



DATE: June 14, 2021

City of Santa Rosa Planning Commission  
Attention: Kristinae Toomians, Senior Planner  
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cc: Supervisors Susan Gorin and Chris Coursey

**File:** PROJECT NAME - Elnoka Continuing Care Retirement Community (CCRC) PROJECT LOCATION - 6100 and 6160 Sonoma Highway, Santa Rosa, Sonoma County, CA, 95409, and Assessor's Parcel Numbers: 031-061-003, 031-050-014, 031-050-018, 031-050-019, 031-050-060, 031-050-061, 031-050-062, 031-050-063, 031-050-064, 031-050-065, 031-050-066, 031-050-067, 031-050-068, 031-050-069, 031-050-070, 031-050-071, and 031-050-072

The Valley of the Moon Alliance (VOTMA) is an organization supported by hundreds of neighbors formed to protect and preserve Sonoma Valley. VOTMA submits these comments on the above application by Oakmont Senior Living LLC. We are writing to express our opposition to the proposed Elnoka high density housing project proposed to be built adjacent to Highway 12.

This project would create substantial new and additional traffic congestion, fire evacuation concerns, and demand for water in this area, and is not appropriate given already substantial pre-existing issues. The proposed 676 residences, 62-unit care center, entertainment centers, restaurant and businesses, swimming pool, and extensive landscaping is a huge project on currently undeveloped land. The proposal estimates the site would contain approximately 975 residents (assuming 1.42 seniors per unit plus an average of 2.62 persons per employee units), but its residential capacity could be larger than that. The project estimates employment of approximately 194 people in full- and part-time positions, including care staff, housekeepers, landscaping, maintenance, administrative and recreation center.

1. **Traffic:** Traffic on Highway 12, particularly on this segment of the road, is a problem at present – before this proposal for a thousand new residents, a care center, and several

businesses have even been approved. The traffic analysis done for this proposal clearly states that unacceptable congestion and delays will exist in the future with this project at all peak traffic times for the intersections of Highway 12 and Calistoga, the intersection of Highway 12 and Melita, the proposed intersection of Highway 12 and the project access, and the intersection of Highway 12 and Oakmont Drive. The Highway 12 traffic problem will only be exacerbated by funneling the traffic of another thousand residents, a wide arrange of service support and employees at this congested spot on Highway 12. Adding another traffic light at the project access road and Highway 12 (which will only cause more delays and create another unacceptably congested intersection) and/or making the developer contribute money to other intersection projects is not a solution. The issue is more intelligently addressed by not building many hundreds of new residential dwellings with thousands of new vehicle trips a day at this problem spot.

This Highway 12 traffic problem is in fact understated in the projects' traffic study because the Sonoma County Traffic model's future growth projections have not been publicly updated in years and almost certainly understate future traffic demand on Highway 12, even without this Elnoka project. The current SCTA model, which was used as the baseline for the project's traffic study, is based on 2017 data, not current traffic levels. But even more importantly, that model estimates cumulative traffic growth of 3.1% between 2017 and 2040 on Highway 12 from Kenwood to Melita. That is absurd. As we understand it, the underlying SCTA data also do not include weekend traffic, which is a serious shortcoming of the model and thus does not address those heavy traffic days that all Valley residents and visitors have to deal with. (There is a reference in the draft EIR to updated 2020 SCTA data, but we have seen no opportunities for public review of those updates.)

The outdated nature of the proposed project's traffic inputs also means that traffic-related greenhouse gas (GHG) assessments are outdated. With changes in traffic flows based on organic growth, post-fire rebuilding in the area, and potentially in Oakmont ingress/egress patterns, we need substantially current level-of-service (LOS) and GHG data/analytics considered together in the EIR. Further, there needs to be greater clarity and public outreach regarding how Santa Rosa, Sonoma County, and Caltrans are coordinating to address this project. The public needs to understand how each administrative agency will bear responsibility for accurate traffic forecasting in the broader area, downstream validation of initial forecasts, adjusting based on gaps between forecast and reality, and ever-more-critical emergency evacuation (see item 2 below). The public needs to be confident that none of the agencies can point fingers at the others for dropped balls in these critical areas.

Bottom-line, we quote verbatim from the summary section of the draft EIR on this topic:

***Level of Cumulative Significance Before Mitigation – Potentially significant impact.***

***Cumulative Mitigation Measures – No cumulative mitigation is available.***

***Level of Cumulative Significance After Mitigation – Significant and unavoidable impact with mitigation incorporated.***

2. Sonoma Valley has a serious evacuation capability issue during fires. During evacuation orders, delays in getting out of Oakmont and other areas of the Valley have been severe and put residents at risk. The Tubbs, Nuns and Glass fires demonstrate with unarguable clarity that this area is a high-risk fire zone and will remain so for the foreseeable future. Putting another high-density housing project, another stoplight, and another intersection at a constricted bottleneck portion of Highway 12 will only exacerbate the problem, and increase the risk to existing County residents, including first responders who need timely and unimpeded access to frontline activities/areas.
3. Sonoma County is in drought conditions, and nobody knows if and when that will end. Water use restrictions are in place now and can be expected to arise again in the future. Santa Rosa's Russian River water supplies cannot be reliably assumed to increase over time, and may decrease. There is currently no long-term solution to this dilemma. A substantial new water demand would be created by the proposed 676 residences, a 62-unit care center, entertainment centers, restaurant and businesses, swimming pool, and extensive lawns and landscaping. Sonoma County residents are now facing the reality of constrained water supplies now and in the future. This project would only exacerbate that problem.

In conclusion, we join what we know will be many other local commenters, in expressing our serious concerns and resistance toward this proposed project. With all of our recent challenges, Sonoma Valley and County remain uniquely "paradise-like." That said, we need to do all we can to avoid the tragedy seen in, literally, Paradise. It's tempting to hope that we've seen the worst that Diablo winds and other natural phenomena can throw at us, but that's not a smart bet. We encourage the City of Santa Rosa (as with Sonoma County more broadly) to be prudent in planning for the future – based on recent and painful local experience, the best available science, and the precautionary principle.

Thank you for reviewing VOTMA's comments.

Kathy Pons

Valley of the Moon Alliance