



Springs Specific Plan Draft Environmental Impact Report Public Comment

June 14, 2022

After The Fire
Boys & Girls Club Of Sonoma Valley/Teen Services Sonoma
Disability Services & Legal Center
FLS.H. Sonoma Valley
Impact100 Sonoma
Hanna Institute
Homeless Action Sonoma
La Luz Center
Midstate Construction
Sonoma Community Center
Sonoma Ecology Center
Sonoma Overnight Support
Share Sonoma County
Sonoma Valley Chamber of Commerce
Sonoma Valley Climate Coalition
Sonoma Valley Community Health Center
Sonoma Valley Education Foundation
Sonoma Valley Golden State Manufactured-Home Owners League
Sonoma Valley Hospital
Sonoma Valley Housing Group
Sonoma Valley Mentoring Alliance
Sonoma Valley Vintners and Growers Alliance
Sonoma Valley Visitors Bureau
Transition Sonoma Valley
Valley Bar + Bottle
Winery Sixteen 600

Please receive these comments from Sonoma Valley Collaborative on the draft Environmental Impact Report (DEIR) for the Springs Specific Plan (SSP). Sonoma Valley Collaborative (SVC) is a forum of community leaders from across the environmental, equity, and economy sectors of Sonoma Valley, finding solutions and taking action to address our community's biggest challenges.

General support for proposed project

In general, SVC supports the proposed project of the SSP, with the exceptions described below. SVC supports the SSP because the SSP maximizes the amount of infill homes, in a variety of sizes and formats, that can be afforded by people who live or work in Sonoma Valley, and thus the SSP as proposed aligns with SVC's Housing Declaration. SVC supports the SSP's greater amount of multifamily and mixed use housing, and lesser amount of single family housing. SVC supports higher-density, taller, infill development and redevelopment that is served by transit, among other reasons to reduce greenhouse gas emissions from driving and commuting, and from heating and cooling buildings, and to create a pleasant, walkable, racially and economically integrated community that is culturally rich. SVC has no comment on commercial or office space.

Displacement policies needed

SVC is acutely aware of how many community members Sonoma Valley is losing, and has already lost, to the high cost of housing. To help with this severe problem, the SSP and its DEIR need a realistic analysis of displacement and gentrification, and effective preventive measures. The DEIR (section 3.11-2) asserts that "Project implementation would not displace substantial numbers of people or housing units" because "New development allowed under the Project would significantly increase the available housing stock..." But displacement is not an averaged-out phenomenon; it happens to particular individuals and households. People are displaced when their cost of living increases beyond their means, or when they are ordered to leave their home. The SSP causes displacement in two ways: Because the SSP increases allowable dwelling units on many parcels, it allows those parcels' owners to replace

existing buildings, which causes 1) removal of the current occupants during construction and 2) an increase in housing cost on those parcels after construction. The SSP needs a strong anti-displacement program to compensate existing residents for their loss of housing, house residents during construction who wish to stay in the area, and offer them a choice of units in the new buildings at a cost that does not create a rent burden. Without protections like these, the SSP is certain to exacerbate the already extreme loss of residents with middle and lower incomes.

Donald Avenue

SVC has no comment about the inclusion of the Donald Ave neighborhood, except that it is unclear why that area is in the planning area when other low-density areas also adjacent to the Springs are not.

Affordability levels needed

We could not find any prescription for the range of affordability levels in the SSP's proposed new or redeveloped housing. The SSP needs to make a substantial contribution to reversing Sonoma Valley's extreme housing affordability crisis, by mandating that a maximum percent of the dwelling units be priced, whether for rent or sale, for households with moderate, low, very low, and extremely low incomes. Related, mobile homes should be protected and allowed throughout the planning area, since they are a major source of low-cost housing. Without such stipulations, the SSP will worsen the affordability crisis.

Building heights

SVC supports allowing taller buildings in mixed use and commercial settings, with more of the zoning districts allowing three stories.

Additional approach recommended

SVC asks staff and Planning Commissioners to consider including provisions for redeveloping an entire block or blocks under one redevelopment process, in locations where many small, old, poorly constructed homes make poor use of space and provide poor living conditions. These could be replaced with taller, healthy, energy-efficient, fire-ready, multi-unit buildings with green space, walkability, transit, and protections from displacement. Larger-scale projects like this could unlock greater reductions in cumulative emissions, VMT, noise, visual impact, and displacement than multiple smaller projects.

Use the full power of a Specific Plan

SVC asks planners and decision-makers to assure that the SSP goes as far as possible to reduce barriers, reduce costs, and speed approvals for future projects that are consistent with the SSP. For example, where the SSP allows three stories, the need for a use permit could be removed. Better to fight the CEQA fights now, once, at the level of the SSP, than to see future consistent projects delayed with their own CEQA fight.

Thanks to the Permit Sonoma staff and Sonoma Valley community members who contributed to this Plan, which SVC hopes will improve the lives of Sonoma Valley residents for years to come.

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