underground slurry wall around the site to contain the chemicals and pave over the site to eliminate any contact. That project only had above ground buildings, no underground parking lot.</p>	As discussed above in the response to comment B01-01, the Phase I performed for the Project site (included in Appendix O of this Final EIR) concluded that there are low levels of soil and groundwater contamination on-site. The findings included in the Phase I do not change the conclusions of the Initial Study.

³ Page & Turnbull. 153 West Napa Street Historic Resource Evaluation. San Francisco, 29 August 2011. Pp 25-26.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B13-05		<p>Traffic The DEIR must identify the number of employees, full and part time, who will be needed to service the hotel, spa, and restaurant at peak times and include all of them in the traffic trips for the traffic study.</p> <p>The First Street West/West Napa Street intersection is identified as problematic by the City. The City must give options to the DEIR report on what their mitigations might be for this intersection. The mitigations need to be looked at for being significant to diminishing/ destroying the historic character and district of Sonoma, regardless of who pays for them.</p>	<p>The traffic impacts of the project as evaluated include trips associated with employees based on typical hotel operations and trip levels. The driving distances of employees are unknown; however, the site is served by transit lines that would allow employees to take the bus to work. Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.</p>
B13-06		<p>Sewer Capacity and Water Supply The project would be allowed to hold discharge of sewage on-site and be "controlled in a manner consistent with the capacity of the collection system" and the DEIR states that this is less than significant. Given the condition of aging sewer lines, this needs to have further study. The DEIR states "The 2010 UWMP projects that the City's water supply, including ground water, will be sufficient to meet projected needs through the year 2035." That is 19 years from now and the study was done in 2010, before the current drought. What is the cumulative effect on water supply of all potential development in the City, residential and commercial, with this project? The projected water usage of the project seems low for a restaurant, spa, hotel, and landscaping. This needs to be accurate.</p>	<p>With respect to the assertion that the age of the sewer system necessitates further study of the sanitary sewer system, please refer to impact discussion UTIL-5 in section 4.11, Utilities, of the Draft EIR. As shown in this impact discussion, the increase in load associated with the Project, was accounted for in the projected growth of the city, and existing wastewater treatment facilities have sufficient capacity.⁴ Please refer to Appendix M of the Draft EIR for more information on this subject.</p> <p>With respect to the question about water supply, please refer to section 4.11.1 of the Draft EIR. Section 4.11.1.4 of the Draft EIR contains an analysis of the cumulative impacts of the proposed Project in combination with past, present and reasonably foreseeable projects. It was determined that this potential impact would be less than significant.</p>
B13-07		<p>Housing is a critical need and must be studied as a partial option for this site.</p>	<p>Section 15126.6 of the CEQA Guidelines specifies that "(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." This means that the lack of analysis of the requested project modification in the Draft EIR does not mean the Draft EIR is inadequate.</p>
B13-08		<p>Cumulative Effect There are several other commercial projects within city limits pending or being developed. The DEIR should look at the potential for the cumulative effects on traffic, quality of life, sewer, water needs, and historic stature of the town due to all of these.</p>	<p>Please refer to Chapter 4 of the Draft EIR. This section describes the assumptions and methodology used to assess cumulative impacts. Additionally, this chapter contains Table 4-1 which lists current and reasonably foreseeable developments in the city of Sonoma. This list was based on the City of Sonoma's Development and Construction Report from July 2015. Since the commenter does not provide any details about what projects are pending or being developed and are not shown in Table 4-1, no further response can be provided and no revisions to the Draft EIR is necessary.</p>
B13-09		<p>Statement Sonoma is reaching the tipping point where it is in danger of losing its quaint, historic character that attracts tourists to it, of destroying quality of life for its residents, of being responsible for future water needs and sewer capacity, and of ignoring its responsibility</p>	<p>This comment contains a general statement about the commenter's view of the state of the city of Sonoma. Since the comment does not question the analysis of environmental issues analyzed in the Draft EIR, no response can be provided.</p>

⁴ Conference call with Douglass Messenger, Sonoma Valley County Sanitation District, on August 10, 2015.

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		to house its employees.	
B13-10		It is imperative that this DEIR be accurate, thorough, and study options because of cumulative effects. Good planning is the answer, not "mitigations". Look to the City Council's priorities: preserve the historic character and hometown feel while encouraging responsible development.	This comment generally states that the Draft EIR should be accurate; however, since the comment does not question the analysis of environmental issues analyzed in the Draft EIR, no response can be provided.
B14	03/03/2016	Bill Hooper, President, Kenwood Investments, LLC ("Kenwood")	
B14-01		On behalf of the applicant, Kenwood Investments, LLC ("Kenwood") we would like to provide comments to the Draft Environmental Impact Report (DEIR) for our proposed hotel project at 153, 135 and 117 West Napa Street ("Project") and to respond to comments made by the public and the Planning Commissioners at the hearing on February 25, 2016. At the outset, Kenwood is in substantial agreement with most of the findings of the DEIR and we believe that the EIR consultant's independent review of the Project is based on and combines the extensive knowledge of objective experts on the Project's potential impacts that the Commissioners have asked to consider.	This comment serves as an introduction. Please see responses to comments B14-02 through B14-09 for responses to comments on environmental issues raised in this comment letter.
B14-02		<p>The following outlines our response and offers some proposed additional mitigation measures:</p> <p>1. Traffic - Since the Commissioners are requesting more locally based information from the traffic consultant, we recommend that there be a supplemental study of the MacArthur Place hotel at Broadway and MacArthur Streets. This hotel has similar uses in terms of number of rooms and size of the restaurant and spa facilities. Direct observation of MacArthur Place relative to its traffic patterns could be instructive for our project. An actual count of their traffic would provide real time metrics for the Planning Commissioners to better understand a local business of similar size and use. For the purposes of evaluating pedestrian impact, performing a study of the pedestrians traveling from the Sonoma Valley Inn on Second Street West to the Plaza would be useful. While this hotel is larger with 80 rooms, many of its guests walk to the Plaza for food and beverage needs (due to a lack of a restaurant at the hotel.) Their guests likely utilize the crosswalk at First Street West and West Napa Street to access the Plaza. While our Project will have less rooms and an on-site restaurant for its guests, the Commissioners might find it helpful to understand the patterns of pedestrian activity from an existing neighboring hotel to better ascertain if pedestrian impacts exist.</p>	The analysis of the MacArthur Place Hotel was completed, and it was determined that, based on the data collected, the evaluation prepared for the Draft EIR adequately reflects anticipated conditions associated with development of the project. In fact, the analysis in the Draft EIR likely over-states the project's potential impacts during the weekday p.m. peak hour. The analysis and comparison of the MacArthur Place Hotel against the proposed project is included in Appendix P of this Final EIR.
B14-03		Additionally, we believe that the study has underestimated the current traffic that passes through the current West Napa Street driveway. The current driveway will remain in substantially the same position for the new hotel. While the consultant has anticipated the continued use of the property by the tenants of the 117 and 135 West Napa Street Buildings and has accounted for the reduction from the elimination of the retail and	This comment provides an opinion regarding unauthorized use of the project site for vehicles to make a left turn onto West Napa Street. The traffic analysis provides an estimate on trips generated by the project that is independent of the unauthorized pass-through trips that currently occur within the project site. No further response is required.

TABLE 5-1 RESPONSE TO COMMENTS

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		warehouse uses that will be eliminated with this Project, they have not accounted for all of the current traffic. Because the parking lot has more spaces than is required to service the 117 and 135 West Napa Street Buildings, there are numerous unauthorized cars using the lot for neighboring buildings that exit through the West Napa Street Driveway. Additionally, the parking lot serves as a thoroughfare shortcut for motorists who wish to turn left onto West Napa Street from First Street West. This significant amount of transient traffic is not associated with the tenant usage from the 117 and 135 buildings and contributes to some of the delays experienced at this driveway today. With the development of the Project, this traffic will be eliminated from the driveway exits. The study should consider the elimination of this unauthorized through traffic in its traffic model study.	
B14-04		Lastly, we will offer a number of additional traffic and pedestrian mitigation measures in response to concerns raised by the public and the Commissioners. These include: limiting deliveries on First Street West to before 10am, prohibiting full size buses from passenger pick up or drop off at the hotel auto court, prohibiting idling in our hotel driveways and by requiring exiting traffic to use the First Street West exit during peak hours. Should the City request a mitigation fee for the future improvement to the Broadway and West Napa Street intersection, we will agree to the hotel's share of that fee.	This comment states the Project Applicant's willingness to include other project features to reduce potential impacts resulting from the project. This comment does not question the adequacy of the analysis included in the EIR, and therefore no response is required.
B14-05		2. Hotel Visual Impact - Should the consultant require additional images of the hotel, we will provide additional elevations and 3 dimensional studies of the hotel from various viewing angles. We believe that our most recent hotel design was responsive to concerns raised by the public and the Planning Commission. Our original design proposed virtually 100% coverage of the property with the three story hotel and parking garage. The proposed design covers only 44% of the property by placing the majority of the parking below ground. This design has substantially reduced the massing along West Napa Street and the adjoining South and East property lines. We believe the City's Design Review Commission is a capable review entity and we will provide adequate design information for them to base their comments and review.	In this comment it is suggested that the Applicant would provide additional images of the proposed hotel if needed. Additionally, the Applicant's representative suggests that the revised design for the Project responds to concerns raised by the public and the Planning Commission. No further response is necessary.
B14-06		3. Water - The Sonoma County Water Agency has determined that sufficient water capacity is available to serve the proposed Project and has not indicated that there is a shortage of water for this Project. Like all proposed projects in Sonoma, our hotel will have to comply with City, County and State water standards for development. We have included an aggressive water conservation plan that includes low flow fixtures, drought tolerant landscaping and a rainwater recapture system for irrigation. The Project will also comply with any water rationing requirements that City proposes in response to drought conditions.	This comment notes that the Sonoma County Water Agency determined that sufficient water capacity is available to serve the proposed Project and that the Project would be required to comply with City, County, and State water standards for development. No further response is necessary.
B14-07		4. Soil Contamination - Should the consultant or the Commissioners wish to review the	This comment provides background data regarding the potential for soil contamination onsite, and does

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TABLE 5-1 RESPONSE TO COMMENTS

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		extensive information on the soils on the Property, we will gladly provide the data. The property was the subject of the removal of underground storage tanks that were used by the Chevron station formerly located on the property. During the development of the Lynch Building at 135 West Napa Street, substantial amounts of dirt were manifested and removed from the property. This includes the area where the building was built as well as other areas throughout the parking lot. Additionally, Chevron as part of its mitigation following the removal of the tanks had to maintain monitoring wells on the property for over 10 years to evaluate the soil and ground water for contaminants. In 2014, the Sonoma County Department of Health Services allowed for the closure of the monitoring wells as the soil and water conditions were determined to be well below the allowable standards for containments. This thorough review Included soil samples and monitoring wells that were located near the printing plant building. Through all of this analysis, there was no indication of the contaminants mentioned at the Planning Commission hearing. There is also no evidence in reviewing our records, including filings by the former owner of the Index Tribune, that certain materials mentioned at the hearing were ever used at the property.	not question the adequacy of the analysis included in the EIR. The Phase 1 Environmental Site Assessment for the project site is included as Appendix O of this Final EIR.
B14-08		5. Sewer Capacity - The Sonoma County Water Agency has indicated the increase in wastewater generated from the Project has been accounted for and the Sonoma Valley Sanitation District's waste water treatment facility would have adequate capacity to serve expected growth in the district and the proposed project. The Project will comply with any sanitary sewer mitigation measures or the payment of reasonable in lieu fees to mitigate potential impacts to the sanitary sewer system.	This comment notes that it was determined that there would be adequate sewer capacity to serve the proposed Project. No further response is necessary.
B14-09		We continue to be ready to respond to requests for information by the consultant, the planning staff or the Planning Commission. Please feel free to contact me should you need further information.	This comment serves as a closing remark. No further response is required.
B15	03/09/2016	Vicki A. Hill, Environmental Planning Consultant	
B15-01		Dear Mr. Goodison: This letter contains my comments on the adequacy of the Hotel Project Sonoma Draft Environmental Impact Report (DEIR) dated January 2016. Please distribute copies of this letter to the City Planning Commissioners and City Council members. To provide background on my qualifications to make these comments, I am a land use/environmental planner with over 30 years of experience in preparing and managing CEQA compliance documents for public agencies. I was the CEQA manager for the entire Sonoma-Marin Area Rail Transit (SMART) project and I worked on the MTC Regional Transportation Plan and Plan Bay Area EIRs. Also, I managed preparation of the Rohnert	This comment serves as an introduction. Please see responses to comments B15-02 through B15-11.

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Comment #	Date	Comment	Response
		Park General Plan and EIR and numerous other city and county general plans in the Bay area. Locally, I have worked with the Southern Sonoma Resource Conservation District in land use and flood reduction issues. In addition to my experience, my qualifications include a graduate degree in Public Administration (emphasis in environmental/public policy) from Harvard's Kennedy School of Government and an undergraduate degree in Environmental Studies (UC Santa Barbara). Being a 21-year resident of Glen Ellen and having a son who attended Sonoma Valley schools, I am very familiar with the land use planning, transportation, and other environmental issues facing Sonoma. I have first-hand knowledge of downtown Sonoma traffic patterns, land use character, and community effects.	
B15-02		I am very concerned about the potential impacts of the proposed hotel and, based on my experience and expertise, I believe that the DEIR underestimates the significance of impacts associated with this project. For this reason, the DEIR is inadequate and seriously flawed in numerous issue areas, as outlined below. There are many additional deficiencies in the DEIR, but my comments focus on substantive issues.	This comment serves as an introduction and generally asserts that the Draft EIR underestimates the significance of impacts associated with this Project. Please see responses to comments B15-03 through B15-11 for responses to comments on environmental issues raised in this comment letter.
B15-03		Traffic 1. DEIR page 4.10-15 states: "Since the trip generation rate for 'Hotels,' as defined in the Trip Generation Manual, generally includes restaurant, banquet facilities and other support facilities, the trip generation potential for the restaurant, spa and banquet facility was not calculated separately." This is a seriously flawed assumption and results in substantially underestimated daily - vehicle trips. I assume that both the restaurant and the large spa will be open to the public and will generate traffic beyond what is estimated for the hotel. Additional vehicle trips must be assigned to these separate uses and the analysis revised.	The trip generation rate for "Hotels," as defined by Trip Generation Manual is not limited to only trips generated by hotel rooms, but assumes that trips would also be generated by other hotel-related uses, such as restaurant and banquet facilities. As a result, the estimated trip generation of the project takes into account additional proposed uses that are not specifically identified in the analysis.
B15-04		2. DEIR page 1-5 states: "During non-peak traffic periods, departing guests would exit right onto West Napa Street, and during weekday evening peak traffic periods (4:00 p.m. and 6:00 p.m.) and weekend midday peak hours (12:00 noon and 2:00 p.m.) guests would depart via a one-way vehicle ramp from the parking garage onto First Street West." This is the only place in the DEIR where peak traffic hours are identified. Are these the peak traffic hours used in the transportation analysis? The peak hours referenced in the transportation section (4.10) should be defined.	The peak hours used in the traffic analysis of the Draft EIR are weekday evening peak traffic periods from 4:00 p.m. to 6:00 p.m., and weekend midday peak hours from 12:00 noon to 2:00 p.m. The specific hours are not wholly important to the impact analysis, other than for informational purposes, because identifying the peak period allows for capturing maximum traffic demand on the surrounding network in order to analysis the project against the most congested time of the day. No further response is required.
B15-05		3. The traffic analysis does not evaluate the proposed traffic control measures of limiting access on West Napa Street during peak hours (see #2 above). It is not clear how they will work and whether they are feasible and enforceable. How will the Hotel prevent guests from using the West Napa Street access during peak hours? What will prevent left turns onto West Napa Street? Signage alone is not effective. Given existing traffic levels on West Napa Street, it seems that an alternative with access solely from First Street	Traffic control during peak traffic periods, as discussed in response to Comment B15-04, would be managed as part of the valet program as well as signage displayed within the project site to allow for ease of access to West Napa Street. Potential for traffic congestion would be limited to delays to other hotel guests exiting the site.

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TABLE 5-1 RESPONSE TO COMMENTS

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B15-06		<p>West should be evaluated.</p> <p>4. DEIR page 4.10-21 states: "Under these future conditions, which represent a worst-case scenario, a left-turn lane is not warranted on West Napa Street at the project driveway during either of the peak periods evaluated. Likewise, a right-turn lane is not warranted at the project driveway." This conclusion is a result of seriously underestimating vehicle trips and peak hours. Under current conditions, West Napa Street in the vicinity of the project is frequently congested, not just during peak hours. The morning commute to work and school (Sonoma Valley High School, Adele Harrison Middle School, Sassarini and St. Francis) results in near gridlock on West Napa Street. Afternoon congestion results from school pick up (starting at 2:30 p.m. and continuing throughout the afternoon). Friday evenings well beyond the "peak" hour are congested as well and summer weekends result in gridlock throughout the day.</p>	<p>Traffic calculations are provided in Appendix K of the Draft EIR that supports the determinations that left turn lanes are not warranted on West Napa Street. No further response is required.</p>
B15-07		<p>Land Use</p> <p>5. Land use is a critical issue associated with this proposal, especially since land use impacts in many cases are unmitigable. Land use issues are often overlooked in EIRs, as they are difficult to quantify. The DEIR fails to evaluate the aggregate land use impacts and incompatibilities of the proposed project. The combined effects of noise, visual, traffic and even air quality emissions result in significant land use disturbances and conflicts, for which there is no substantive mitigation measure. This issue is the very essence of the concerns expressed by Sonoma Valley citizens regarding large-scale development in close proximity to Sonoma plaza. When the impacts are disaggregated, they may not be significant. However, when the various impacts of the project are combined, there is no question that there will be a substantial and significant adverse change to the existing land use character in the area.</p>	<p>Please refer to Appendix B of the Draft EIR, Initial Study Checklist. Section ten of this appendix, Land Use and Planning, evaluated potential land use impacts within the scope of CEQA review. All potential impacts were determined to be less than significant and as such they were not analyzed in the Draft EIR. Additionally, please refer to Chapter 2 of this Final EIR. In this chapter, Table 2-1 summarizes the impacts and mitigation measures discussed in the Draft EIR. This table allows the reader to see all of the potentially significant impacts of the Project, as well as mitigation measures recommended to minimize potential impacts, in one place.</p>
B15-08		<p>6. The proposed project represents the introduction of a large-scale commercial business, larger than any of the nearby land uses that are in close proximity to the Sonoma plaza. The massive buildings are not consistent with surrounding land uses. This type of commercial enterprise will erode the land use character of downtown Sonoma, and will set precedent for additional large scale visitor related businesses in the vicinity.</p>	<p>This comment suggested that implementation of the proposed Project would be inconsistent with the land use character of the Project area. Since this comment does not question any of the analysis in the Draft EIR, no further response is required.</p>
B15-09		<p>7. In addition to evaluating the direct land use effects, the EIR must assess the indirect land use implications of the proposed project. Many residents avoid the Sonoma plaza area on weekends due to the influx of tourists and existing levels of traffic from visitors. With the addition of another exclusive land use (the proposed project) geared towards affluent customers (with no amenities for local residents of a lower socioeconomic status), the socioeconomic disparity will become even more apparent in the local area and in the community. This influence can then have a physical effect by displacing existing uses that serve residents. This disparity also relates to effects on community</p>	<p>Please refer to Appendix B of the Draft EIR, Initial Study Checklist. Section 13 of this appendix, Population and Housing, evaluated the potential for the proposed Project to displace substantial numbers of housing units and people. As shown, it was determined that a less-than-significant impact would result in this respect. While the commenter suggests that since the Project would cater to affluent visitors there would be an increase in the socioeconomic disparity in the community which would result in displacement, no evidence is provided to substantiate this claim and it is therefore speculative. As such, no further response is necessary. The portion of this comment about community character is addressed below.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		character (discussed below).	
B15-10		The impact of the project on the local environment will be huge during construction. Local businesses will be substantially disrupted during construction and these impacts are understated in the DEIR. Furthermore, the construction period is underestimated in the DEIR.	This comment generally suggests that construction impacts were underestimated in the Draft EIR. However, since no specific references to the Draft EIR or facts that would undermine the analysis in the Draft EIR are provided, no further response can be given.
B15-11		<p>Community Character & Visual Resources</p> <p>9. The visual analysis underestimates and understates the significance of visual impacts that will result from the large three story building masses. Instead of including an analysis of the actual impacts on visual character, the DEIR defers to City policies and guidelines and determines that the impact is less than significant, based on the assumption that the Planning Commission will enforce these guidelines. This analysis is inadequate and seriously flawed. The DEIR must include an independent analysis of the visual impacts, including an evaluation of the project's consistency with existing land use and environmental policies rather than leaving it up to the Planning Commission to conduct the evaluation. The Planning Commission will need to use the analysis in the EIR to make their decisions/recommendations, but there is currently no such analysis. The purpose of CEQA is to conduct the analysis that will inform decision makers, not rely on decision makers to conduct their own analysis. This applies to both the project-specific and cumulative impact analyses.</p>	Please refer to the response to comment B07-11.
B15-12		<p>10. At a minimum, the DEIR must analyze the following issues, based on existing policies cited in the Aesthetics section of the DEIR:</p> <ul style="list-style-type: none"> • The project's potential to impair the historic character of its surroundings; • The project's effects on any significant historic structures or other significant historic features on the site; • The project's compliance with applicable guidelines set forth in Chapter 19.42 SMC (Historic Preservation and Infill in the Historic Zone); and • The project's compliance with any applicable preservation plan or other guidelines or requirements pertaining to a local historic district as designated through SMC Section 19.42.020. 	Please refer to the response to comment B07-11. With respect to the portions of this comment related to historical resources, please refer to section 4.4 of the Draft EIR where the analysis of these issues is contained. All potential impacts related to aesthetics and cultural resources were determined to be less than significant.
B15-13		<p>11. Furthermore, the project's consistency with the following policies (cited in the DEIR) must be evaluated:</p> <ul style="list-style-type: none"> • Buildings should reinforce the scale, massing, proportions and detailing established by other significant historic buildings in the vicinity (if any). • The massing of larger commercial and mixed use buildings (5,000 square feet or greater) should be broken down to an appropriate scale through the use of storefronts and breaks in the facade. 	Please refer to the response to comment B07-11.
B15-14		12. The DEIR refers to City of Sonoma Municipal Code Section 19.34.010(B), which states	Please refer to the response to comment B07-11.

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		that "The primary objectives for the Downtown district are to preserve and enhance its historic character and to retain and promote its economic vitality as a commercial, cultural, and civic center attractive to residents and visitors." The DEIR states: "Additionally, this section states that new construction should build upon the established character of Downtown." The DEIR must address the project's consistency with this City provision. The proposed project does not enhance the city's historic character, nor does it create a use that is attractive to residents.	
B15-15		<p>13. DEIR Table 4.1-1 lists additional General Plan Community Development Element goals and policies that apply to the proposed project, but there is no analysis of the project's consistency with these City provisions. Goals and policies in this table that should be evaluated include:</p> <ul style="list-style-type: none"> • Goal CD-5: Reinforce the historic, small-town characteristics that give Sonoma its unique sense of place. • Policy CD-5.1: Preserve and enhance the scale and heritage of the community without imposing rigid stylistic restrictions. • Policy CD-5.2: Promote positive community interaction through provision of attractive public spaces. • Policy CD-5.6: Pursue design consistency, improved pedestrian and bicycle access, and right-of-way beautification along the Highway 12 corridor. <p>Note that the proposed project does not provide public spaces, nor does it reinforce the historic, small-town characteristics of Sonoma.</p>	Please refer to the response to comment B07-11.
B15-16		14. Most of the surrounding and nearby uses are single story or two-story. The large-scale three-story buildings will not be consistent with City policies regarding massing. The applicant states that architectural features will be incorporated into the design to reduce effects of massing, but these measures are not sufficient to reduce impacts to levels that are less than significant, given the huge size and height of the buildings and the high density/intensity of development on the site.	Please refer to the response to comment B07-11.
B15-17		<p>Air Quality/Greenhouse Gases</p> <p>15. DEIR page 4.2-26 states "The proposed project is estimated to take approximately 18 months to complete, and full buildout is anticipated to occur at the end of year 2017." The 2017 date for project completion is completely infeasible, given the need for Final EIR preparation, design review and permitting. The 18 month construction period is insufficient, given the size and scale of the buildings, the demolition and excavation required, and the interior finishing that will be needed. Therefore, construction emissions impacts and effects on nearby sensitive receptors (Impact Air-3) will be substantially higher than estimated in the DEIR. The analysis needs to be revised to reflect a more realistic construction scenario.</p>	The particular completion date assumed for buildout is of no consequence to the analysis contained in the Draft EIR because projected emissions from the construction phase are determined based on the length of the construction period. The commenter suggests that based on the size and scale of the buildings, the demolition and excavation required, and the interior finishing that will be needed, the assumed length of the construction period is underestimated. However, this assertion is an assertion of the commenter and no facts are presented to support it. As such, it is speculative to determine that the proposed construction period would be an underestimate. No revisions to the Draft EIR are required.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B15-18		16. The greenhouse gas analysis for proposed project construction relies on the applicant-provided construction schedule, which I believe is not feasible, as noted above. The analysis should include longer construction period.	Please refer to the response to comment B15-17.
B15-19		Alternatives 17. Given the size and scale of the proposed project, a reduced-scale project with fewer rooms should be required to be evaluated. A reduced footprint and intensity of use would make it more consistent with the community character and would reduce traffic and air quality impacts. Clearly, the size is a concern - looking at an alternative with no restaurant does not address this concern, especially since a restaurant will likely be needed to accommodate the increase in visitors to Sonoma plaza where restaurants are fully booked on weekends. A project with fewer rooms should be fully evaluated.	According to CEQA Guidelines section 15126.6, "(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." Additionally, CEQA Guidelines section 15126.6 states that, "(a)n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives..." As shown in chapter 3, Project Description, of the Draft EIR, one of the Project objectives is to "Construct a 62-room hotel, restaurant, and spa on an infill site in downtown Sonoma, CA." Therefore, there is no requirement that a reduced intensity alternative be analyzed. The comment is noted and requires no further action.
B15-20		18. Before moving forward with a project of this size, the City should conduct an independent economic study to determine whether there is a need for 62 high-end hotel rooms and adjust the alternatives analysis based on the results of this study.	The suggestion contained in this comment is outside of the scope of CEQA review. The comment is noted and requires no further action.
B15-21		19. Offsite alternatives - no offsite alternatives were fully evaluated in the DEIR. CEQA Guidelines and related case law require consideration of other sites that reduce impacts, such as traffic congestion in downtown Sonoma.	Please refer to section 6.3 of the Draft EIR. This section provides the following reasoning why an off-site alternative would be unnecessary and infeasible: "Off-Site Alternative. Under the Off-Site Alternative, the Project would be constructed at an off-site location. However, given that the Project would not result in any significant unavoidable impacts, an alternative site analysis was not necessary. Further, due to the nature of the Project, which includes reconfiguring and constructing new buildings on an infill site, an off-site alternative would be infeasible due to the lack of sites in the downtown area that could accommodate the Project and would not meet the objectives of the Project."
B15-22		Growth Inducement 20. DEIR page 7-3 states: "The Project is not expected to result in indirect growth inducement because it is replacing existing commercial development on the site, albeit at a higher density. Furthermore, there are no required infrastructure improvement that would increase capacity to the degree that additional development could occur elsewhere in the city." This statement completely dismisses the fact that the project represents a much higher density and intensity of use, and as such, would have the potential to result in significant growth-inducement effects. Placing a large-scale tourist facility in Sonoma's small community will likely induce additional growth to accommodate the types of goods and services expected by the project's clientele. Furthermore, concerns throughout Sonoma County have been expressed over resort developments, as they not only degrade the local character, but they also start a chain reaction of development.	This comment suggests that the Draft EIR failed to analyze indirect growth inducement that could result in additional growth to accommodate the types of goods and services expected by the Project's clientele. Please refer to Appendix B of the Draft EIR, Initial Study Checklist. Standard of significance a) in section 13, which was taken from Appendix G of the CEQA Guidelines, states that examples of projects with the potential result in indirect growth inducement include the extension of roads or other infrastructure. As stated in section 7.2 of the Draft EIR, the proposed Project does not entail "required infrastructure improvement(s) that would increase capacity to the degree that additional development could occur elsewhere in the city." Since the project does not include infrastructure improvements that would increase capacity to the degree that additional development could occur elsewhere in the city and no facts are provided to support the commenter's claim, it is speculative and represents the opinion of the commenter. Moreover, as the commenter notes in comment B15-09, there is significant amount of tourist activity in the city of Sonoma under existing conditions. This means that potential future tourist serving uses could not be considered a direct consequence of the proposed Project because they would be serving an existing tourist population in addition to potential customers of the proposed Project. The comment is noted and requires no further action.

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Comment #	Date	Comment	Response
B15-23		<p>Water Use and Hydrology</p> <p>21. DEIR page 4.7-16 states: "... the City intends to increase the water supply entitlement limit to 3,000 acre-feet by 2035." Is this future increase necessary to accommodate the proposed project? Please clarify.</p>	<p>As shown on page 4-25 of the City of Sonoma's 2010 Urban Water Management Plan, "the City intends to request that its entitlement limit of 3,000 acre-feet per year be available by 2035 (an increase from its request of 2,626 acre-feet per year in 2035), in order to provide more reliability to this supply during periods of shortages, not due to droughts, but due to environmental factors."⁵ This shows that the City's intent to request a larger entitlement is not directly attributable to the proposed Project.</p>
B15-24		<p>22. Given existing water shortages and conservation requirements, it is not clear how the proposed project's water use is not a significant unavoidable impact. More documentation is needed on how this project is accommodated by the Urban Water Management Plan and whether other planned uses (e.g., affordable housing or land uses for residents) would be preempted by the proposed project's water use. How does approval of this project's water use affect implementation of other projects needed in the community such as affordable housing, community facilities (public pool)?</p>	<p>The significance of the impact of the proposed Project's water demand was evaluated on three levels. Impact analysis contained in impact discussion HYDRO-1 on pages 4.7-15 and 4.7-16 of the Draft EIR determined that the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would not drop to a level which would not support existing land uses or planned uses for which permits have been granted). Impact analysis contained in impact discussion UTIL-1 on page 4.11-8 of the Draft EIR determined that the Project would have sufficient water supplies available to serve the Project from existing entitlements and resources. Impact analysis contained in impact discussion UTIL-2 on pages 4.11-8 and 4.11-9 of the Draft EIR determined that the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Additionally, potential cumulative impacts related to these topics are addressed in sections 4.7 and 4.11 of the Draft EIR.</p> <p>With respect to how the projected water deliveries analyzed in the 2010 UWMP, account for the increased water demand that would result from the proposed Project, please refer to impact discussion UTIL-2 on pages 4.11-8 and 4.11-9 of the Draft EIR. In this discussion it is explained that during a conference call with Dan Takasugi, City of Sonoma Public Works Director/City Engineer, on August 10, 2015, CSW ST2 confirmed that there are sufficient water supplies to support development of the proposed Project without needing to construct or expand water treatment facilities. If other planned uses (e.g., affordable housing, land uses for residents, community facilities) were also accounted for in the 2010 UWMP then they would not be substantially affected by approval of the proposed Project, with respect to water supply.</p>
B15-25		<p>23. The potential for interference with groundwater table flows is dismissed and needs additional analysis, given the underground parking area and shallow water table. The few sentences in the DEIR are not sufficient to address this problem. Mitigation measures should be identified and required.</p>	<p>This comment suggests that additional analysis is needed with respect to the potential for the proposed Project to deplete groundwater supplies or interfere substantially with groundwater recharge; however, the commenter does not specify what is lacking in the existing analysis contained on pages 4.7-15 and 4.7-16 of the Draft EIR. Furthermore, the commenter does not specify what analysis should be added. Therefore, no further response can be provided.</p>
B15-26		<p>Biological Resources/Tree Removal</p> <p>24. The Biological Resources Section 4.3 of the DEIR does not address impacts of tree</p>	<p>Please refer to Appendix B of the Draft EIR, Initial Study Checklist. Impact discussion e) in section 4, Biological Resources, on page 23, states that upon Project approval, the Project would be consistent with</p>

⁵ City of Sonoma, June 2010, Final Urban Water Management Plan 2010, page 4-25.

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		removal, other than related to potential impacts on bats. The proposed project involves removal of many trees, in potential conflict with the City's tree preservation policies and provisions. Compliance with the City's tree preservation policies should be addressed and mitigation should be included to preserve at least some of the existing mature trees, regardless of whether there is specific habitat identified.	Sonoma Municipal Code (SMC) section 12.08 and SMC section 12.09 and a less-than-significant impact would occur with respect to the potential for implementation of the proposed Project to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Additionally, on page 22 of Appendix B of the Draft EIR, the impact of the removal of trees on-site as a part of the Project is analyzed with respect to the potential for implementation of the Project to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. This potential impact was also determined to be less than significant. Since these potential impacts were found to be less than significant in the Initial Study Checklist, there was no need to analyze them in the Draft EIR.
B15-27		<p>Cultural Resources</p> <p>25. DEIR page 4.4-10 states: "Although the Project includes redevelopment of the Project site, the proposed buildings would not be readily apparent visibly from the District, nor would the Project construct new buildings in direct proximity to the District." This statement is inaccurate, given the size and height of the proposed development and its proximity to the historic district. The project will be visible from several places within the historic district and will have an effect on the setting of the historic district. The project fronts West Napa Street and would visually dominate the street front adjacent to the historic district and near other historic structures. Again, the DEIR understates the impact.</p>	<p>The Draft EIR does not suggest that no portion of the proposed structure would be visible from the Sonoma Plaza National Register District. Rather, the Draft EIR concludes that since there would only be limited views of the proposed structure from a few vantage points within the District, the proposed Project would alter the setting of the District only to a small degree. This analysis is based on the Historic Resources Evaluation prepared by Knapp Architects, contained in Appendix G of the Draft EIR.</p> <p>In addition, photo simulations were prepared by the project applicant, and an independent peer review was conducted to verify proper scale as it relates to the proposed project's height, siting, and massing. The photo simulations and peer review memorandum are included as Appendix Q of this Final EIR.</p> <p>The comment is noted and requires no further action.</p>
B15-28		<p>Section 7.1, Impacts Found to be Less than Significant</p> <p>26. As stated in the quote on DEIR page 7-1, "An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR." No such statements exist in the DEIR. Attaching the Initial Study does not satisfy this requirement. Many potential issues have been dismissed, which is surprising for a project of this size and scale, compared to existing uses in Sonoma. Substantially more information is needed in the DEIR regarding these dismissed issues.</p>	Please refer to Appendix B of the Draft EIR, Initial Study Checklist. This document indicates the reasons that various possible significant effects of the Project were determined not to be significant and were therefore not discussed in detail in the Draft EIR. Since the commenter does not provide a reason why the analysis contained in the Initial Study Checklist does not satisfy this requirement, no further response can be provided.
B15-29		<p>Project Objectives</p> <p>27. One of the project objectives is to provide employment opportunities for local citizens. However, there is no discussion on how this would be achieved. Without a written commitment to employing local residents, this objective is meaningless. Furthermore, most of the jobs offered by the proposed project are low-paying service jobs that could not support Sonoma's housing costs so it is highly likely that workers will come from out of the area.</p>	This comment does not relate to an environmental issue analyzed in the Draft EIR. The comment is noted and no further response is necessary.
B15-30		28. The DEIR states that the Mitigation Monitoring and Reporting Program for the Project	Each of the Mitigation Measures that will be included in the Mitigation Monitoring and Reporting Program

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B15-31		<p>will be included in the Final EIR, but that provides no opportunity for public review of the monitoring provisions. It is unclear whether numerous applicant-proposed measures are enforceable and effective. It would be prudent to allow the public review of the monitoring plan.</p> <p>Conclusion The project may have economic benefits for some, but it will adversely impact residents in the community and the community as a whole. This is the largest project proposed in downtown Sonoma and will permanently change the town's character and sense of place. Please take the time to fully consider these issues before going forward with the Final EIR.</p> <p>Please feel free to contact me if you have any questions or would like to discuss my comments and concerns.</p>	<p>(MMRP) are included in sections 4.1 through 4.11 of the Draft EIR. As such, the mitigation measures themselves were available to the public for review during the public review period for the Draft EIR. Furthermore, the MMRP for the Project has been completed and is available for consideration prior to approval of the Project by the Sonoma Planning Commission.</p> <p>This comment serves as a closing remark and does not present comments which have not been expressed in the previous comments from this comment letter. Please refer to response to comments, B15-01 through B15-30. This comment is noted and no further response is necessary.</p>
B16	03/10/2016	Karla Noyes	
B16-01		The cumulative impact of the increased traffic, increased greenhouse gasses, increased pedestrian traffic, water use and increased creation of sewage is indeed significant.	This comment suggests that the Draft EIR should have found significant impact related to traffic, greenhouse gas emissions, pedestrian traffic, and utilities. However, since the comment does not specify the reasons why the analysis in the Draft EIR is inadequate, no further response can be provided.
B16-02		<p>Regarding the Sonoma General Plan:</p> <p>Policy CD-5.4 Preserve and continue to utilize historic buildings as much as feasible.</p> <p>Goal CD-5 Reinforce the historic, small-town characteristics that give Sonoma its unique sense of place. Policy CD-5.1 Preserve and enhance the scale and heritage of the community without imposing rigid stylistic restrictions</p> <p>Policy CD-5.4 Preserve and continue to utilize historic buildings as much as feasible.</p> <p>Policy CD-5.8 Encourage the designation and preservation of local historic structures and landmarks, and protect cultural resources.</p> <p>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.</p>	This comment reproduces General Plan policies with portions of the policies in bold font for emphasis. Since this comment does not directly question the analysis contained in the Draft EIR, no further response is required.
B16-03		<p>This project is absolutely out of scale with the historic character of the Plaza area.</p> <p>1) "AES-I The Project would not substantially degrade the existing visual character or</p>	Please refer to the discussion in section 4.1.3 of the Draft EIR. As described, Section 19.54.080(G) of the SMC provides the findings that would need to be made during the design and architectural review process in order for the proposed Project to be approved. Section 19.54.080(G)(1) provides the basic findings that

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		<p>quality of the site and its surroundings." I disagree wholeheartedly. Because of the project's massive scale in that location the project does indeed substantially degrade the existing visual character or quality of the site and its surroundings. The enormous scale is absolutely significant.</p>	<p>must be made. These include the following, "The project responds appropriately to the context of adjacent development, as well as existing site conditions and environmental features." In addition to these findings, in accordance with Section 19.54.080(G)(2), for projects that are within the Historic Overlay District, like the proposed Project, the following findings would also be required prior to Project approval:</p> <ul style="list-style-type: none"> ▪ The project will not impair the historic character of its surroundings; ▪ The project substantially preserves the qualities of any significant historic structures or other significant historic features on the site; ▪ The project substantially complies with the applicable guidelines set forth in Chapter 19.42 SMC (Historic Preservation and Infill in the Historic Zone); and ▪ The project substantially complies with any applicable preservation plan or other guidelines or requirements pertaining to a local historic district as designated through SMC Section 19.42.020. <p>Since the above findings would need to be made by the City prior to Project approval, the City would be required to determine that the Project would fit in with the visual character of the site's surroundings or it would not be approved. Therefore, adherence to the SMC sections listed above would ensure a less-than-significant impact with respect to visual character, upon Project approval. The commenter's opinion is noted. No further response is necessary.</p>
B16-04		<p>2.) "GHG-2 The Project, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to GHG emissions." I disagree wholeheartedly. Not only will there be the increased traffic and greenhouse gas emission associated with hotel and restaurant patrons and employees there will be a huge impact on air quality from idling busses, limos and taxis keeping their air conditioning running during the summer. Climate studies predict that Sonoma County will have 90 days of over 90 degree temperatures. Three months of really hot weather. There will be a huge increase in air conditioning use and all of the energy use ramifications that will cause. This is absolutely significant.</p>	<p>Please refer to section 4.6.4 of the Draft EIR. As described, GHG emissions related to the proposed Project are not confined to a particular air basin but are dispersed worldwide. The analysis of impacts in Section 4.6.3 of the Draft EIR showed that the proposed Project would not result in a cumulatively significant contribution to GHG emissions impacts. As identified in Impact GHG-1, Table 4.6-5 shows that the proposed Project would not exceed BAAQMD's bright-line threshold and therefore would generate a nominal increase in GHG emissions. Consequently, GHG emissions impacts of the Project are not cumulatively considerable, and therefore would be less than significant. While the commenter suggests factors to consider in determining the level of GHG emissions that would result from implementation of the proposed Project, as described in section 4.6.3 of the Draft EIR, GHG emissions from construction and operation of the project were calculated using the California Emissions Estimator Model (CalEEMod), Version 2013.2.2. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The mobile source emission</p>

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
			factors currently used in the model (EMFAC2011) includes the Pavley standards and Low Carbon Fuel standards into the mobile source emission factors. ⁶ This shows that while every imaginable future possibility was not considered, direct and indirect sources of GHG emissions were analyzed and the tool that was used is the Statewide standard for calculating GHG emissions. The opinion of the commenter is noted. No further response is required.
B16-05		<p>3.) "AIR-4 The proposed Project, in combination with past, present, and reasonably foreseeable projects, would not result cumulatively contribute to air quality impacts in the SFBAAB."</p> <p>I disagree wholeheartedly. This is absolutely significant.</p>	This comment suggests that the Project would have a significant impact on air quality. However, since the commenter does not provide specific reasoning for their objection, no further response can be provided. The commenter's opinion is noted.
B16-06		<p>4.) "CULT-1 The Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5"</p> <p>The demolition of 153 W. Napa Street, an important contributor to the visual historic charm of Sonoma, is absolutely significant. I want a more thorough investigation of that important structure. The Project site is still within proximity to the National Register Historic District as a whole which would significantly negatively impact this important historical resource.</p>	Please refer to Appendix G of the Draft EIR, Historic Resources Evaluation. This appendix contains a report prepared by Knapp Architects which analyzes the potential impact of the Project with respect to historic resources. This analysis considered the context of the site as well as potential impacts related to the proximity of the site to the Sonoma Plaza National Register District. It determined that all potential impacts would be less than significant. Section 4.4 of the Draft EIR incorporates the analysis contained in Appendix G. Since the commenter does not specify which portion of this analysis is inaccurate or what is missing from this analysis, no further response can be provided. The opinion of the commenter is noted.
B16-07		<p>5.) "PS-1 The proposed Project would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives."</p> <p>I want to see the Fire Chief's opinion about the ability to provide fire protection. I believe there would be a significant problem with fire safety.</p>	Please refer to section 4.9.3 of the Draft EIR. As shown in this section, based on confirmation from Fire Marshal Alan Jones, it was determined that that the proposed Project would not require construction or expansion of Sonoma Valley Fire & Rescue Authority (SVFRA) facilities. This shows that the proposed Project would be able to be safely served by the Sonoma Valley Fire & Rescue Authority without new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts.
B16-08		<p>6.) "PS-2 The proposed Project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to fire protection services."</p> <p>See above plus include the increased traffic the Project will create. This negative impact is absolutely significant.</p>	Please see the response to comment B16-07.
B16-09		<p>7.) "TRANS-3 The Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks."</p> <p>Less than significant impact, are you kidding?! There is altogether too much traffic in that area including First Street West. I took a friend to the doctors on First Street West Friday, February 26, 2016 at 2:30pm and attempted to parallel park. What a nightmare!</p>	This comment questions a significance determination related to air traffic and describes difficulties related to vehicular and pedestrian traffic around the Project site. The volume data for the traffic study was collected in Spring 2015 while local schools were in session, which also coincides with average tourist activity within the Sonoma Valley. Data collected in spring typically reflects peak activity system-wide due to the differences in traffic patterns when school is in session versus during the summer when it is not and many residents are on vacation.

⁶ California Air Pollution Control Officers Association (CAPCOA), Developed by ENVIRON International Corporation in collaboration with the South Coast Air Quality Management District (SCAQMD) and other California Air Districts, <http://www.aqmd.gov/calemod/home>, accessed April 29, 2016.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		Between backing up traffic and cars swerving around me, and FedEx and UPS trucks stopping to drop off packages then zipping around me - that was nothing compared to trying to cross the street with all that traffic! Taking my life into my hands. And you want to put MORE traffic on that street? More traffic on W. First and W. Napa is absolutely significant. The traffic study should be done during the summer high season in order to accurately gauge the impact.	
B16-10		8.) "TRANS-7 The proposed Project, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to transportation and traffic." This conclusion is absolutely wrong. This negative impact is absolutely significant.	This comment does not provide evidence to substantiate this assertion. As stated on page 4.10-25 of the Draft EIR, upon the addition of project-related traffic to the Future volumes developed when considering past, present and reasonably foreseeable projects, all of the study intersections are expected to continue operating at the same levels of service, with increases in delay of 0.3 seconds or less. The project does not result in direct or cumulatively significant intersection impacts under the standards applied. No further response is required.
B16-11		9.) "UTIL-1 The Project would have sufficient water supplies available to serve the project from existing entitlements and resources, or new or expanded entitlements needed." I disagree. You have no idea of the state of future water supplies with Climate Change. Scientists predict hotter, dryer conditions for Sonoma County and the Russian River watershed and the Sonoma County Water Agency supplies are already over-subscribed. Future water supply is absolutely significant.	Please refer to section 4.11.1.3 of the Draft EIR. As described, CSW ST2 analyzed the plans for the proposed Project and found that implementation would result in a water demand of 8.2 million gallons a year (mgal/year). However, the Project would implement a number of water conservation measures which, CSW ST2 confirmed, would bring the Project's water demand to 5.7 mgal/year. The City of Sonoma's 2010 Urban Water Management Plan (UWMP) identified projections for water demand through year 2035. Projected water deliveries identified in the UWMP are shown in Table 4.11-2 of the Draft EIR. As shown in Table 4.11-2, the 2010 UWMP found that the City's projected water supplies are sufficient to meet projected demands during normal and multiple dry year conditions. During a severe drought, under the single-dry year conditions, the City would impose mandatory water conservation measures. During peak summer months, the City would be able to increase groundwater pumping on a short-term basis to supplement the SCWA supply. CSW ST2 has contacted City officials and has determined that projected water deliveries shown in Table 4.11-2 account for the increased water demand that would result from the proposed Project. ⁷ Therefore, new or expanded entitlements would not be necessary and a less-than-significant impact would result. This analysis confirms that based on the best data available, new or expanded entitlements would not be necessary. Since the comment does not provide evidence that contradicts any of the analysis in the Draft EIR, no further response can be provided.
B16-12		10.) "UTIL-3 Implementation of the Project, in combination with past, present, and	Please refer to the response to comment B16-11.

⁷ Conference call between CSW|ST2 and Dan Takasugi, City of Sonoma Public Works Director/City Engineer, on August 10, 2015.

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B16-13		<p>reasonably foreseeable projects, would not result in a significant cumulative impacts with respect to water supply or services." Wrong. See above. Future water supply is absolutely significant.</p> <p>11.) "UTIL-7 Implementation of the Project, in combination with past, present, and reasonably foreseeable projects, would not result in a significant cumulative impacts with respect to wastewater treatment." Investigate the dilapidated condition of the existing sewer pipes. It is irresponsible and possibly illegal to increase the sewage supply. This is absolutely significant.</p>	<p>The commenter is correct that under existing conditions, implementation of the proposed Project, without adequate mitigation, would result in a significant impact. However, as described in section 4.11.2.3 of the Draft EIR, implementation of Mitigation Measure UTIL-6 would result in a determination by the wastewater treatment provider which serves the Project that there is adequate capacity to serve the Project's projected demand is addition to the provider's existing commitments. Mitigation Measure UTIL-6 calls for the Project Applicant to coordinate with the Sonoma Valley County Sanitation District (SVCSD) to upgrade the capacity of the local sanitation collection system, such that the additional flows generated by the Project would be fully accommodated, specifically during peak wet weather flows. Implementation of Mitigation Measure UTIL-6 would also reduce the potential impact described in standard of significance UTIL-7 to a less-than-significant level.</p>
B16-14		<p>12.) "UTIL-9 The proposed Project would not contribute to cumulative natural gas and electrical service demands." Wrong. Increasing the electric usage of 494,073 KWh DAILY and natural gas usage 2,704,193 (KBtu) annually is absolutely significant.</p>	<p>This comment suggests that a significant impact would result with respect to natural gas and electrical service demands. However, since justification for the objection is not provided, no further response can be provided.</p>
B17	03/10/2016	Regina Baker	
B17-01		<p>I'll make my objection short. The traffic on First Street us already a nightmare, as you know!</p> <p>People parking in or blocking driveways, delivery trucks parking in the middle of the street, drag racers speeding all say and night long on the street, and much more.</p> <p>The hotel project does not fit in well with the Sonoma small town community ambiance. The analogy is it's (the hotel) is like the mean stepsisters in Alice in Wonderland trying to put their size ten foot into the size six glass slipper! It doesn't work.</p> <p>Cordially, Regina Baker</p>	<p>This comment expresses the commenter's objections to the proposed Project related to traffic and community ambiance. While the comment does not directly question the analysis contained in the Draft EIR and as such no response is required, the commenter's opinion is noted.</p>
B18	3/10/2016	Kristi Black	
B18-01		<p>My comments on the Draft Environmental Impact Report (EIR) for the Hotel Project Sonoma are detailed in this letter. Several deficiencies of the Draft EIR require revisions that should trigger recirculation of the Draft EIR:</p>	<p>This comment serves as an introduction. Please refer to the responses to comments B18-02 through B18-12.</p>
B18-02		<ul style="list-style-type: none"> • Impact AES-1 (construction): The Draft EIR fails to describe and disclose a significant aesthetic impact during construction. The Draft EIR should disclose and mitigate this 	<p>Please refer to the response to comment B18-06.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		significant impact.	
B18-03		<ul style="list-style-type: none"> • ImpactAES-1 (buildout): The Draft EIR defers until a later time the analysis of project buildout aesthetic impacts and whether they would be significant. This does not allow meaningful comments on the EIR aesthetics analysis. The Draft EIR should disclose the buildout aesthetic impacts. 	Please refer to the response to comment B18-07.
B18-04		<ul style="list-style-type: none"> • Section 4.3, Biological Resources (construction): The Draft EIR fails to describe and disclose a significant construction impact to protected nesting birds. The Draft EIR should disclose and mitigate this significant impact. 	Please refer to the response to comment B18-08.
B18-05		<ul style="list-style-type: none"> • Impact HYDRO-1 (buildout): The Draft EIR does not contain an adequate analysis of impacts to groundwater but instead speaks to whether there would be sufficient water supply. This does not allow meaningful comments on the Draft EIR groundwater supply analysis. The Draft EIR should disclose the impacts on groundwater supply. 	Please refer to the response to comment B18-09.
B18-06		<p>These and other comments are described in greater detail below.</p> <p>Section 4.1.3, Impact AES-1</p> <ul style="list-style-type: none"> • Construction Impacts. The Draft EIR does not analyze degradation of visual character or quality of the site and its surroundings during construction. Construction equipment, structure demolition, ground disturbance, excavation, and other activities would be visible at the site during construction of the proposed project. Viewers of the site would include highly sensitive receptors such as residents and tourists driving by the site and walking in the downtown area. Construction activities do not fit in with the visual character of the site or surrounding area and would degrade visual quality. This would be a significant impact and should have been analyzed in the Draft EIR. Mitigation, such as screening of the site during construction, should be required in the EIR. The lack of analysis of construction impacts in the Draft EIR does not allow meaningful public comment on the project's aesthetic impacts during construction. Furthermore, the Draft EIR analysis overlooks a significant environmental impact of the proposed project. Thus, the EIR should be recirculated after revision. 	<p>The following text has been added to impact discussion AES-1 to address this comment:</p> <p>“During the construction phase of the Project, construction activities and equipment on-site would be inconsistent with the site’s surroundings. However, these potential impacts would be temporary and as such, less than significant.”</p> <p>Since there was no potential for a significant impact in this respect, recirculation is not necessary.</p>
B18-07		<ul style="list-style-type: none"> • Buildout Impacts. The Draft EIR does not disclose the buildout aesthetic impacts of the proposed project. Instead, the Draft EIR defers analysis and disclosure of buildout aesthetic impacts to a later date, i.e., when the City makes design review findings. The buildout aesthetic impacts analysis does not contain a visual simulation or drawing and does not even describe what the hotel would look like from any viewpoints, including the viewpoints described in the Draft EIR, and does not state the impacts of the project as proposed. The Draft EIR should be revised to describe and disclose the buildout aesthetic impacts of the proposed project, state whether those impacts would be significant, and 	Please refer to the responses to comments B07-11 and B07-12. As demonstrated in those responses, recirculation is not necessary.

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B18-08		<p>outline mitigation for any identified significant impact. Furthermore, the lack of disclosure of impacts and mitigation in the Draft EIR does not allow meaningful public comment on the project's aesthetic impacts at buildout. Thus, the EIR should be recirculated after revision.</p> <p>Section 4.3, Biological Resources</p> <ul style="list-style-type: none"> • Construction Impacts. The Draft EIR fails to analyze impacts to avian species protected at the federal level (e.g., under the Migratory Bird Treaty Act) and at the state level (e.g., under various sections of the Fish and Game Code). The project has the potential to adversely impact birds directly through tree removal and nest destruction and indirectly through noise from construction activities that can cause nest abandonment. Nest abandonment or destroying an active nest during construction would be a significant impact. There are fifty trees on the site identified in the arborist report in the Draft EIR. Many of them are in moderate condition, which could provide habitat for nesting birds. Thus, the project may result in a significant impact to nesting birds. The Draft EIR, however, is silent on this significant impact. The EIR should be revised to describe and disclose construction impacts to nesting birds, state that the impact would be significant, and outline mitigation for the impact. Furthermore, the Draft EIR analysis overlooks a significant environmental impact of the proposed project. Thus, the EIR should be recirculated after revision. 	<p>Please refer to Appendix B of the Draft EIR. Impact Discussion d) on pages 22 and 23 address this issue. As shown, the discussion recognizes the potential for impacts associated with the loss of habitat due to the removal of trees on-site. However, it was determined that this potential impact would be less than significant without mitigation and as such it is not described in the text of the Draft EIR. Since this impact was described and shown to be less than significant, there is no need to recirculate the Draft EIR based on this comment.</p>
B18-09		<p>Section 4.7.3, Impact HYDRO-1</p> <ul style="list-style-type: none"> • Buildout Impacts. The Draft EIR groundwater supply impact analysis does not actually speak to whether the project's annual demand of 5.7 million gallons per year would result in a net deficit in aquifer volume or a lowering of the local groundwater table. The Draft EIR only concludes the City of Sonoma's Urban Water Management Plan states there is sufficient supply. The Draft EIR is silent as to whether, even if the water is available from the groundwater aquifer, the project would cause a deficit in water volume or lowering of the local groundwater table. The mere availability of water from SCWA and the City's groundwater wells does not per se mean there would not be drawdown of groundwater or a net deficit in water volume in an aquifer. That is, there may be groundwater available for pumping, but there could still be an adverse impact to groundwater volume or level through using available groundwater. Therefore, the Draft EIR should analyze the groundwater volume and groundwater level impacts of water from use of the City's groundwater wells during peak summer months to supplement SCWA supplies, particularly given that the Draft EIR recognizes that withdrawals from the groundwater basin as a whole are occurring faster than the natural recharge. The EIR should be revised to describe the impact to groundwater volume and groundwater levels, state whether that impact is significant, and outline mitigation for any significant impacts. Furthermore, the omission of such an analysis in the Draft EIR does not allow 	<p>Impact HYDRO-1 provides an analysis related to the direct physical impacts related to building on the project site, and whether or not construction and operation within the project site would result in environmental impacts within the project site. Please refer to the response to Comment B12-09 with respect to water demand generated by the proposed project.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B18-10		<p>meaningful comment on the project's impacts to groundwater volume and level. Thus, the EIR should be recirculated after revision.</p> <p>Chapter 6, Alternatives</p> <ul style="list-style-type: none"> • Reasonable Range of Alternatives. The Draft EIR does not seem to consider a reasonable range of alternatives and does not consider at least two alternatives that meet all CEQA requirements for consideration. Other than the CEQA-required No Project Alternative, the Draft EIR examines only two alternatives to the project and omits without explanation any alternatives with smaller building footprints and fewer rooms. <p>The EIR should be revised to consider reduced development alternatives, including an alternative with fewer rooms as well as an alternative with fewer rooms and no restaurant. Unlike the no-restaurant alternative contemplated in the EIR where the size of the building would not be reduced, the building space itself should be reduced under these two suggested alternatives. Both suggested alternatives would avoid or substantially reduce significant impacts of the proposed project. For example, a hotel with a smaller footprint could substantially reduce fugitive dust and exhaust emissions during construction (Impacts AIR-1, AIR-2, and AIR-3) due to less ground disturbance and less equipment use, respectively. A hotel with a smaller footprint could also be configured to completely avoid the significant impact to the Index-Tribune building (Impact CULT-1). A hotel with fewer rooms would also reduce the amount of wastewater generated by the project (Impacts UTIL-6 and UTIL-7). Neither alternative would meet all objectives listed in the EIR (since they do not have 62 rooms and one does not have a restaurant), but they would meet most of the basic objectives, as required under CEQA. Both alternatives are potentially feasible. There is no discussion, however, of why an alternative with fewer rooms and a smaller footprint has not been considered. The EIR should therefore be revised to consider these two alternatives.</p>	<p>The three alternatives analyzed in the EIR were developed to provide a reasonable range of alternatives that attempt to meet the project objectives as well as lessen the potential environmental impacts resulting from the proposed project. The No Restaurant Alternative was developed specifically to attain most of the basic project objectives while also being economically feasible to construct. By reducing the square footage of the hotel and restaurant on-site, both uses would be less likely to be economically viable. In addition, in order to identify an alternative to analyze in the Draft EIR, a nexus between the alternative and the potential impact that should be reduced as a result of a project alternative. An overall reduction in hotel rooms and square footage in restaurant space, although an overall square footage in area developed, would not result in less ground-disturbing construction activities, nor would the reduction in square footage result in any meaningful reductions in water demand or wastewater generation.</p>
B18-11		<ul style="list-style-type: none"> • Project Objectives. The objective of constructing a 62-room hotel, restaurant, and spa on an infill site in downtown Sonoma, CA, seems to be unnecessarily narrow. It seems this very specific objective might have limited the range of alternatives considered, given that the only build alternatives considered in the EIR have 62 rooms and there is no discussion of why a hotel with fewer rooms was considered but rejected. It seems that a key purpose of alternatives under CEQA is to reduce significant environmental impacts of a proposed project. If the objective of constructing a 62-room hotel, restaurant, and spa precluded examination of a reduced-project alternative with fewer rooms and a smaller footprint, then this objective also precluded examining alternatives that might avoid or substantially reduce a significant impact of the proposed project. Given that objectives are defined by the lead agency, the City should reconsider this objective of the proposed project and, as previously stated, should examine alternatives with fewer rooms. 	<p>The objective of constructing a 62-room hotel, restaurant and spa on an infill site is identified as a project objective, but as identified in Section 15126.6(a) of the CEQA Guidelines, the alternatives evaluated as part of the alternatives analysis need to contain a “range of reasonable alternatives to the project” which would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant [impacts] of the project.” The objective included construction and operation of a restaurant, but the restaurant component was removed in the No Restaurant Alternative. Although both the No Restaurant Alternative and Mitigated Project Alternative both included 62-room hotel buildings, maintaining the number of hotel rooms was not the primary consideration when developing the alternatives. As noted in response to Comment B18-10, reducing the overall number of rooms would not necessarily reduce the short-term ground-disturbing construction activities.</p>

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B18-12		<p>•<i>Avoid or Substantially Reduce A Significant Effect.</i> Alternatives to the proposed project must avoid or substantially reduce a significant effect of the proposed project. The Draft EIR, however, provides no conclusion and no substantiation that the No Restaurant Alternative or Mitigated Alternative would result in avoidance or substantial reduction of a significant impact of the proposed project. The Draft EIR only concludes that certain impacts would be "less severe." Thus, it is unclear whether these alternatives are appropriately considered in the EIR. The Draft EIR should be revised to clarify which impacts are substantially reduced by the considered alternatives. Substantiation should be provided for these conclusions.</p>	<p>As noted on page 6-1 of the Draft EIR, an EIR need only contain a "range of reasonable alternatives to the project" which would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant [impacts] of the project" (CEQA Guidelines Section 15126.6(a)). For each alternative, an analysis was provided that compared the potential impacts of the proposed project to the potential impacts that could result from each project alternative. For each alternative, a discussion of each resource topic discusses whether a potentially significant impact, less-than-significant impact, or no impact would occur as a result of the alternative. This discussion is the basis for whether or not the potential impacts for each alternative would be similar, less severe, or more severe when compared to the proposed project. The analysis of project alternatives should include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. By including the discussion of each resource topic area and Table 6-1, Comparison of Project Alternatives, the analysis included in the Draft EIR allows for meaningful evaluation, analysis, and comparison with the proposed project.</p>
B19		Kent Iverson	
B19-01	No Date	<p>EIR Feedback The ingress/egress proposed (Napa Street) is unrealistic, since this stretch of road is backed up with traffic during peak hours on weekends and during the summer and fall. It is also unclear how a right turn only flow will be enforced. The developers will certainly want a grand entrance on Napa Street, and a right turn only ingress should be OK provided there is enough "staging capacity" that demolition and construction vehicles and later customers' cars will not back up into Napa Street waiting to enter the property. The egress from the hotel should be out onto to Second Street, perhaps via a shared driveway with the Sonoma Valley Inn.</p>	<p>This is a comment on the merits of the Project and does not pertain to the analysis contained in the Draft EIR. The comment is noted but no further response is necessary.</p>
B19-02		<p>It seems that the developer is planning to put in a significant amount of parking, although current parking capacity is insufficient during the summer on Tuesday evenings when the Farmer's Market is underway and a Stompers game is on. I do not see a strong need to further mitigate this issue within the current project, but new projects around the Plaza should all be "self supporting" in term of parking capacity.</p>	<p>This is a comment on the merits of the Project and does not object to the analysis contained in the Draft EIR. The comment is noted but no further response is necessary.</p>
B19-03		<p>The projected water usage of the development (>5M gallons per year) is a significant increase in demand on a depleted resource with an uncertain future (i.e., severe degradation of anadromous fisheries, saltwater intrusion in the south county, climate change long term impacts on precipitation and water usage in Sonoma County). Given the predominance of negative long term forecasts regarding precipitation and temperature, it would be sensible to mitigate major increases in water usage in the city. I think it would be reasonable to require the developer to mitigate at least 75% of the projected water usage of the hotel through a combination of:</p> <ul style="list-style-type: none"> - Rainwater collection, storage and use for landscaping irrigation 	<p>This comment expresses an opinion on the potential impacts related to water demand. Although this comment provides a series of mitigations, there is no nexus between the proposed mitigation and a potential impact. Water demand generated by the proposed project is discussed on page 4.11-8 of the Draft EIR. The 2010 Urban Water Management Plan (UWMP) found that the City's projected water supplies are sufficient to meet projected demands during normal and multiple dry year conditions, and the projected demand accounts for the increased water demand that would result from the proposed Project. No further response is required.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B19-04		<ul style="list-style-type: none"> - Contribution of funds to the extension of the recycled water system - Contribution of funds to rainwater collection and xeriscape conversion elsewhere in the city <p>The additional burning of carbon-based fuels should also be addressed via mitigation by the developer. I would expect that the new development would include solar panels to generate a significant amount of the projected summertime energy usage (air conditioners), and I would also like to see the developer contribute to a fund to plant native trees in and around the city of Sonoma. The developer's contribution to this fund could be promoter to the public with a "matching funds" type offer to increase the impact of this mitigation. The City of Sonoma would determine what to plant and where, but I have suggestions if they run out of ideas.</p>	<p>Potential environmental impacts related to the burning of carbon-based fuels is addressed Chapter 4.2, Air Quality, and Chapter 4.6, Greenhouse Gas Emissions. As noted in the discussion of Impact AIR-1 and Impact AIR-2, the Project would result in potentially-significant impacts to air quality resulting from construction. Both construction-related impacts would be mitigated through developer-implemented mitigation measures occurring during the construction-phase of the Project. As a result, additional mitigation would not be required.</p>
B19-05		<p>The additional volume of waste water discharge into the city sewer should also be mitigated, but perhaps to a lower proportion. The options for mitigation that I would think would be reasonable include:</p> <ul style="list-style-type: none"> - Funding the diversion of storm water runoff from city sewer to streams, ponds and wetlands - Funding the upgrading of sewer piping servicing the site 	<p>Mitigation Measure UTIL-6 is included to mitigate potential impacts to the sanitary sewer system. The mitigation measure includes payment of in-lieu fees and installation of a holding tank so as to not overburden the system by metering the discharge rate from the project site. The inclusion of Mitigation Measure UTIL-6 would reduce the potential impact to the sanitary sewer system and the additional measures proposed in this comment would not be required.</p>
B19-06		<p>The development will increase the proportion of hardscape which will increase runoff and exacerbate flood risk in the general area. The planners should look for opportunities to mitigate this risk via daylighting intermittent and perennial stream courses, such as Fryer Creek, which has buried tributary channels near the site of the development. There is probably no practical flood control mitigation that can be done within the confines of the property, but general mitigation could be applied to downstream areas such as riparian channel enhancement along Second Street West, south of Andrieux.</p>	<p>As discussed beginning on page 40 of the Initial Study (included in Appendix B of the Draft EIR), because project construction requires implementation of best management practices (BMPs) and compliance with the Standard Urban Stormwater Mitigation Plan (SUSMP) and Stormwater Pollution Prevention Plan (SWPPP), the potential flooding would be minimized and the project would result in a less-than-significant impact. Therefore, general mitigation suggested in the comment, such as riparian channel enhancement along Second Street West would not be required to reduce a potential environmental impact.</p>
B19-07		<p>A smaller hotel would be more esthetically appropriate and better from a resources and environmental standpoint. Broadway would be appropriate for this size of development if the resource and environmental mitigations were reasonable.</p>	<p>This comment expresses an opinion regarding the scale of the proposed project. As noted in the discussion of Impact AES-1 beginning on page 4.1-7 of the Draft EIR, Section 19.54.080(G) of the Sonoma Municipal Codes provides the findings that would need to be made during the design and architectural review process in order for the proposed Project to be approved. Section 19.54.080(G)(1) provides the basic findings that must be made including, "The project responds appropriately to the context of adjacent development, as well as existing site conditions and environmental features." Since the findings would need to be made by the City prior to Project approval, the City would be required to determine that the Project would fit in with the visual character of the site's surroundings or it would not be approved. Therefore, adherence to the municipal code sections discussed above would ensure that the project would not result in a significant impact.</p>
B20	03/21/2016	C.A. Collier	
B20-01		The developer won the right to build a hotel when Measure B failed. Its impact on the	This comment expresses an opinion and does not question the adequacy of the analysis included in the

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		Sonoma community and the environment in general was only addressed theoretically because voters were unaware of specific aspects of the project. Now we know.	EIR. No response is required.
B20-02		One issue that is completely untenable is the projected amount of water the project will utilize. For several years homeowners have been ripping out lawns, planting drought tolerant landscapes, and conserving water. To ignore our conservation efforts and allow this project to proceed as described indicates Sonoma's voluntary and mandatory water restrictions were unnecessary.	Water demand generated by the proposed project is discussed on page 4.11-8 of the Draft EIR. The 2010 Urban Water Management Plan (UWMP) found that the City's projected water supplies are sufficient to meet projected demands during normal and multiple dry year conditions, and the projected demand accounts for the increased water demand that would result from the proposed Project. No further response is required.
B20-03		The chosen location for this hotel and restaurant is at odds with many other environmental issues including air quality. We know the buses and limos that deliver tourists to the Plaza often sit in the parking lots with engines running to keep the inside air cool for the guests. The pollution from so much increased traffic and idling of motors will impact the community's health.	As discussed beginning on page 18 of the Initial Study (included in Appendix B of the Draft EIR), long-term air pollutant emissions generated by hotel projects are typically associated with the burning of fossil fuels in cars (mobile sources), energy use for cooling, heating, and cooking (energy), and landscape equipment use and household products (area sources). BAAQMD's CEQA Guidelines identifies screening criteria for operation-related criteria air pollutant emissions for a "hotel" development with 489 rooms. General hotel developments with 489 rooms or more have the potential to generate a substantial increase in criteria air pollutant emissions and would need further analysis. The Project is substantially below the BAAQMD screening criteria for a hotel. Even with the additional on-site facilities, the Project would still be below BAAQMD's screening criteria and would generate nominal criteria air pollutant emissions. As a result, operational phase criteria air pollutant emissions generated by the Project, including idling vehicles, would be considered a less-than-significant impact.
B20-04		The Commission will examine mitigation ideas offered by the developer. I have read nothing that indicates a plan to create more water (recycle, extension of the purple pipe, etc.) Instead, the hotel will compete with residents for our limited amount of available water. The impact of millions of gallons of additional sewage has not been addressed, either.	Please refer to the response to Comment B20-02 with respect to Increased water demand. A potential environmental impact resulting from increased wastewater generation would be addressed through implementation of Mitigation Measure UTIL-6 which would require payment of in-lieu fees to fund identified conservation measures within the collection system area that would offset flows generated by the project and installation of a holding tank to meter the discharge rate of wastewater from the project site. The inclusion of Mitigation Measure UTIL-6 would reduce the potential impact to the sanitary sewer system.
B20-05		The developer has a right to build a hotel and restaurant, but it does not have the right to threaten the existing community. I suggest the project be moved to an area away from the Plaza, perhaps to Cornerstone where it can utilize its own source of water with a well, and where the prevailing afternoon winds will disperse some of the noxious emissions. The Plaza is the center of too much activity already, and this hotel/restaurant will cause serious congestion of traffic and create a hazard for pedestrians. Stop lights would only increase the congestion and are not a viable solution. All things considered, this project would be bad for the environment in many ways, and the Developer has alternatives.	This comment expresses opinions regarding the potential environmental impacts that could result from the proposed project and suggests relocating the proposed project, but does not provide evidence to support the assertions. No response is required.
B21	No Date	Laurie Sebesta	

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B21-01		<p>I am writing this letter to formally object to the above referenced project for several very compelling reasons.</p> <p>First and Foremost, this project's design and scale is out of place in the proposed location site. Though it has been reduced by 50% from its original design, it is still far too big for First Street West and West Napa Street.</p>	<p>As discussed in response to Comment B19-07, Section 19.54.080(G) of the Sonoma Municipal Codes provides the findings that would need to be made during the design and architectural review process in order for the proposed Project to be approved. Section 19.54.080(G)(1) provides the basic findings that must be made including, "The project responds appropriately to the context of adjacent development, as well as existing site conditions and environmental features." Since the findings would need to be made by the City prior to Project approval, the City would be required to determine that the Project would fit in with the visual character of the site's surroundings or it would not be approved. Therefore, adherence to the municipal code sections discussed above would ensure that the project would not result in a significant impact.</p>
B21-02		<p>Second, this project says it will have underground parking "for most: of the guests. Exactly what does "most" mean/ The proposal is for a 62 room hotel along with a restaurant and spa/ Even if you provide parking for 50% of the guest, where will all the others park??? We are already lacking in parking around the plaza. This will just create more gridlock and safety hazards on a state owned highway, not to mention the lack of pedestrian safety.</p>	<p>Please refer to the response to Comment B07-15. No further response is required.</p>
B21-03		<p>Thirdly, I have been conserving water now for 4 years. We have removed all of our lawn and gone to the expense of redesign to low drought landscaping. This hotel/restaurant/pool and spa will do nothing but increase water use in the city while the citizens are penalized with conserving and paying higher water rates.</p>	<p>Water demand generated by the proposed project is discussed on page 4.11-8 of the Draft EIR. The 2010 Urban Water Management Plan (UWMP) found that the City's projected water supplies are sufficient to meet projected demands during normal and multiple dry year conditions, and the projected demand accounts for the increased water demand that would result from the proposed Project. No further response is required.</p>
B21-04		<p>I am definitely NOT a proponent of this project in any way shape or form; however, since it is inevitable it will be built, I respectfully request that you include my objection in the Final EIR report.</p>	<p>This comment does not question the adequacy of the analysis included in the EIR, and therefore does not require a response.</p>
B22		<p>Anna Gomez, 5th Generation Sonoma Valley Resident</p>	
B22-01		<p>Sonoma Hotel Project Sonoma does not have a shortage of tourist accommodation therefore is not in need of a charmless mega complex hotel which would be more fitting for a larger city. What Sonoma does have is a shortage of affordable housing, water, and a very old sewer collection system with limited capacity. One would be hard pressed to try to come up with justification for using up the equivalent capacity space of 39.88 Single Family Dwelling Equivalents (I.e. 39.88 single family homes) of our sewer collection system even if it were feasible. Unfortunately, It Is not feasible. Kenwood Investments hired engineers whom have stated that If the hotel Is built and connected to the sewer, the raw sewage would "surcharge" (overflow) up thru the manholes on Broadway and W. Napa St. The Idea that an 8 hour holding tank system could be Installed would very costly for Sonoma Valley Sanitation District (SVCSD) to Implement or all citizens that of course would be offered this new Septic Holding Tank Release System (named for reference) so as to not</p>	<p>This comment questions the viability of a wastewater holding tank, as proposed by Mitigation Measure UTIL-6. As noted in Mitigation Measure UTIL-6, the project applicant shall be responsible for installing the holding tank and for developing an operations and maintenance plan for the holding tank to ensure that the holding tank operates correctly and leaks are prevented or repaired. The comment does not provide any evidence that the holding tank, or Mitigation Measure UTIL-6 would not reduce the potential impact to a less-than-significant level. No further response is required.</p>

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>show favoritism for a project that the City of Sonoma does not need and that does not benefit its citizens. The liability of an 8 hour hold tank puts Sonoma at great risk for litigation considering the rain is an act of God that we have no control over. In contrast we are completely liable for any and all agreements made to the hotel as to the hold release time of the tank and our ability to make space in the sewer system for the emptying of that tank in a timely manner. We are currently in an ongoing drought which probably will end at some point. Our new weather pattern seems to be drought with patches of heavy flooding rain. In the early 2000's we had 30 days of non - stop rain and that could happen next year-we don't know.</p> <p>That being said, if the Sonoma Valley County Sanitation District already has plans to implement a Septic Holding Tank Release System that is controlled by a computer system at the treatment plant that could wirelessly monitor, meter, manage and control the pumps of all of the newly installed holding tanks feed into the Sonoma Valley Sanitation Districts collection system as well as monitor the fluctuating sewage flow in the lines to avoid Sanitary Sewer Overflows (SSOs), then I look forward to reviewing the proposal and budget for this system in the revised EIR. This new system would also alter the existing description of the SVCSD facility on the Discharge Permit.</p>	
B22-02		<p>There is no need for additional guest accommodations in Sonoma, ca</p> <p>AirBnB.com reveals that there are over 300 homes and estates in Sonoma Valley that offer accommodations to tourist and to the general public. 30 of these properties can accommodate from 10 to 16 plus guests. These homes and estates have been built over the past 100 years so their continued operation would be preferable to the environmental impacts (cancer being one) of constructing a large out of scale, mega complex hotel which is devoid of all charm with its large blank walls dwarfing our surrounding, sweet historical buildings in the charming area of the Historical Square in Sonoma.</p>	This comment expresses an opinion on the merits of the project. Therefore, no response is required.
B22-03		<p>What is lacking in Sonoma Valley is drinking water, and a repaired sewer collection system:</p> <p>NPDES Discharge Permit: Sonoma Valley Sanitation District (SVCSD) has to adhere to the rules and regulations of the discharge permit in order to operate the collection and treatment plant. The discharge permit is issued to SVCSD by The State of California, San Francisco Regional Water Board. The discharge permit governs the entire collection and treatment facility of SVCSD. The discharge permit does not permit any other individual or entity to operate or affect the collection system or treatment facility other than "the Discharger" (SVCSD) -</p>	As noted on page 4.11-16 of the Draft EIR, the Sonoma Valley County Sanitation District, City of Sonoma Engineer, and City of Sonoma Public Works Department would have enforcement responsibilities to ensure that the holding tank required by Mitigation Measure UTIL-6 would operate correctly and reduce impacts to the existing sanitary sewer system to a less-than-significant level.

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>doing so would violate the discharge permit. The referred to Septic Holding Tank Release System must be operated and managed by SVCSO not Kenwood Investments.</p> <p>http://www.google.com/url?sa=t&rct=i&qac&esrc=s&source=web&cd=l&ved=OahIJKewil-Z3V9gIAhU092MKHRIGBPEQFggdMAA&url=http%3A%2F%2Fwww.waterboards.ca.gov%2Fsanfrancisco%2Fboard%2Fdecisions%2Fadopted%2Forders%2F2014%2FR2-2014%2F0_020.pdf&usq=AFQjCNHkWDTP3feuSbCY4G4T-PzwWToOgg&sig2=20_PUjQhXilTDcOIYZiWog</p> <p>ORDER No. R2-2014-0020 NPDES No. CA0037800 The following discharger is subject to waste discharge requirements (WDRs) set forth in this Order.</p> <p>ATTACHMENT D –STANDARD PROVISIONS</p> <p>D..D</p> <p>.I. STANDARD PROVISIONS – PERMIT COMPLIANCE</p> <p>.A. Duty to Comply 1. The Discharger must comply with all of the conditions of this Order. Any noncompliance constitutes a violation of the Clean Water Act (CWA) and the California Water Code and is grounds for enforcement action, for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (40 C.F.R. § 122.41(a).)</p> <p>.B. Need to Halt or Reduce Activity Not a Defense It shall not be a defense for a Discharger in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Order. (40 C.F.R. § 122.41(c).)</p> <p>.C. Duty to Mitigate The Discharger shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this Order that has a reasonable likelihood of adversely affecting human health or the environment. (40 C.F.R. § 122.41(d).)</p> <p>.D. Proper Operation and Maintenance The Discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Discharger to achieve compliance with the conditions of this Order.</p>	
B22-04		<p>Holding Tank Release System Program: The EIR, which under calculates the water use of a luxury hotel, states the Hotel's water demand at 22,071 gallons per day and restaurants demand at 4,527 gallons per day for a total of 22,071 gallons per day. The sewer capacity is calculated at 39.44 Single Family Dwelling Equivalents which are allotted 200 gallons per day equaling 7,888 gallon per day. So are we to believe that 22,071 gallons of water are going into the hotel but only 7,888 gallons of waste water are leaving the hotel? Where is the 14,183 gallons of water going if not the sewer? The pool and spa? I would like some clarification in this area.</p>	<p>As stated on page 4.11-8 of the Draft EIR, the project would result in a water demand of 5.7 million gallons of water per year, or, on average, 15,616 gallons of water per day. As stated on page 4.11-14 of the Draft EIR, the Project would generate an increase of 7,888 gallons of wastewater per day. The difference between water demand (15,616 gallons per day) and wastewater generated (7,888 gallons per day) would be 7,728 gallons of water not discharged into the sewer. This amount would be consumed by users of the site, including restaurant patrons and hotel guests, and used for landscaping.</p> <p>With respect to the size of the holding tank is not known at this time, but the tank is to be sized to store a minimum of 8 hours of wastewater originating from the project, and discharge at a rate and time</p>

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>The Holding Tank Size: It may not be possible to estimate the size of the tank now but for discussion purposes I would like to elaborate. I will calculate this without considering worst case scenario of the hotel having to use the holding tanks during all peak hours. Using the "water use" figures the hotel would be using and disposing of approximately 22,071 gallons per day of waste water. That is 919.62 gallons of waste water per hour totaling 7357 gallons in an 8 hour hold. So would that be an 8000 gallon hold tank?</p> <p>Using the sewer analysis based off of Exhibit A the hotel would equal 39.44 Single family dwelling units that are allotted 200 gallon per day each per day that would total 7888 gallons of waste water per day or 328.67 gallons per hour totaling 2629.33 gallons in an 8 hour period. So, is that a 3000 gallon holding tank?</p> <p>Considering that the sewer output calculations and the water usage figures are grossly miscalculated in the EIR and hotel guest are not limited In their access or use of water, I would think the sewer holding tanks would be much larger. So, do we want a 10,000 or 15,000 gallon tank of raw sewage sitting downtown? How much methane would be gassing off of a tank that large in the middle of summer? The whole idea is ludicrous.</p>	<p>approved by SVCSD. The final calculations for the required size to accommodate 8 hours of storage shall be verified during plan check.</p>
B22-05		<p>Constrained System Requirements: The EIR engineering report stated that the surcharging would occur on Broadway and West Napa Street but what about the rest of the system from Broadway to the treatment plant? I think that an extended review of the entire length of the collection system needs to be inspected to make sure "other users would not be affected"</p> <p>It has already been demonstrated in the EIR that the sewer will be constrained if the hotel were connected to the collection system. Below is the Sonoma Valley County Sanitation District Sanitation Code Ordinance and It makes no mention of an alternative to the applicant agreeing to pay the full cost of finishing out-of-track trunk or collection lines or facilities so that said extension will not adversely affect other users. Does the SVCSD need to re write the Sonoma Valley County Sanitation District Sanitation Code in order to facilitate the Hotel Project? Who is going to absorb that cost?</p> <p>http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwj_plzK3a_LAhVMzGMKHdUD5YQFggdMAA&url=http%3A%2F%2Fwww.scwa.ca.gov%2Ffiles%2F%2Fdocs%2Fsanitation%2Fcodes%2Fsonoma-valley-sanitation-code-2013.pdf&usg=AFQjCNHhAFDp0nSBLBpgzhGHu7_45LobAA&sig2=9yEIlmZi70E5Sxcx23AR9Q</p>	<p>The sewer analysis, included as Appendix M of the Draft EIR, used a modeling tool to analyze both an existing scenario and a scenario that includes the proposed project. The project would result in direct wastewater flow into the sewer line downstream from the project, and would require modeling of the sewer line from intersection of MacArthur Street and Broadway to the intersection of West Napa Street and Second Street West. As stated on pages 4.11-16, implementation of Mitigation Measure UTIL-6 would result in a less-than-significant impact to the carrying capacity of the sanitary sewer system.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>Sonoma Valley County Sanitation District Sanitation Code Ordinance</p> <p>SECTION 3.17 - REVIEW OF APPLICATION FOR NEW SEWER CONNECTIONS</p> <p>SECTION 3.17 - REVIEW OF APPLICATION FOR NEW SEWER CONNECTIONS: Receipt of application by the District is not a guarantee that a sewer service permit will be issued. Each application will be reviewed individually by the District. After such review, the District reserves the right to grant or reject said application for any cause which may adversely affect the District's wastewater treatment system.</p> <p>SECTION 3.28 - SEWER MAINLINE EXTENSION PERMITS:</p> <p>C. Additional Constrained System Requirements: Whenever the District determines that existing trunk sewers, collector sewers, or lift stations are insufficient to adequately serve any sewer mainline extension, the District shall not issue a sewer mainline extension permit for such extension until such time the applicant agrees to pay the full cost of furnishing out-of-tract trunk or collector lines or other facilities so that said extension will not adversely affect other users or potential users of existing sewer pipelines.</p> <p>The Discharge Permit issued by San Francisco Regional Water Board:</p> <p>On May 14, 2014 the Discharge Permit for Sonoma Valley County Sanitation District (SVCS D) had expired and needed to be reissued. I opposed the issuing of that Discharge Permit sighting that SVCS D was in violation of the current Discharge Permit and would be in violation upon signing a new Discharge Permit. It states very clearly on the permit that the discharger may not release sewage from their collection system:</p> <p>"Duty to Comply:</p> <p>1. The Discharger must comply with all of the conditions of this Order. Any noncompliance constitutes a violation of the Clean Water Act (CWA) and the California Water Code and is grounds for enforcement action, for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (40 C.F.R. § 122.41(a).)</p>	

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>Definitions:</p> <p>15. Waste, waste discharge, discharge of waste, and discharge are used interchangeably in the permit. The requirements of the permit apply to the entire volume of water, and the material therein, that is disposed of to surface and ground waters of the State of California.</p> <p>69B69BA. Discharge Prohibitions</p> <p>1. Prohibitions in this Order</p> <p>a. Discharge Prohibition III.A (No discharge other than as described in this Order): This prohibition is based on 40 C.F.R. section 122.21(a) and Water Code section 13260, which require filing an application and Report of Waste Discharge before a discharge can occur. Discharges not described in the application and Report of Waste Discharge, and subsequently in this Order, are prohibited.</p> <p>c. Discharge Prohibition III.C (No bypass of untreated wastewater): This prohibition is based on 40 C.F.R. section 122.41(m). See Federal Standard Provisions, Attachment D, section G.</p> <p>e. Discharge Prohibition III.E (No sewer overflows): This prohibition is based on Basin Plan Prohibition 15 (Table 4-1) and the CWA, which prohibits the discharge of wastewater to surface waters except as authorized under an NPDES permit. Publicly owned treatment works must achieve secondary treatment at a minimum and any more stringent limitations necessary to meet water quality standards (33 U.S.C. § 1311[b][1][B and C]). A sanitary sewer overflow that results in the discharge of raw sewage or wastewater not meeting this Order's effluent limitations to surface waters is therefore prohibited under the CWA and the Basin Plan.</p> <p>G</p> <p>1. Neither the treatment nor the discharge of pollutants shall create pollution, contamination, or nuisance as defined by California Water Code Section 13050.</p> <p>2. Collection, treatment, storage, and disposal systems shall be operated in a manner that precludes public contact with wastewater, except in cases where excluding the public is infeasible..."</p>	
		<p>After being found in violation of the Discharge Permit for a leaking collection system that is under capacity with deferred repairs dating back to a 1994, SVCSD settled the violation and was fined \$732,300.00 (part of which was off set). The violations included 46 Sanitary Sewer Overflows (SSOs) 39 of which were due to "flow exceeding capacity". SVCSD is currently working to make repairs over the next (estimated) 20 years along with the ongoing Capital Projects for the sewer that get rolled over from yearly report to yearly report. The cost of repairs in 1994 to repair the collection system (10 miles of it) was 45 million dollars. Until those repairs are completed we are dealing with a very old leaking collection system that is so old and leaky that Sonoma Valley Sanitation District is number 2 on the list of Top 20 Sanitary Sewer Systems Ranked Spill Criteria for Fiscal Year 2013 - 2014 with 127,990 gallons of raw sewage spilled. In Top 20 Sanitary Sewer Systems Ranked Spill Criteria Since 2007 we are number 3 coming in at 1,239,161 gallons of raw sewage spilled. We should be ashamed to be such a tiny town with such a reputation of polluting.</p>	

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
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Especially considering we have been in a drought since 2007. We should not add any more connections onto the collection system until it is repaired. It is broken and we are literally eliminating into the ground water.

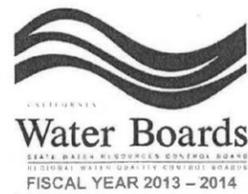
The following three pages are from that report:



**Statewide
Sanitary Sewer Overflow Reduction Program
Annual Compliance Report**



March 26, 2015



COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment # **Date** **Comment** **Response**

**Sanitary Sewer Overflow Reduction Program: Annual Compliance Report,
Fiscal Year 2013 – 2014**

reported SSO volume. However, during fiscal year 2013-2014, the state experienced the lowest volume of SSOs spilled in comparison to the past six fiscal years. Approximately, five million gallons of sewage spilled during fiscal year 2013-2014 in comparison to 8.6 million gallons of sewage spilled during fiscal year 2012-2013.

Table 6 – Top 20 Sanitary Sewer Systems Ranked Spill Criteria for Fiscal Year 2013-2014

Region	Collection System	Population	Miles	Volume (Gallons)	% Volume Reaching Surface Water	#50k SSOs	SSO Rate	Volume Rate	FY 13-14 Ranking (Low is Better)
San Francisco Bay	San Dist #1 of Marin CS	55,000	204	131,584	93%	2	14.8	2,399	100%
San Francisco Bay	Sonoma Valley County S.D. CS	44,706	159	127,990	99%	1	6.9	2,871	89%
Central Valley - Redding	Mt Shasta CS	3,627	30	97,949	100%	1	30.1	27,080	85%
North Coast	SCWA Russian River CSD CS	7,305	46	133,004	100%	1	8.8	18,257	83%
San Francisco Bay	West County WW District CS	93,000	255	84,546	88%	1	6.7	912	83%
Central Valley - Sacramento	Sacramento Area Sewer District CS	1,170,000	4,463	198,243	80%	No SSO	31.4	170	83%
Los Angeles	Whittier City CS	87,000	194	9,353	76%	No SSO	11.4	108	75%
Central Valley - Sacramento	Amador City CS	179	4	3,600	100%	No SSO	128.6	20,167	74%
Central Valley - Sacramento	Discovery Bay CS	14,000	52	215	98%	No SSO	7.7	15	72%
San Francisco Bay	Delta Diablo SD CS	190,567	71	46,553	100%	No SSO	7.1	245	71%
San Francisco Bay	Napa Sd CS	79,360	418	32,295	94%	No SSO	31.2	408	71%
Los Angeles	La Habra Heights City CS	5,712	2	1,340	100%	No SSO	87.2	235	71%
Central Valley - Redding	City Of Oroville CS	15,000	69	61,761	100%	1	5.8	4,129	71%
North Coast	Fort Bragg City CS	7,273	36	5,711	94%	No SSO	22.5	787	70%
San Francisco Bay	Oak Knoll SMD	1,521	1	212	99%	No SSO	71.6	140	70%
Los Angeles	Inglewood City CS	120,000	145	15,598	86%	No SSO	4.8	130	70%
Central Valley - Sacramento	Yuba City CS	45,000	180	86,315	100%	1	2.8	1,923	70%
Santa Ana	Eastern Municipal Water District CS	570,400	1,144	162,145	98%	1	0.6	285	70%
Santa Ana	Costa Mesa SD CS	111,918	229	79,885	96%	1	1.3	716	69%
San Francisco Bay	Port of San Francisco CS	5,000	13	1,990	79%	No SSO	69.4	399	68%

Since September 2007, when all enrollees were required to start reporting, 56 enrollees have reported approximately 90 percent of the reported SSO volume in the state. The 56 enrollees responsible for 90 percent of the volume spilled have reported three or more SSOs reaching

TABLE 5-1 RESPONSE TO COMMENTS

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Sanitary Sewer Overflow Reduction Program: Annual Compliance Report, Fiscal Year 2013 – 2014

surface waters. The total reported SSO volume reaching surface water from these 56 enrollees is approximately 156 million of gallons.

Table 7 shows the 20 sanitary sewer systems that ranked the highest using the spill ranking tool from highest to lowest since September 2007. Table 7 also shows the total SSO volume reported in millions of gallons, the number of spill events that exceeded 50,000 gallons and spill rates.

Table 7 – Top 20 Sanitary Sewer Systems Ranked Spill Criteria Since 2007

Region	Collection System	Population	Miles	Volume (Gallons)	% Volume Reaching Surface Water	#50k Spills	SSO Rate	Volume Rate	Ranking (Low is Better)
San Francisco Bay	Richmond City CS	68,280	199	45,992,150	100%	38	20.64	98,580	100%
San Francisco Bay	San Mateo CS	99,670	237	5,157,093	99%	27	18.59	7,572	92%
San Francisco Bay	Sonoma Valley County S.D. CS	44,706	159	1,239,161	100%	6	8.46	4,057	75%
San Francisco Bay	Town Of Hillsborough CS	11,016	98	5,143,694	72%	12	30.28	68,336	71%
Central Valley - Sacramento	Sacramento Area Sewer District CS	1,170,000	4,463	1,489,685	83%	2	32.88	186	71%
San Francisco Bay	San Dist #1 of Marin CS	55,000	204	3,545,889	81%	7	18.77	9,435	69%
San Francisco Bay	San Bruno City CS	40,165	89	1,739,088	94%	4	33.38	6,337	68%
San Francisco Bay	Oakland City CS	400,000	920	1,372,187	57%	4	14.31	502	68%
San Francisco Bay	Port of San Francisco CS	5,000	13	23,342	94%	No SSO	66.42	683	67%
San Francisco Bay	Novato And Ignacio CS	56,000	229	561,868	89%	3	8.55	1,468	66%
Lahontan - Victorville	Victor Valley Wastewater CS	110,000	44	43,514,818	100%	4	5.99	57,895	66%
San Francisco Bay	Millbrae City CS	20,718	67	88,845	91%	No SSO	55.92	628	65%
San Diego	City Of La Mesa CS	58,244	155	1,341,018	99%	2	9.06	3,370	65%
San Francisco Bay	Berkeley City Public Works CS	112,580	385	88,851	76%	No SSO	7.42	116	64%
San Francisco Bay	Rodeo SD CS	8,000	27	156,517	97%	No SSO	28.19	2,863	64%
San Francisco Bay	Sam CS	25,000	8	143,396	98%	1	25.37	839	64%
Central Coast	Oceano Comm. Serv. Dist. CS	7,700	24	94,782	99%	No SSO	14.03	1,801	64%
Central Coast	South San Luis Obispo Sd CS	40,000	9	440,658	95%	2	35.77	1,612	64%
Central Valley - Redding	Mt Shasta CS	3,627	30	99,327	99%	1	12.20	4,008	64%
North Coast	Loleta CS	750	2	97,000	99%	1	30.49	18,928	63%

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
B22-06		<p data-bbox="506 352 1600 645">Sanitary Sewer Overflows (SSOs): On the follow page you will see a copy of the Interactive map of SSO's from the State Water Resources Control Board's website. The pink crosses represent Category 1 SSO's of the Sonoma Valley Sanitation District from Jan 1, 2007 to Feb 29 2016. Most of these years were drought years. There are too many to count for the purpose of this report so I have included a smaller, more resent example to illustrate the condition of the collection system. The cause of the majority of the SSO's from 2007 - 2016 stated "Flow Exceeded Design".</p> <p data-bbox="506 685 1600 945">The 5 pages that follow It are the SSO's from March 7, 2014 to February 7, 2016. I wanted to give a true example of how crippled our collections system is by showing the SSO's during obvious drought years - that being the two most recent years. They do not Include the SSO's that occurred with last week's flooding (March). The five pages represent SSO's totaling 154,085 gallons of spilled waste with only 5,655 gallons recovered. Almost all of these SSO's occurred due to "Rain Fall Exceeded Design". That was the rainfall we had during our severe drought.</p>	<p data-bbox="1613 352 2943 493">This comment provides information relating to sewer overflows, but does not question the adequacy of the analysis include in the EIR. As stated in response to Comment B22-05, implementation of Mitigation Measure UTIL-6 would result in a less-than-significant impact to the carrying capacity of the sanitary sewer system.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
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Home » Water Issues » Programs » Sso » Sso Map

Sanitary Sewer Overflow (SSO) Incident Map

SANITARY SEWER OVERFLOWS: 01/01/2007 - 02/29/2016

Spill type: Category 1 Category 2 Category 3
Click on a map icon for incident information.

Note: Map does not include spills from sewage treatment plants.

Show all incidents
 Show only incidents with valid GPS coordinates
Change basemap

Filter by volume (gallons):
0 - 1,000,000+ gal.

Minimum: 0
Maximum: 1,000,000+
Set Volume

Filter by date:
01/01/2007 - 02/29/2016

Start: Jan 01 2007
End: Feb 29 2016
Set Dates

Filter by Agency:
(All)
Set Agency Show All

(Example: "123 Main Street, Sacramento, CA")
Go to street address:

Go to county: All Show county layer

Go to Regional Board: All Show RB layer

QA Tools
To find a Latitude/Longitude for a point or address, click [here](#).

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p style="text-align: center;"><u>SSO Event ID: 811475</u></p> <p>Site Name: 4th Street E./ E Spain St. Spill date: 12/11/2014 10:15:00 AM Volume: 12825 gallons Recovered: 0 gallons Type: Category 1 Reason: Rainfall Exceeded Design, I and I (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.293 N -122.450 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
		<p style="text-align: center;"><u>SSO Event ID: 811472</u></p> <p>Site Name: Vailletti/Casabella Spill date: 12/11/2014 8:55:00 AM Volume: 22375 gallons Recovered: 0 gallons Type: Category 1 Reason: Rainfall Exceeded Design, I and I (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.322 N -122.489 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS Full Report</p>	
		<p style="text-align: center;"><u>SSO Event ID: 811471</u></p> <p>Site Name: Rancho Mobile Homes Spill date: 12/11/2014 8:45:00 AM Volume: 65055 gallons Recovered: 0 gallons Type: Category 1 Reason: Rainfall Exceeded Design, I and I (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.320 N -122.488 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p style="text-align: center;"><u>SSO Event ID: 814042</u></p> <p>Site Name: Larson Park Spill date: 3/23/2015 1:30:00 PM Volume: 300 gallons Recovered: 0 gallons Type: Category 3 Reason: Grease Deposition (FOG) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.317 N -122.489 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
		<p style="text-align: center;"><u>SSO Event ID: 811476</u></p> <p>Site Name: 18055 River Rd. Spill date: 12/11/2014 1:00:00 PM Volume: 2750 gallons Recovered: 0 gallons Type: Category 1 Reason: Rainfall Exceeded Design, I and I (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.312 N -122.486 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
		<p style="text-align: center;"><u>SSO Event ID: 811468</u></p> <p>Site Name: 18715 Sonoma Hwy. Spill date: 12/11/2014 8:30:00 AM Volume: 35910 gallons Recovered: 0 gallons Type: Category 1 Reason: Rainfall Exceeded Design, I and I (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.305 N -122.478 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p style="text-align: center;"><u>SSO Event ID: 811479</u></p> <p>Site Name: 4th Street W./Bettencourt St Spill date: 12/11/2014 1:30:00 PM Volume: 3375 gallons Recovered: 0 gallons Type: Category 1 Reason: Rainfall Exceeded Design, I and I (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.288 N -122.467 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
		<p style="text-align: center;"><u>SSO Event ID: 819294</u></p> <p>Site Name: 301 Napa Rd. Spill date: 11/3/2015 7:15:00 AM Volume: 5200 gallons Recovered: 5000 gallons Type: Category 2 Reason: Grease Deposition (FOG) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.275 N -122.457 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
		<p style="text-align: center;"><u>SSO Event ID: 813284</u></p> <p>Site Name: Arroyo Rd Spill date: 2/17/2015 8:40:00 AM Volume: 30 gallons Recovered: 25 gallons Type: Category 3 Reason: Grease Deposition (FOG) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.315 N -122.477 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p><u>SSO Event ID: 811196</u></p> <p>Site Name: 18880 Hwy 12 Spill date: 12/3/2014 8:37:00 AM Volume: 600 gallons Recovered: 0 gallons Type: Category 1 Reason: Flow Exceeded Capacity (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.305 N -122.478 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
		<p><u>SSO Event ID: 821321</u></p> <p>Site Name: 18880 Sonoma HWY Spill date: 1/19/2016 9:55:00 AM Volume: 100 gallons Recovered: 95 gallons Type: Category 3 Reason: Rainfall Exceeded Design, I and I (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.306 N -122.477 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
		<p><u>SSO Event ID: 811485</u></p> <p>Site Name: Meadowbrook Trailer Park Spill date: 12/15/2014 12:15:00 PM Volume: 200 gallons Recovered: 0 gallons Type: Category 1 Reason: Rainfall Exceeded Design, I and I (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.305 N -122.477 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p><u>SSO Event ID: 805796</u></p> <p>Site Name: 472 5th Street West Spill date: 4/29/2014 7:55:00 AM Volume: 1500 gallons Recovered: 500 gallons Type: Category 1 Reason: Grease Deposition (FOG) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.293 N -122.468 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
		<p><u>SSO Event ID: 805961</u></p> <p>Site Name: 765 Donald St. Sonoma, CA Spill date: 4/30/2014 8:00:00 PM Volume: 200 gallons Recovered: 10 gallons Type: Category 3 Reason: Root Intrusion Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.304 N -122.469 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
		<p><u>SSO Event ID: 811481</u></p> <p>Site Name: 4th Street W./ Andrieux st. Spill date: 12/11/2014 10:20:00 PM Volume: 3570 gallons Recovered: 0 gallons Type: Category 1 Reason: Rainfall Exceeded Design, I and I (Separate CS Only) Address: <i>Not Reported</i> City: <i>Not Reported</i> County: Sonoma Coordinates: 38.289 N -122.466 W Responsible Agency: Sonoma County Water Agency (SCWA) R1 Collection System: Sonoma Valley County S.D. CS</p>	
B22-07		Water:	The water analysis, included as Appendix L of the Draft EIR estimated the gallons of water that the project

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>This 62 room mega hotel represents the equivalent of 39.88 Single Family Home Dwellings to be connected into the sewer.</p> <p>As to the EIR sewer estimations using SVCSD "Exhibit A" from SVCWA</p> <p>"Exhibit A - The Equivalent Single Family Dwelling Billing Unit for Sonoma Valley Sanitation District"</p> <p>May I remind the authors of the EIR that SVCSD board of directors are not authorities on statistics and have no expertise in the field of modern luxury hotels water usage. I would like to know how old this document is and what year the statistics were gathered and published. The water use on Exhibit A is based on an average winter day so as to not include irrigation water of landscaping for billing purposes. This makes no sense to be used as the equivalent use of a luxury hotel guest. Upon examining Exhibit A, I find that it allots .52 Equivalent Single Dwelling Units' (ESD) for each "sleep room". It also allots .65 for a "Dental Exam Room" and .65 for a "Convalescent Bed". It does not seem reasonable that a luxury hotel guest would use approximately the same amount of water as a person in a convalescent room, bedridden, recovering from an illness or operation receiving sponge baths and hooked up to a catheter. The term "sleep room" if given its proper historical meaning in reference to the City of Sonoma would be more a kin to the historic hotels found on the square. My grandmother spent her honeymoon in an old hotel on the square. In those days a "sleep room" was a room with a bed and a dresser. There was one bath and toilet that were located at the end of the hall. I think it more reasonable that the EIR should base its estimations of the water/sewer uses of this unsettlingly large luxury hotel complex based on figures more up to date of the hospitality industry studies.</p> <p>According to a study prepared by The RICE Group, Inc. for the City of Seattle, Seattle Public Utilities September 1999 titled:</p> <p>"Hotel Water Consumption Analysis Project"</p> <p>"Findings and Conclusions: Total water usage across a wide variety of hotels ranges from under 100 gallons per day per room (gmp/rm) to over 400 gpm/rm. Older hotels, luxury hotels and hotels with full service restaurants and on-site laundry facilities typically exhibit the highest water usage per room."</p> <p>According to a study prepared by O'Neill & Siegelbaum and The RICE Group for Seattle Public Utilities Resource Conservation Section July 2002 titled:</p>	<p>would demand each year to be a gross increase of 8.2 million gallons per year (mgal/year) and after projected conservation savings, the project would result in a net increase of 5.7 mgal/year. The calculations provided in this comment (a range between 100 and 400 gallons per room per day), help to identify potential impacts, but the calculations on water demand were prepared by an engineering firm independent of the project applicant. The calculations for water demand are shown in Attachment 1 of the Appendix L of the Draft EIR, and are considered accurate by the City of Sonoma.</p>

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>"Hotel Water Conservation"</p> <p>"Findings</p> <p>Total water usage across a wide variety of hotels range from under 100 gallons per day/room (gpd/rm) to over 400 gpd/rm, with median range between 144 and 190 gpd/rm. Hotels rated as larger, older, or luxury had median range usage close to 250 gpd/rm. Hotels with full service restaurants, large irrigated areas, and on site laundry facilities typically exhibited the highest water use per room."</p> <p>The website www.coloradowaterwise.org states that:</p> <p>"Currently the average annual water per room use at the St. Regis Resort hotel is 336 gpd"</p> <p>The studies sighted above are more realistic of a luxury hotels water use per room per day and I would like to see this portion of the EIR water calculations reinvestigated and studied with professionals input as opposed to the "Exhibit A" document used in the current EIR.</p>	
B22-08		<p>Hotel/ Commercial Laundry Facilities:</p> <p>The EIR also did not disclose the types of detergents and solvents that would be used in the hotel laundry. The types of Pre-spotting solvents used in commercial laundries (hotels/hospitals) to remove blood and urine are extremely harsh - some requiring special training due to toxicity. Industrial detergents are much stronger than household detergents because they need to kill herpes and other communicable viruses followed by highly concentrated bleach that is followed by a solvent that removes the smell of the bleach followed by a fabric softener. That is a lot of toxic chemicals. Is it safe for these chemicals to be stored in a sewer tank mixing with methane gas and ammonia from the sewage from an 8 hour hold? Is that safe? I was under the impression that ammonia from urine mixed with bleach caused a toxic gas. I would like the EIR to explain this further. I would also like to know the details of venting/filtering of the methane gas from the holding tank.</p>	<p>As stated on page 34 of the Initial Study, included as Appendix B of the Draft EIR, during Project operations, common cleaning substances, building maintenance products, paints and solvents, and similar items would be stored and used, in the buildings on-site. These potentially hazardous materials, however, would not be of a type or occur in sufficient quantities to pose a significant hazard to public health and safety or the environment.</p>
B22-09		<p>Liability:</p> <p>The Sonoma Valley County Sanitation District cannot guarantee that an 8 hour hold tank will be held for only 8 hours because we are dealing with the unknown acts of nature and the water use of humans that are based on averages not the exceptions. While some hotel guest may take a 5 to 8 minute showers there are others that may take a 30 minute shower or take 3 showers a day. Many cultures use bides and when not given this added</p>	<p>The technical details of the holding tank are not known at this time. The final calculations for the required size to accommodate 8 hours of storage shall be verified during plan check. Design details shall also be established during plan check, and the tank shall be installed and operational prior to occupancy of the Project site.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>water using consuming feature in American hotels these hotel guest will jump in the shower to clean themselves as an alternative. There are far too many uncontrollable variables to guarantee any hold time on any sized tank. Will the tank have a switch to shut off the hotel water If It becomes full during a non - discharge period? Will the water supply to the hotel suddenly shut off without warning to the hotel guests? Will hotel guests In the shower with chemical hair removers (Nair, Neet) have no way to rinse It off resulting in chemical burns? Infants and young children left with soap on delicate areas not able to rinse off? Will the toilets back up resulting in contact with raw sewage? The litigation that would come from a hotel that had a full holding tank that was not able to be emptied leaving guest with no running water, shower, toilet or restaurant facilities would be devastating to the City of Sonoma and to SVCSD. The repercussions of videos uploaded to social media, Yelp reviews (etc.) across the Internet would be devastating to the hotel owners. The amount of lawsuits that would come from the hotel guests would be vast. The litigation against the City of Sonoma from the hotel and against SVCSD that would result to cover the hotels law suit losses as well as loss of Income from refunding guests and damages resulting from the destruction of the hotels reputation would be devastating.</p> <p>Or would the hotel owners having full tanks and having waited 8 hours and 1 second, pump them out regardless of capacity of the sewer at the time resulting In the flow of raw sewage "surcharging" down Broadway? In either scenario the City of Sonoma loses.</p>	
B22-10		<p>Traffic: Using standard figures like "peak traffic hours" are not suitable to get a true picture of the traffic situation in Sonoma. I would like to see the EIR Include real time examples to confirm their standard figures as true. Google maps "typical" traffic gives a more reliable estimate of traffic. West Napa Street is the major artery that supports traffic through Sonoma. I think that building a huge hotel at the corner is going to turn the normal delay in traffic into a miserable, miserable situation. There Is no alternative route once you pass 5th Street West -you are locked Into waiting for gridlock to clear at the corner. If more pedestrians and cars exiting and entering the hotel were added it would be like the traffic after the 4111 of July fireworks have ended. It would make It very difficult to get around and it would wreck our small town charm.</p>	<p>The peak hours used in the traffic analysis of the Draft EIR are weekday evening peak traffic periods from 4:00 p.m. to 6:00 p.m., and weekend midday peak hours from 12:00 noon to 2:00 p.m. Identifying the peak period allows for capturing maximum traffic demand on the surrounding network in order to analysis the project against the most congested time of the day. This allows for the analysis to understand when the average demand is the highest. No further response is required.</p>
B22-11		<p>Fire truck/ Emergency personnel: The width of the driveway seems too narrow. In the EIR rendering an Audi is pictured. I would like to see a 3-D model scale in reference to the buildings size, humans, and cars around the project. I would like to see a Sonoma Valley Fire ladder truck and ambulance for size reference to confirm that in an emergency situation everyone could navigate and get out safely while fire and rescue personnel could work unhindered. I believe the county requires a fire truck to be able to turn around on a driveway to exit. I would think</p>	<p>As discussed beginning on page 4.10-21 of the Draft EIR, the proposed driveways would provide adequate access to the street network both for emergency vehicles to respond to and depart from the site. It is expected that fire trucks would access the site from either of the streets fronting the project site, so they do not need to navigate through the parking area. Smaller emergency vehicles, such as ambulances, will be able to gain access on-site as needed. Plans submitted to the City would be reviewed by the Fire Department for compliance with applicable standards and requirements. The Project would be designed to ensure adequate emergency vehicle access, including requirements for aerial fire apparatus access.</p>

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>there would be no choice if the building(s) in the rear of the property were engulfed in flames preventing passage.</p> <p>The project lacks parking. What is the solution?</p>	<p>In addition, photo simulations were prepared by the project applicant, and an independent peer review was conducted to verify proper scale as it relates to the proposed project's height, siting, and massing. The photo simulations and peer review memorandum are included as Appendix Q of this Final EIR.</p> <p>With respect to parking, please refer to the response to Comment B07-15.</p>
B22-12		<p>Old Printing Building: I would think with a printing building that old there would be a high level of lead in the soil beneath the old printing building from the inks used. Soil testing should include tests for lead.</p> <p>I know that the current owner of the building and the City of Sonoma does not consider the building to be historic but much of my family's history in the valley dating back to the 1850's was printed in the Sonoma-Index Tribune's old printing building.</p>	<p>As discussed above in the response to comment B01-01, the Phase I performed for the Project site (included in Appendix O of this Final EIR) concluded that there are low levels of soil and groundwater contamination on-site. The findings included in the Phase I do not change the conclusions of the Initial Study.</p>
B22-13		<p>Water: The Sierra snowpack measurements conducted by the Department of Water Resources for 2016 to determine if we are headed into another drought year have been measured and they conclude that we will indeed have another year of drought. 150% of snowpack would mean we are easing out of the drought but the numbers were not there:</p> <p>December 136%, January 12%, February 120%, March 85%</p> <p>The Idea of Rain Harvesting is very unrealistic. With the severe drought that we have been in for years and that will continue thru 2016/2017. The mere mention of offsetting water use by means of rain harvesting is completely ludicrous. To harvest rain you need monthly rain and enough to offset the diverting (into the storm drains? Sewer?) that needs to be done in between dry spells to clean the roof from dirt and bird droppings. I had a rain harvesting system. I removed it because there wasn't enough rain to fill the tank.</p>	<p>This comment provides an opinion on the viability of rainwater harvesting to offset water demand. As discussed in the water analysis, included as Appendix L of the Draft EIR, rainwater harvesting only accounts for a portion of water savings. Other savings include low flow faucets and showerheads, and high efficiency toilets, urinals, and laundry equipment.</p>
B22-14		<p>Water usage allotments: In the EIR the hotel allows itself allotments for hotel, restaurant, and irrigation but later states that the irrigation will be trucked in. Is there a conflict in using water allotments for other uses? Water use, run off, drainage and use of partially treated sewer water for dust control:</p> <p>How much water is estimated will be consumed by watering down the construction site 2 x a day for the 1 ½ years of the construction of the hotel? Will run off be captured or flow into the storm drains?</p>	<p>Water demand estimates provided in the water analysis, included in Appendix L of the Draft EIR, assumed major water uses for three uses during the operation phase of the project; hotel, restaurant, and landscaping. Because of the intensity of the uses, the water demand estimates show where the greatest impact to water supply would be following construction of the project.</p> <p>With respect to the construction phase, watering the construction site, as required by Mitigation Measure AIR-1, would require a negligible amount of water due to the size of the project site (1.24 acre), and the duration of ground-disturbing construction activities (less than 18 months) that would result in fugitive dust. Additionally, as noted in the comment, Mitigation Measure AIR-1 requires the use of reclaimed</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>Will the run off from the roof drainage go into the storm drain system? What are the estimates of addition load on the storm drains?</p> <p>Will the hotel be air conditioned I believe it takes 2.5 gallons of water per ton per hour for air conditioning but I am not an expert.</p> <p>Aerating partially treated sewer water (recycled water) on the job site 2 times a day in such a compact city urban area needs to be investigated for health risk. Have there been any tests or studies done to see if there is any health risks involved in aerating this non potable water? I personally wouldn't want contact with this water.</p>	<p>water if possible. Reclaimed water would not be drawn from the same source used for on-site potable water, and is not accounted for in the water analysis. Reclaimed water is commonly used in construction sites and in landscaping.</p>
B22-15		<p>"Construction Health Risk Assessment August 2015 for The Hotel Project Sonoma"</p> <p>The conclusion: Cancer Risk - definitely.</p> <p>"Results of the health risk assessment shown in Table 2 indicate that the maximum incremental cancer risk during the Construction phase of the project at the MER is 17 per million (17E-06), which exceeds the significance Threshold of 10 per million."</p> <p>I for one would not rely on a construction crew to monitor safety measures that if ignored would cause a rise in cancer in the community.</p>	<p>Impact AIR-3 discusses the potential impacts resulting from construction activities that were evaluated through the preparation of a Health Risk Assessment (HRA). As a result of potential cancer risk, Mitigation Measure AIR-3 requires the use of common construction equipment and construction procedures to reduce the potential for health-related impacts.</p>
B22-16		<p>Conclusion:</p> <p>This hotel project is just too large for the City of Sonoma and takes up too many of our tiny town's precious resources. It does not fit the character of Sonoma that is a delight of small charming buildings rich with history. It dwarfs our small town charm and creates an atmosphere of big business which I believe we decided we did not want by limiting large chain stores in the valley. For an enormous downtown commercial lot that is over an acre (1.24) in size that does not serve the people of Sonoma one bit I think we could do better. We are small, we simply cannot provide for the needs of a 62 room hotel and all of its guests and employees. We don't have the sewer capacity, the fresh water or the road width to accommodate this hotel project. I for one do not want the downtown Historical District of Sonoma to turn into a Las Vegas type attraction at the whim of Kenwood Investments busying people in from their other projects like Corner Stone to make millions of dollars a year while we suffer. I believe if we wanted a huge influx of tourists in Sonoma we would do so by approving prior development proposals like the Casino at the raceway. We all know what the traffic is like on Fourth of July after the fireworks are over- do we want that every day? I do not.</p>	<p>This comment provides a summary of the comments provided in this comment letter. This comment does not provide any new information, and no further response is required.</p>

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>The negative aspects pointed out in the EIR report clearly show a project that will uses far too much of our resources, pollutes our air and without a doubt will cause cancer in our community. Is that what we want?</p> <p>My family came to the Sonoma Valley in the 1850's from Aabenraa, Denmark (Denmark Street). They would be rolling over In their graves if they knew what Kenwood Investments had In mind for Sonoma.</p>	
C PUBLIC HEARINGS			
<i>This section includes comments received during public hearings on the Draft EIR held during the public review period. Please note that only comments that commented on the CEQA analysis are included and provided with responses.</i>			
C01	2/25/2016	Public Hearing on the Draft EIR	
C01-01		<p>Chair Felder opened the item to public comment. Anna Gomez, Sonoma Valley resident, asked about sewer treatment issues, stating that she was concerned that according to the EIR the project would resulting in surcharging of the collection system on Broadway. She stated that two years ago, when the hotel project was first under consideration, she made a complaint to the Water Board asserting that the Sanitation District is in violation of its discharge permit because the collection leaks due to its age. This complaint led to a cease-and-desist order which resulting in a settlement that occurred about six months ago. She stated that no additional connections to the sewer system should be made because the collection system is so damaged that the Water Board has given the District 22 years to repair the system. She also stated that the District is in violation of the District's own Sanitation Code. This project is a behemoth and it is just too big. I told the City Attorney that if the permit is issued and it is in violation of the permit and the Code, I will file another complaint with the Water Board.</p> <p>The project will also cause traffic problems due to the concentration of hotel rooms in one place.</p>	<p>With respect to the assertion that the age of the sewer system necessitates further study of the sanitary sewer system, please refer to impact discussion UTIL-5 in section 4.11, Utilities, of the Draft EIR. As shown in this impact discussion, the increase in load associated with the Project, was accounted for in the projected growth of the city, and existing wastewater treatment facilities have sufficient capacity. Please refer to Appendix M of the Draft EIR for more information on this subject.</p> <p>Please refer to Master Response 2, Traffic Operation Impacts, with respect to potential traffic impacts.</p>
C01-02		<p>Larry Barnett, Fifth Street East, made reference to the letter that he has submitted. In his view, it was a mistake to exclude an analysis of potential impacts in the area of hazards and hazardous materials in the scope of the EIR as defined in the initial study and approved by the Planning Commission. There are no public documents that provide information on soils testing that may have occurred in conjunction with the former printing plan use on the site. In his experience, chemicals used in the printing industry during the period of the printing use on the site were often highly toxic, many of which were ultimately banned. In particular, he is concerned about the potential use of</p>	<p>The Phase I Environmental Site Assessment is included in Appendix O of this Final EIR. The findings included in the Phase I do not change the conclusions of the Initial Study.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		trichloroethylene, which was used in the industry for the clean-up of printing presses. This is now a banned substance. Even if the operators were scrupulous in their use of this material, if there was a crack in the drainage system, there could be soils contamination. Therefore, I ask that this topic be addressed through soils testing, including for lead and heavy metals, as well as vapor intrusions inside the building. Any soils testing that has been done should be made public.	
C01-03		<p>Karla Noyes, 15549 Brookview Drive, Sonoma, referred to the letter submitted by David Eicher, who could not attend tonight's meeting. This letter raises questions about the lack of a housing component as called for in the Commercial zone and suggests that the EIR should include an alternative with a housing component in order to be considered complete. The letter asserts that the 62-room hotel building is not consistent with other buildings in the historic overlay zone, contrary to the design guidelines set forth in the Development Code. She questioned how the EIR could conclude that impacts related to greenhouse gas emissions would be less-than-significant when 90 percent of workers in Sonoma commute from outside of city limits. This impacts traffic as well as GHG emissions. Assuming that hotel guests will not use their cars at after they check in is a fallacy. The traffic study fails to take into account that a major reason for traffic back-ups in the Plaza area is cause by vehicles waiting for pedestrians to cross the street.</p> <p>The EIR states that the project would add pedestrians to an intersection that has been identified as deficient. The traffic study should be conducted during the peak tourism season in order to identify the true impacts of the project. The intersection operation of First WestNvest Napa and First East/East Napa should be included in the traffic study.</p>	Please refer to the responses to Comment Letter B03, and Master Response 2, Traffic Operation Impacts.
C01-04		Fred Allebach, 19550 Eighth Street East, referred to the written comments that he has previously submitted. In his view, with regard to the cumulative net increase in pollutants and GHG emissions generated by the project, this estimate should include estimates air travel by hotel guests, not just employee traffic. The scope of the current analysis is too narrow. Do we not have a global problem? We cannot just keep adding more. In his view, the County's Climate Action Plan suffers from a similar deficiency. He asked what the window is to challenge a CEQA determination. In terms of hydrology and water, with respect to water obtained from the Sonoma County Water Agency (SCWA), the EIR finds that the project will use approximately 5.7 million gallons per year, which he calculates as amounting to 16-17 acre feet. He asked why, if we have adequate water, residents and business owners are being asked to conserve during this drought? In his view this, a significant environmental issue to the public, but it is not characterized in that way in the EIR.	Please refer to the responses to Comment Letter B04.
C01-05		With regard to traffic, he noted that the EIR concludes that intersections in the vicinity of the project will continue to operate at an acceptable level of service as defined by the	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, and Master Response 2, Traffic Operation Impacts.

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		<p>thresholds adopted by the City. He stated that it was his understanding that in the update of the Circulation Element, many Plaza intersections will be exempted from level of service standards in order to preserve the historic character of the Plaza. In his view, that does not follow. Why analyze them if they are going to be exempt from the standards. These concerns also relate to the topic of "conflict with an adopted congestion management plan." He asked how thresholds or significance are defined, as the term "significance" often seems to lack meaning. For example, the people he talks to view traffic congestion in the Plaza as significantly bad while the EIR apparently does not. In terms of the topic of "conflicts that would decrease the performance of intersections", he is glad to see that with respect to pedestrian uses the potential cumulative impact at the intersection of First West/West Napa Street is regarded as potentially significant. However, he does not see how bike lanes will address this issue. In his view, some form of pedestrian traffic control should be provided.</p>	
C01-06		<p>Bonnie Brown, Sonoma Valley resident, questioned the finding that the Chateau Sonoma building is not historically significant. This appears to be based on the Page and Turnbull report that was prepared several years ago. In her view, the report is woefully inadequate as it does not describe when the building was built, what businesses occupied it, or what people owned it. The Index-Tribune building was once considered to be not historically significant but its stature has changed. Now, it is considered to be historically-significant, based on its association with the Lynch family. As wonderful as that family may be, in her view it is elitist to value them over the businesses that took place in the Chateau Sonoma building. In her view, the possibility exists that the status of the Chateau Sonoma building could also change based on further study. She has gone to the League for Historic Preservation to look into the history of the building, but nothing was found. In her view, there should be a through historical report on the Chateau Sonoma building addressing when it was built, who owned it, and what businesses were there. The historical analysis should be prepared by a local resident.</p>	<p>The Chateau Sonoma building is not considered a historic resource and demolition of the building would result in a less-than-significant impact. An historic resource evaluation (HRE) addressing the Chateau Sonoma building is included as Appendix G of the Draft EIR and, as mentioned in the comment, a previous evaluation of the Chateau Sonoma building was prepared in 2012. The findings of the 2012 evaluation were incorporated into HRE included in Appendix G of the Draft EIR based on the independent judgement of Knapp Architects. No further response is required.</p>
C01-07		<p>With regard to the underground parking structure, the EIR states that dewater would be needed but the volume of water would be low and would occur at a shallow strata of the aquifer. In other words, we are taking water from an aquifer-that is asking for trouble. If a project to be built in Sonoma requires underground parking that is a clue that it is too big.</p> <p>The EIR states that the City has sufficient water to accommodate projected growth through the year 2035. That's 19 years from now. Where we will get our water after that? This project will use 5. 7 million gallons per year, yet we are called upon to reduce out water use. That does not seem right.</p> <p>In her view, parking should be considered a significant environmental impact.</p>	<p>As discussed beginning on page 4.7-15, the underground garage and basement level walls will be waterproofed, and if it is determined that permanent dewatering is necessary, a possible system would consist of a subsurface drainage system and backdrains under the garage floor and behind the basement walls. This activity would also require a Waste Discharge Requirement (WDR) permit from the San Francisco Bay RWQCB and compliance with RWQCB sampling requirements. Because intercepted groundwater would be from the shallow aquifer and is limited in volume, it would not interfere with recharge of the regional aquifer or groundwater supply.</p> <p>Urban Water Management Plans are intended to be updated every five years to provide accurate water demand forecasts.</p>

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
			Though adequacy of the parking supply is not considered an environmental impact under the current CEQA checklist, the City's Municipal Code provides minimum requirements for various land uses, including hotels and restaurants. The adequacy of project parking will be evaluated by the Planning Commission as part of its use permit review of the project.
C01-08		With regard to impacts on intersections, the EIR states that the project generates about 3-10 daily trips. Does this include employee traffic? There should be a thorough traffic analysis. The EIR states that the average delay in making a turn into the project from West Napa Street would be 11 seconds. When there are tourists and commuters on West Napa, turning left will be difficult. In her view, the estimated delay is not realistic and the project will cause back-ups onto Broadway. This should be looked at again. With respect to pedestrians, we don't know what the mitigation will be. There is a point where you can mitigate in manner that violates your values. When that happens, tourists will stop coming and locals will no longer enjoy the community.	Please refer to Master Response 2, Traffic Operation Impacts, and the response to Comment A01-02.
C01-09		With regard to sewage, there is a major problem that needs to be addressed. Also, I would like to ask about the two redwood trees on First Street West-- are they proposed for removal?	The comment regarding sewage is not specific. Please refer to the response to Comment B13-06. As stated in the Arborist Report, included as Appendix C of the Draft EIR, both redwood trees are identified for removal. Although mature trees are proposed to be removed, the trees would be replaced on a one-for-one basis, either on-site or through a City-sponsored in lieu payment to support tree planting elsewhere within the City, consistent with the requirements of Tree Ordinance contained in Sonoma Municipal Code Chapter 12.08.
C01-10		She agreed with a previous speaker that the alternatives analysis should include a project with housing component.	The commenter suggests that the Draft EIR must have an alternative that includes housing in order for it to be complete. According to CEQA Guidelines section 15126.6, "(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." Therefore, there is no requirement that an alternative with a residential component be analyzed. The comment is noted and requires no further action.
C01-11		Carol Campbell, 307 West Spain Street, as always I am concerned about traffic and water, but it has also occurred to me that if the convention center has been removed from the project plan, then it seems likely to me that the General's Daughter and Ramekins will be used as wedding venues, so has the traffic on West Spain Street that would occur as a result of this been considered? When I leave home and go through the square, pedestrians are often an issue and this project will contribute to that problem.	Off-site events were not considered, but traffic level of service impacts are discussed in Master Response 2, Traffic Operation Impacts. The traffic projections include trips made by hotel guests to off-site locations. With respect to pedestrian traffic, please refer Master Response 1, Pedestrian/Bicyclist Impacts.
C01-12		Marilyn Goode, Sonoma Valley resident, stated that she had not been able to submit comments on the project because she is in the middle of selling a family property in San Francisco that was next to a printing press and phase 1 and phase 2 environmental study	A Phase 1 Environmental Site Assessment was completed for the project site and is included as Appendix O of this Final EIR. A gasoline service station was constructed on the 135 West Napa Street portion of the site in the 1920s. The service station was located on site until the January 1998, when the station was

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		addressing hazardous materials had been necessary as a result of that. The Chateau Sonoma building is charming and there should be old records on its history. She stated that she did not know if anyone was working in the printing press building or whether there were any underground storage tanks on the site, but in her view this should be addressed in the EIR.	dismantled and all USTs, hydraulic lifts, and other fuel related piping were removed from the site. A LUST case for the service station was opened through the Local Oversight Program (LOP) in 1987, and the site underwent extensive excavation of petroleum hydrocarbon-impacted soil from 1998 through 2002. The LUST case was closed by the Sonoma County Environmental Health Department (SCEHD) in September 2014. In 2002, following the majority of soil excavation and cleanup activities, the current 3-story, mixed-use office and residential building was constructed on the 135 West Napa Street portion of the site.
C01-13		Comm. Willers thanked those who made comments. In his review of the EIR, he had the following areas of concern. First, with regard to aesthetics, in his view the analysis in the EIR is lacking. A project of this size, located in a historically-significant part of town, requires a more thorough review. His primary concern is with regard to the western elevation as viewed from West Napa Street and from Second Street West. It represents a large wall that will not likely have much in the way screening, which affect how the historic structures in the area are perceived.	Photo simulations of the project were prepared by the project applicant, and an independent peer review was conducted to verify proper scale as it relates to the proposed project's height, siting, and massing. The photo simulations and peer review memorandum are included as Appendix Q of this Final EIR. The photo simulations do not change the conclusions of the Draft EIR or Initial Study (included as Appendix B of the Draft EIR).
C01-14		A second area of concern is traffic. In his view; the analysis does not adequately address potential traffic on First Street West, as that could receive the majority of traffic exiting the site and will certainly be the main route from commercial drop-offs. The intersections of First Street West south of West Napa Street to Andrieux Street should be analyzed. Delivery vehicle routing needs to be defined and mitigated. Currently, the Post Office receives deliveries from Petaluma and in many cases the preferred route is down West MacArthur Street and from there to First Street West.	As described in the response to Comment B08-03, page 4.10-21 of the Draft EIR provides a description of on-site circulation as it relates to delivery vehicles and their access to the project site. As noted, some delivery trucks with trailers would not be able to drive through the site, and it would be necessary for these trucks to be parked on either First Street West or West Napa Street for loading/unloading, which appears to be a common practice within Downtown Sonoma. Off-site delivery activity conducted at the First Street West garage entrance, with delivery products transported by foot and hand carts to the garage receiving area. Such deliveries would be limited to off-peak periods, which would minimize impacts on downtown circulation which is generally busiest during the afternoon. Designation of a truck loading zone on First Street West located adjacent to the basement parking garage entry is being requested as part of the Project's Use Permit Application. The intersections of West Napa Street/Second Street West, West Napa Street/First Street West, and Napa Street/Broadway were analyzed because of the existing level of service issues as well as the anticipated travel routes that project-related vehicles would travel. Furthermore, the project would result in a less-than-significant impact to the intersection of Napa Street and Broadway. Because Napa Street and Broadway have substantially higher traffic volumes than First Street West and Andrieux Street, it is expected that the project would result in a less-than-significant impact to the intersection of First Street West and Andrieux Street.
C01-15		The issues of water and sanitation are important. The statements made in tonight's public hearing needs to be investigated to ensure that this project will not affect the sanitation system in a negative way.	Please refer to the responses to Comment B13-06.

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Comment #	Date	Comment	Response
C01-16		Comm. Heneveld stated that his primary concern was with the availability of water. Although there is a significant amount of water stored in local dams, it is provided via Dry Creek and the flows are regulated to protect fish. Gallons per day per capita is a figure used by the State but it does not address commercial use, so the analysis in the EIR should be more expansive in this area. He noted that the reason we are being asked to conserve water is in light of the Statewide drought not necessarily as a result of local conditions. He added that the comments about the sewer system were of concern to him and he would like to see a response.	Please refer to the responses to Comment B12-09.
C01-17		Comm. Wellander stated that he wished to address three areas that were of concern to him. First, he is concerned about traffic and the estimate of 23-27 additional peak period trips seems low to him and he would like to make sure that the estimates encompass employee and restaurant traffic.	The traffic impacts of the project, including additional peak period trips, include trips associated with employees based on typical hotel operations and trip levels. In addition, as mentioned in response to Comment B14-02, a comparative analysis of the MacArthur Place Hotel was completed and is included in Appendix P of this Final EIR. The comparative analysis of the MacArthur Place Hotel determined that, based on the data collected, the evaluation prepared for the Draft EIR adequately reflects anticipated conditions associated with development of the project. In fact, the analysis in the Draft EIR likely overstates the project's potential impacts during the weekday p.m. peak hour.
C01-18		In addition, it is his view that hotel guests will make day trips in their vehicles, which needs to be factored in. The concern expressed in the public hearing regarding soil contamination should be addressed given the historic uses of the building.	Text on page 4.10-16 has been updated, and is shown in Chapter 3 of this Final EIR. The anticipated trip generation for the proposed project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in the <i>Trip Generation Manual</i> , 9 th Edition, 2012. The trip generation potential of the project as planned was developed using the rates for a Hotel (Land Use #310), as this description most closely matches the proposed project. Based on application of these assumptions, the proposed project is expected to generate a total of 507 trips daily, including 37 during the p.m. peak hour and 45 during the weekend midday peak hour. After deducting trips associated with existing uses to be removed, the project has an average trip generation of 310 new weekday daily trips, of which 23 trips would occur during the p.m. peak hour. During weekends, 27 new trips are expected during the midday peak hour.
C01-19		Lastly, with regard to water, the discussion of the conservation plan (3.10), it refers to the purpose of conserving the water supply for the greatest public benefit. He would like to make sure that this is happening.	As discussed in the water analysis, included as Appendix L of the Draft EIR, in addition to rainwater harvesting other water savings that aim to achieve the goals of Chapter 13.10 of the Sonoma Municipal Code, Water Shortage and Conservation Plan, include low flow faucets and showerheads, and high efficiency toilets, urinals, and laundry equipment.
C01-20		With regard to cumulative impacts, he noted that in Section 4.11.1.4, the EIR makes reference to the 2020 General Plan, which was adopted in 2006, the 2010 Urban Water Management Plan. He would like to make sure that the most up-to-date information is used in evaluating cumulative impacts on water supply, especially in light of the drought conditions that have been experienced.	At the time of publication of the Draft EIR, the information presented was current. Subsequently, on June 6, 2016, the City Council adopted the 2015 update to the Urban Water Management Plan. However, the City Engineer has verified that the information and analysis contained in the updated Water Management Plan do not alter the finding of the Draft EIR that the City's existing and planned water is adequate to accommodate the project.
C01-21		Comm Cribb thanked the public for their comments. He wants to address the three issues of most concern to him. First, while he recalls that the Planning Commission discussed	According to CEQA Guidelines section 15126.6, "(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

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Comment #	Date	Comment	Response
		the issue of the housing component and whether it could be waived, to get clarity on the question, it should be addressed in the EIR.	informed decision making and public participation.” Therefore, there is no requirement that an alternative with a residential component be analyzed. The comment is noted and requires no further action.
C01-22		With regard to traffic, he has a somewhat different perspective. The assumption seems to be that because a 62-room hotel is proposed to built, it will attract guests who otherwise would never have come to Sonoma. That seems unrealistic to him as it seems likely that many guests would have come to Sonoma anyway. To assume that they are all entirely new trips that would otherwise never have happened exaggerates the potential impact in his view. He noted that there was a printing plant on the site for many years. That use generated considerable truck traffic on a daily basis, far more than will be generated by the hotel. That has all gone away, so there is less truck traffic now. He noted that, too, Rin's Restaurant on East Napa Street closed a few years ago, which has also reduced trips in the Plaza. In addition, he pointed out that services such as Uber tend to reduce traffic volumes. On the issue of potential soil contamination, while soils testing may be warranted, he read the article provided by Mr. Barnett, and it states that TCE was largely replaced in the 1950s, so it may not have been much in use on the site.	This comment provides a comment on the traffic analysis, but does not question the analysis included in the EIR. As discussed above in response to Comment C01-18, the proposed project is expected to generate a total of 507 trips daily, including 37 during the p.m. peak hour and 45 during the weekend midday peak hour. After deducting trips associated with existing uses to be removed, the project has an average trip generation of 310 new weekday daily trips, of which 23 trips would occur during the p.m. peak hour. During weekends, 27 new trips are expected during the midday peak hour.
C01-23		Comm. McDonald thanked the public for their comments. He agreed that the visual analysis and the cultural resources analysis needs to be strengthened and he would like to see it include accurate 3-D perspectives as that would make it much easier to understand how the project fits into its surroundings in the context of its surroundings, including the historically significant Plaza. He agrees that the western elevation, in particular, needs to be evaluated in terms of views from West Napa Street and Second Street West.	Photo simulations of the project were prepared by the project applicant, and an independent peer review was conducted to verify proper scale as it relates to the proposed project’s height, siting, and massing. The photo simulations and peer review memorandum are included as Appendix Q of this Final EIR. The photo simulations do not change the conclusions of the Draft EIR or Initial Study (included as Appendix B of the Draft EIR).
C01-24		With regard to traffic analysis and the GHG/air quality analysis, in his view, it needs to be verified that the traffic projects include buses, shuttles, taxis, limousines, and other ancillary vehicles. He noted that at the Sonoma Lodge, there are often large tour buses that frequent the site and are often idling for long periods of time. Based on the number of hotel rooms that are proposed, he is concerned that tour buses will serve the site, which would cause disruption to traffic and parking. On a related matter, he expressed concern that since the owner of the project also owns nearby event venues, there may be shuttles and other car trips to wedding parties and other types of events at these locations that might be packaged with a stay at the hotel. This possibility should be addressed in the traffic and air quality analysis.	Inclusion of buses, shuttle, taxis, etc. would serve to reduce the estimate of trips generated by the project. The traffic analysis used a conservative approach to analyze a greater number of vehicles. Air quality and GHG impacts were analyzed using a greater number of vehicles in order to better assess a greater potential impact. No further response is required.
C01-25		In terms of pedestrian safety and circulation, the ability to get vehicles in an out of the hotel at peak times is of concern and would seem to be a potentially cumulative impact. While noting this concept is perhaps outside of the scope of the project, he suggested that perhaps the City could consider stationing a police officer at Broadway/West Napa during peak periods.	Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, with regard to pedestrian impacts.

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Comment #	Date	Comment	Response
C01-26		<p>Comm. Coleman thanked those who commented on the DEIR. With regard to air quality, he expressed concern that there could be as many as 12 cars idling in the drop-off area, where the air-flow is restricted by adjoining buildings, which could increase air quality concerns, especially if vehicles are delayed from entering West Napa Street due to peak hour traffic. He asked whether the hotel lobby and restaurant would have a positive air-pressure system.</p> <p>He noted that the intersection of Broadway and West Napa Street is wide and not controlled by a signal. He shares the concern expressed by Comm. Willers that delivery traffic on First Street West is an issue that should be looked at. He expressed concern that no funding had been allocated from improvements at any of the intersections under discussion.</p>	<p>As discussed on page 19 of the Initial Study, included as Appendix B of the Draft EIR, areas of vehicle congestion have the potential to create pockets of carbon monoxide (CO) called hotspots. These pockets have the potential to exceed the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. The hotel would generate a nominal amount of vehicle trip since the Project is an infill development. In addition, the potential for CO hotspots to be generated in the SFBAAB is extremely unlikely because of the improvements in vehicle emission rates and control efficiencies. Typical projects would not expose sensitive receptors to substantial pollutant concentrations and analysis of CO hotspots is not warranted.</p> <p>With respect to deliveries to the project site, please refer to response B08-03.</p> <p>The comment also expresses concern regarding funding for intersection improvements. The project applicant would be required to pay a fair share contribution for intersections that would be impacted by the proposed project. In addition, in June 2016, the City Council added the improvement of the intersection of West Napa Street/First Street to the Five-year Capital Improvement Program. This intersection improvement would be required to be completed prior to or in conjunction with the development of the project.</p>
C01-27		He asked whether there was any provision for composting organic waste from restaurants.	Sonoma Garbage Collectors, the solid waste collection company that serves the project site, has a food waste program that allows for organic waste to be recycled.
C01-28		He stated that it will be interesting to see whether the excavation for the underground parking area reveals buried cultural resources.	Mitigation Measures CULT-2A, CULT-2B and CULT-3 include procedures for addressing any cultural resources discovered during pre-construction surveys or during ground-disturbing construction activities.
C01-29		<p>He asked whether the hotel would provide a light or other safety indicator to alert pedestrians on sidewalks near the driveways as to when a car is exiting the hotel.</p> <p>He asked if the hotel will direct cars to exit on First Street West when traffic is backed up on West Napa Street and what affect that might have on First Street West.</p> <p>He asked whether the West Napa Street access had been designed to accommodate fire trucks.</p>	<p>Please refer to Master Response 1, Pedestrian/Bicyclist Impacts, regarding pedestrian safety.</p> <p>Please refer to Master Response 2, Traffic Operation Impacts, regarding level of service and vehicle circulation.</p> <p>As discussed beginning on page 4.10-21 of the Draft EIR, the proposed driveways would provide adequate access to the street network both for emergency vehicles to respond to and depart from the site. It is expected that fire trucks would access the site from either of the streets fronting the project site, so they do not need to navigate through the parking area. Smaller emergency vehicles, such as ambulances, will be able to gain access on-site as needed. Plans submitted to the City would be reviewed by the Fire Department for compliance with applicable standards and requirements. The Project would be designed to ensure adequate emergency vehicle access, including requirements for aerial fire apparatus access.</p>
C01-30		Chair Felder thanked the EIR preparers and those who commented on the DEIR. He stated that in his view the draft was flawed in many respects, as he felt that in too many	This comment states an opinion, but does not provide specific details regarding the adequacy of the analysis in the EIR. No response is required.

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TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
		areas the EIR finding was that the impact is less-than-significant, which does not meet the common sense standard. In order for mitigation to occur, an impact has to be found to be significant so when too many things are categorized as insignificant, there isn't adequate mitigation.	
C01-31		He stated that he was concerned about the issues regarding the sewer system and there has to be a response to this. He also agrees that soil contamination has to be considered. He is concerned that cumulative impacts are too often dismissed in the EIR.	Regarding potential impacts to the sanitary sewer system, please refer to the responses to Comment B13-06. Regarding potential impacts to soil contamination, please refer to the responses to Comments B01-01, etc. With respect to cumulative impact often dismissed in the EIR, references to specific issues is not provided, and no further response can be provided.
C01-32		With regard to traffic, he is concerned at the draft EIR underestimates the traffic generation of the project. In his experience, there are many times during the day when there is traffic congestion in both directions. To add a 62-room hotel and an 80-seat restaurant and say that there will not be significant traffic created is not credible. It should not be assumed that guests of the hotel will not take day trips using their automobiles. That and the additional pedestrian usage will increase congestion around the Plaza. Also, while he understands that parking will not be addressed in the EIR, when there is a proposal that has a deficiency of 51 spaces, that will only add to the traffic impact. If the project goes forward, the City should recognize that the project will have significant impacts and require the project to mitigate those impacts.	As stated previously, the proposed project is expected to generate a total of 507 trips daily, including 37 during the p.m. peak hour and 45 during the weekend midday peak hour. After deducting trips associated with existing uses to be removed, the project has an average trip generation of 310 new weekday daily trips, of which 23 trips would occur during the p.m. peak hour. During weekends, 27 new trips are expected during the midday peak hour. As a result, of the increases, potential impacts related to traffic would be considered less-than-significant. Although adequacy of the parking supply is not considered an environmental impact under the current CEQA checklist, the City's Municipal Code provides minimum requirements for various land uses, including hotels, and the adequacy of project parking will be evaluated by the Planning Commission as part of the use permit review process.
C01-33		With regard to water, the State has experienced a drought for the last several years and the City is under mandatory conservation water restrictions. The EIR estimates that the hotel will use 5.7 million gallons of water per year, following voluntary water conservation methods. That number equates to seven single-family homes, which seems low. But whatever the number is, that is water that is gone, so there needs to be a meaningful way to conserve water or develop new water resources, but the City does not have funding to do that. The City does not have guarantees that the Water Agency will give us the water it needs. The State could step in say that Water Agency cannot deliver any more water to the City, in which case we would have to rely on our wells. To my mind, this means that the City should require a development impact fee that addresses water demand, which could be used for programs such as recharging the aquifer. How can it be said that there is a less-than-significant impact in terms of water demand, when residents are being required to conserve? The EIR should be more realistic in identifying impacts that require mitigation, including development impact fees.	The net water demand estimated for the project (which includes discounts for water conservation measures and existing uses on the site that would be removed) amounts to 5.7 million gallons per year, or 15,616 gallons per day. In terms of how the City calculates water connection fees, as set forth in Resolution 56-2014, this estimate of net new water demand equates to 28 single-family residences. As described in impact discussions UTIL-1 and UTIL-2, City officials were contacted in order to confirm that projected water deliveries analyzed in the 2010 Urban Water Management Plan account for the increased water demand that would result from the proposed Project. As noted in response to Comment C01-20, at the time of publication of the Draft EIR, the information presented was current. Subsequently, on June 6, 2016, the City Council adopted the 2015 update to the Urban Water Management Plan. The City Engineer has verified that the information and analysis contained in the updated Water Management Plan do not alter the finding of the Draft EIR that the City's existing and planned water is adequate to accommodate the project. Please refer to Appendix L of the Draft EIR which contains a water analysis report dated September 3, 2015. All potential impacts related to water supply were determined to be less than significant. In part, this finding is based on the fact that the City does charge water impact fees on new

TABLE 5-1 RESPONSE TO COMMENTS

Comment #	Date	Comment	Response
			development, in the form of a water connection that is based on estimated water use in terms of ESDs (Equivalent Single Family Dwellings). The proposed project is expected to be charged a minimum of \$300,000 in water connection fees, an amount that does not include charges for water meters and the front-footage fee.

COMMENTS AND RESPONSES

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1625 Shattuck Avenue, Suite 300
Berkeley, California 94709
510.848.3815
510.848.4315 (f)
www.placeworks.com