



September 14, 2017

Ms. Flora Li  
Tohigh Investment SF LLC  
88 First Street, 6<sup>th</sup> Floor  
San Francisco, CA 94105

## **Response to Comments in Appeal of Approval of the Sonoma Country Inn Project**

Dear Ms. Li;

As requested, W-Trans has reviewed comments from the Valley of the Moon Alliance (VOTMA) as contained in their appeal of the Planning Commission approval of the Sonoma Country Inn Project dated August 14, 2017. W-Trans has previously prepared as a letter dated May 25, 2017 that addressed issues relative to the traffic analysis as contained in the 2004 EIR for the Sonoma Country Inn project and its continued adequacy for the project as approved by the Planning Commission. Following are responses to the comments from VOTMA as set forth on Pages 4-6 of the appeal letter.

The comment from VOTMA that our letter report says there is a “potential for the [rooftop] bar to attract more clientele due to the view,” is a misstatement of what the letter actually says. What the letter actually says is, “The VOTMA letter indicated that there was potential for the project to generate more traffic than was evaluated in the 2004 EIR due to a proposed outdoor seating area at the rooftop bar...” It further states, “Concerns relative to the potential for the bar to attract more clientele due to the view should be considered within the context of the time periods evaluated versus when a bar has its peak patronage. Because a bar has its peak activity during the late evening and nighttime hours, traffic associated with this use would not typically affect the commute or Sunday afternoon peak periods that were the focus of the traffic analysis.” Our letter specifically states: “Based on the lack of change in the independent variables, the trip generation would likewise not be expected to change.”

VOTMA continues to assert that the project will generate more trips than were evaluated, which is in direct conflict with the findings of our letter. On Page 2 the trip generation estimates as applied in the EIR were compared to standard rates that conservatively included the restaurant as a separate entity even though it could reasonably be considered part of the hotel. It was determined that the resulting trip generations are essentially equal during the evening peak, though lower during the morning peak. Just based on the two peak periods it could be anticipated that the daily trip generation, and therefore GHG, is actually lower than would be projected using the data from the EIR.

VOTMA claims that the analysis must be redone because it is more than two years old. However, the County’s *Traffic Impact Study Guidelines* apply to traffic studies, and not necessarily to EIRs. It routinely takes more than two years to complete an EIR process, so if this criterion were applied to EIR documents, they might never be finished. Further, the data presented in an EIR is more detailed and generally covers a broader range of topics than a traffic study. The requirement to update documents if more than two years old is applicable to the less-restrictive traffic study document, but it is not reasonable to conclude that this same standard applies to an EIR due to the much-longer time period over which such a document is typically prepared and adopted.

However, as noted in our letter report, the traffic volumes used to evaluate future conditions in the 2004 EIR have not yet been reached, so the document still reflects a future scenario that is beyond 2017, and potentially beyond 2040 if the data from the SCTA model is correct. While it is easy to understand why growth stalled around 2008-2010, it is again noted that the volumes in 2017 are lower than those projected for 2012 in the EIR, and, in fact, the increase in volumes assumed in the EIR is greater than the 30-year growth projected by SCTA. Regardless of when the projections were made and what year they represent, the bottom line is that the analysis reflects conditions

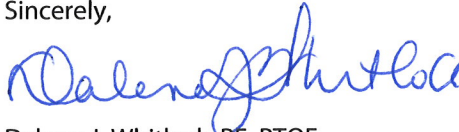
under higher volumes than exist today or are expected to exist based on any available data. The calculations therefore consider conditions that include potential development that is known, as well as that which has yet to be proposed.

There is no need to analyze an increase trip generation because there is nothing in the appeal letter to indicate why the trip generation would increase over what was evaluated in the EIR. There is also no need to update the analysis to reflect current-day volumes when a much higher-volume scenario has already been studied. Use of current volume projections from the SCTA model would indicate lesser impacts as those volumes are lower than the projections used in the EIR because it was based on very conservative growth factors.

In conclusion, we continue to maintain that the 2004 EIR reflects a reasonable trip generation for the project, and the future volumes used to evaluate operation in the future are still greater than what is experienced in 2017, so reflect a future condition with additional development and its associated traffic in the Sonoma Valley.

Thank you for giving W-Trans the opportunity to provide these services. Please call if you have any questions.

Sincerely,



Dalene J. Whitlock, PE, PTOE  
Principal

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