

Appendix NOP

Notice of Preparation

Sonoma County Rezone Sites for Housing Project EIR Scoping Comments

The comments contain herein were submitted to the County during the NOP comment period (March 11, 2020 to May 14, 2020) for consideration in the preparation of the DEIR.

From: Areana Flores
Sent: Tuesday, April 21, 2020 1:53 PM
To: HousingSites
Subject: RE: Re. Rezoning sites for housing project

EXTERNAL

Hi Nina,

Sorry we keep missing each other. I wanted to follow-up with regards to the last email on how projects will be analyzed in the EIR.

I noticed a couple sites where near major roads or highways and I wanted to bring these to your attention. Our research here at the Air District has shown that a large amount of particulate matter pollution comes from a vehicle's brake and tire wear and from picking up dust that is already on the road, a major health risk for those consistently breathing it in. We want to recommend that this be taken into account when conducting the health risk assessment and to consider measures to reduce particulate matter exposure, for example installing MERV 13 or above air filtration units and/or placing a vegetative barrier.

In addition, if any of these housing units are apartments that will have an elevator, permits may be required for backup generators. Please inform the applicant to contact Barry Young in our Engineering Division at 415-749-4721 or at byoung@baaqmd.gov for further details.

Let me know if you have any questions or would like to discuss. I can be reached at 415-610-1684.

Thank you,



AREANA FLORES, MSc
ENVIRONMENTAL PLANNER

Bay Area Air Quality Management District
375 Beale St. Suite 600 | San Francisco, CA
94105

☎ 415-749-4616 | ✉ aflores@baaqmd.gov

From: Areana Flores <aflores@baaqmd.gov>
Sent: Wednesday, May 6, 2020 1:45 PM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: RE: Re. Rezoning sites for housing project

EXTERNAL

Hi Nina,

Of course.

Freeway:

US-101

Here are the sites to consider:

GEY-1,2,3,4

SAN-4, 9

Please let me know if you have any other questions.

Best,



AREANA FLORES, MSc
ENVIRONMENTAL PLANNER

Bay Area Air Quality Management District
375 Beale St. Suite 600 | San Francisco, CA
94105

☎ 415-749-4616 | ✉ aflores@baaqmd.gov

SONOMA LOCAL AGENCY FORMATION COMMISSION

111 SANTA ROSA AVENUE, STE. 240, SANTA ROSA, CA 95404
(707) 565-2577 www.sonomalafco.org

DATE: May 13, 2020

TO: Nina Bellucci
Permit Sonoma
2550 Ventura Ave
Santa Rosa, CA 95403

FROM Cynthia Olson
Administrative Analyst

RE: Notice of Preparation of a Draft Environmental Impact Report Rezoning Sites

Ms. Bellucci:

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the rezoning of selected sites for housing throughout the County.

The Sonoma Local Agency Formation Commission (Sonoma LAFCO) believes that the best method to accommodate the housing needs of the county, while providing the necessary governmental services in the most efficient and effective manner, is to encourage additional growth and development within the jurisdictional boundaries of the cities. We recognize, however, that the County has the legal obligation to meet its projected housing needs as set forth in state law.

We have reviewed the Notice and have several comments regarding the availability of public sewer and/or water services to some of the potential rezone sites.

During the presentation given at the May 6, 2020 Scoping Meeting, County staff stated that in order for a site to be considered for rezoning, the site must be "located in the unincorporated County" and "located within an General Plan established Urban Service Area (USA) where public sewer and water service is available."

Section 56300 of the California Government Code provides each LAFCO with the authority to "establish written policies and procedures and exercise its powers...in a manner consistent with those policies and procedures and that encourages and provides planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space and agricultural lands within those patterns."

Section 56133(a) states "a city or district may provide new or extended services by contract or agreement outside its jurisdictional boundary only if it first requests and receives written approval from the commission."

SONOMA LOCAL AGENCY FORMATION COMMISSION

As per Section 56300, Sonoma LAFCO has established policy for the extension of public services to unincorporated parcels located within a city's Sphere of Influence (SOI) and not eligible for annexation into that city. This extension would be authorized through an Outside Service Area Agreement (OSAA). The policy reads as follows:

Policy: Outside Service Area Agreements for Parcels within a City's Sphere of Influence

The Commission, or by direction, the Executive Officer, will consider authorization of an Outside Service Area Agreement for existing development within a city's sphere of influence under the following conditions only:

- A. There is a documented existing or potential threat to public health or safety;
- B. The property owner and city have entered into a recordable agreement that runs with the land, limiting development to existing levels;
- C. A covenant is recorded against the property prohibiting the current and future property owners from protesting annexation to the city; and
- D. The existing development has been determined to be either legal or legally non-conforming by the Sonoma County Permit and Resource Management Department.

The Commission, or by direction, the Executive Officer will not consider authorization of an Outside Service Area Agreement for new development within a city's sphere of influence, unless the new development meets the following criteria:

- A. The new development is a 100 percent affordable project as defined in Section 50079.5 of the Health and Safety code,
- B. The proposed new development is consistent with the City and County General Plans, and
- C. Annexation to the city is not feasible at the time of application

If at the time of a request from a city or district for an extension of service(s), a parcel is determined to be under Sonoma LAFCO's jurisdiction and is eligible for annexation, Sonoma LAFCO may require that the parcel be annexed in order to receive those services. If the parcel is not eligible for annexation, Sonoma LAFCO may approve, approve with conditions or deny the request of the extension of services based on the law and policies in effect at that time.

Sonoma LAFCO has identified the following sites as currently falling under Sonoma LAFCO's jurisdiction for the extension of public services including water and sewer.

City of Santa Rosa - Sites SAN-1, SAN-3, SAN-5, SAN-6, SAN-7 and SAN-10

City of Sonoma - Sites SON-1, SON-2, SON-3 and SON-4

City of Petaluma - Sites PET-1, PET-2, PET-3 and PET-4

SONOMA LOCAL AGENCY FORMATION COMMISSION

Graton Community Services District - Site GRA-4

Those sites located within the boundaries of the various special districts are not subject to Sonoma LAFCO's authorization of the extension of new or additional services. We do, however, encourage the districts to ensure that there is sufficient capacity for current and projected needs for the existing level of development prior to authorizing the extension of service to new development.

From: Ed Fortner <efortner@sweetwatersprings.com>
Sent: Monday, March 16, 2020 11:01 AM
Subject: Lot 070-070-040

Dear Ms. Bellucci,

Sweetwater Springs Water District owns lot 070-070-040, 14139 Sunset Avenue, Guerneville, CA. The lot is fully utilized for water infrastructure, water tanks, and a treatment plant. Please remove this lot from your list of potential rezoning for housing. Please contact me if you have any questions. Please advise.

Sincerely,

Ed Fortner
General Manager
Sweetwater Springs Water District
efortner@sweetwatersprings.com
<http://www.sweetwatersprings.com/>
707-869-4000



From: Ed Fortner <efortner@sweetwatersprings.com>
Sent: Friday, April 24, 2020 11:03 AM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: Rezoning Sites for Housing Project

EXTERNAL

Dear Sir or Madam,

I received another notice on the extension of public comment related to the rezoning sites for housing project. I had previously asked that site GUE-1 be removed from your list as it is water treatment property in active use as treatment and storage of potable water by our Water District. Please advise why this parcel is not yet removed from consideration.

Sincerely,

Ed Fortner
General Manager
Sweetwater Springs Water District
efortner@sweetwatersprings.com
<http://www.sweetwatersprings.com/>
707-869-4000



Good Morning:

I am writing in my role as a member of the Geyserville Planning Committee, an elected representative body for the Geyserville Community. In 2018-19, the GPC conducted an in-depth community survey with both written and oral components to determine how the community envisioned development into the future. A key component of the survey was a discussion around the nature of housing growth in the community that would preserve the rural, agricultural nature of the town.

I am enclosing a letter that was recently sent to the Sonoma County Community Development Commission along with a copy of the Power Point presentation that was presented to the GPC on the results of the survey. It is the hope of the members of the GPC that this information will be considered as housing initiatives are undertaken by the County. The President of the GPC, Daisy Damskey, and I along with all of the members of the GPC, would be pleased to discuss the survey and its conclusions at your convenience.

Thank you very much for your consideration.

All best wishes,

John

John M. Cash, Ph.D. | Of Counsel

Marts&Lundy

o: 201-406-6793

www.martsandlundy.com

GEYSERVILLE PLANNING COMMITTEE

To the Sonoma County Community Development Commission:

Last year, the Geyserville Planning Committee (GPC) conducted an extensive survey in order to understand better community interests in future development. The survey had a written component where respondents filled out a questionnaire and a series of in-depth interviews where community members were able to discuss their interests and concerns for the future of the town and the region around it in detail.

The GPC believes the survey will be of interest to the Sonoma County Community Development Commission as it considers how to address the serious housing crisis in the County. The survey directly reflects the attitudes of this community toward growth and development including housing.

We have enclosed a copy of the presentation on survey results made to the GPC in February of 2019. Some of the highlights include:

- A deep commitment to preserving the rural and agricultural nature of the town.
- The desire for a park and other recreational resources such as direct access to the Russian River.
- Improvements in lighting and sidewalk repair in the downtown corridor.
- Public restrooms.
- Multiple-unit housing that is combined where possible with retail development. There was little to no support for typical suburban housing tracts or for mobile home parks.

The GPC hopes that the Sonoma County Community Development Commission will take the views of the Geyserville community, as expressed in this survey, into account as it considers potential development including zoning recommendations. Addressing the housing crisis in our County is a critical concern for everyone and was acknowledged in the survey. It is our view, however, that Geyserville can grow and do its share to support additional and affordable housing while maintaining its distinct character as a historic agricultural community.

In order for the town to grow and accept new residents, there must be improvements in our civic infrastructure. Sidewalks are not ADA compliant and do not extend to the local school. There is minimal lighting through the community and that, combined with the poor state of the sidewalks, creates potentially hazardous conditions at night. We have very limited public transportation in Geyserville. As noted, there is no public park in the community and very limited recreational opportunities to support a growing population. We have no medical or financial service providers either.

If properly planned, we believe that additional housing could spur further retail development provided the infrastructure issues are addressed up front. Affordability is a critical issue particularly when we consider that a significant portion of our census area population is low income and provides vital services to the world-class vineyards that make our region an international destination. All of this argues for the multiple unit, mixed housing/retail development supported by the survey.

It is our hope that as the County looks for opportunities to address the housing crisis, the GPC can be a partner in helping to shape an appropriate response that builds upon the wonderful character of this historic town.

Thank you very much for taking the time to review this material. Members of the GPC would be pleased to meet with the Commission at any point to discuss how Geyserville could contribute to thoughtful development.

Sincerely,

Daisy Damskey
President, GPC

John M. Cash
Member, GPC

Enclosure

The background features abstract green geometric shapes. On the left, a long, thin green triangle points downwards. On the right, a larger, more complex shape is composed of several overlapping triangles in various shades of green, creating a layered effect. The text is positioned in the center-left area, between these two main shapes.

Geyserville Planning Committee

Report of the Ad Hoc Committee
on Community Surveys

February 2019

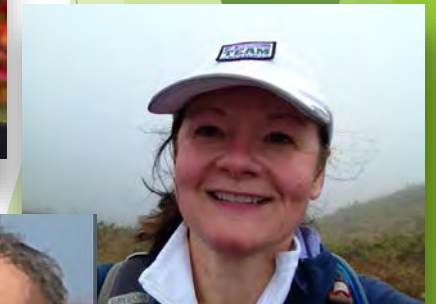
Purpose of the Ad Hoc Committee

- ▶ In March 2018, the Geyserville Planning Committee (GPC) completed two surveys
- ▶ An Ad Hoc Committee (AHC) was appointed in June of 2018
 - ▶ Refine the two existing surveys
 - ▶ Increase the amount and specificity of data from the community



Membership of the AHC

- ▶ **Bryce Jones**, co-chair, GPC member, real estate development consultant and former wine industry professional
- ▶ **John Cash**, Ph.D., co-chair, a Geyserville resident and Senior Consultant to non-profit, mission-driven organizations
- ▶ **Jessica Heiges**, UC Berkeley grad student; part-time Geyserville resident; Geyserville Community Foundation member; fascinated & disturbed by waste generation
- ▶ **Hal Hinkle**, Geyserville resident, GPC member
- ▶ **Lorie Loe**, Geyserville resident, marketing & brand specialist, and SRJC adjunct faculty
- ▶ **Gene Schnair**, architect (recently retired from international practice) avid cyclist, and part-time Geyserville resident for past 15 years



Goals of the AHC

- ▶ Amplify findings of initial surveys
 - ▶ Refine and deepen community input
 - ▶ Provide actionable recommendations to GPC
- ▶ The AHC created:
 - ▶ An additional short, 12-question paper survey designed to be handed out and completed in real time
 - ▶ A set of more detailed, conversational questions to be asked by AHC members as live, “man-on-the street” interviews

The AHC collected 147 completed short surveys and conducted 23 long-form interviews.



Survey Analysis: Common Takeaways

- ▶ Deep community engagement by Geyserville residents
- ▶ Desire to retain Geyserville's small-town, rural, agricultural feel while simultaneously building a much more active, lively downtown core
- ▶ Preservation of historic structures while diversifying businesses and services offered in the community
- ▶ Concern about the variety of housing, and especially affordable housing
- ▶ A wish for even greater community engagement





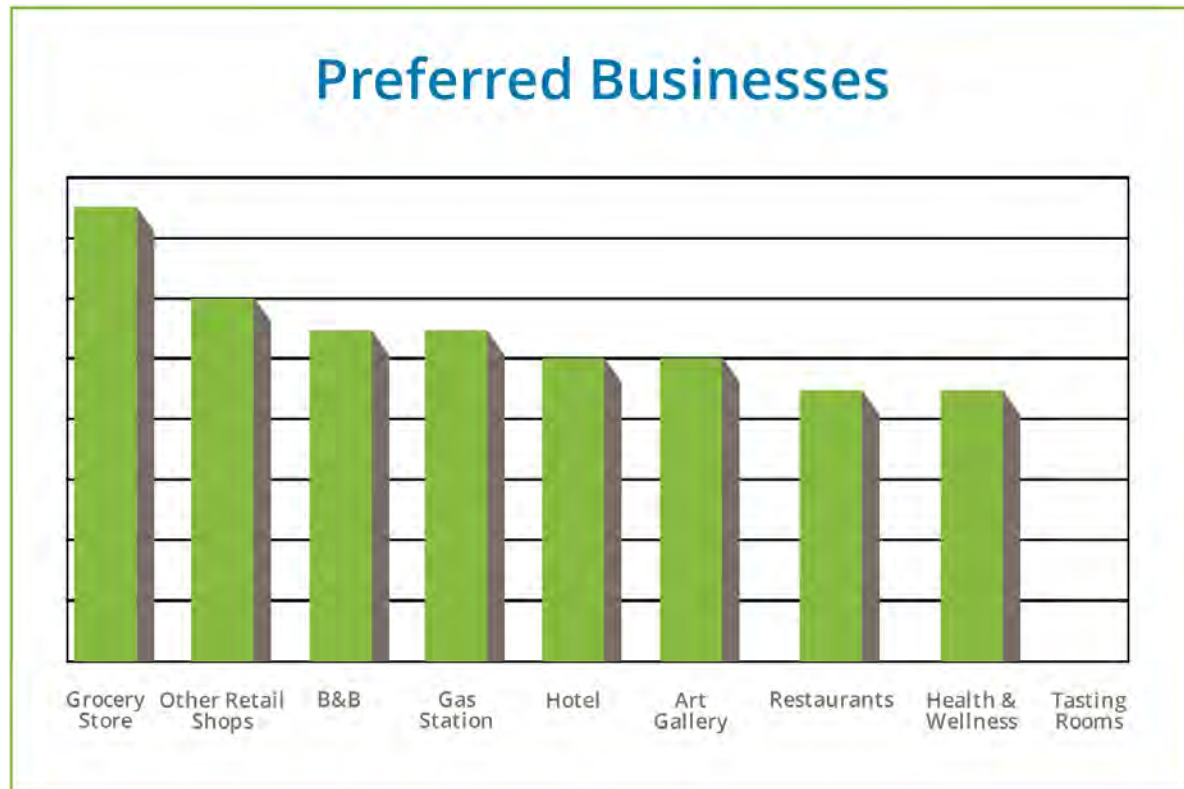
All surveys reveal a vibrant community that cares about Geyserville and its future.



Survey Results & Analysis

Interview Question #1: Preferred Businesses

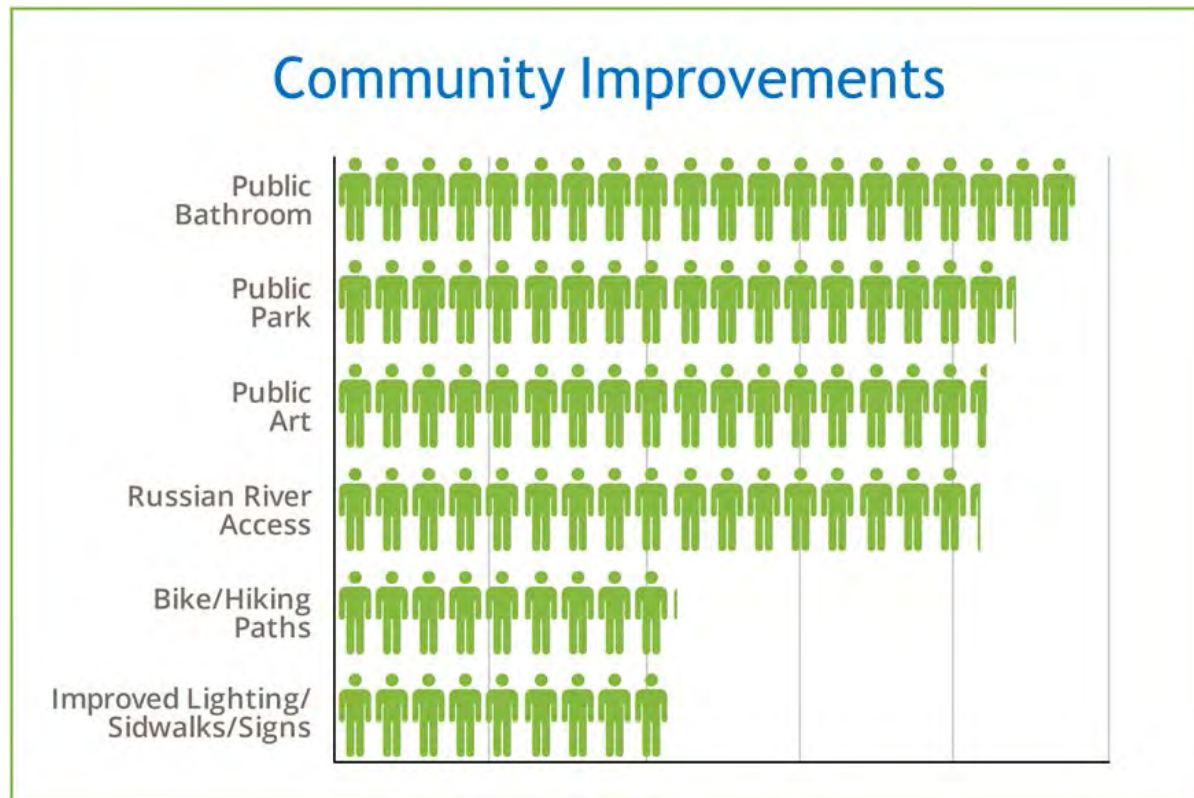
In the Geyserville (online) Community Survey, the majority of respondents said that they highly valued the small-town, rural/agricultural character of the community and would like to see it in the future in the downtown core. If you agree with this perspective, which of the following businesses would you like to see in town?



- ▶ Desire for a local grocery store; no chains or convenience stores
- ▶ Showcase for local products
- ▶ Variety in retail shops:
 - ▶ Bakery
 - ▶ Bank/atm
 - ▶ Hardware store
 - ▶ Gift shop
 - ▶ Clothing store
 - ▶ Mexican restaurant

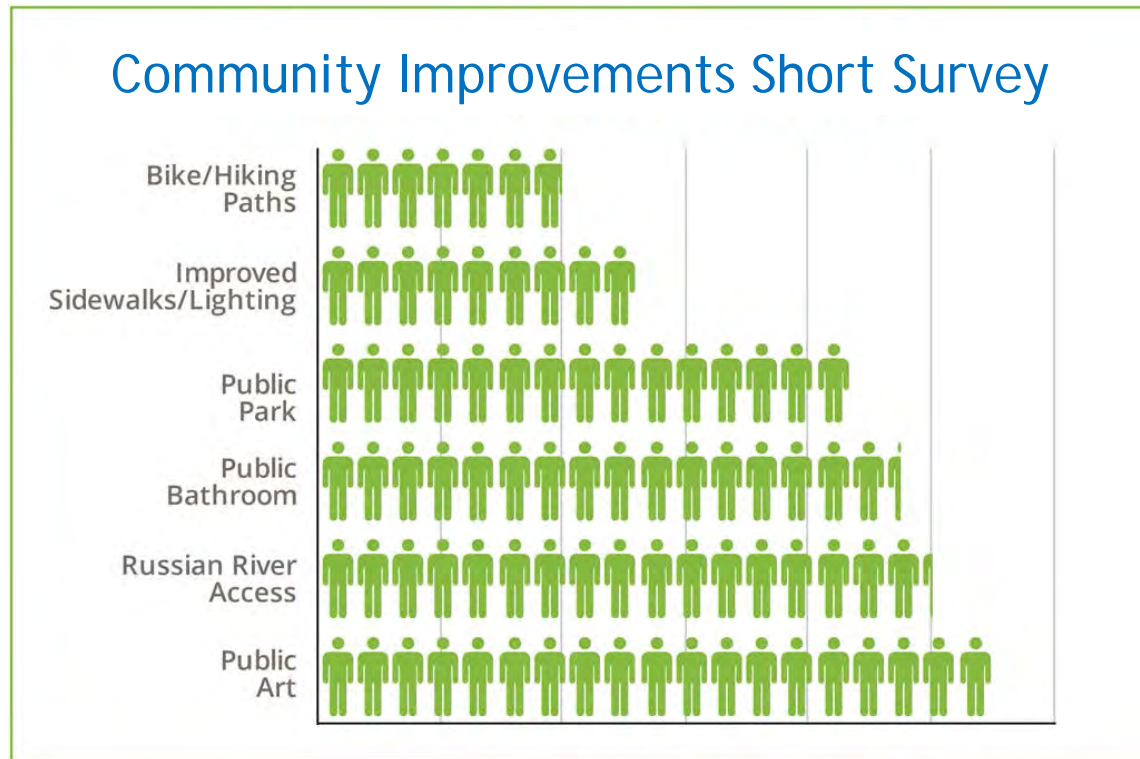
Interview Question #2: Community Improvements

In the original online survey last March, several needs were identified. Which of the following do you think would be important for the future of the town? (*choose at least one answer*).



Short Survey: Community Improvements

In the original online survey last March, several needs were identified. Which of the following do you think would be important for the future of the town? (*choose at least one answer*).

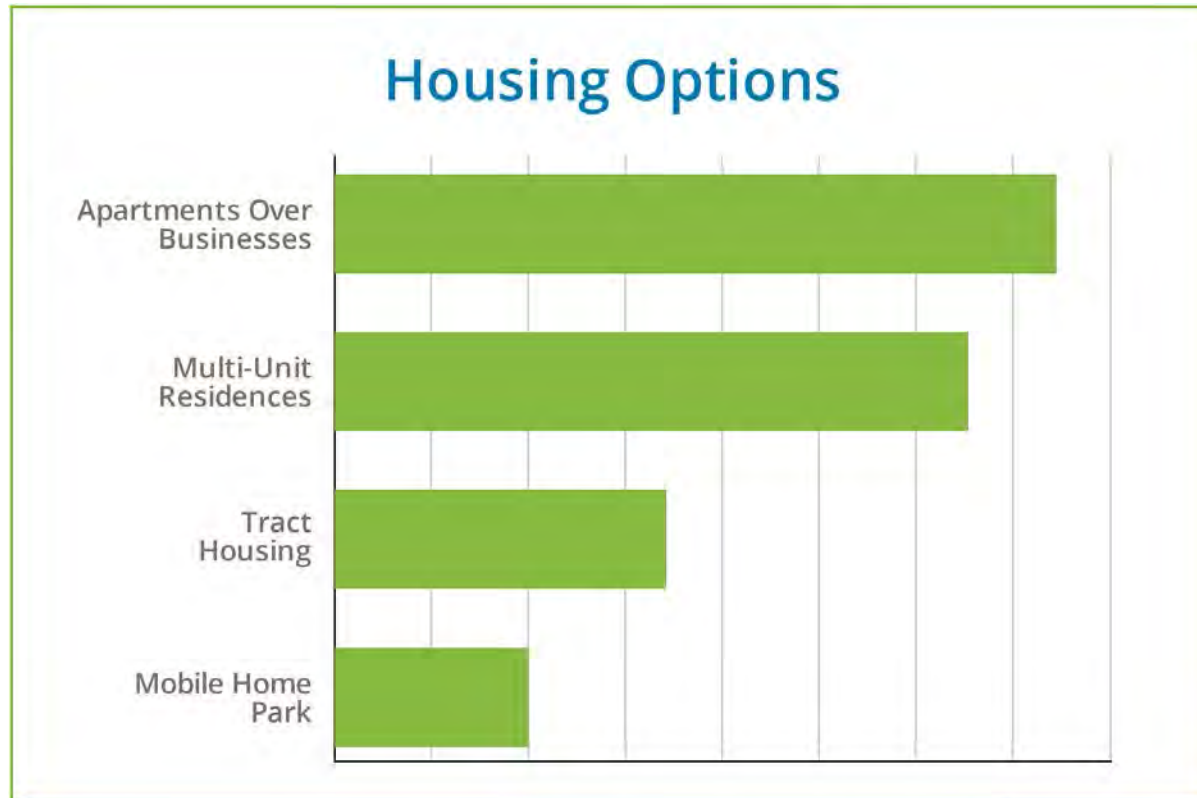


► Both the short survey and the interviews saw similar responses

- The desire for a public park, a public bathroom and access to the Russian River were broadly supported
- Continued expansion of public art and sculpture were strongly supported in the short survey
- Some concern about ongoing maintenance for a river park

Interview Question #3: Housing

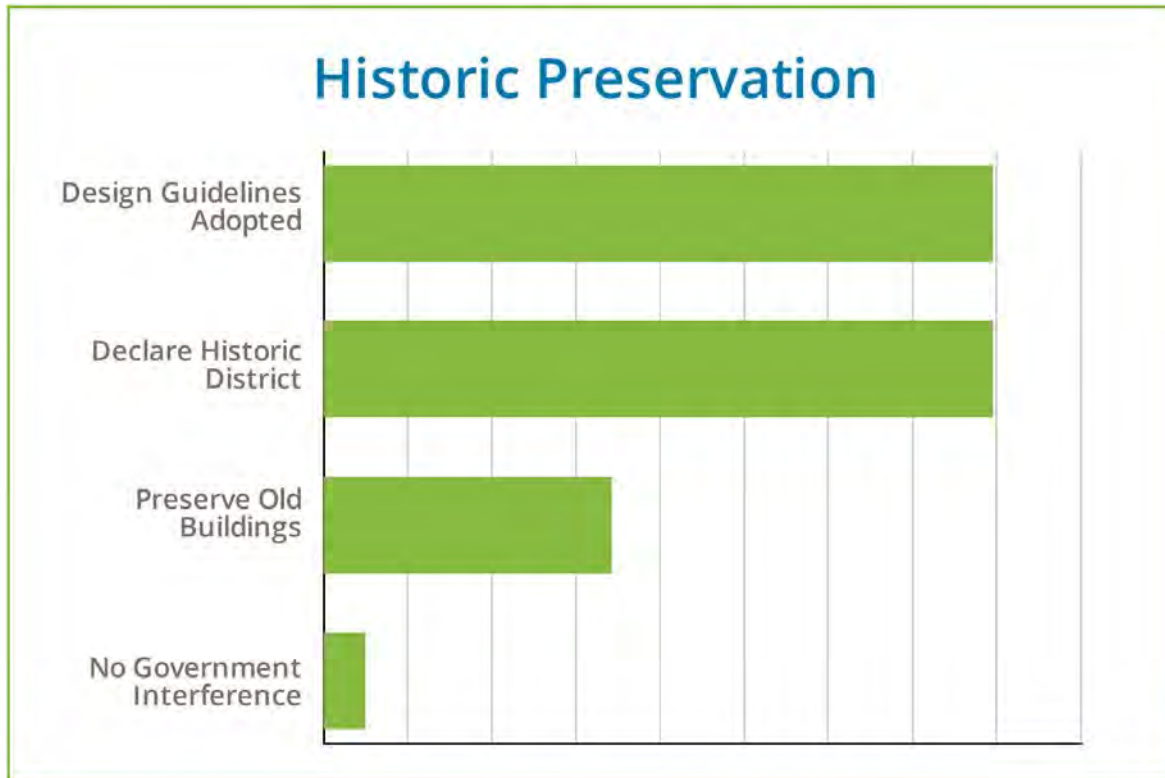
Affordable housing is a serious problem in Sonoma County and any plan for the future of the town has to take into account the need for housing. Which of the following options would you support for Geyserville? (*choose at least one answer*)



- ▶ In the short survey, nearly equal numbers of respondents (104 and 106) felt that both variety and affordability were important for the future of Geyserville
- ▶ Overall significant interest in both affordable housing and for housing that is higher density
- ▶ Strong support for multiple use structures to ensure that new businesses in the downtown core include a residential component

Interview Question #4: Historic Character

Geyserville is an old community with a number of buildings that are more than 75 years old in the downtown core. Which of the following statements do you agree/disagree with (*choose at least one answer*):



- ▶ 140 respondents to short survey said it is important for Geyserville to preserve and enhance its agricultural heritage and identity
- ▶ Preservation of historic Geyserville and its rural character are important to the community
 - ▶ Develop building design guidelines
 - ▶ Investigate declaring parts of Geyserville an historic district

Interview Question #5: Beautification

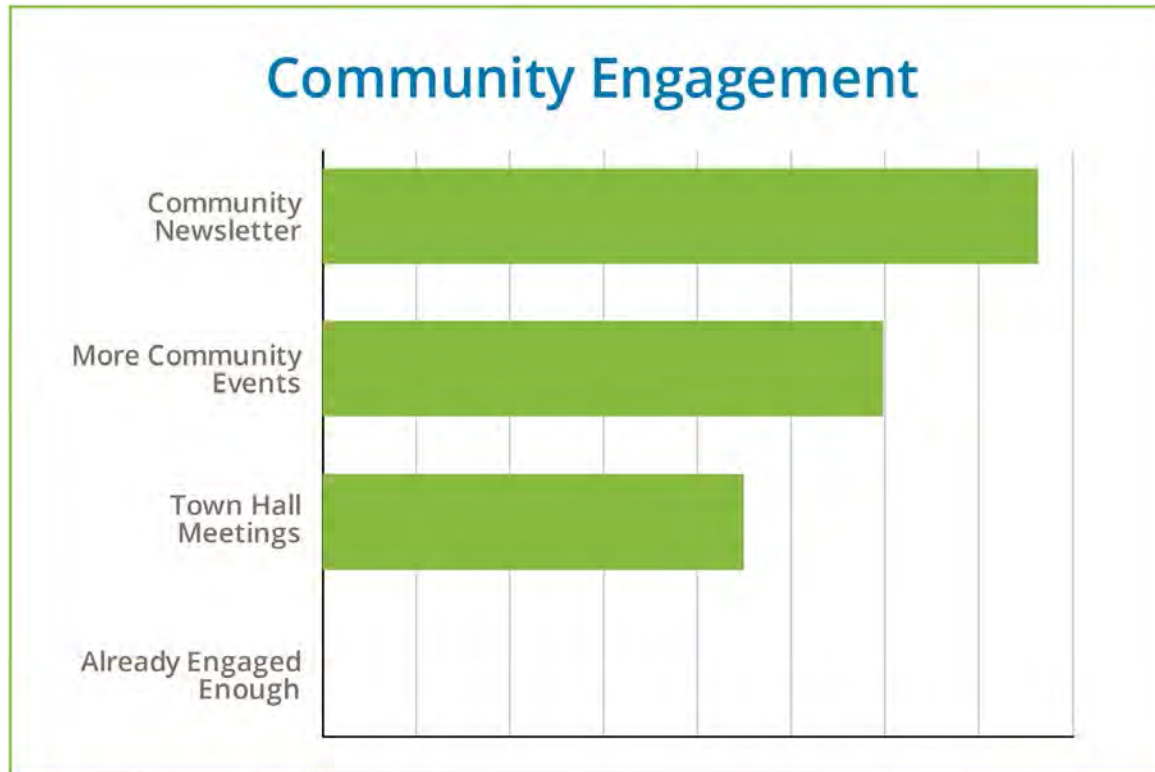
Beautification of the town was also raised as a priority by some in the online survey last March. Which of the following do you think would be important to pursue?



- ▶ Some unhappiness over the condition of some downtown buildings especially vacant storefronts
- ▶ Businesses should be encouraged to help beautify the town by adding flower boxes or landscaping
- ▶ Strong support for improvement of southern entrance to the town and for the sculpture garden
- ▶ Interest in improving the northern entrance into town

Interview Question #5: Community Engagement

A number of the original online survey respondents expressed a wish for greater community engagement. Which of the following do you think would be of value?



- ▶ Geyserville residents value their community and seek additional opportunities for community engagement.
- ▶ People would like to see some kind of community newsletter.
- ▶ Community events were highly rated in the interviews and in addition, 131 respondents to the short survey said they would like to see more community events.

Additional Short Survey Responses

The short written survey included three additional questions that were not in the live interviews. The short survey asked if the following were wanted for Geyserville:

- | | |
|---|-------------------------------------|
| ▶ SMARTrain stop | 106 positive responses ¹ |
| ▶ More jobs/business opportunities | 97 positive responses ² |
| ▶ Preserve town's agricultural heritage | 140 positive responses |

¹ Although 106 respondents to short survey support a SMARTrain stop, it also received the highest number of "NO" answers on the same survey

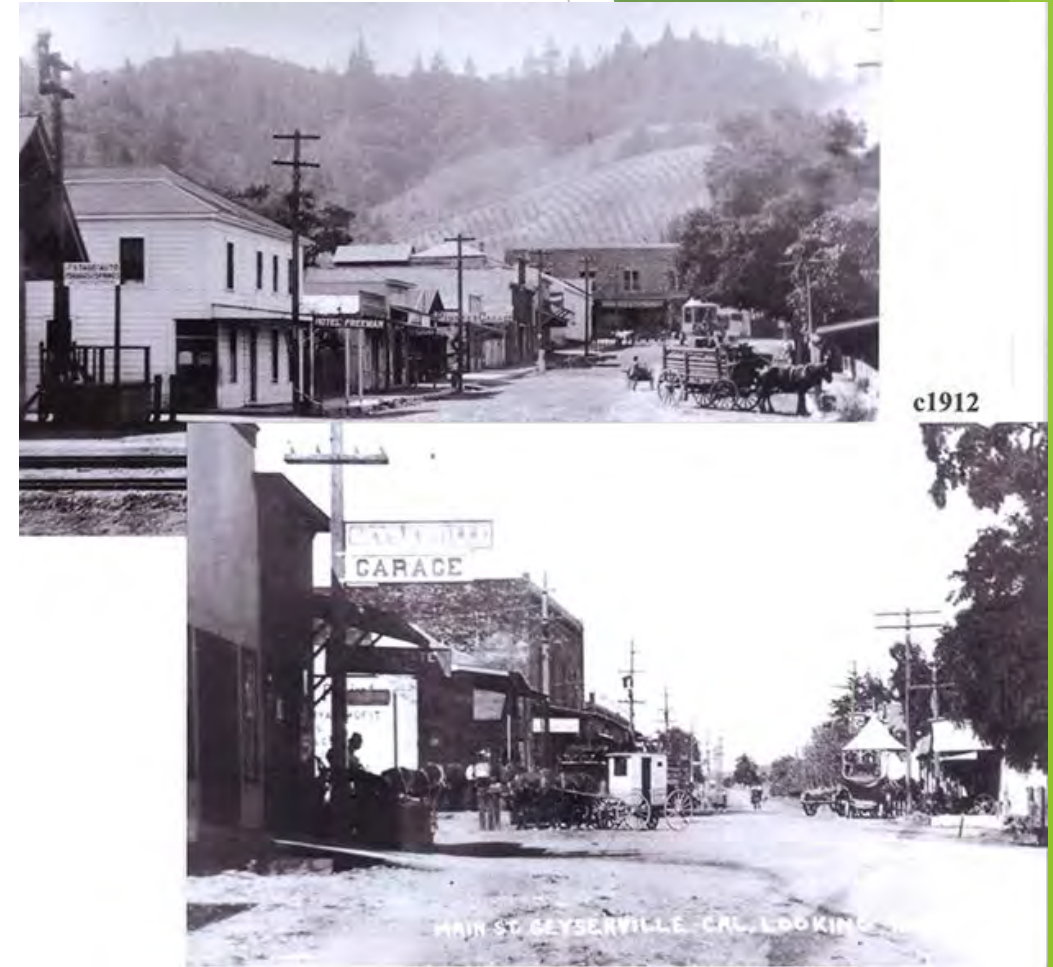
² Above is true for additional jobs; demographic data shows high percentage of residents are self-employed, and most others do not work in town



AHC Recommendations

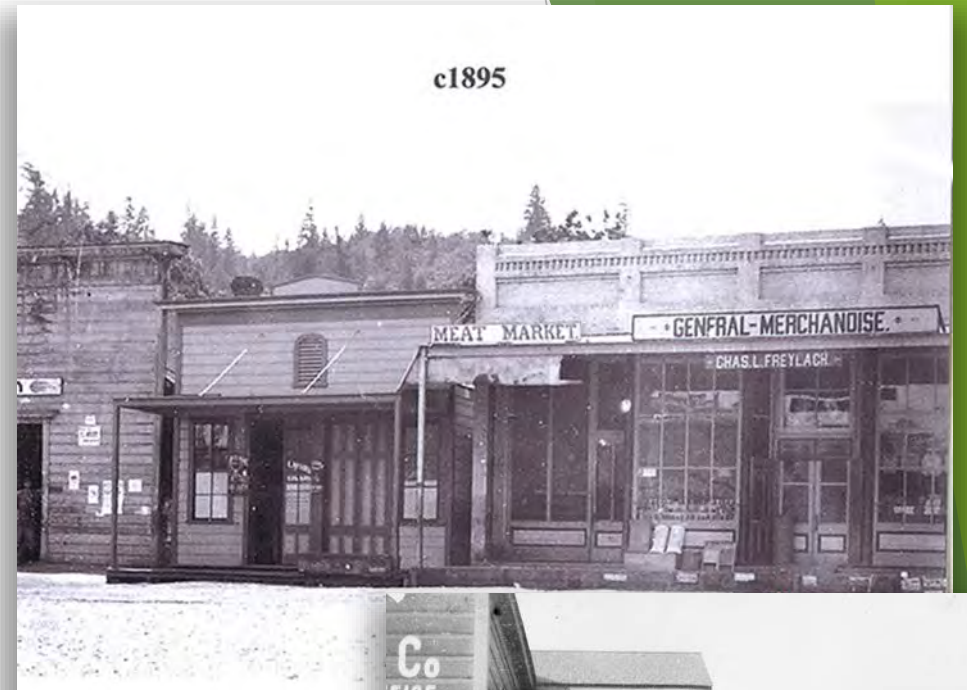
Our Caveat

- ▶ The following findings and recommendations should be fully evaluated in the context of:
 - ▶ Local demographics
 - ▶ Economics
 - ▶ Land use
 - ▶ Zoning regulations
 - ▶ Other relevant factors present in the community or the County.
- ▶ We also suggest that the Committee look for synergies with other existing or planned County projects that affect the Geyserville community



Recommendation #1

- ▶ The GPC should commit itself to the preservation of Geyserville as a rural, small-town community with an agricultural heritage
- ▶ The community, as represented by the GPC, should actively engage in county planning and general plan updates
- ▶ This philosophy should guide the GPC's decisions going forward and be a core contribution to the Geyserville Master Plan



Recommendation #2

- ▶ The GPC should include in its recommendations to the County for the Geyserville Master Plan update:
 - ▶ A public park
 - ▶ A public bathroom
 - ▶ Plans for public access to the Russian River
 - ▶ Sidewalk improvements and enhanced lighting in the downtown core
 - ▶ Variety of housing

Recommendation #3

- ▶ The GPC to consider the following:
 - ▶ Development and adoption of design guidelines for new construction in the downtown core
 - ▶ Investigate the possibility of having the Geyserville downtown core declared a California Historic District



Recommendation #4

- ▶ In support of affordable housing in the community, we ask that the Geyserville Planning Committee consider the following:
 - ▶ Encourage new business construction in the downtown core be multi-use and include one or more residential units
 - ▶ Encourage the development of multiple unit residences as a solution to the housing crisis
 - ▶ Actively promote opportunities for development of affordable housing to potential developers and investors

Recommendation #5

- ▶ While the Geyserville Planning Committee cannot mandate new business in the community, survey respondents expressed interest in encouraging the following types of new businesses:
 - ▶ A local grocery store (not a chain store and not a convenience store)
 - ▶ A selection of small variety stores that would serve both the community and visitors
 - ▶ An ATM or bank branch
 - ▶ A small gas station in keeping with the agrarian, rural character of the town



Recommendation #6

- ▶ Town beautification was a priority for many survey participants and we ask the Committee to consider the following:
 - ▶ Encouragement of new and existing businesses to beautify their properties with flower boxes and other landscaping
 - ▶ Planting more native trees on Geyserville Avenue
 - ▶ Encourage development at the northern entrance to the town to enhance the quality of the visitor experience
 - ▶ Review any applicable zoning requirements related to maintaining a clean and tended landscape in the downtown core, with an eye toward enforcement of these requirements
 - ▶ Encourage the Chamber of Commerce and other groups to continue to expand the presence of public art and sculpture

Recommendation #7

- ▶ There is real interest in further community engagement and while the Geyserville Planning Committee has limited influence in this area, we recommend the following:
 - ▶ With the Chamber of Commerce or other community partner, explore the possibility of one or more additional community events
 - ▶ With the Chamber of Commerce or other community partner, explore the possibility of producing a regular town newsletter



Questions

25

CITY OF PETALUMA, CALIFORNIA

MEMORANDUM

*Public Works & Utilities Department, 202 McDowell Blvd. North, Petaluma, CA 94954
(707) 778-4546 Fax (707) 778-4508 E-mail: dwrc@ci.petaluma.ca.us*

DATE: March 25, 2020

TO: Ms. Nina Bellucci, Permit Sonoma (Sent via email)

FROM: Kent Carothers, P.E., Deputy Director PW&U - Operations

SUBJECT: Rezoning Site of Housing Project, Petaluma Potential on Bodega Ave. PET 1-4.

xc: Gina Benedetti-Petnic, C.E., City Engineer
Mike Ielmorini, Assist. Operations Manager

The Operations Division under the Public Works and Utilities Department has reviewed the notice of Public Scoping dated March 11, 2020, and has the following comments:

1. The existing wastewater collection system in Bodega Avenue is at capacity and will required to be upgraded to meet minimum City Standard from the development site east to Bantam Ave. It is assumed that the on-site wastewater collection system for any housing development will be privately maintained.
2. Upgrades to the water distribution system to the site will be required to meet City Standards. The 8-inch water main in Bodega Ave. has capacity for the development.
3. Stormwater improvement will be required to meet BASMAA post construction requirements and provide full detention mitigation for increased runoff.

Additional comments may be generated as a result of additional information, response to comments, or design changes. Any site plan changes or revisions impacting the utility design during construction will require the resubmittal to Operations Division.

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

April 1, 2020

SCH: 2020030351

GTS # 04-SON-2020-00449

GTS ID: 18950

SON/VAR/VAR

Nina Bellucci, Planner
Sonoma County
2550 Ventura Avenue
Santa Rosa, CA 945403

Rezone Sites for Housing Project – Notice of Preparation (NOP)

Dear Nina Bellucci:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the Rezone Sites for Housing Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the March 2020 NOP.

Project Understanding

The project proposes site identification, environmental analysis, and rezoning of urban sites for by-right medium density housing. This project will add sites to the Sonoma County's (County) Housing Element site inventory to comply with the new inventory requirements and will implement current General Plan Policies and Programs, including Policy HE-2f to consider a variety of sites for higher-density and affordable housing and Housing Element Programs 11 and 20, which encourages the identification of urban sites near jobs and transit that may appropriately accommodate additional housing. The project includes: 1) a General Plan Map amendment as necessary to adjust allowable densities on identified sites; 2) rezoning of sites to match new general plan densities or to add the AH (Affordable Housing) or WH (Workforce Housing) combining zones; and 3) a program Environmental Impact Report (EIR) to evaluate the potential environmental impacts of the project. The project is intended to facilitate and encourage by-right housing development. US-101 and State Routes (SR)-12 and 116 are in the vicinity of some of the proposed project sites.

Travel Demand Analysis

Please note that a travel demand analysis that provides a Vehicle Miles Traveled (VMT) analysis for projects proposed within this site's boundaries may be required as part of the California Environmental Quality Act (CEQA) process. With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development to ensure alignment with State policies using efficient development patterns, innovative travel demand reduction strategies, multimodal improvements, and VMT as the primary transportation impact metric. The travel demand analysis should include:

- A vicinity map, regional location map, and site plan clearly showing project access in relation to the State Transportation Network (STN). Ingress and egress for all project components should be clearly identified. Clearly identify the State right-of-way (ROW). Project driveways, local roads and intersections, car/bike parking, and transit facilities should be mapped.
- A VMT analysis pursuant to the County's guidelines or, if the County has no guidelines, the Office of Planning and Research's Guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential safety issues for all road users should be identified and fully mitigated.
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

Vehicle Trip Reduction

Given the place, type and size of the project, projects within this site's boundaries should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access. The measures listed below can promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Unbundled parking;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

Transportation Impact Fees

We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. Caltrans welcomes the opportunity to work with the City and local partners to secure the funding for needed mitigation. Traffic mitigation or cooperative agreements are examples of such measures.

Lead Agency

As the Lead Agency for potential projects within this site's boundaries, the City of Santa Rosa is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should

Nina Bellucci, Planner
April 1, 2020
Page 4

be fully discussed for all proposed mitigation measures.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto the ROW requires a Caltrans-issued encroachment permit. If any Caltrans facilities are impacted by the project, those facilities must meet the American Disabilities Act (ADA) Standards after project completion. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application, six (6) sets of plans clearly delineating the State ROW, six (6) copies of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Andrew Chan at 510-622-5433 or andrew.chan@dot.ca.gov.

Sincerely,



Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

CC: State Clearinghouse



NATIVE AMERICAN HERITAGE COMMISSION

March 12, 2020

Nina Bellucci
Sonoma County
2550 Ventura Avenue
Santa Rosa, CA 95403

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
Marshall McKay
Wintun

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Joseph Myers
Pomo

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2020030351, Rezone Sites for Housing Project, Sonoma County

Dear Ms. Bellucci:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
- b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Nancy.Gonzalez-Lopez@nahc.ca.gov.

Sincerely,



Nancy Gonzalez-Lopez
Staff Services Analyst

cc: State Clearinghouse

Santa Rosa Office
555 Fifth Street, Suite 300 A
Santa Rosa, CA 95401
(707) 575-3661

April 22, 2020

Tennis Wick, Director
Nina Bellucci, Planner
Permit Sonoma
2550 Ventura Avenue,
Santa Rosa, California 95403

Via EMAIL

Re: Rezoning Sites for Housing Project– Comments on Notice of Preparation of Environmental Impact Report

Greenbelt Alliance offers these comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the proposed Rezoning Sites for Housing Project (Project). The proposed project would rezone multiple parcels across Sonoma County for by-right medium density residential development.

Given the unprecedented public health crisis currently affecting the globe, Greenbelt Alliance respectfully urges the County to postpone the EIR for the proposed Project. Tragically, the coronavirus is infecting and killing countless Americans. Those who are healthy are required to shelter-in-place and are caring for and/or homeschooling their children. Put simply, the County should not be asking that the public focus on land use planning issues when humanity is facing a life-threatening pandemic. Given that the County must update its Housing Element within the next two years, for the reasons discussed below, common sense dictates that the proposed project be deferred until the Housing Element Update process.¹

Introduction

Greenbelt Alliance supports the need for residential development in the right places. Development should occur in a sustainable manner, i.e., growth should be located in the existing urban footprint so that greenbelts and working lands can be protected. This pattern of development is necessary to achieve our state's climate change goals. Sprawling or scattered land use development, on the other hand, results in increased vehicle miles traveled (VMT), increased air pollution, greenhouse gas emissions, and energy consumption. It also substantially increases the cost of infrastructure and public services. The

¹ The update of the Housing Element will require a new EIR. As the County is well aware, EIRs are very expensive. This duplication of effort is not the best use of County staff's time, or the taxpayers' monies.

proposed project would facilitate a sprawl pattern of development as it would allow haphazard scattered “by-right” medium density housing throughout the County. Consequently, it has the potential to severely degrade the environment.

As will be discussed below, the NOP is lacking in detail about the objective and need for the proposed Project. There would appear to be ample room within existing cities and unincorporated communities to meet the County’s housing and population needs. Indeed, based on the housing and population projections within the County and Cities’ General Plans, the Sonoma County Transportation Authority’s housing pipeline estimates, and Plan Bay Area 2040, the project does not appear to be justified. Consequently, if approved, the project would conflict with and undermine longstanding policies in the County and Cities’ General Plans that call for city-centered development. The project also has the potential to conflict with the voter-approved Urban Growth Boundaries (UGBs) in all nine of the County’s cities. Of highest concern is that many parcels proposed for rezoning are inside of the voter-approved UGBs and Spheres of Influence of several cities. Although these are the precise areas that the cities have reserved for city growth after all infill sites are exhausted, we can find no indication that the County has consulted with the affected cities about the proposed project.

It would appear that the County is pursuing this stand-alone project not as part of a strategic and comprehensive land use planning exercise (i.e., as part of a countywide Housing Element or General Plan Update process). Instead, based on the NOP, the County appears to be responding to random requests from property owners and developers. Land use regulations should not be based on ad-hoc requests. Instead they should be based on comprehensive planning goals and decisions. Again, we urge the County to defer consideration of sites for new residential development until it undertakes a comprehensive county-wide evaluation as part of the required update of the County’s Housing Element and the General Plan.

The County should also postpone the proposed project to allow it sufficient time to coordinate and consult with each of the cities in the County. Several of the housing sites the County is considering are inside the boundaries of the cities’ Sphere of Influence and voter-approved Urban Growth Boundaries. For more than 20 years, the County has respected the cities’ SOIs and UGBs to support city-centered growth while giving the cities room to expand as needed. Greenbelt Alliance strongly encourages the County to consult with the cities prior to proceeding with the proposed project.

Detailed NOP Comments

The NOP Lacks Necessary Information Regarding the Project and Its Probable Environmental Impacts:

The purpose of a NOP is to “solicit guidance from members of the public agencies as to the scope and content of the environmental information to be included in the EIR.” CEQA Guidelines § 15375; *see also* CEQA Guidelines § 15082. In order to effectively solicit such guidance, the NOP must provide adequate and reliable information regarding the nature of the Project and its probable environmental

impacts. Unfortunately, the County's NOP does not meet this minimum standard for adequacy as it contains scant information about the Project and **no** information about its potential environmental impacts. We respectfully request that the County revise and recirculate its NOP in order to provide substantive detail about the Project and its likely environmental impacts.

To be adequate, a NOP must provide sufficient information describing the probable environmental effects of the project, in order to enable the public to make a meaningful response to the NOP. CEQA Guidelines § 15082(a)(1)(C). The County's approach of publishing the NOP before the Project has been defined contributes to the document's troubling lack of detail. The NOP simply lists the environmental factors that will purportedly be addressed in the EIR, but it does not provide any specificity as to the nature of these impacts. If the EIR suffers from the same lack of detail and focus, it will be legally inadequate under CEQA. It will be imperative that the EIR comprehensively analyze the following environmental impact topics:

- ☐ Aesthetics/Visual
- ☐ Agriculture and Forestry Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology and Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards and Hazardous Materials
- ☐ Hydrology and Water Quality
- ☐ Land Use and Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population and Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities and Service Systems
- ☐ Wildfire
- ☐ Cumulative Effects
- ☐ Growth Inducing Effects

RHNA: The NOP states that “this project will add sites to the County's Housing Element site inventory to comply with the new inventory requirements . . .” At the time of this NOP, the County does not have new inventory requirements for the next cycle of RHNA, 2023 to 2031. It is unknown what the numbers will be or exactly when they will be issued to the County. It is critical to note, however, that the County is one of the few jurisdictions that is meeting RHNA in the current cycle.

Until the RHNA numbers are identified, along with an assessment of existing housing capacity and population, and official projections, it is premature to move forward with the proposed project.

Number of Parcels and Units: The NOP identifies approximately 50 parcels but does not describe the number of units or types of units that would be built. In the absence of this information, it will be impossible for the EIR to evaluate the project's environmental impacts.

By-right: The project includes site identification and rezoning of various parcels for by-right medium density housing. The NOP, however, does not define the term "by-right." It is imperative that this definition be consistent with the County's General Plan and Zoning Code. Currently, by-right only applies to narrowly defined affordable housing and farmworker housing development. Adding uses that are allowed by right implies that the approval process for development on the 50 or more parcels will be streamlined and therefore potentially avoid future environmental review. If this is the case, it is imperative that the EIR accurately describe the amount of development that can occur as a result of the proposed project and thoroughly examine the environmental impacts that will result from that development. The EIR must also clearly acknowledge that by right development will undoubtedly set a precedent for other property owners to seek similar treatment. Again, the EIR must acknowledge the precedent setting nature of such a regulatory scheme and thoroughly analyze the associated environmental impacts.

The EIR must also include, as a project alternative, not including by-right as a project component.

Project Objectives: The NOP does not identify the proposed project's objectives. CEQA requires that an EIR include a statement of objectives sought by the proposed project. CEQA Guidelines section 15124 (b). A clearly written project statement of objectives will help the County develop a reasonable range of alternatives. *Id.* Without such, it is unclear as to why the County is proposing to rezone sites for medium density housing. Accordingly, the County should develop clear project objectives. As part of these objectives we urge the County to consider high- and low-density zoning options as well as medium density.

Water and Sewer: The NOP states that the parcels that would be rezoned are located where "water and sewer is available," but it does not describe how many of these parcels are currently on septic and well. The EIR must provide details on how many of the project parcels are on septic and well and assess the environmental impacts of extending water and sewer, and infrastructure to serve the proposed development.

Affordability: The NOP does not address affordable housing. The EIR must provide details as to how many, if any, of the proposed units that would be developed on the 50 parcels will be legally affordable, at what levels, for how many people, and what regulatory structure will be established to guarantee that the units remain affordable in perpetuity.

Vacation Rentals: The NOP does not address vacation rentals. The impact of vacation rentals is a primary reason for lack of affordable housing, or housing in general, in the County and must be taken into account. The EIR must identify how many of the units developed on the 50 parcels will be available for vacation rentals. In addition, the EIR must analyze the impacts of vacation rentals on housing stock

in the County. This is addressed in the current Housing Element and will also have to be considered in the Housing Element Update.

The EIR should include as a project alternative the conversion of some or all the existing vacation rental units to “regular” long term residential rental housing. This alternative will be important for the public and decision-makers to understand whether conversion of vacation rental units would be enough to avoid the need for the proposed project.

Cumulative Impacts

The EIR must assess the cumulative environmental impacts of the multiple other housing initiatives that have moved forward in the past two years following the wildfires. Most of these other initiatives have proceeded with limited environmental review so the cumulative effects of all these projects remain unanalyzed. The EIR for the proposed project must also assess the cumulative environmental impacts of the multiple Specific Plans and housing projects that are currently being developed or in the planning stage. See list below of the Specific Plans that are currently underway and include new and/or higher density residential development.

In addition, the county recently established several new Priority Development Areas with the potential for new and/or more higher density residential housing.

The EIR must analyze the impacts of these and other County actions listed below.

The EIR must also evaluate the cumulative impacts of the project, together with the new housing initiatives adopted in recent years (tiering off the 2008 General Plan EIR) as well as the pending Specific Plans and housing projects that are currently being planned or underway including the following (that are posted on the Permit Sonoma Housing Initiative website):

→In May 2018, the County updated local policy with the following actions to increase housing development in urban service areas:

- Increased the allowable residential floor area in mixed-use projects from 50 percent to 80 percent.
- Delayed collection of fees until near occupancy, rather than at permitting.
- Allowed small single room occupancy (SRO) projects as a permitted use and removed the existing 30-room limit for larger SRO projects.
- Allowed transitional and supportive housing in all zoning districts that allow single-family dwellings.

→In October 2018, the Board approved further housing initiatives, including:

- Simplified development standards for multi-family housing projects.
- Allowed higher densities near jobs and transit through provision of a new Workforce Housing Combining Zone.

- Provided for a new housing type called Cottage Housing Developments that will provide multi-unit housing in the style, scale, and size of single-family homes, in low- and medium-density neighborhoods.
- Allowed use of a new density unit equivalent concept to encourage more smaller rental units and fewer larger units.

→ Specific Plans Under Way or Planned

- Springs Specific Plan
- Airport Business Park Specific Plan
- Sonoma Developmental Center Specific Plan
- Southeast Santa Rosa Specific Plan
- Russian River Area Specific Plan

→ Housing Projects Planned or Underway in County Lands

- Wikiup Commons (29 units proposed, none are affordable)
- Verano Family Hotel/Housing project (70 possible deed restricted affordable units within 10 years)
- New projects in Southeast Santa Rosa, Todd Road areas
- Other housing development projects that are in the Permit Sonoma files, which must be explicitly identified so cumulative environmental impacts can be evaluated.
-

Land Use Policies of Cities

The EIR must evaluate the proposed project's impacts on the cities' general plans and land use planning efforts including, for example, the annexations underway or planned within each city. This analysis must also address how the project would affect the cities' Urban Growth Boundaries.

Alternatives

The EIR must include a reasonable range of alternatives which would feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project. These include, for example, the following:

- an alternative that reduces vacation rental use and conversion of vacation rentals back to "regular" residential rental housing countywide.
- an alternative that requires deed-restricted legally affordable housing at 100 percent, 50 percent and 35 percent for all proposed new parcels and units in the project.
- an alternative that calls for growth within existing infill sites within unincorporated communities and Urban Service Areas with existing sewer and water that are not inside cities' Spheres of Influence and voter approved-Urban Growth Boundaries.

- alternatives with other potential densities such as high density and low-density options
- an alternative where “by-right” is not a project component.

Additional Questions and Concerns:

Planning Related Issues

The County’s General Plan is out of date and planning documents indicate that there may be no need for the project. The EIR must thoroughly examine the following issues:

- **Outdated County General Plan:** The Sonoma County General Plan and existing General Plan EIR is quite out of date as it was adopted in 2008. The existing General Plan EIR does not reflect the many amendments that have been adopted since 2008. As discussed above, it would be prudent for the County to fold the proposed project into a comprehensive update of the Housing Element and the General Plan.
- **Population and Housing Need in Sonoma County:** The County’s Housing Element (2014 – 2023) estimates that there are nearly 3,000 potential new housing units of various types available in the County’s urban residential zones with water and sewer. *See* Table 3-1a, below from 2016 Housing Element. The NOP does not explain the relationship between the sites that will be added to the County's Housing Element site inventory as part of the proposed project and these 3,000 units. The

Table 3-1a Urban Sites with Appropriate Zoning to Address Housing Needs

Type of Housing	Number of Sites	Potential (net) New Units
Urban Residential Totals	49	1,570
Single Family Ownership (Type C)	26	751
Multi Family Rental (Type A)	23	819
Commercial & Industrial Allowing Residential Totals	87	1,404
Mixed-Use (Office or Retail + Residential)	22	387
Work-Live (Industrial Lofts)	21	337
Single Room Occupancy (SRO)	30	158
Affordable Housing Combining Zone (AH)	14	522
Totals for urban sites	136	2,974

EIR must clearly disclose whether these 3,000 new housing units would be developed on the 50 parcels contemplated by the proposed project.

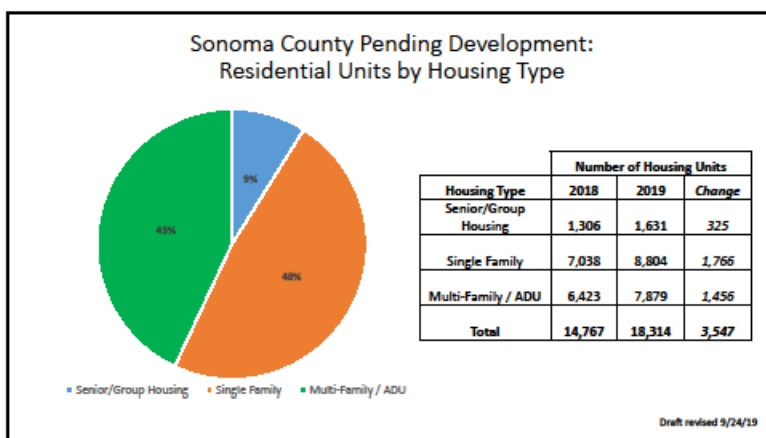
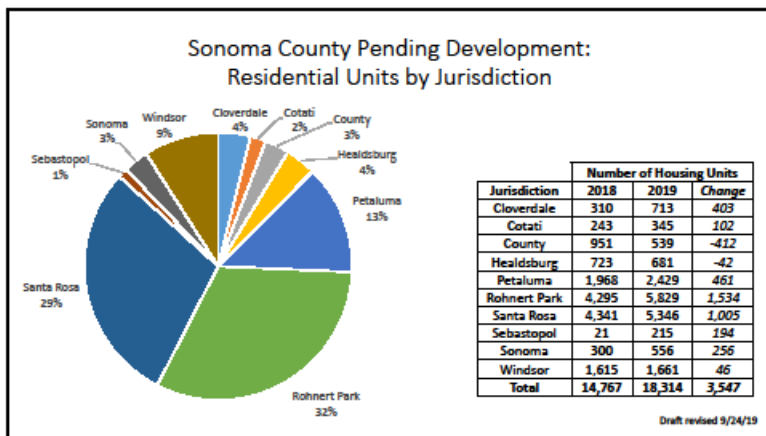
- **County Housing in the Pipeline:** The Sonoma County Transportation Authority estimates that there are currently 18,000 new units of housing in the pipeline in existing cities and towns in the County — not including the rebuild of 5,000 homes lost from the wildfires.² In fact, the number of new homes in the County pipeline jumped by more than 2,000 compared to last year. As per longstanding County and city policies, most of the development is within UGBs and cities. The County alone has about 536 new units in the pipeline. The EIR must disclose the need for the proposed project considering the 18,000 new housing units in the pipeline. See pie charts below.

The Sonoma County Transportation Authority also utilized Urban Footprint and determined that the County could build 30,000 new homes (rebuild and new) within existing UGBs, USAs and PDAs.³ The EIR must take this critical information into account.

² Sonoma County Transportation Authority/Regional Climate Protection Authority Board Meeting Packet, October 14, 2019, 4.3.2. Housing – update on pipeline projects (REPORT)*

³ Sonoma County Transportation Authority/Regional Climate Protection Authority Board Meeting Packet, September 10, 2018, 4.5. SCTA Planning Item 4.5.1. Housing – housing projects in the pipeline and update on housing items (REPORT)*

10/3/2019



108

1

- **Plan Bay Area 2040:** Plan Bay Area 2040 estimates that the County will grow by 30,000 households by 2040, capturing 4 percent of the region's growth. The EIR must take into account these estimates.

Hazards

Hazard Mitigation Plan: The EIR must include a comprehensive analysis of hazards. At a minimum, this must include updated information related to wildfires, floods, and other hazards. The current "County of Sonoma Hazard Mitigation Plan," and the "Public Safety Element of the General Plan" were

adopted before the 2017 wildfires and 2018 floods. The EIR must analyze the proposed project's consistency with the County's "multijurisdictional" update of the County's Hazard Mitigation Plan that is getting underway this year. The EIR must also evaluate the project's consistency with the Hazard Mitigation Plans of the various cities affected by the proposed Project.

Wildfire Mapping: CalFire is updating its maps which will identify wildfire dangers. The CalFire maps are expected to be released this summer. It is imperative that the County include current wildfire mapping, including Santa Rosa's Wildland Urban Interface Map, in the proposed project's EIR. If the CalFire maps are delayed, the County should delay the release of the Project EIR.

SB 743

SB 743 requires that congestion management be balanced with statewide goals intended to reduce greenhouse gas emissions, promote infill development, and improve public health through active transportation (biking and walking). By facilitating decentralized development, the proposed project would appear to contradict the intent of SB 743. The EIR must address the project's consistency with this important legislation. In addition, CEQA Section 15064.3, adopted by the state in December 2018, requires that a project's effect on automobile delay (i.e., level of service) shall not constitute a significant environmental impact under CEQA and that VMT is likely the most appropriate measure of a project's transportation impacts.

Conclusion

We again request that the County defer preparation of the EIR until such time as the public is able to focus on this important project. Given the imminent update of the Housing Element it makes sense to combine this project into the Housing Element Update process. If, however, the County intends to proceed with the proposed project, please provide Greenbelt Alliance notice of all workshops and hearings and the release of the draft EIR.

Thank you for consideration of our views. We look forward to your response.

Sincerely yours,



Teri Shore
Regional Director, North Bay
tshore@greenbelt.org

From: Fred Allebach <fallebach@gmail.com>
Sent: Tuesday, May 5, 2020 6:54 AM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: Public comment on: Rezoning Sites for Housing Project

EXTERNAL

5/4/20

Public comment on:

Rezoning Sites for Housing Project

Comment prepared by the Sonoma Valley Housing Group

Dave Ransom, Ann Colichidas, Ken Brown, David Kendall, Mario Castillo, Ann Wray, Norm Wray
Fred Allebach

Acronyms

AH- in capital letters, deed-restricted Affordable Housing

ah- in small letters, market rate affordable housing (i.e. "by design", very small, bad location, cheaper materials etc.)

USA- urban service area

green checkmate- when NIMBYs block anything at city edges and anything within cities

CEQA- California Environmental Quality Act

EIR- Environmental Impact Report

SSP- Springs Specific Plan

WFH- Workforce Housing combining zone

SVHG- Sonoma Valley Housing Group

CEQA and environmental impacts

The Permit Sonoma **notice to comment immediately goes beyond CEQA environmental issues** and notes the lack of AH, and factors like fire, UGB, and NIMBYism that have contributed to lack of county AH and county housing in general.

General SVHG comment and take home point

We in the County don't have a housing problem, we have an Affordable Housing problem. For building new projects, a program that defaults to a 20% inclusionary ordinance is not enough to address it. We have no CEQA issues with this DEIR. We do have issues with the Plan that this CEQA DEIR is based on.

If this programmatic EIR is really meant to address Affordability issues and to boost deed-restricted AH, and not just build more market rate housing, then the county needs to make this goal stronger and more explicit, with more AH units to include, and not allow loopholes where all the talk ends up as just a 20% inclusion at 80% and 100% AMI.

The whole point of a Workforce Housing combining zone is to serve the AMI workforce, not to disguise 80% market rate projects with only a 20% inclusion.

The County's **Density Bonus Program** looks very good, a by-right, within USA, 100% increase in density for rentals that provide 40% AH for people at 50-60% AMI. This is much better than a

flat 20% inclusion at 80% and 100% AMI only. Too bad the Density Bonus program is optional.

Please figure a way to mandate and/or further incentivize these Density Bonus provisions.

The **WFH combining zone's 20% inclusion**. This percent is too low, and to boot, half of this 20% is for low and the other half for moderate, i.e., 80% and 100% AMI. The real need is 40%-60% AMI and below, given the low wages prevalent in the county's primary service-tourism, hospitality economy, and now the Covid-19 major hit to the AMI workforce's housing burden and ability to pay rent.

When at the WFH section of the Permit Sonoma website, following the links to all the different supporting references and policies, you get to a place where it seems to say that of the **20% inclusion, 15% had to be low and very low, and 10% for very low and extremely low**. There are no details here about what fraction the developer might choose, who chooses, and if they would always choose the highest possible option, i.e. low over very low.

Are there further WFH rules here? If not, then there needs to be. Please look at this and make Permit Sonoma language so there are not so many loopholes for developers to avoid serving the lower AMI cohort.

Take home point for SVHG comments: We're concerned that provision for AH will end up as mostly talk and developers will choose the highest price units overall, and that the programmatic EIR will end up being a ticket for business as usual, market rate housing development that does not adequately serve the AMI workforce. The county has primarily an Affordable Housing problem, not simply a housing problem.

Available Sites in Sonoma Valley

The **8th East industrial area in Sonoma**, north of MacArthur, on city water, is a perfect place for a WFH combining zone. The county needs to flexibly adjust the goal posts here and allow some WFH overlay in this area. Some of the qualifications are just off, very close.

Steve Ledson is involved with the **Son 1-4 Merlo properties**. Ledson is not known for doing any AH projects, only minimum inclusionary as required. Mr. Ledson may not go for the density bonus. It looks like the County process here in Son 1-4 will lead to only a 20% inclusion, at 80% and 100% AMI.

Sonoma school teachers do not make 100% AMI until the very end of their careers. This **Son 1-4** *would not be* the Affordable Housing that is really needed here, just more of a trend to get as high a priced unit as possible.

Son 1-4... what can be done to make sure more than a 20% inclusion at 80-100% AMI gets built here? The regular 20% inclusion at that AMI would be business as usual. Isn't this Permit Sonoma rezoning effort supposed to be breaking new ground to go beyond business as usual?

Agua Caliente potential rezone sites. The **Agu-1 and Agu-2** parcels appear to be right on top of Sonoma and Agua Caliente Creeks, and directly west of the FAHA complex on Verano Ave., not a great location for building... Additionally, with the new Krug hotel and Verano Family Apts. hoping to go in directly to the east on Verano Ave., as part of the Springs Specific Plan, Agu-1 and Agu-2 might be making things a bit busy in this area.

Agu-3 appears to be right next to the El Verano School, on the southeast corner of Craig and Railroad Ave. Hopefully this would be mandatory high density, and all deed-restricted AH, to serve the great Affordable Housing need in this neighborhood.

We support the Glen Ellen rezoning. Glen Ellen can't just be fantasy island out there. People who work there deserve to have an Affordable place in that community. **Yet** if that ends up as only a 20% inclusion, it's weak tea for an EIR that purports to be for Affordable Housing. The need is greater than 20%. A 20%-only inclusion builds in an approximate 30% displacement rate, for AMI workforce people who will be forced out and not able to find AH. This is a production of homelessness pipeline by failure to build enough needed AH.

Hopefully Permit Sonoma can make more cutting edge policy like with the Density Bonus Program. Now with the pandemic meltdown of the economy, we risk an even greater societal division and segregation by housing. The County has to find a way through this current crisis, to serve those who need to be served. This rezoning plan by Permit Sonoma is aspirational and based on an old normal anyway, until we all find out what will happen with the economy.

.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: R.S. <skypilot4u2@yahoo.com>

Sent: Friday, March 13, 2020 1:02 PM

Subject: Notice of Preparation Published for Housing Sites EIR Project

3/13/20

Attn: Mike Thompson, SCWA, et al

Hello Mike, as noted, the County has released a ***Notice of Preparation Published for Housing Sites EIR Project***.

As you know there are several outstanding and unresolved concerns regarding the status of the PSZ (Penngrove Sanitation Zone) and existing collection system capacity constraints, and uncertainty of availability of any extra capacity beyond the existing land use plan and the need to maintain a reserve capacity to allow for failing septic systems.

The need for replacement of collection lines "L" and "P" was identified in the original Penngrove Sanitation Zone sewer capacity study, and the updated study by David Grundman. and this existing collection system capacity constraint condition is also noted in LAFCO's Municipal Services Review.

This was also discussed and evaluated during the County's last General Plan update while looking at suitable housing sites in the PSZ noting the existing capacity constraints and limitations of any extra capacity beyond the existing land use plan and the need to maintain a reserve capacity to allow for failing septic systems.

When we discussed this issue several years ago when PRMD received a development application for the Hatchery Bldg. requesting extra sewer capacity beyond the amounts allocated for the existing land use plan. *(The proposed Hatchery Bldg. project was subsequently withdrawn and canceled.)*

At that time I had requested the preparation of a Master Plan for the PSZ however you noted that the environmental costs for a Master Plan were excessive and that instead we should develop a PSZ outline/worklist, a count of existing hook ups, an estimate of total hook ups needed for the land use plan FULL build out, plus a reserve capacity maintained to allow for failing septic systems in the future. This baseline information is required **before any serious consideration can be given to the idea of having** "any extra excess capacity" for additional unplanned for projects.

PSZ ratepayers are entitled to know if there are any anticipated proposed land use changes being considered that could adversely impact their ability to hook up in the future to the sanitation system they finance.

Please advise.

Thank you, Rick Savel
Penngrove Area Plan advisory Committee

PO Box 227
Penngrove, CA 94951
415-479-4466
skypilot4u2@yahoo.com

On Mar 17, 2020, at 3:58 PM, Teri Shore <tshore@greenbelt.org> wrote:

Dear Permit Sonoma and County Counsel,

Greenbelt Alliance requests that Permit Sonoma extend the deadline for comments on the EIR Scoping for the Housing Rezone and to reschedule the April 2 public meeting to at least a month out due to the Coronavirus quarantines and office closures.

In addition, the City Councils that I've recently contacted about this action were unaware that the county is planning to rezone lands for by-right housing inside their voter approved Urban Growth Boundaries and Spheres of Influence, pending the results of the EIR.

An extension of the deadline and rescheduling of the EIR scoping would provide the affected cities and unincorporated communities to review and make comment.

Greenbelt Alliance is very concerned that the housing rezone initiative and associated EIR action violates the voter-approved Urban Growth Boundaries in Petaluma, Santa Rosa and the city of Sonoma. These sites are also within each city's Sphere of Influence and covered by their General Plans and zoning codes.

Other sites are in unincorporated Urban Service Areas, where we have less concern but remains questionable given that the county General Plan and Housing Element is not built out; and the new RHNA numbers have not been issued. The county is meeting current RHNA. The population in the county is decreasing.

We plan to provide more detailed comments and an extension as requested would allow us to do due diligence and outreach to provide the best input.

Thank you,

Teri Shore

--

Teri Shore
Regional Director, North Bay

Greenbelt Alliance
555 Fifth Street, Suite 300 A | Santa Rosa, CA 95401

1 (707) 575-3661 office | 1 (707) 934-7081 cell |
tshore@greenbelt.org<<mailto:tshore@greenbelt.org>>
[greenbelt.org](http://www.greenbelt.org/)<<http://www.greenbelt.org/>> | Facebook<<http://www.facebook.com/pages/San-Francisco-CA/Greenbelt-Alliance/63088415063>> |
Twitter<<http://www.twitter.com/gbeltalliance>>

From: Alice Horowitz <oneallicat@gmail.com>

Sent: Tuesday, May 5, 2020 4:34 PM

To: HousingSites <HousingSites@sonoma-county.org>

Cc: Nina Bellucci <Nina.Bellucci@sonoma-county.org>

Subject: Re: County "Rezoning Sites for Housing Project" EIR Scoping Comments - inclusion of 2 Glen Ellen parcels (GE-1 and GE-2) - Marty Winters property

EXTERNAL

Alice Horowitz, Ph.D

Sanford Horowitz, Esq.

P.O. Box 1045

Glen Ellen, CA 9542

707-939-8919, oneallicat@comcast.net

May 5, 2020

Tennis Wick, Director

Nina Bellucci, Planner

Permit Sonoma

2550 Ventura Avenue,

Santa Rosa, California 95403

Via EMAIL

Re: 1) Rezoning Sites for Housing Project EIR Scope, regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084

Dear Director Wick and Ms. Bellucci,

We are writing to voice our concerns about the unfortunate timing of the EIR scope for the Sonoma County proposed housing rezoning, specifically regarding the two properties referenced above owned by Mr. Marty Winters and located on the corner of Carquinez and Arnold Drive in the heart of downtown Glen Ellen. As many others in our community have already expressed, we are shocked that Permit Sonoma should move forward with this EIR scope given the fact that the entire community is locked down in order to better fight the coronavirus global pandemic. People are stressed, distracted, and overwhelmed just trying to make it through the day with little time or energy to focus on land use issues. While we appreciate the critical need for housing, moving ahead with the EIR scope at this time displays a severe lack of regard for those of us who have grave concerns about maintaining our voter-approved Urban Growth Boundaries, updating the General Plan, future development of the Sonoma Developmental Center (which by mandate must include housing), etc. **In light of the unprecedented health crisis affecting the entire globe, we respectfully request that the County postpone the proposed EIR scope.**

More specifically, as 26-year-residents of downtown Glen Ellen, we request that parcels # 054-290-057 and # 054-290-084 be removed from the EIR scope altogether. We have no objection to Mr. Winters moving forward with improving his properties (they certainly are in great need of improvement), but to rezone these parcels and add 13 or more units in the middle of our downtown core (all two blocks of it) will generate

untold negative consequences in terms of traffic circulation, particularly in light of future development of the SDC, which by state mandate must include housing. The Glen Ellen community has repeatedly weighed in to oppose Mr. Winters' proposed "Rustic Shops and Apartments." Only last September he was instructed by PRMD to consult with the community in search of a more acceptable design, but to our knowledge (and we are well informed when it comes to Glen Ellen), he has yet to do so. Although Mr. Winters owns numerous properties in downtown Glen Ellen and, consequently, has ties to the community, as a resident of Marin County, we believe he does not fully appreciate 1) the extent to which the people of Glen Ellen care about preserving the historical character of our town; and 2) the extent to which his project as currently proposed could generate negative impacts, not the least of which would be opening the door to rezoning other downtown properties.

In closing, any EIR for rezoning sites for housing projects throughout Sonoma Valley must be undertaken as part of a strategic and comprehensive land use planning exercise and not as a stand-alone project in response to random requests from property owners and developers. To move forward while the specific plan for the SDC is just beginning to take shape is wholly unconscionable. We can and should do much better.

Respectfully,

Alice Horowitz, Ph.D

Sanford Horowitz, Esq.

From: Arthur Dawson <baseline@vom.com>

Sent: Wednesday, May 6, 2020 3:39 PM

To: HousingSites <HousingSites@sonoma-county.org>

Subject: Comments on Sonoma County "Rezoning Sites for Housing Project" EIR Scope

EXTERNAL

Also attached

DELIVERED VIA EMAIL

Please distribute copies of this letter to all concerned County staff members.

RE: Comments on Sonoma County "Rezoning Sites for Housing Project" EIR Scope, regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GE-1 and GE-2)

Dear PRMD Staff,

As a thirty-year resident and owner of a historical consulting business in Glen Ellen, I am in agreement with the points and conclusions made by Vicki Hill, MPA in her May 4 letter to you.

Issues relating to development of this site have been raised during two public hearings in the last four years. In an April 5, 2016 letter to the Joint Design Review Committee & Landmarks Commission (attached to email), I detailed the sensitivity of this site for development. Fronting along a significant portion of Glen Ellen's main thoroughfare, development on these parcels has the potential to either enhance or appreciably erode the character of our small down.

The current rezoning proposal only increases my concerns about the future of this site. Three contributing structures to the Glen Ellen Historic District (Painter 2013) occupy the property. Zoning these parcels for higher density risks compromising the integrity of the Glen Ellen Historic District. As one example, the building currently occupied by Talisman Winery on the southeast corner of Carquinez and Arnold Drive, was constructed in about 1895 and appears to be the oldest commercial structure in downtown Glen Ellen.

I share other concerns voiced by Vicki Hill about this rezoning proposal, including: 1) the scoping process, timing, and lack of notice; 2) lack of consideration of previous comments submitted regarding this property; 3) inappropriateness of including these parcels given other housing being developed nearby and to be included in the SDC Specific Plan; 4) inadequate definition of the County's proposed rezone project for purposes of CEQA; and 5) serious environmental impacts.

In my professional opinion, rezoning these two parcels to a potential high-density zone district is out of scale and has the potential to result in significant adverse impacts on the character of Glen Ellen and the integrity of the Glen Ellen Historic District.

I hereby request that the County remove the two Glen Ellen parcels from rezoning consideration, given potential environmental effects, other housing being developed, and the large amount of housing that will be included in the SDC Specific Plan less than a mile away.

Sincerely,

Arthur Dawson

Arthur Dawson

BASELINE CONSULTING

P.O. Box 207

13750 Arnold Drive, Suite 3

Glen Ellen, CA 95442

(707) 996-9967

(707) 509-9427 (c)

www.baselineconsult.com

CITED: Painter, Diana. 2013. 'Assessment of Historic Resources for the Community of Glen Ellen.'



May 6, 2020

DELIVERED VIA EMAIL

Please distribute copies of this letter to all concerned County staff members.

RE: Comments on Sonoma County "Rezoning Sites for Housing Project" EIR Scope, regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GE-1 and GE-2)

Dear PRMD Staff,

As a thirty-year resident and owner of a historical consulting business in Glen Ellen, I am in agreement with the points and conclusions made by Vicki Hill, MPA in her May 4 letter to you.

Issues relating to development of this site have been raised during two public hearings in the last four years. In an April 5, 2016 letter to the Joint Design Review Committee & Landmarks Commission (attached to email), I detailed the sensitivity of this site for development. Fronting along a significant portion of Glen Ellen's main thoroughfare, development on these parcels has the potential to either enhance or appreciably erode the character of our small down.

The current rezoning proposal only increases my concerns about the future of this site. Three contributing structures to the Glen Ellen Historic District (Painter 2013) occupy the property. Zoning these parcels for higher density risks compromising the integrity of the Glen Ellen Historic District. As one example, the building currently occupied by Talisman Winery on the southeast corner of Carquinez and Arnold Drive, was constructed in about 1895 and appears to be the oldest commercial structure in downtown Glen Ellen.

I share other concerns voiced by Vicki Hill about this rezoning proposal, including: 1) the scoping process, timing, and lack of notice; 2) lack of consideration of previous comments submitted regarding this property; 3) inappropriateness of including these parcels given other housing being developed nearby and to be included in the SDC Specific Plan; 4) inadequate definition of the County's proposed rezone project for purposes of CEQA; and 5) serious environmental impacts.

In my professional opinion, rezoning these two parcels to a potential high-density zone district is out of scale and has the potential to result in significant adverse impacts on the character of Glen Ellen and the integrity of the Glen Ellen Historic District.

I hereby request that the County remove the two Glen Ellen parcels from rezoning consideration, given potential environmental effects, other housing being developed, and the large amount of housing that will be included in the SDC Specific Plan less than a mile away.

Sincerely,

Arthur Dawson
Historical Consultant
Baseline Consulting
Glen Ellen, California

CITED: Painter, Diana. 2013. 'Assessment of Historic Resources for the Community of Glen Ellen.'



P.O. Box 207, 13750 Arnold Drive, Suite 3, Glen Ellen, CA 95442
(707) 996-9967 • baseline@vom.com

Sonoma County Joint Design Review Committee
& Landmarks Commission
Sonoma County Permit and Resource Management Department
2550 Ventura Ave
Santa Rosa, CA 95403

April 5, 2016

Dear Joint Design Review Committee & Landmarks Commission,

I would like to express several concerns about the Gibson Corner Project (DRH 16-0001) as it is currently being proposed. While I commend the developer for including ten housing units in the plan, which are in short supply in Glen Ellen, I am concerned that the project is:

- **Out of proportion** and incompatible with the character of Glen Ellen's downtown neighborhood;
- **Significantly compromises the integrity of the Glen Ellen Historic District** by demolishing three contributors to the District and the settings of two others (this is about 15% of all District contributors);
- **Lacks harmony of design** with nearby buildings.

I believe these concerns are supported by the following sections of the Applicable Standards and Guidelines identified in the Staff Report on the project:

Zoning Code Design Review Standards (26-82-030)

- *The design of buildings, fences and other structures shall be evaluated on the basis of harmony with site characteristics and nearby buildings, including historic structures, in regard to height, texture, color, roof characteristics and setback*

Height: Proposed buildings are 34.5' high at the roof peak. The tallest nearby buildings, including contributors to the Historic District, are 20' high or less. Marshall's Body Shop is about 20' high. The historic building which currently houses the Talisman Tasting Room is less than 20' at the roof peak. This same building is only 8' high at the eaves on the side closest the proposed Building #2. The separation between these two buildings is only 8' and Building #2 is over 20' high at the eaves. The Garden Court Café building, across Carquinez Avenue from Talisman, is less than 20' high at the eaves and has a much lower-angled roof. Its roof peak is nearly invisible from the street and is about 25' high.

Glen Ellen Design Guidelines Subarea 1

- *A1 Ensure that the size, scale and intensity of all development are consistent with the character of Glen Ellen*

As mentioned above, the size and scale of this project is out of proportion and incompatible with the character of the neighborhood. If built as proposed, this would be

the most significant change to downtown Glen Ellen in at least 25 years, and arguably since 1906 when the three-story Chauvet Hotel was built (when the Glen Ellen Village Market was constructed in 1992, no historic structures were demolished. A comparison of its footprint with the proposed project has not been made)

- *5. Maintain the various architectural styles and the mix of commercial and residential uses characteristic of the town center.*

The architectural style as proposed does not match or echo existing styles in the town center. The pillars on Buildings #1 and #2 are out of character for the neighborhood.

- *D.2. Continue to use the established patterns of physical development such as lot widths, setbacks, massing, relationship to the street, auxiliary structures, etc.*

As mentioned above the massing of this project is incompatible with the town center. In addition, the 8' separation with the Talisman Tasting Room less than the separation of most other individual buildings in town. The separation between the Chauvet Hotel and the Poppe Building is about 16'.

- *D.3. Site and mass buildings in a manner which acknowledges and accentuates Glen Ellen's topographic features.*

Buildings #1 and #2 are large enough to change the perception of a rising hill behind them.

- *D.5. Provide a subtle, understated visual sense of arrival to the town and the town center.*

This project is neither subtle nor understated in relation to the surrounding town center.

- *D.6. Preserve and enhance important historic places, structures and artifacts.*

This project will significantly impact the integrity of the Glen Ellen Historic District by removing three contributing buildings and changing the setting for two others (Marshall's and Talisman).

My concerns under *Land Use Policies 5* and *Circulation Policies* basically reiterate the above.

- *Open Space and Natural Resource Policies*

8. Encourage public open space areas in the design of projects in or near the town center.

Glen Ellen is lacking in these types of areas. A small bench or two accessible to the public from the sidewalk would be welcome (see *Public Amenities Policies*)

- *Elevations Policies*

1. ...avoid monotony of design.

The design as proposed is quite monotonous and has little or no visual interest or obvious connection to the buildings nearby.

2. The height of new structures in the town center should not exceed two stories above street level.

While this project is described as two-stories, the height of the roof peaks along Arnold Drive are 34.5' high. This is typically the height of a three-story building.

- *Historical Preservation Policies*

2. Building features...reminiscent of Glen Ellen's past should be retained where possible.

See previous comments with respect to impacts to the Historic District

- *Building Design*

Architectural creativity and diversity that is compatible with the surrounding neighborhood is encouraged. Visual interest should be provided...

The design as proposed is quite monotonous and has little or no visual interest or obvious connection to the buildings nearby.

Building design should reflect a human scale where appropriate. Larger projects will generally require greater setbacks and architectural treatment to reduce the mass and scale of the building.

Buildings #1 and #2 would be the second tallest buildings in Glen Ellen after the Chauvet Hotel (which is about 42' high). The façade of the Glen Ellen Village Market along Arnold is about 24' high, which meets the two-story guideline and reflects a 'human scale.'

I would like to offer the following general suggestions to bring the project more in line with the character of downtown Glen Ellen and the 'Applicable Standards and Guidelines' identified by staff:

- Preserve at least two of the four contributors to the Historic District. Besides the Talisman Tasting Room building, the highest priority should be 987 Carquinez. This residence was constructed between 1911 and 1916 (Sanborn maps), which was during Jack London's time here. It was known as the 'Elmer Bass House' in the 1920s. It is one of the oldest residences in downtown Glen Ellen (see Painter 2013. Bass worked for the railroad, first as the fireman and then as the baggage man: "At every station where the train stopped, he'd open the baggage door . . . and he'd have his striped overalls on and be wearing his six- shooter. ... Money came one way-by train; so the baggage man had to be armed." from *Childhood Memories of Glen Ellen*)
- Lower the roof peaks to a maximum of 24', in keeping with the 'two-story' guideline.
- Consider a design for the mixed-use buildings which echoes the nearby Garden Court building which is also mixed use. Combining Buildings #1 and #2 into a single building with one and two-story sections would accomplish this.

- Create a more substantial separation between the project and the Talisman Tasting Room building.
- Provide more visual interest and harmony with surrounding buildings. Reduce the large areas of 'blank' walls.
- Increase setbacks, especially at the corners nearest the street.
- Consider running the roof ridgeline parallel with the street.
- Provide a small public area with a bench, plantings and possibly a fountain.
- Ensure that any residential rental units be earmarked for local residents, not for short-term tourist rentals.
- Remove pillars as a design element facing Arnold Drive

Thank you for your time and consideration. Please note the attachments showing the relationship of proposed Building #2 with the Talisman Tasting Room Building and a photo of the Garden Court Café Building, a mixed-use building one block away.

Sincerely,

Arthur Dawson

Arthur Dawson
Historical Consultant
Baseline Consulting
Glen Ellen, California

SOURCES CITED:

Glotsbach, Robert. 2000. *Childhood Memories of Glen Ellen*.
Painter, Diana. 2013. 'Assessment of Historic Resources for the Community of Glen Ellen.'
Sanborn Map Company. 1911 & 1916. 'Glen Ellen, California' insurance map.



BUILDING #2, placed as proposed

GARDEN COURT CAFÉ BUILDING, about 20' high at the eaves and 67' of frontage on Arnold.



Vicki A. Hill, MPA
Environmental Planning

3028 Warm Springs Road
Glen Ellen, CA 95442
(707) 935-9496
Email: vicki_hill@comcast.net

May 4, 2020

DELIVERED VIA EMAIL

Please distribute copies of this letter to all concerned County staff members.

RE: Comments on Sonoma County “Rezoning Sites for Housing Project” EIR Scope, regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GE-1 and GE-2)

Dear PRMD Staff:

This letter contains extensive comments regarding the EIR scope for the Sonoma County proposed Rezoning Sites for Housing Project, specifically regarding the two properties in Glen Ellen at the corner of Carquinez and Arnold Drive (parcels GE-1 and GE-2 on the County rezone map). My comments include: 1) concerns about the scoping process, timing, and lack of notice, especially during this pandemic; 2) lack of consideration of previous comments submitted regarding this property; 3) inappropriateness of including these parcels given other housing being developed nearby and to be included in the SDC Specific Plan; 4) inadequate definition of the County’s proposed rezone project for purposes of CEQA; and 5) serious environmental impacts.

In my professional opinion, the proposal for these two parcels in Glen Ellen involves **inappropriate and precedent-setting rezoning to a potential high-density zone district, which is out of scale and has the potential to result in significant adverse impacts on the small village of Glen Ellen.**

Based on previous comments and comments presented below, I hereby request that the County remove the two Glen Ellen parcels from rezoning consideration, given potential environmental effects, other housing being developed, and the large amount of housing that will be included in the SDC Specific Plan less than a mile away.

1. Lack of Community Notice

The NOP was issued at the beginning of the current pandemic and has not received the proper amount of notice or community attention for the substantial change that it represents for our village. **Given the current shelter in place order and associated stress and conditions, this proposal should be delayed for the time being.** As a professional land use planner/CEQA specialist and local resident who submitted comments on previous proposals for this particular property, I consider myself reasonably

informed. However, I just learned in the May 1 issue of the Kenwood Press that these two parcels have been included in the County's rezoning proposal. I am concerned about how many other people are unaware of this proposal and therefore have not submitted scoping comments to the County. Dozens of comment letters were submitted regarding the property owner's (Marty Winters) previous submittals (i.e., WH rezoning application in 2019; application considered by SVCAC in March 2019), including letters to the County Design Review Committee (DRC) in September 2019. Many of the public comments expressed concerns about increasing residential density on this site. The DRC rejected the proposal and directed the applicant to work with the community to reduce the mass and scale, something that has not been done. **The community believed the rezoning project was on hold.** There was no notice to the Glen Ellen Forum or members of the public who previously submitted comments that the County was taking on the rezone proposal itself, as part of the Countywide housing rezoning project.

2. Lack of Consideration of Previous Comments

Over the past several years, the property owner has attempted to redevelop his property at a higher density than is currently allowed. Dozens of community members submitted comments opposing the increased density on the site, referencing serious environmental concerns. It does not appear that these previous comments were considered when the County chose to include these parcels in the rezoning proposal. Please include as scoping comments all previous comments (attached to my email sending this letter), as well as comments made to the SVCAC in March 2019 regarding this property.

While this proposal may appear nonthreatening to those who are unfamiliar with Glen Ellen, the rezone site represents a large part of the downtown core (which is only two blocks long) and will dramatically change the character of our village. As a planner, it is disheartening to see a proposal that is **clearly inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.** With the devastating loss of established neighborhoods during the 2017 fires, it is more important than ever to not overtax our rural infrastructure and to protect the quaint, small town feel that the community values so much.

Both the County Design Review Committee and the SVCAC rejected the applicant's proposal and directed the applicant to adhere to the Glen Ellen Guidelines and work with the community to address concerns about his proposal. Yet, it appears that the County is now advancing a rezone proposal in line with his project. I understand that the County will not evaluate specific site designs as part of this Program EIR, but it is not understandable why the County would pursue rezoning this developed site in light of valid concerns expressed by the community.

3. Inappropriateness of Including These Parcels Given Other Housing Sites

Our small community is being faced with a substantial amount of new housing, as a result of the current Sonoma Developmental Center (SDC) Specific Plan process (housing is mandated there by the State legislation) and as a result of the increased density currently being developed across the street at 13647 Arnold Drive (6 new residential units). It does not make good land use planning sense to force additional housing when it is clear that Glen Ellen is already undergoing a disproportionate amount of housing development and lacks adequate infrastructure and services for higher density housing.

4. Inadequate Definition of Proposed Project for Purposes of CEQA

The County FAQ sheet regarding the rezoning proposal states the following answer to this question: What will the new zoning for my property be?

“Potential proposed zoning designations for each parcel will be determined as part of the environmental review process is near complete. Possible zoning designations will be R2 Medium Density Residential or R3 High Density Residential, or the WH Workforce Housing or AH Affordable Housing combining zones.”

I question the adequacy of not defining proposed zoning during the scoping phase. There must be a proposed project with specified zone district(s) (rather than a variety of potential zones). How else can the EIR be scoped and impacts be assessed? The public cannot make meaningful comments on the EIR scope without knowing which of these zone districts are proposed for a particular site. R2 is very different from R3 or WH zoning. Is the environmental analysis going to consider the worst case, highest density zoning for each site? How will this be decided? This information is crucial to make scoping comments.

5. Potential Environmental Effects that must be considered in the EIR

In addition to the issues explained above, there are numerous land use and environmental concerns associated with this proposal, as summarized below. Given the potential for significant impacts in regard to substantial density increase, growth-inducement, land use compatibility, visual effects, drainage, tree removal, traffic issues, and cumulative effects, new studies (not the property owner's studies) in all these issue areas should be required and impacts fully disclosed in the EIR.

Workforce Housing (WH) Combining Zone Concerns: The potentially proposed Workforce Housing Combining Zone is particularly problematic and could set a significant growth-inducing precedent for future projects in downtown Glen Ellen. The parcels DO NOT meet the criteria for application of the Workforce Housing (WH) Combining Zone and should not be considered for such designation.

The stated purpose of the WH zone is: “to increase housing opportunities for Sonoma County's local workforce in areas that are close to employment and transit.” Glen Ellen is not a substantial

employment center, nor does it provide adequate transit to employment centers. The regulation states that “The WH Combining Zone can be applied to properties within an urban service area that are also within 3,000 feet of a transit center, or to an employment node with at least three acres of commercial zoning or 10 acres of industrial zoning.” There is no transit center in Glen Ellen and very little commercial zoning so this zone district is inappropriate.

The WH Combining Zone allows a density of 16 to 24 dwelling units per acre, with additional density allowed under the County’s density bonus programs for affordable units. Furthermore, the regulation **requires a minimum density of 16 units per acre** as stated in the ordinance. There is no option to provide less than 16 units per acre. This high density zone is completely out of scale with existing housing density and existing zoning. There is no place in downtown Glen Ellen where housing density is remotely close to this density. This combining zone is appropriate for urban areas, not rural villages. While the community supports housing in Glen Ellen, the amount of housing that would be allowed to be concentrated on these small parcels is completely out of character with surrounding land uses and would not be supported by appropriate infrastructure (roads, parking, services, transit, etc.). Furthermore, it is likely that other downtown parcels would seek the WH zone to increase density far beyond existing allowed levels.

The zoning, if applied to the two Glen Ellen parcels (totaling .85 acre), could result in 20 units on the site, or more, if a density bonus granted. This would be a dramatic change from the existing 4 residential units on the project site.

The WH ordinance also requires that:

“(d) The proposed rezoning is consistent with the overall goals, objectives, policies, and programs of the General Plan and any applicable Area or Specific Plans as amended from time to time.”

This zone district is not consistent with the General Plan provisions for Glen Ellen. Sonoma County General Plan Policy 20i requires that new uses in the Glen Ellen area meet the following criteria:

- The size, scale, and intensity of the use is consistent and compatible with the character of the local community,
- Capacities of public services are adequate to accommodate the use and maintain an acceptable level of service,
- Design and siting are compatible with the scenic qualities and local area development guidelines of the local area.

There are clear inconsistencies with bullets 1 and 3 above, as the high density zone district is not compatible with the local community, nor is it compatible with the scenic qualities or local development guidelines.

The County staff report on the previous rezoning proposal states that: “the WH Combining Zone would allow residential development of 16-24 units per acre **in addition** to the uses allowed by the base zoning district.” This would further exacerbate impacts on the downtown area.

Land Use Compatibility and Historic Value: Although housing is important for Glen Ellen, the bottom line is that the potential magnitude of the rezoning on these sites simply doesn’t “fit in.” Land use compatibility is a critical issue yet it is often overlooked. Uses that are developed at densities and intensities greater than surrounding uses have the potential to become a focal point and erode the existing land use character of the small downtown area. It is undeniable that increased density will have adverse land use and quality of life impacts on Glen Ellen and its residents. Furthermore, the historic value of the existing structures should be evaluated.

Aesthetic Impacts and Community Character: An independent and thorough analysis of visual and aesthetic impacts by experienced professionals is necessary to inform decision makers regarding how increased density may appear on this site. What building heights will be analyzed? When a previous proposal was submitted for the site, it was clear that the increased density would result in little open space or landscaping to soften the buildings’ appearance. **The large mass structures required to accommodate increased density on this highly visible site (and within the Scenic Resources zone) will degrade the visual qualities of the area.**

The density will not be consistent with Glen Ellen policies regarding design and massing. For example, Sonoma County General Plan Policy 20i requires that new uses in the Glen Ellen area meet criteria noted above (see discussion under Workforce Housing). Clearly, the proposed rezone is not consistent with bullets 1 and 3. The Glen Ellen Development and Design Guidelines are intended to ensure that the size and scale of new development is compatible with the existing local land uses. Higher density development, by definition, will not be compatible with downtown Glen Ellen.

Traffic, Circulation, and Parking: Traffic impacts need to be assessed through an independent thorough traffic analysis. Observation and common sense indicate that there are valid circulation, parking, and line of sight concerns associated with increased density. The Carquinez/Arnold Drive intersection is in an awkward location, just a block down from the stop sign at Arnold and Warm Springs. Directing traffic to Carquinez to access the site (and potential parking area) will create many more left turns onto Carquinez from Arnold Drive. The amount of parking that will be required to meet the requirements for the higher density will generate on- and offsite circulation problems. The site does not provide adequate turning/maneuver space for the two way traffic that will be using it. Adjacent properties will be subject to substantial impacts from traffic. Also, future residents will likely park on Arnold Drive, thus creating competition for onstreet parking. Another potential impact is that community residents will increase use of the unpaved Railroad Street to avoid negotiating the Arnold Drive/Carquinez intersection. This rural road is already impacted by the redevelopment across the street, which is increasing residential density.

Tree Removal and Landscaping: Because of the large building footprint that would be required to meet increased density, most mature trees will be removed from the project sites, including removal of an ancient redwood tree and heritage oak trees. There will be nothing left to screen or at least soften the appearance of large unattractive buildings. The stark appearance will significantly detract from Glen Ellen's visual qualities. Given the large number of trees lost during the 2017 fires, every attempt to preserve existing mature vegetation should be made. Further analysis of property owner claims that trees (e.g. the redwood) must be removed due health conditions should be investigated.

Site Drainage and Containment: How would onsite drainage be handled, particularly given all the new impervious surfaces required for higher density housing? Significant drainage impacts could occur, given the lack of large capacity drainage systems and proximity to the junction of Sonoma and Calabazas Creeks.

Cumulative and Precedent-Setting Effects: While impacts in issues like traffic, circulation, visual, and land use may not be individually significant, when combined together they result in substantial impacts, especially within our two-block town. These aggregate effects can cause the demise of local land use character and quality of life. For example, the existing Accessory Dwelling Unit (ADU) ordinance allows second units on single-family parcels, in effect doubling the density in single family zones in Glen Ellen. Furthermore, there is a development across the street from the proposed rezone site that is adding residential units and increasing density within the same block. Also, there are several parcels, including property on Carquinez, which may soon transfer ownership and will likely undergo redevelopment. If the WH zone district or other high density district is approved, it will become an attractive tool for developers wishing to substantially increase density. Finally, development allowed under the upcoming SDC Specific Plan must be considered in the cumulative impact analysis.

Conclusion

The County's proposed rezoning is a significant project for downtown Glen Ellen and will permanently change the town's character and will set precedent for future development.

Please delete these two parcels from further consideration in the County's rezoning proposal to ensure impacts on our small town are avoided. These sites are not appropriate and not needed to meet the County's housing requirements.

Regards,



Vicki A. Hill, MPA

Environmental Planning Consultant

From: Christine Cunha <clcunha@msn.com>

Sent: Wednesday, May 13, 2020 8:30 AM

To: HousingSites <HousingSites@sonoma-county.org>

Subject: Notice for Preparation for housing rezoning issued in March

EXTERNAL

Hello,

I am a resident of Glen Ellen who is among the many people who hope the properties in my town owned by Marty Winters will not be rezoned for high density housing.

My parents bought the home I now live in in 1953. I was 5. I have seen so many changes in Glen Ellen over the years, but the charming, small town character has always remained. Thankfully.

Building high density housing will change our darling town completely. Please do not rezone the parcels owned by Mr. Winters. Thank you.

Sincerely,

Christine Cunha

7920 Sonoma Mt. Rd.

Glen Ellen

Sent from my iPad

From: Dan Baumgartner
Sent: Wednesday, May 6, 2020 7:55 AM
To: HousingSites
Subject: Comment on Rezoning Sites for Housing Project

EXTERNAL

May 4, 2020

To: County of Sonoma

Permit & Resource Management Department

Dear Permit Sonoma-

We are in receipt of your letter of April 15, 2020 and the accompanying list of potential sites for rezoning for housing projects in Sonoma County. Our church is potentially impacted by three

of the sites listed. LAR-2 (039-040-040) and LAR-6 (039-040-035) adjoin our property, as far as we can tell from the map. We would be supportive of these sites being additional and hopefully affordable housing.

Our concern is the listing of LAR-1 (039-320-051). We have no idea how our property came to be listed as a housing possibility. We are a fairly young church, and specifically bought this existing building and accompanying large open lot so that we would have room to expand as the church grew. We stretched ourselves financially to purchase this exact property, rejecting another possible site for the very reason that there was no possibility of future growth. We have made good connections in the local community, hosting many homeowner, fire response, mental health and other community meetings. It remains in our hopes and plans that The Cove will continue to flourish, and we have every intention of expanding our facility in this location.

For these reasons, we respectfully request that our property be removed from the list of potential sites. Please contact us if there are questions we can answer. We would request that you inform us as soon as possible with your response.

Thanks so much,

Pastor Dan Baumgartner Janver Holly, Elder & Facilities Chair

*Pastor Dan Baumgartner
The Cove Fellowship
5146 Old Redwood Highway
Santa Rosa, CA 95403
707-526-7711*

From: Deb Pool <debjimpool@gmail.com>
Sent: Wednesday, May 6, 2020 6:57 PM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: Winters Project EIRScope2020

EXTERNAL

Good Morning Nina,

Attached is a letter from Rory & I concerning the Winters Project in Glen Ellen and the “Rezoning Sites for Housing Project” EIR Scope.

Thank you,

Deb Pool
13588 Railroad Ave
Glen Ellen

May 5th, 2020

From: Deb & Rory Pool
13588 Railroad Avenue
Glen Ellen, CA 95442
debjmpool@gmail.com

Re: Comments on Sonoma County "Rezoning Sites for Housing Project" EIR Scope, regarding Glen Ellen parcels, #054-290-057 and # 054-290-084

To the PRMD Staff:

We have lived on Railroad Avenue since 1975. This letter is regarding the EIR scope for the Sonoma County proposed housing rezoning, specifically regarding the two properties noted above at the corner of Carquinez and Arnold Drive.

Our concerns are:

- About the scoping process, the lack of notice, and timing, especially during this pandemic. (We just read about it in the Kenwood Press. And the timing...the 2017 Fire, the PG&E shutoffs)
- There is lack of consideration for the previous comments that have been submitted about this property. The last review the SVCAC & County Design Review Board rejected the applicant's plans due to incompatibility with Downtown Glen Ellen. Comments were sent in about concerns for the density of the project, about environmental concerns.
- The inappropriateness of creating a high-density housing area in downtown Glen Ellen of such a large scale (16-20 units approx.) when the surrounding area does not reflect this same design. This is a rural area. AND directly across Carquinez from this site there is presently a new development with high density work force housing that will create 8 units. (Steven Sorkin's project)
- Environmentally, the removal of 32 out of 39 trees for this project is huge.
- Traffic and road conditions specifically pertaining to Carquinez Ave & Railroad Ave. The infrastructure is missing. Railroad Avenue, which intersects with Carquinez, is a dirt single lane county road, maintained by resident volunteers. It is full of pot holes in winter and in the summer is a dusty road. More traffic due to difficulties on Carquinez, is a likely outcome following the Winter project and the Sorkin Project. Railroad Avenue will become a more attractive alternate for heading toward Highway 12.

The definition of workforce housing is “to increase housing opportunities for Sonoma County’s local workforce in areas that are close to employment and transit”. Glen Ellen is not a substantial employment center, and it has one bus that passes through going east & west throughout the day which doesn’t provide adequate transit to employment destinations.

The downtown of Glen Ellen is about two blocks. This project’s property is a main section of those two blocks. The scale and massive coverage of the proposed high density zoning plus the removal of the majority of the trees is going to transform our town to an unfamiliar landscape that is not going to reflect the true nature of our town. It does not follow the guidelines of the General Plan.

Please remove these two parcels from further consideration in the County’s rezoning proposal. These sites are not needed and are not appropriate to meet the County’s housing requirements.

Thank you for this opportunity to comment.

Sincerely,

Deb & Rory Pool

From: Erik Hansen <EHansen@coffeeholding.com>
Sent: Tuesday, May 5, 2020 9:05 AM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: GLE1, GLE2 Opposition to ReZone

EXTERNAL

I am writing to express my opposition to the proposed rezoning of this site in Glen Ellen and request that these two parcels be removed from consideration. These sites in the center of the village are inappropriate for increased housing density due to the lack of infrastructure, roadways, and public services and are inconsistent with the semi-rural character of the village. Basic services such as water are already strained and unable to provide service to EXISTING housing in the district. This is NOT an urban site and would create an inappropriate precedent-setting rezoning that would result in adverse impacts to the character and culture of the village and is in direct conflict with the guidelines for the village of G.E. While I understand and support the need for additional housing, more appropriate locations should be considered such as Santa Rosa, Aqua Caliente/Boyes Hot Springs and possibly even the SDC if support services were also included.

Erik Hansen
12405 Flicker Hill Road, Glen Ellen, Ca. 95442
415-786-2149

Public Comment on Rezoning Sites for Housing Project EIR

Fred Allebach 707-935-3514 fallebach@gmail.com 3/23/20

Acronyms

AH- in capital letters, deed-restricted Affordable Housing

ah- in small letters, market rate affordable housing (i.e. "by design", very small, bad location, cheaper materials etc.)

USA- urban service area

green checkmate- when NIMBYs block anything at city edges and anything within cities

CEQA- California Environmental Quality Act

EIR- Environmental Impact Report

SSP- Springs Specific Plan

WFH- Workforce Housing combining zone

I know this is a **CEQA process** is about environmental impacts only, but it is well known that once the CEQA hurdle is made, it is green lights for whatever development may come afterwards. This is why many use CEQA stalling tactics and may fight this programmatic EIR, to frustrate the process and make it costlier for the developer or lead agency. Everyone knows if an EIR passes, that is the critical first step of project approval.

The Permit Sonoma **notice to comment, however, goes beyond environmental issues** and notes the lack of AH, and factors like fire, UGB and green checkmate NIMBYism that have contributed to lack of county AH and county housing in general. IMHO, we don't have a housing problem, we have an Affordable Housing problem, and the 20% inclusion is not enough to address it.

In general I am **for programmatic EIR rezoning for all the sites in the county**. I see no serious environmental impacts to worry about. If environmental resources and impacts do become an issue, I suggest that rather than having existing stakeholders exclude new Affordable Housing uses, that existing stakeholders can all make do with less so as to accommodate the county workforce. People can sacrifice for AH, there is less reason to sacrifice for market rate because no AMI-spectrum workforce people can afford it.

If this programmatic EIR is really meant to boost deed-restricted AH, then the county needs to make this goal stronger, more explicit, and with more AH units to include, and not allow loopholes where all the talk just ends up as a 20% inclusion at 80% and 100% AMI.

I have concerns and reservations that the potential housing and projects proposed will not end up being affordable enough. If this EIR passes, developers will have a programmatic EIR, by right, and no one will be able to object to a wave of market rate Trojan Horse projects. **The whole point of a Workforce Housing combining zone is to serve the AMI workforce, not to disguise 80% market rate units with only a 20% inclusion.**

I always suspect that market rate actors have infiltrated a process, had undue backroom influence, and tried to stack the deck in their favor. For a real WFH combining zone, the deed-restricted/ AMI inclusion needs to be at 40% and above. For this reason, **I can only really support projects that take the density bonus, which forces a higher inclusion.**

But since choosing the density bonus is optional, all the talk here about serving AH may only end up as the business as usual 20% inclusion at the highest AMI allowed. This is difficult to support. I could support this EIR much more enthusiastically if provisions to force density bonus levels of inclusion was mandated.

Another concern is that a planned rezoning will set off speculation, and lead to higher land prices, and then to less actually affordable housing. Permit Sonoma could have some sort of pre-rezoning set, so as to **limit the market rate**, and to incentivize actually affordable housing, affordable to AMI-spectrum people.

I am not a build, build, build advocate. **I don't see that market rate housing will solve any of our housing issues.** Why? Because no one who makes any range of the county AMI can afford market rate housing. If run-of-the mill projects have 80% market rate and a 20% inclusion, that is totally not meeting the real need. The county already has a glut of market rate units. I am primarily a deed-restricted AH advocate.

The county **Density Bonus Program** looks very good, a by-right, within USA, 100% increase in density for rentals that provide 40% AH for people at 50-60% AMI. This is much better than a flat 20% inclusion at 80% and 100% AMI only. **Please figure a way to mandate and/or further incentivize these density bonus provisions.**

In principle, **I like the WFH and AH combining zones.** NIMBYs will be against all; hold your ground, and **hold your ground on the SSP Version #8 map**, the higher density zoning map of the SSP.

The **8th East industrial area in Sonoma**, north of MacArthur, on city water, is a perfect place for a WFH combining zone. The county needs to flexibly adjust the goal posts here and allow some WFH overlay in this area. Some of the qualifications are just off, very close. The city had its sphere out to 8th East, and then pulled it back, creating an orphaned area with no supporting housing. To locals, this area is part of Sonoma, not out on the countryside. 8th Street east is one of the major arteries into Sonoma, even with rail service a bit further south. Getting things done for AH in this area is hardly "sprawl", in spite of what a few environmentalists might say.

As I have mentioned, I am concerned about the **WFH combining zone's 20% inclusion.** I think this percent is too low, and to boot, half of this 20% is for low and the other half for moderate, i.e., 80% and 100% AMI. The real need is 40%-60% AMI and below, given the low wages prevalent in the county's primary service-tourism, hospitality economy, and now the Covid 19 major hit to the AMI workforce's housing burden and ability to pay rent.

When I was at the WFH section of the Permit Sonoma website, I followed the links to all the different supporting references and policies, I got to a place where it seemed to say that of the **20% inclusion, 15% had to be low and very low, and 10% for very low and extremely low.**

There are no details here about what fraction the developer might choose, who chooses, and if they would always choose the highest possible option, i.e. low over very low.

Are there further rules here? If not, then there needs to be. Suggestion. If a developer chooses higher AMI units when lower could have been chosen too, then the next time, it has to be lower. A fairness regime needs to be in place so the full range of AMI units called for eventually gets covered. If developers A, B and C all choose higher AMI units, then developer D has to make it up with all lower AMI units, with funds from developers A, B and C. Some kind of fairness scheme is needed to include all AMI types, and the not the least for the poorest people.

Take home point for my comments: I'm concerned that provision for AH will end up as mostly talk and developers will be able to choose the highest price units overall, and that the programmatic EIR will end up being a ticket for business as usual, market rate housing development that does not serve the AMI workforce at all. We have an Affordable Housing problem, not simply a housing problem.

The county is going to end paying for the homeless anyway, at a much higher cost than if people can stay housed.

The *in lieu fee* is likely not even close to a real replacement for a unit, don't allow it. Minimize it.

Available Sites.

I believe Steve Ledson is involved with the **Son 1-4 Merlo properties**. Ledson is not known for doing any AH projects, only inclusionary as required. Mr. Ledson may not go for the density bonus. I'm not excited that the county process here in Sonoma will actually lead to anything more than a 20% inclusion here at 80% and 100% AMI.

Sonoma school teachers do not make 100% AMI until the very end of their careers. This would not be the Affordable Housing that is really needed, just more of trend to get as high a priced unit as possible.

Son 1-4... what can be done to make sure more than a 20% inclusion at 80-100% AMI gets built here? The regular 20% inclusion at that AMI would be business as usual. Isn't this all supposed to be breaking new ground beyond business as usual?

In the EIR notice packet, and call for public comment, the **El Verano area site map** shows no rezoning area? Where is the rezoning here? Why the map but no zones?

It's crazy that **285 Napa Rd.** has about the exact same relation spatially and utility-wise to the city as Son 1-4, and 285 Napa Rd. has been talked about for AH, by Habitat and Burbank, but since it is not in the city UGB or USA, it will take a city UGB extension and annexation to work with this land. Oh well. Whatever it takes, if there is a will from non-profit builder at 285 Napa Rd., hopefully if the city changes its UGB language, Permit Sonoma will not stand in the way and will make AH here more rather than less possible. If we need the AH, pave the way, help out where needed.

I support the Glen Ellen rezoning. They can't just be fantasy island out there. People who work there deserve to have an Affordable place in that community. **Yet** if all that ends up being offered is a 20% inclusion, it's weak tea for an EIR that purports to be for Affordable Housing. The need is greater than 20%. 20%-only builds in an approximate 30% displacement rate, for AMI workforce people who will be forced out and not able to find AH. This is the production of homeless people pipeline. Wouldn't it be better to have plans and policies that created and protected AMI-level housing? And not always seeming to be sucked into one more market rate black hole?

General planning comments

Permit Sonoma's consistency in acronym use for AH and ah is not clear. Is Permit Sonoma consistently using *AH* and *ah* acronyms to signify deed-restricted versus market rate affordable? For example, Policy HE-f says *higher density affordable housing*, ah is in small letters. Does this really mean AH? What is *higher density affordable housing* if not AH in capital letters deed-restricted? **Please excise all weasel word uses of "affordable housing" and be clear exactly what you are talking about, and at what AMI.**

I see that the county Housing Element conforms ABAG and RHNA. RHNA, in cahoots with HUD and the determination of AMI itself, ends up creating a systemic masking of the lower AMI cohort. How? By adhering to a business as usual **higher skewing of the AMI cohort as a whole.** **In 2018, AMI went up 10.5% but workforce wages did not go up by that at all.** This is the Trump HUD, decidedly calculated against helping poor people out. The median point, the AMI, has been skewed first by federal manipulation to disenfranchise the poor and to exacerbate homelessness, and then by Bay Area gentrification, displacement, by wine country luxury living real estate hype, by Bay Area wealth imbalances at Silicon Valley, and by loss of units to fires.

By adhering to RHNA AMI numbers, this ends up displacing more and more people off the bottom end, as only a small fraction of housing built serves the very bottom. As the AMI itself gets inflated by higher-end earners, the lower end suffers higher housing burdens and more displacement, and this all leads to homelessness. As this AMI lower-end attrition happens, the county then has to spend millions on homelessness. Better to serve the full lower AMI cohort more comprehensively, with a more accurate AMI spread of who really needs the housing. Planning ahead is cheaper. The county should think about the interrelation of AH and homelessness in a long-term frame, and not be penny wise and pound foolish.

Hopefully Permit Sonoma can make more cutting edge policy like with the Density Bonus Program. Now with the pandemic meltdown of the economy, we risk an even greater societal division and segregation by housing. Market rate housing may totally take over as the only economically viable path forward for developers. The county has to find a way through this current crisis, to serve those who need to be served.

I suggest **AH incentives that reward the use of lower cost building materials, simple and efficient designs** that use less materials, and the use of common space to economize on utilities services. For example, a building with no interior walls except for bathroom and kitchen, all spaces can be separated by screens or curtains. Electric all in the slab, with outlets countersunk with folding covers. Common laundry. Common clothesline.

Modular is typically poorly made. Incentivize modular that has the basics so that the construction will be more durable. Unfortunately, it is cheaper to order modular from out of state where they don't have progressive labor laws. What is coming to a head now, is how **our current system is just not cutting the cake** to serve the American people. We've been boxed in by one economic rip off after another.

Maybe it's time to demand that our tax dollars stop going to support a massively bloated military budget, and then everyone says there is no money for even the basics that people need, like Affordable Housing.

From: Holly Bennett <bennettholly@icloud.com>
Sent: Sunday, May 17, 2020 7:42 AM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: Housing Site Comment- Mary Winters- Glen Ellen

EXTERNAL

One of the very first comment in your meeting is the need for good public transportation. Marty Winters site is a terrible location for such for rezoning allowing more housing units. The public transportation that is available is very very slow. Glen Ellen does not have the commercial infrastructure to service the needs of those who need affordable housing and/or workforce house. Our grocery store is very expensive, we don't have a gas station and we have no drug store and Glen Ellen does not have any affordable restaurants. SCPRMD would be further hindering those that can already not afford to live in areas like Glen Ellen.

Furthermore, the site is located at a dangerous section of Arnold Drive. Over the years there have been cars that have run into the building which now houses The Fig Cafe. The intersection of Arnold Drive and Carquinez already backs up on any given day due to the very close proximity of the 3 way stop sign at Arnold Drive and Warm Springs Road which hinders safe access to Arnold Drive off Carquinez and there is a cross walk at the same intersection.

The property on Carquinez that use to be Gemini's appliance is now for sale which could be redeveloped to more housing. The redevelopment of the SDC is on the drawing board, I would urge all committees, the SCPRMD, and the Board of Supervisors to look at Glen Ellen has a "whole" when it comes to consideration for the best sites for more housing affordable housing and/or workforce housing.

I know the need is urgent but there are far better locations.

Holly Bennett/ Glen Ellen Resident
(707)484-4747

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

Sent: Sunday, April 12, 2020 7:22 PM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: 1002 Bodega Avenue - Petaluma AP 019-090-058

EXTERNAL

Hello All,
Thank you for reading my letter-

Can you please tell me what the benefit would be to the change to R2 zoning for my property?
What would the usage differences be between what it is now with regard to development?

My property is located a couple of hundred feet outside city limits.

If it is rezoned to R2, is there a possibility that I can then hook up to city sewer since the sewer line is at the street on Bodega Ave where the entrance to my property is and it continues to run past my property on Bodega Ave. heading west continuing further into the county jurisdiction where you will find that other properties past mine are also tied into city sewer!

It is my understanding that my contiguous neighbors on either side of me on Bodega Ave **which are also outside city limits** may be tied into the same sewer location on Bodega Ave and the only reason that **I am not** presently on the sewer system is because my parcel was split off from the contiguous Sorenson parcel (on the east side of my parcel) **after they tied into the sewer at the street on Bodega Ave.**

I have been trying to build on my property in good faith for the past 3 ½ years to no avail. I have fenced, crossed fenced, had a well drilled, brought in electric and power pole, surveyed etc. I have spent quite a bit of money and I still can not build 2 homes because of all of the changes in city/county requirements within the past 4 years.

The concrete box and leach field approach is no longer acceptable from what I understand and the required "mound" system at a cost of around \$60,000 and the associated costs of asking for a variance from PRMD to allow 2 bedrooms instead of 1 are beyond what I can manage and still be able to go forward.

In addition, the set back constraints along with the amount of land that would be encumbered by a mound system (which is what I am suppose to have per PRMD – unless that has changed.) will likely preclude me from a second unit anyway... The shape of my property is very narrow.

I really need some help here. I will be 72 in September...

I wanted the second house on my property for my adult daughter so that if I need some assistance, she would be nearby. She is single and a teacher at Meadow School for more than 20 years.

I have lived in Sonoma County for 45 years and in Petaluma for 23 years.

Please let me know if there is a solution for us.

I look forward to hearing from you.

Please take care and stay healthy,

Jan

Jan Frost
D 707.364.2981
Jan.frost@sbcglobal.net

Golden Rules -

*Do unto others, -
ALL creatures great and small!*



Virus-free. www.avast.com

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: Deb Votek <deblouvo85@sonic.net>

Sent: Monday, May 11, 2020 3:26 PM

To: HousingSites <HousingSites@sonoma-county.org>

Subject: Notice of Preparation for housing rezoning issued in March

EXTERNAL

My husband and I have lived in Glen Ellen for 36 years and are business owners. We understand that two properties owned by Marty Winters in downtown Glen Ellen are included in the County proposal to rezone certain properties throughout the county to increase housing density.

It is our opinion that these two parcels should **definitely be removed from consideration in the EIR**. There is obviously inadequate public service, problems with the roads, and insufficient infrastructure to accommodate increased housing density. Rezoning these properties allowing as many as twenty units on .85 acre is inconsistent with the semi rural atmosphere of our beloved town of Glen Ellen. One bedroom and studios do not address urgent needs for families needing housing. A housing- only project would be our preference. Tree removal, too large to scale structures, traffic circulation and not enough parking will impact neighboring streets such as Railroad Street. We have already lost trees in the fires. No space for landscaping will erode visual qualities. How will site drainage and containment be dealt with? If the County NOP is identifying urban sites near jobs and transit which may appropriately accommodate additional housing, commonsense excludes the Marty Winters parcels. Glen Ellen is not an urban area. Glen Ellen does not have many jobs or various transit options available. Rezoning would have monumental negative impacts that would permanently change the character of our town. I understand that there will be housing in the SDC Specific Plan so the rezoning in the downtown area is not necessary. The success of businesses in Glen Ellen thrives on small restaurants, the bakery, grocery stores and shops that service tourists and locals because our small town feel is valued .The scope of so many units does not adhere to the **General Plan and Glen Ellen Development and Design Guidelines** for downtown Glen Ellen. We respectfully request that you remove these parcels from rezoning to a high-density Workforce Housing Combining district.

Joseph & Deborah Votek

From: joy spragens <spragens.joy@gmail.com>
Sent: Monday, May 4, 2020 3:46 PM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: Glen Ellen rezoning

EXTERNAL

We live on Sonoma Mountain Rd in Glen Ellen. We bought here for the rural character, a charming village that doesn't even need a traffic light! There is already too much density between us and the Glen Ellen Market and our tiny post office. We are absolutely opposed to any rezoning that would allow any more housing. The roads are old, current, and dangerous. The fires were horrific partly because of too much housing and escaping was a nightmare. Kindly put us down as opposing any zoning change.

Respectfully yours,
Joy and Jeff Spragens
Elizabeth, Alex, and Adrien Ramirez,
Jasen Rocha

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: Lori Barber <lbarber@sonic.net>
Sent: Tuesday, May 5, 2020 3:19 PM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: Transit Oriented Development

EXTERNAL

Hello,

I am interested in the possibility of having transit oriented development which would mean the "walkability" of a site would be .25 miles from major transportation. The train is underutilized at the present in part because there is not enough housing surrounding the train stations. Please note: the Sonoma County Transit bus system is a far cry from decent transportation and many times cannot be relied upon, so please try to include the area around the train station on Airport Boulevard.

As far as infrastructure, I believe it must exist on the west side of the freeway with the number of businesses including food processing which require sewer and water. There are also ample amenities available on the west side of the freeway for residential occupants to utilize.

Thank you.

Respectfully,
Lori Barber

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: Margie Foster <margiefo707@gmail.com>
Sent: Friday, May 8, 2020 2:51 PM
To: HousingSites <HousingSites@sonoma-county.org>
Cc: Margie Foster <margiefo707@gmail.com>
Subject: Rezoning for Glen Ellen downtown/Marty Winters' project

EXTERNAL

I am attaching a two page letter with 19 signatures STRONGLY OPPOSING rezoning for the Marty Winters project in downtown Glen Ellen. There are 19 signatures, with 583 cumulative years residency in Glen Ellen, ranging from 1 to 68 years. Please incorporate this letter into your proceedings.

Respectfully submitted, Margie Foster, 4850 Warm Springs Rd, Glen Ellen, CA 95442

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

May 8, 2020

Sent Via email: HousingSites@sonoma-county.org
ATTN: SONOMA COUNTY PRMD / HOUSING

Re: Rezoning proposal for 2 parcels owned by M. Winter in downtown Glen Ellen

It has very recently come to our attention that the County is proposing to rezone certain properties to INCREASE housing density. While our community supports affordable housing for local residents, this project is NOT the right place for it.

We strongly request that this particular project be REMOVED from consideration for increased high density housing. Downtown Glen Ellen, where the project is located, has lack of infrastructure, public services, and is just an INAPPROPRIATE property for such a project. Current traffic is already a problem, without adding such a high density project. Most of our downtown is comprised of modest, single family homes.

Glen Ellen's rural village character is what adds to its charm, and what brought many of us here from over 65 years ago, to recently. Having a project of this scope, which would take up a large percentage of our two-block downtown, is simply unacceptable. There is NO QUESTION that such a housing-dense property would forever and dramatically change the character of our small town. PLEASE DON'T ALLOW THIS.

Respectfully yours,

Margie Foster Margie Foster, 45 year resident of Glen Ellen

Ritch Foster Ritch Foster, 45 year resident of Glen Ellen

Marjorie Everidge Marjorie Everidge, 68 year resident of Glen Ellen

Archie Horton Archie Horton, 27 year resident of Glen Ellen

Genevieve Haven Genevieve Haven, 8 year resident of Glen Ellen

Nicholas Brown Nicholas Brown, 25 year resident of Glen Ellen

Mary Ann Carr Mary Ann Carr, 38 year resident of Glen Ellen

Page 2

May 8, 2020

Sent Via email: HousingSites@sonoma-county.org
ATTN: SONOMA COUNTY PRMD / HOUSING

Re: Rezoning proposal for 2 parcels owned by M. Winter in downtown Glen Ellen

Angela Morgan Angela Morgan 31 years Glen Ellen property owner
Lance Morgan Lance Morgan 31 years GE property owner
Ronan Morgan Ronan Morgan 22 years GE resident

Michael Brusatori Michael Brusatori, 45 year Glen Ellen property owner

Susan Brusatori Susan Brusatori, 28 year resident of Glen Ellen

Sandra Carr Sandra Carr, 1 year Glen Ellen resident

Jeri Escheverria Jeri Escheverria, 1 year Glen Ellen resident

Jill Dawson Jill Dawson, 30 yr. GE resident

TERESA MURPHY 46 year resident
J Michael Witkowski J Michael Witkowski - 46 year resident

Jane Marie Witkowski Jane Marie Witkowski - 46 year resident

Cumulative years in Glen Ellen: 583 years

From: Merry Edwards <maedwards@sonic.net>
Sent: Monday, March 23, 2020 3:59 PM
Subject: APN 130-180-079

To whom it may concern:

We received notification about our property at 3155 Frei Road. The consideration of this parcel for additional housing units doesn't seem appropriate. It's currently zoned RR and is on a four way corner with a traffic light. Two of the four corners are already zoned commercial. To my husband and I, commercial zoning would seem more appropriate if rezoning is under consideration. It's already heavy traffic on Frei Road getting out of the driveway. The line of sight approaching the intersection from the east is quite poor due to the hill which obscures traffic.

Respectfully,

Merry Edwards
maedwards@sonic.net
636 Gold Ridge Road
Sebastopol, CA 95472
707-483-3333

From: Sonia Taylor <great6@sonic.net>

Sent: Wednesday, May 13, 2020 6:46 PM

To: Jane Riley <Jane.Riley@sonoma-county.org>; Nina Bellucci <Nina.Bellucci@sonoma-county.org>;

HousingSites <HousingSites@sonoma-county.org>

Subject: Re: Rezoning Sites for Housing Project

EXTERNAL

Attached please find my letter regarding your Rezoning Sites for Housing Project, requesting missing information and providing scoping comments.

Sonia Taylor

707-579-8875

great6@sonic.net

Sonia E. Taylor
306 Lomitas Lane
Santa Rosa, CA 95404
707-579-8875
Great6@sonic.net

13 May 2020

Jane Riley, AICP, Comprehensive Planning Manager
Nina Bellucci, Planner II
Sonoma County Permit and Resource Management Department

Via email, including to housingsites@sonoma-county.org

Re: Rezoning Sites for Housing Project
Request for Missing Information/EIR Scoping Comments

Dear Ms. Riley and Ms. Bellucci:

Following are my comments on this proposed project and its EIR.

Missing Necessary Information:

The Addendum 1 to the Request for Proposals (RFP) states that the following information will be provided to each RFP respondent:

- APN(s)
- Situs
- Acreage
- Existing General Plan designation and Zoning, including allowable density
- Current use(s) on the site
- Whether the site is listed in the current housing element site inventory & to be rezoned
- Transit, services, and schools within 3000'
- Known environmental constraints
- Sewer and water providers
- Proposed rezoning and density

Only some of this information is available to the public, negatively impacting the ability to adequately prepare scoping comments for this project. In particular, the following information is NOT available:

- Current use(s) on the site
- Whether the site is listed in the current housing element site inventory & to be rezoned
- Transit, services, and schools within 3000'
- Known environmental constraints
- Sewer and water providers
- Proposed rezoning and density

Please provide this information for each affected parcel and extend the time period for scoping comments to allow adequate time to evaluate said missing information and effectively comment.

Scoping Comments:

1. The contract for preparation of the EIR required by this project contemplates only two meetings in the County to engage the public and stakeholders (locations tentatively identified as Santa Rosa/Larkfield-Wikiup and the Russian River). Given the far-flung properties to be rezoned, evaluate whether two meetings will be adequate to engage the public and stakeholders, even under COVID-19 conditions.
2. Given that the properties identified for consideration by this project were identified by members of the public, property owners, etc., and that most of the properties are not contiguous, but are scattered throughout various Urban Service Areas (USAs) and/or ultimate Urban Growth Boundary areas (UGBs), evaluate whether this project encourages or promotes orderly development and what impacts will occur from rezoning of these scattered sites, including but not limited to efficient delivery of all services, growth inducing impacts, etc.
3. There is nothing in the project description or in the consultant's contract that acknowledges that many of these parcels are contained within incorporated jurisdictions' ultimate UGBs, or acknowledges that those incorporated jurisdictions have plans, policies, initiatives and other adopted rules and regulations (hereinafter "plans, etc.") covering the properties in this project.

In every incorporated jurisdiction covered by this project, evaluate all of that incorporated jurisdictions' plans, etc. covering, concerning and/or addressing the parcels in this project, determining conflicts between this proposed project and those plans, etc., as well as determining the impacts of this project on those plans, etc.

Further, where there are plans, etc. that are under development/review, the within EIR must evaluate those plans, etc. that are under development/review as part of the evaluation of impacts of this project. Currently, as examples only (because there are no doubt other plans, etc.), Petaluma's new Hazard Mitigation Plan is completed and out for public review, and will likely be adopted prior to the completion of this project, Santa Rosa has commenced preparation of their new General Plan, and the County has commenced an updated Hazard Mitigation Plan.

4. Many of the properties identified for consideration by this project EIR are currently being used and/or are zoned and/or are designated as manufacturing or industrial properties (by either/or/both the County and incorporated jurisdictions), and many are surrounded by other properties being used and/or are zoned and/or are designated for manufacturing or industrial uses.

Evaluate the impacts of converting these properties to residential uses, including but not limited to:

- The impacts said change will have on the inventory of manufacturing and/or industrial use properties in the county and in each of the USAs and/or in the incorporated jurisdictions where some project properties are located,
- The impacts said change will have on the viability of non-project properties designated, zoned and/or being used for manufacturing and/or industrial uses surrounding the new proposed residential uses,

- The compatibility the rezoned properties will have with existing and projected surrounding land uses,
- Whether this project will provide housing opportunities compatible with surrounding land uses, and
- The impacts of said rezoning on consistency with County and incorporated jurisdictions' policy and planning documents as well as with regional planning policies.

5. Many of the properties identified for consideration by this project EIR are currently being used and/or are zoned and/or are designated as retail/commercial/business services (by either/or/both the County and incorporated jurisdictions), and many are surrounded by other properties being used and/or zoned and/or designated for retail/commercial/business services.

Evaluate the impacts of converting these properties to residential uses, including but not limited to:

- The impacts said change will have on the inventory of retail/commercial/business services properties in the county and in each of the USAs and/or in the incorporated jurisdictions where some project properties are located,
- The impacts said change will have on the viability of non-project properties designated, zoned and/or being used for retail/commercial/business service uses surrounding the new proposed residential uses,
- The compatibility the rezoned properties will have with existing and projected surrounding land uses,
- Whether this project will provide housing opportunities compatible with surrounding land uses, and
- The impacts of said rezoning on consistency with County and incorporated jurisdictions' policy and planning documents as well as with regional planning policies.

6. Consider the context of this project, and evaluate the necessity for this project under CEQA, considering facts such as, but certainly not limited to, the following:

- As of the 2018 General Plan Implementation Annual Report, Sonoma County is meeting its Regional Housing Allocation (RHNA) numbers , with only 68 extremely low and very low income units remaining to be built prior to the end of 2023 (perhaps even fewer units need to be built after the 2019 and 2020 numbers are known).
- There is little to no probability that the 2023 to 2031 RHNA numbers will be released or known during the time period for this project (even though this project is currently 19 weeks behind schedule).
- The County's contemplated build out population in its 2008 General Plan and other documents compared to the actual County population in both incorporated and unincorporated areas, including consideration of recent Census numbers.
- The number of housing units currently approved and/or under construction in Sonoma County, both in incorporated and unincorporated areas of the county.

7. Consider the context of this project, including evaluation of the necessity for/appropriateness of this project under CEQA, considering that the revised time frame for this project means that the within EIR likely will not be completed until very late in 2020 (this project is at least 19 weeks behind schedule at

this time), and Sonoma County will have to commence preparation of their required Housing Element update a short 6 months later, in mid-2021.

8. Evaluate whether this project will induce an unplanned population growth in any of the project areas.
9. To adequately evaluate the impacts, including the cumulative impacts of this project, this EIR must first evaluate all of the impacts, including cumulative impacts, of every Sonoma County General Plan amendment and every relevant County initiative, policy, rule and/or regulation undertaken since the certification of the 2008 Sonoma County General Plan and then use that information to evaluate the impacts and significant impacts of this project. This project must undertake this evaluation.
10. Consider the growth inducing impacts of providing sewer and/or water service to these scattered parcels in both the incorporated jurisdictions and unincorporated areas affected by this project.
11. Identify all times where there has been City and County cooperation with regard to this project so as to achieve consistent land use policies.
12. Evaluate whether this project will achieve consistent land use policies, and identify all impacts associated with the results of this evaluation.
13. Evaluate whether there will be adequate recreation facilities for the properties anticipated to be rezoned by this project.
14. Evaluate the compatibility the rezoned properties will have with existing and projected surrounding land uses, and identify all impacts associated with this rezoning.
15. Evaluate whether this project will provide housing opportunities compatible with surrounding land uses, and identify all impacts associated with this rezoning.
16. Evaluate the impacts of this project on consistency with County and incorporated jurisdictions' policy and planning documents as well as with regional planning policies.
17. Require this project EIR to investigate, report on and consider all potentially hazardous substances on any and all of the properties being considered for this rezoning project, including but not limited to properties with any current or historic industrial, manufacturing or other uses likely to generate hazardous materials or substances.
18. Evaluate whether the County will comply with the County's South Santa Rosa Specific Plan's requirements that the County increase the frequency of bus service, provide new bus service and expand bus service to all parcels within Santa Rosa's USAs/UBGs covered by this project. If the County will not be providing any bus service, whether new or expanded, evaluate who will provide this bus service, the costs for said bus service, and the impacts if said service is or is not provided.
19. Require this project to prepare a soil analysis of all properties being considered for this rezoning project unless said projects have received clearance from the Regional Water Quality Control Board and/or any other governing agencies, or, at a minimum, require that prior to any development occurring on any of the properties being considered for rezoning by this project conduct said soil analysis and/or receive said clearance prior to any development occurring.

20. Evaluate whether each of properties included in this project has sufficient public services to support the rezoning to higher residential densities.

21. Explain how this project's EIR will evaluate water and/or sewer capacity, or plans to have that capacity by 2030, considering that the County has no existing planning document with 2030 as a planning horizon.

22. Many of the sites to be studied in this proposed EIR will ultimately be annexed to an incorporated jurisdiction. Evaluate the impacts that annexation of a previously reviewed site will have on the proposed "by right" development of housing on said site, on any property's tiering off of this project's EIR, and/or on the possible "streamlining checklist" that may be part of this EIR.

23. Evaluate the impacts of the County's newly approved Priority Development Areas and new/revised Specific Plans on the properties covered by this project.

24. Evaluate the impacts of displacing any current residential residents, any current retail/commercial/business service businesses and/or any current manufacturing/industrial use businesses that are living on/operating on any of the properties covered by this project.

25. Require any evaluation of impacts from wildfire danger to include all maps, policies and other associated documents of incorporated jurisdictions, including historic records of occurring wildfires, including but not limited to Santa Rosa's Wildland Urban Interface Map and accompanying policies, and the locations of the 2017 and 2019 Sonoma County wildfires and evacuations.

I look forward to your consideration of the issues raised in this letter, and to your response.

Sincerely yours,

Sonia E. Taylor

From: Steve Birdlebough <scbaffirm@gmail.com>
Sent: Friday, May 15, 2020 3:30 PM
To: HousingSites <HousingSites@sonoma-county.org>
Cc: Willard Richards <willard@sonic.net>; Lois Fisher <lois@fishertowndesign.com>; Rick Theis <ricktheis@igc.org>; David Harris <legaciesusa@gmail.com>; David Petritz <dpetritz@sbcglobal.net>; Dave Alden <davealden53@comcast.net>
Subject: Comment on Project: Rezoning Sites for Housing

EXTERNAL

Attached and below are comments on the project to rezone properties for medium density housing. Thank you for this opportunity to participate in the process.
Steve Birdlebough
576-6632

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

Stephen C. Birdlebough

15 May 2020

Jane Riley, AICP, Comprehensive Planning Manager
Nina Bellucci, Planner II
Sonoma County Permit and Resource Management Department

Via email, housingsites@sonoma-county.org

Re: Project Comments: Rezoning Sites for Housing

Dear Ms. Riley and Ms. Bellucci:

The opportunity to comment on this project and its EIR is greatly appreciated, especially in view of recent Climate Emergency Declarations. State and regional policies call for net zero greenhouse gas emissions by the year 2045, as well as significant reductions in vehicle miles traveled (VMT) per capita. The re-zoning and density elements of this project must contribute to *significant reductions* in GHR emissions.

An overall concern regarding by-right development in Sonoma County is that medium-density housing located more than a mile or so from a train station is very likely to result in *increased*

greenhouse gas emissions, due to increases in driving. Any such increases would make it more difficult for Sonoma County to comply with greenhouse gas reduction requirements.

It may prove very difficult to re-zone a significant number of properties in disparate parts of the County so as to reduce GHG emissions. Proximity to a bus stop is a questionable basis for selecting properties to be evaluated. Also, there may be few available developers and funding sources with the needed experience to deliver projects that would reduce vehicle miles traveled per capita.

Specific Comments:

Transit. Because only about 6% of suburban, and 3% of rural Americans regularly ride a bus, the proximity of a particular site to a bus stop may not be the best way to identify properties to be evaluated for by-right construction of multi-unit or affordable housing developments. See: <https://www.pewresearch.org/fact-tank/2016/04/07/who-relies-on-public-transit-in-the-u-s/>

The Future of Shared Vehicles. Transit as well as Uber/Lyft-type services have been severely affected by the pandemic, and new technologies are likely to change their markets significantly. Some bus routes and schedules may also change. Please determine which bus services are certain to be restored after the end of the pandemic in the course of evaluating any particular site. See: Sonoma County Transit Coordination Study <https://scta.ca.gov/wp-content/uploads/2019/10/TIES-Draft-Final-Report.pdf>

Automobile Ownership. It is normal for dwelling units in Sonoma County to be accompanied by one or more vehicles per resident, and sometimes cars are parked on unpaved surfaces. Local habits relating to auto dependency must be considered in forecasting changes in VMT per capita.

Parking Policies. In Sonoma County the costs of parking are usually bundled into the costs of rent, groceries, other goods, and services. By contrast, where parking costs are unbundled, and where drivers must pay the costs of parking, there may be lower auto ownership rates. See, e.g., *Arlington Residential Building Study* https://1105am3mju9f3st1xn20q6ek-wpengine.netdna-ssl.com/wp-content/uploads/2018/05/Residential-Aggregate-Analysis_Final-Report.pdf In order to reduce VMT, it may be necessary for housing projects to unbundle parking costs.

VMT Impacts. Because construction of any medium-density housing that results from zoning changes will be subject to CEQA analysis under SB 743, this Environmental Impact Report must include an analysis of any new zoning impacts on VMT.

Walking & Cycling Distances. People living in neighborhoods with high residential density, mixture of land uses, and grid-like street patterns with short block lengths engage in more walking and cycling trips than do people living in sprawling neighborhoods. See, Choi, *Walkability as an Urban Design Problem* <https://www.diva-portal.org/smash/get/diva2:551283/FULLTEXT01.pdf> and Alta, <https://blog.altaplanning.com/level-of-traffic-stress-what-it-means-for-building-better-bike-networks-c4af9800b4ee> Please disclose the distances that people are expected to walk with respect to each property designated for re-zoning.

Housing Construction. Please identify six or more developers and six or more financing entities that have proven experience in delivering projects that reduce overall VMT by the

residents in their projects. Report their evaluations for the potential development of each site to be re-zoned, together with their assessment of likely GHG reductions.

Utilities & Services. Because the properties under consideration by this project are not contiguous, and are within various Urban Service Areas and school districts please show how any re-zoning would affect orderly development near each site. Also, please identify the impacts of rezoning each property with respect to matters such as utility services, schools, safe routes to schools, and the inducement of additional growth in the vicinity.

Urban Growth Boundaries. Many of the parcels appear to be within the Urban Growth Boundary of a city, and re-zoning could affect the plans or policies, of the jurisdiction. Please consult with appropriate members of the city staff, and report their views of the proposed re-zoning. Describe the likely effect that re-zoning would have upon the city's planning process, as well as on the potential annexation of the particular property.

Commerce. If any properties to be re-zoned by this project are currently zoned or used for commercial, industrial, manufacturing, or farming purposes, or are surrounded by other such properties, please describe the effects of converting these properties to residential uses, such as reducing the availability or viability of the non-residential properties.

Street Addresses. Finally useable information regarding the project needs to be published, especially the street address for each property under consideration. Not everyone is adept at reading maps, and the project will benefit from having comments about matters such as: access routes to schools and grocery shopping options, current and planned uses of nearby properties, and the density that would result from re-zoning.

Please provide regular updates of information as the project goes forward, and enable further scoping comments to be submitted periodically so that concerned residents can comment intelligently on potential recommendations for re-zoning.

I look forward to your consideration of the issues raised in this letter, and to your response.

Cordially,

/s/

Steve Birdlebough

Stephen C. Birdlebough

15 May 2020

Jane Riley, AICP, Comprehensive Planning Manager
Nina Bellucci, Planner II
Sonoma County Permit and Resource Management Department

Via email, housingsites@sonoma-county.org

Re: Project Comments: Rezoning Sites for Housing

Dear Ms. Riley and Ms. Bellucci:

The opportunity to comment on this project and its EIR is greatly appreciated, especially in view of recent Climate Emergency Declarations. State and regional policies call for net zero greenhouse gas emissions by the year 2045, as well as significant reductions in vehicle miles traveled (VMT) per capita. The re-zoning and density elements of this project must contribute to *significant reductions* in GHR emissions.

An overall concern regarding by-right development in Sonoma County is that medium-density housing located more than a mile or so from a train station is very likely to result in *increased* greenhouse gas emissions, due to increases in driving. Any such increases would make it more difficult for Sonoma County to comply with greenhouse gas reduction requirements.

It may prove very difficult to re-zone a significant number of properties in disparate parts of the County so as to reduce GHG emissions. Proximity to a bus stop is a questionable basis for selecting properties to be evaluated. Also, there may be few available developers and funding sources with the needed experience to deliver projects that would reduce vehicle miles traveled per capita.

Specific Comments:

Transit. Because only about 6% of suburban, and 3% of rural Americans regularly ride a bus, the proximity of a particular site to a bus stop may not be the best way to identify properties to be evaluated for by-right construction of multi-unit or affordable housing developments. See: <https://www.pewresearch.org/fact-tank/2016/04/07/who-relies-on-public-transit-in-the-u-s/>

684 Benicia Drive #63, Santa Rosa, CA 95409 (707) 576-6632 scbaffirm@gmail.com

The Future of Shared Vehicles. Transit as well as Uber/Lyft-type services have been severely affected by the pandemic, and new technologies are likely to change their markets significantly. Some bus routes and schedules may also change. Please determine which bus services are certain to be restored after the end of the pandemic in the course of evaluating any particular site. See: Sonoma County Transit Coordination Study <https://scta.ca.gov/wp-content/uploads/2019/10/TIES-Draft-Final-Report.pdf>

Automobile Ownership. It is normal for dwelling units in Sonoma County to be accompanied by one or more vehicles per resident, and sometimes cars are parked on unpaved surfaces. Local habits relating to auto dependency must be considered in forecasting changes in VMT per capita.

Parking Policies. In Sonoma County the costs of parking are usually bundled into the costs of rent, groceries, other goods, and services. By contrast, where parking costs are unbundled, and where drivers must pay the costs of parking, there may be lower auto ownership rates. See, e.g., *Arlington Residential Building Study* https://1105am3mju9f3st1xn20q6ek-wpengine.netdna-ssl.com/wp-content/uploads/2018/05/Residential-Aggregate-Analysis_Final-Report.pdf In order to reduce VMT, it may be necessary for housing projects to unbundle parking costs.

VMT Impacts. Because construction of any medium-density housing that results from zoning changes will be subject to CEQA analysis under SB 743, this Environmental Impact Report must include an analysis of any new zoning impacts on VMT.

Walking & Cycling Distances. People living in neighborhoods with high residential density, mixture of land uses, and grid-like street patterns with short block lengths engage in more walking and cycling trips than do people living in sprawling neighborhoods. See, Choi, *Walkability as an Urban Design Problem* <https://www.diva-portal.org/smash/get/diva2:551283/FULLTEXT01.pdf> and Alta, <https://blog.altaplanning.com/level-of-traffic-stress-what-it-means-for-building-better-bike-networks-c4af9800b4ee> Please disclose the distances that people are expected to walk with respect to each property designated for re-zoning.

Housing Construction. Please identify six or more developers and six or more financing entities that have proven experience in delivering projects that reduce overall VMT by the residents in their projects. Report their evaluations for the potential development of each site to be re-zoned, together with their assessment of likely GHG reductions.

Utilities & Services. Because the properties under consideration by this project are not contiguous, and are within various Urban Service Areas and school districts please show how any re-zoning would affect orderly development near each site. Also, please identify the impacts of rezoning each property with respect to matters such as utility services, schools, safe routes to schools, and the inducement of additional growth in the vicinity.

Urban Growth Boundaries. Many of the parcels appear to be within the Urban Growth Boundary of a city, and re-zoning could affect the plans or policies, of the jurisdiction. Please

consult with appropriate members of the city staff, and report their views of the proposed re-zoning. Describe the likely effect that re-zoning would have upon the city's planning process, as well as on the potential annexation of the particular property.

Commerce. If any properties to be re-zoned by this project are currently zoned or used for commercial, industrial, manufacturing, or farming purposes, or are surrounded by other such properties, please describe the effects of converting these properties to residential uses, such as reducing the availability or viability of the non-residential properties.

Street Addresses. Finally useable information regarding the project needs to be published, especially the street address for each property under consideration. Not everyone is adept at reading maps, and the project will benefit from having comments about matters such as: access routes to schools and grocery shopping options, current and planned uses of nearby properties, and the density that would result from re-zoning.

Please provide regular updates of information as the project goes forward, and enable further scoping comments to be submitted periodically so that concerned residents can comment intelligently on potential recommendations for re-zoning.

I look forward to your consideration of the issues raised in this letter, and to your response.

Cordially,

/s/

Steve Birdlebough

From: susan mulcahy <1susanmulcahy@gmail.com>
Sent: Wednesday, May 6, 2020 3:07 PM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: glen ellen rezoning proposal

EXTERNAL

good afternoon,

I live in Glen ellen and I first and foremost want to say this proposal should not be allowed to go ahead right now during this pandemic . You cannot get a fair reading of the local community at this time.

Clearly this project is undesirable in our 2 block town.Isn't the purpose of zoning to regulate the growth.? Im well aware people change zones all the time . The scale of this project is ridiculous for the feel of our small town. I know housing is big issue but I cant believe there aren't other locations better suited for this.

Its unsafe to have any more traffic problems than we already do.

Please deny this proposal as it stands

Thank you

Susan Mulcahy

From: Suzi Molofsky <suzimolofsky@yahoo.com>
Sent: Friday, May 8, 2020 4:42 PM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: Zoning changes to Glen Ellen Property

EXTERNAL

To whom it may concern,

As forty year Glen Ellen residents and owners of the commercial property at 969 Carquinez Ave. we are very attuned to the nature and character of the Glen Ellen community. Glen Ellen is a unique, historical village in Northern California. Any development in the center of Glen Ellen should reflect that.

We oppose the proposal to change or even study the zoning change to increase the number of housing units to be built on Marty Winters parcels in downtown Glen Ellen.

The center of the town of Glen Ellen is integral to supporting the diverse population that both lives and visits. What's needed is an investment to recreate a viable town center that the surrounding residents and visitors can enjoy and support. Businesses such as services, shops, boutiques, food and beverage retail. Without a commercial downtown Glen Ellen residents would need to increasingly drive further to find these services. In addition, the scale of that density of development is not in keeping with the Glen Ellen development plan. We do not have the infrastructure to handle that many more cars in that small of an area nor local services that these residents would need.

We strongly request that this proposal be stopped at this point rather than have the county waste money and resources to study this further.

Thank you,

Suzi and Mark Molofsky
12300 Manzanita Lane, Glen Ellen

From: Tom Conlon <tom@geopraxis.org>
Sent: Thursday, May 14, 2020 3:38 PM
To: HousingSites <HousingSites@sonoma-county.org>
Subject: Scoping Comments on "Rezoning Sites for Housing" EIR

EXTERNAL

RE: Permit Sonoma's Housing Initiatives and/or Rezoning Sites for Housing project

Hello!

The following comments on PRMD's "Rezoning Sites for Housing" project EIR were filed by:
Tom Conlon
tom@geopraxis.org
on 5/14/2020 (prior to 3:30PM).

These comments were filed directly into the web app form at:
Sonoma County Rezoning Sites for Housing EIR Public Input

App:
<https://rincon.maps.arcgis.com/apps/CrowdsourcingPolling/index.html?appid=f8c05d3e11234dd488257ef5024314d9>

This email is a redundant backup only. It is not necessary to duplicate these comments in the public record.

Thank You,
- Tom Conlon

=====

AGU-1 =
APN 056-531-005
Urban Service Area Sonoma Valley
Planning Area 9 - Sonoma Valley
Assmt Use Code 0051 [Rural Res/Single Residence]
Zone R1 B6 1 DU, F2 RC50/25 VOH X
Land Use UR 1
Zone Legend R1
Land Use Legend UR
Asmt Category Residential Properties
Acres 1.35
EIR Area Number AGU-1
EIR Area Name Agua Caliente (AGU)

AGU-1
Land Use & Planning
In addition to the default No Project option, EIR should

assess alternative land uses for this unique parcel
including its potential to provide valleywide benefits
such as enhanced flood control, groundwater recharge,
local food production, biological resource protection,
etc.

AGU-1
Hydrology
Parcel is in Flood Zone 3A and adjacent to confluence of
2 creeks, Agua Caliente, Sonoma. EIR must fully assess
water storage, recharge, and water quality enhancement
potential of this site.

AGU-1
Hazards
Parcel is in Flood Zone 3A and adjacent to confluence of
2 creeks, Agua Caliente, Sonoma. EIR must fully assess
increased seasonal variability of precipitation, runoff,
stream flows, and increased risk of extreme floods (IPCC
Special Report on Climate Change and Land 2019; IPCC
Special Report on Global Warming of 1.5C 2018, Sonoma
Water Local Hazard Mitigation Plan, 2018; North Bay
Climate Adaptation Initiative, Climate Ready Sonoma
County: Climate Hazards and Vulnerabilities Feb. 2015).

=====

AGU-2 =
APN 056-531-006
Urban Service Area Sonoma Valley
Planning Area 9 - Sonoma Valley
Assmt Use Code 0023 [SFD w/Granny Unit]
Zone R1 B6 1 DU, F2 RC50/25 VOH X

Land Use UR 1
Zone Legend R1
Land Use Legend UR
Asmt Category Residential Properties
Acres 6.59
EIR Area Number AGU-2
EIR Area Name Agua Caliente (AGU)

AGU-2
Land Use & Planning
In addition to the default No Project option, EIR should

assess alternative land uses for this unique parcel

including its potential to provide valleywide benefits

such as enhanced flood control, groundwater recharge,

local food production, biological resource protection,

etc.

AGU-2
Hydrology
Parcel is in Flood Zone 3A and adjacent to confluence of

2 creeks, Agua Caliente, Sonoma. EIR must fully assess

water storage, recharge, and water quality enhancement

potential of this site.

AGU-2
Hazards
Parcel is in Flood Zone 3A and adjacent to confluence of

2 creeks, Agua Caliente, Sonoma. EIR must fully assess

increased seasonal variability of precipitation, runoff,

stream flows, and increased risk of extreme floods (IPCC
Special Report on Climate Change and Land 2019; IPCC
Special Report on Global Warming of 1.5C 2018, Sonoma
Water Local Hazard Mitigation Plan, 2018; North Bay

Climate Adaptation Initiative, Climate Ready Sonoma

County: Climate Hazards and Vulnerabilities Feb. 2015).

=====

AGU-3 =

APN 052-272-011

Urban Service Area Sonoma Valley

Planning Area 9 - Sonoma Valley

Assmt Use Code 0710 [Religious Building]

Zone R1 B6 5 DU, RC50/25 X

Land Use UR 5

Zone Legend R1

Land Use Legend UR

Asmt Category Institutional Properties

Acres 3.19

EIR Area Number AGU-3

EIR Area Name Agua Caliente (AGU)

GHG Emissions

Appears to be an excellent site for higher density

housing, provided that safer bicycle & pedestrian access

to nearby schools, shopping and neighborhood parks can be

improved.

=====

SON-1 =

APN 128-311-015

Urban Service Area Sonoma, Sonoma Valley

Planning Area 9 - Sonoma Valley

Assmt Use Code 0052 [Rural Res/2 or More Residences]

Zone RR B6 3, SR VOH

Land Use RR 3

Zone Legend RR*

Land Use Legend RR*

Asmt Category Residential Properties

Acres 0.97

EIR Area Number SON-1

EIR Area Name Sonoma (SON)

Transportation

Appears to be an excellent site for higher density

housing, provided that: 1) Daytime transit service

headways at nearby bus stop are reduced to <20 minutes,
and 2) safe bicycle & pedestrian access to nearby
schools, shopping and neighborhood parks can be improved.

=====

SON-2 =
APN 128-311-016
Urban Service Area Sonoma, Sonoma Valley
Planning Area 9 - Sonoma Valley
Assmt Use Code 0052 [Rural Res/2 or More Residences]
Zone RR B6 3, SR VOH
Land Use RR 3
Zone Legend RR*
Land Use Legend RR*
Asmt Category Residential Properties
Acres 1.00
EIR Area Number SON-2
EIR Area Name Sonoma (SON)

Transportation
Appears to be an excellent site for higher density
housing, provided that: 1) Daytime transit service
headways at nearby bus stop are reduced to <20 minutes,
and 2) safe bicycle & pedestrian access to nearby
schools, shopping and neighborhood parks can be improved.

=====

SON-3 =
APN 128-311-014
Urban Service Area Sonoma, Sonoma Valley
Planning Area 9 - Sonoma Valley
Assmt Use Code 0052 [Rural Res/2 or More Residences]
Zone RR B6 3, SR VOH
Land Use RR 3
Zone Legend RR*
Land Use Legend RR*
Asmt Category Residential Properties
Acres 1.02
EIR Area Number SON-3
EIR Area Name Sonoma (SON)

Transportation

Appears to be an excellent site for higher density

housing, provided that: 1) Daytime transit service

headways at nearby bus stop are reduced to <20 minutes,

and 2) safe bicycle & pedestrian access to nearby

schools, shopping and neighborhood parks can be improved.

=====

SON-4 =

APN 128-311-017

Urban Service Area Sonoma, Sonoma Valley

Planning Area 9 - Sonoma Valley

Assmt Use Code 0010 [Single Family Dwelling]

Zone RR B6 3, SR VOH

Land Use RR 3

Zone Legend RR*

Land Use Legend RR*

Asmt Category Residential Properties

Acres 0.97

EIR Area Number SON-4

EIR Area Name Sonoma (SON)

Transportation

Appears to be an excellent site for higher density

housing, provided that: 1) Daytime transit service

headways at nearby bus stop are reduced to <20 minutes,

and 2) safe bicycle & pedestrian access to nearby

schools, shopping and neighborhood parks can be improved.

--

Tom Conlon

tom@geopraxis.org

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: Vicki Hill <vicki_hill@comcast.net>

Sent: Monday, May 4, 2020 12:35 PM

To: HousingSites <HousingSites@sonoma-county.org>

Subject: County "Rezoning Sites for Housing Project" EIR Scoping Comments - inclusion of 2 Glen Ellen parcels (GE-1 and GE-2) - Marty Winters property

EXTERNAL

Hello,

Thank you for the opportunity to comment on the above-referenced project. My comments regarding the County's proposed Housing Rezone Project EIR scope are attached, titled "Vicki Hill Comments on County Housing Rezoning EIR Scope 5-4-2020."

The timing for the scoping process is unfortunate and proper noticing has not occurred. I just found out that the County housing rezoning project includes two Glen Ellen parcels that are the subject of a long history of contention within the community. This has slipped under the radar in the community – no one knew about it until the May 1 article in the Kenwood Press. People thought that Marty Winters' proposal to increase density and rezone to WH (Workforce Housing) was on hold, based on the County Design Review Committee rejection of his proposal and their direction to him to work with the community, which has not happened. People were not aware that the County was taking on rezoning this property as part of the Countywide rezoning effort.

Also attached are the numerous comments submitted by community members regarding the property owner's last application (which included a WH rezone request) to the Design Review Committee (two compiled comment documents). Many of these comments point out the problems on this site, including densification issues. These should all be included as scoping comments for the current County Rezoning EIR.

The inclusion of these parcels does not seem to take into account that Glen Ellen is already facing an increase in housing on the parcel across the street (Sorkin project under construction) and will have to absorb the impacts of many new housing units on the Sonoma Developmental Center property on the south side of town.

I know the timing is not the County's fault, but it would be great to delay this project or at least delete these two parcels from the proposed rezoning effort.

Please feel free to contact me if you have any questions about my comments or need additional clarification.

Regards,
Vicki Hill
707 935-9496

Vicki A. Hill, MPA
Environmental Planning

3028 Warm Springs Road
Glen Ellen, CA 95442
(707) 935-9496
Email: vicki_hill@comcast.net

May 4, 2020

DELIVERED VIA EMAIL

Please distribute copies of this letter to all concerned County staff members.

RE: Comments on Sonoma County “Rezoning Sites for Housing Project” EIR Scope, regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GE-1 and GE-2)

Dear PRMD Staff:

This letter contains extensive comments regarding the EIR scope for the Sonoma County proposed Rezoning Sites for Housing Project, specifically regarding the two properties in Glen Ellen at the corner of Carquinez and Arnold Drive (parcels GE-1 and GE-2 on the County rezone map). My comments include: 1) concerns about the scoping process, timing, and lack of notice, especially during this pandemic; 2) lack of consideration of previous comments submitted regarding this property; 3) inappropriateness of including these parcels given other housing being developed nearby and to be included in the SDC Specific Plan; 4) inadequate definition of the County’s proposed rezone project for purposes of CEQA; and 5) serious environmental impacts.

In my professional opinion, the proposal for these two parcels in Glen Ellen involves **inappropriate and precedent-setting rezoning to a potential high-density zone district, which is out of scale and has the potential to result in significant adverse impacts on the small village of Glen Ellen.**

Based on previous comments and comments presented below, I hereby request that the County remove the two Glen Ellen parcels from rezoning consideration, given potential environmental effects, other housing being developed, and the large amount of housing that will be included in the SDC Specific Plan less than a mile away.

1. Lack of Community Notice

The NOP was issued at the beginning of the current pandemic and has not received the proper amount of notice or community attention for the substantial change that it represents for our village. **Given the current shelter in place order and associated stress and conditions, this proposal should be delayed for the time being.** As a professional land use planner/CEQA specialist and local resident who submitted comments on previous proposals for this particular property, I consider myself reasonably

informed. However, I just learned in the May 1 issue of the Kenwood Press that these two parcels have been included in the County's rezoning proposal. I am concerned about how many other people are unaware of this proposal and therefore have not submitted scoping comments to the County. Dozens of comment letters were submitted regarding the property owner's (Marty Winters) previous submittals (i.e., WH rezoning application in 2019; application considered by SVCAC in March 2019), including letters to the County Design Review Committee (DRC) in September 2019. Many of the public comments expressed concerns about increasing residential density on this site. The DRC rejected the proposal and directed the applicant to work with the community to reduce the mass and scale, something that has not been done. **The community believed the rezoning project was on hold.** There was no notice to the Glen Ellen Forum or members of the public who previously submitted comments that the County was taking on the rezone proposal itself, as part of the Countywide housing rezoning project.

2. Lack of Consideration of Previous Comments

Over the past several years, the property owner has attempted to redevelop his property at a higher density than is currently allowed. Dozens of community members submitted comments opposing the increased density on the site, referencing serious environmental concerns. It does not appear that these previous comments were considered when the County chose to include these parcels in the rezoning proposal. Please include as scoping comments all previous comments (attached to my email sending this letter), as well as comments made to the SVCAC in March 2019 regarding this property.

While this proposal may appear nonthreatening to those who are unfamiliar with Glen Ellen, the rezone site represents a large part of the downtown core (which is only two blocks long) and will dramatically change the character of our village. As a planner, it is disheartening to see a proposal that is **clearly inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.** With the devastating loss of established neighborhoods during the 2017 fires, it is more important than ever to not overtax our rural infrastructure and to protect the quaint, small town feel that the community values so much.

Both the County Design Review Committee and the SVCAC rejected the applicant's proposal and directed the applicant to adhere to the Glen Ellen Guidelines and work with the community to address concerns about his proposal. Yet, it appears that the County is now advancing a rezone proposal in line with his project. I understand that the County will not evaluate specific site designs as part of this Program EIR, but it is not understandable why the County would pursue rezoning this developed site in light of valid concerns expressed by the community.

3. Inappropriateness of Including These Parcels Given Other Housing Sites

Our small community is being faced with a substantial amount of new housing, as a result of the current Sonoma Developmental Center (SDC) Specific Plan process (housing is mandated there by the State legislation) and as a result of the increased density currently being developed across the street at 13647 Arnold Drive (6 new residential units). It does not make good land use planning sense to force additional housing when it is clear that Glen Ellen is already undergoing a disproportionate amount of housing development and lacks adequate infrastructure and services for higher density housing.

4. Inadequate Definition of Proposed Project for Purposes of CEQA

The County FAQ sheet regarding the rezoning proposal states the following answer to this question: What will the new zoning for my property be?

“Potential proposed zoning designations for each parcel will be determined as part of the environmental review process is near complete. Possible zoning designations will be R2 Medium Density Residential or R3 High Density Residential, or the WH Workforce Housing or AH Affordable Housing combining zones.”

I question the adequacy of not defining proposed zoning during the scoping phase. There must be a proposed project with specified zone district(s) (rather than a variety of potential zones). How else can the EIR be scoped and impacts be assessed? The public cannot make meaningful comments on the EIR scope without knowing which of these zone districts are proposed for a particular site. R2 is very different from R3 or WH zoning. Is the environmental analysis going to consider the worst case, highest density zoning for each site? How will this be decided? This information is crucial to make scoping comments.

5. Potential Environmental Effects that must be considered in the EIR

In addition to the issues explained above, there are numerous land use and environmental concerns associated with this proposal, as summarized below. Given the potential for significant impacts in regard to substantial density increase, growth-inducement, land use compatibility, visual effects, drainage, tree removal, traffic issues, and cumulative effects, new studies (not the property owner's studies) in all these issue areas should be required and impacts fully disclosed in the EIR.

Workforce Housing (WH) Combining Zone Concerns: The potentially proposed Workforce Housing Combining Zone is particularly problematic and could set a significant growth-inducing precedent for future projects in downtown Glen Ellen. The parcels DO NOT meet the criteria for application of the Workforce Housing (WH) Combining Zone and should not be considered for such designation.

The stated purpose of the WH zone is: “to increase housing opportunities for Sonoma County's local workforce in areas that are close to employment and transit.” Glen Ellen is not a substantial

employment center, nor does it provide adequate transit to employment centers. The regulation states that “The WH Combining Zone can be applied to properties within an urban service area that are also within 3,000 feet of a transit center, or to an employment node with at least three acres of commercial zoning or 10 acres of industrial zoning.” There is no transit center in Glen Ellen and very little commercial zoning so this zone district is inappropriate.

The WH Combining Zone allows a density of 16 to 24 dwelling units per acre, with additional density allowed under the County’s density bonus programs for affordable units. Furthermore, the regulation **requires a minimum density of 16 units per acre** as stated in the ordinance. There is no option to provide less than 16 units per acre. This high density zone is completely out of scale with existing housing density and existing zoning. There is no place in downtown Glen Ellen where housing density is remotely close to this density. This combining zone is appropriate for urban areas, not rural villages. While the community supports housing in Glen Ellen, the amount of housing that would be allowed to be concentrated on these small parcels is completely out of character with surrounding land uses and would not be supported by appropriate infrastructure (roads, parking, services, transit, etc.). Furthermore, it is likely that other downtown parcels would seek the WH zone to increase density far beyond existing allowed levels.

The zoning, if applied to the two Glen Ellen parcels (totaling .85 acre), could result in 20 units on the site, or more, if a density bonus granted. This would be a dramatic change from the existing 4 residential units on the project site.

The WH ordinance also requires that:

“(d) The proposed rezoning is consistent with the overall goals, objectives, policies, and programs of the General Plan and any applicable Area or Specific Plans as amended from time to time.”

This zone district is not consistent with the General Plan provisions for Glen Ellen. Sonoma County General Plan Policy 20i requires that new uses in the Glen Ellen area meet the following criteria:

- The size, scale, and intensity of the use is consistent and compatible with the character of the local community,
- Capacities of public services are adequate to accommodate the use and maintain an acceptable level of service,
- Design and siting are compatible with the scenic qualities and local area development guidelines of the local area.

There are clear inconsistencies with bullets 1 and 3 above, as the high density zone district is not compatible with the local community, nor is it compatible with the scenic qualities or local development guidelines.

The County staff report on the previous rezoning proposal states that: “the WH Combining Zone would allow residential development of 16-24 units per acre **in addition** to the uses allowed by the base zoning district.” This would further exacerbate impacts on the downtown area.

Land Use Compatibility and Historic Value: Although housing is important for Glen Ellen, the bottom line is that the potential magnitude of the rezoning on these sites simply doesn’t “fit in.” Land use compatibility is a critical issue yet it is often overlooked. Uses that are developed at densities and intensities greater than surrounding uses have the potential to become a focal point and erode the existing land use character of the small downtown area. It is undeniable that increased density will have adverse land use and quality of life impacts on Glen Ellen and its residents. Furthermore, the historic value of the existing structures should be evaluated.

Aesthetic Impacts and Community Character: An independent and thorough analysis of visual and aesthetic impacts by experienced professionals is necessary to inform decision makers regarding how increased density may appear on this site. What building heights will be analyzed? When a previous proposal was submitted for the site, it was clear that the increased density would result in little open space or landscaping to soften the buildings’ appearance. **The large mass structures required to accommodate increased density on this highly visible site (and within the Scenic Resources zone) will degrade the visual qualities of the area.**

The density will not be consistent with Glen Ellen policies regarding design and massing. For example, Sonoma County General Plan Policy 20i requires that new uses in the Glen Ellen area meet criteria noted above (see discussion under Workforce Housing). Clearly, the proposed rezone is not consistent with bullets 1 and 3. The Glen Ellen Development and Design Guidelines are intended to ensure that the size and scale of new development is compatible with the existing local land uses. Higher density development, by definition, will not be compatible with downtown Glen Ellen.

Traffic, Circulation, and Parking: Traffic impacts need to be assessed through an independent thorough traffic analysis. Observation and common sense indicate that there are valid circulation, parking, and line of sight concerns associated with increased density. The Carquinez/Arnold Drive intersection is in an awkward location, just a block down from the stop sign at Arnold and Warm Springs. Directing traffic to Carquinez to access the site (and potential parking area) will create many more left turns onto Carquinez from Arnold Drive. The amount of parking that will be required to meet the requirements for the higher density will generate on- and offsite circulation problems. The site does not provide adequate turning/maneuver space for the two way traffic that will be using it. Adjacent properties will be subject to substantial impacts from traffic. Also, future residents will likely park on Arnold Drive, thus creating competition for onstreet parking. Another potential impact is that community residents will increase use of the unpaved Railroad Street to avoid negotiating the Arnold Drive/Carquinez intersection. This rural road is already impacted by the redevelopment across the street, which is increasing residential density.

Tree Removal and Landscaping: Because of the large building footprint that would be required to meet increased density, most mature trees will be removed from the project sites, including removal of an ancient redwood tree and heritage oak trees. There will be nothing left to screen or at least soften the appearance of large unattractive buildings. The stark appearance will significantly detract from Glen Ellen's visual qualities. Given the large number of trees lost during the 2017 fires, every attempt to preserve existing mature vegetation should be made. Further analysis of property owner claims that trees (e.g. the redwood) must be removed due health conditions should be investigated.

Site Drainage and Containment: How would onsite drainage be handled, particularly given all the new impervious surfaces required for higher density housing? Significant drainage impacts could occur, given the lack of large capacity drainage systems and proximity to the junction of Sonoma and Calabazas Creeks.

Cumulative and Precedent-Setting Effects: While impacts in issues like traffic, circulation, visual, and land use may not be individually significant, when combined together they result in substantial impacts, especially within our two-block town. These aggregate effects can cause the demise of local land use character and quality of life. For example, the existing Accessory Dwelling Unit (ADU) ordinance allows second units on single-family parcels, in effect doubling the density in single family zones in Glen Ellen. Furthermore, there is a development across the street from the proposed rezone site that is adding residential units and increasing density within the same block. Also, there are several parcels, including property on Carquinez, which may soon transfer ownership and will likely undergo redevelopment. If the WH zone district or other high density district is approved, it will become an attractive tool for developers wishing to substantially increase density. Finally, development allowed under the upcoming SDC Specific Plan must be considered in the cumulative impact analysis.

Conclusion

The County's proposed rezoning is a significant project for downtown Glen Ellen and will permanently change the town's character and will set precedent for future development.

Please delete these two parcels from further consideration in the County's rezoning proposal to ensure impacts on our small town are avoided. These sites are not appropriate and not needed to meet the County's housing requirements.

Regards,



Vicki A. Hill, MPA

Environmental Planning Consultant

P.O. Box 565
Glen Ellen, CA 95442
September 17, 2019

Nina Bellucci
Planner II
www.PermitSonoma.org
County of Sonoma
Planning Division | Comprehensive Planning
2550 Ventura Avenue, Santa Rosa, CA 95403

Attention: **PLP17-0034**

Dear Ms. Bellucci:

I have been a resident of the village of Glen Ellen since 1986 when we purchased our home at 13645 Garric Avenue. We raised our two children in the community and have been active in community affairs for over 30 years.

I am disheartened to learn of the Rustic Shops and Apartments project proposed in downtown Glen Ellen at the corner of Carquinez and Arnold Drive. Living 2 blocks uphill on Garric Avenue, I walk, bike, and drive this location daily. It is challenging and hazardous to enter Arnold Drive from Carquinez, whether on foot, by car, or bike. Adding 23 parking spaces to be accessed solely from Carquinez, very close to this intersection, will exacerbate an already heavily trafficked and dangerous area. There is poor visibility due to parked cars along Arnold, and little impediment to speed other than a stop sign and crosswalk. All too often drivers race by this intersection hellbent on tearing through town with little regard for entering pedestrians or cyclists. A Sonoma County transit bus stop further diminishes visibility. Averting a disaster has come to depend on the courtesy, attention, and good judgment of hurried drivers. The stop sign at the adjacent intersection of Warm Springs Road and Arnold has given rise to the infamous California stop for cars entering from Warm Springs Road, with rude disregard for pedestrians walking to the post office, the grocery store, or nearby restaurants and shops, or motorists trying to turn onto Arnold Drive from Carquinez.

An intensive residential commercial project of this magnitude has no place in an already congested area where traffic and noise are increasing at an alarming rate. All the conditions are in place for a tragic accident.

The proposed project calls for the removal of many beautiful and mature trees (including a large redwood on Arnold) growing behind and in front of the existing triplex and along Carquinez as well as the removal of the triplex on Arnold and an existing home on Carquinez—all to make room for a high density construction of 5 new multistory buildings. This is completely out of character with the existing historic architecture of the village. It will change the character of tiny rural Glen Ellen irreversibly.

Who is standing for these trees—the mature conifers, oaks, ornamentals, and olive? They grace our landscape, help to cool the asphalt and cement, enrich our oxygen supply, draw down carbon, and help to mitigate the car exhaust and noise. They nourish us in so many vital ways. The proposed destruction of these trees must be carefully weighed in the overall design review.

In Glen Ellen, we have already fought long and hard against the greed of vacation home investors who commercialize our residential neighborhoods, valuing profit at the expense of community. This project is calling for a change in zoning to Workforce Housing Combining Zone. This appears to permit an even higher density housing than previously allowed—and may turn out to be a Pandora's box on a par with vacation rentals, especially if shorter term rentals are permitted. It does not appear to be a fair deal for Glen Ellen residents with its dubious concession of more living units.

I appreciate this opportunity to voice my strong objections to a poorly conceived and designed project to be located in a sensitive historic area already burdened with high traffic and noise. We in unincorporated Glen Ellen are completely dependent, politically speaking, on the good will, wisdom, and foresight of the Planning Department and the Board of Supervisors when it comes to regulating the health, livability, and well being of our community. We deserve a thoughtful and measured response to the insistent demands of development interests.

Thank you for your consideration.

Sincerely,

Diana Hindley

From: [LEELA H](#)
To: [Nina Bellucci](#)
Subject: Glen Ellen development planning for apartments
Date: September 16, 2019 9:02:58 PM

EXTERNAL

Too much traffic for apartments to be downtown in my opinion...

with three restaurants, at WSR/ARNOLD and the Garden Cafe, wine tasting shops, liquor store and post office and Jack London Park access road with Nugget market and bakery shoppe too?.. more density on a narrow bridge that cannot be widened is ridiculous. And I've seen plenty of semi tractor trailers with heavy loads use Arnold Drive in Glen Ellen in the early morning and late night hours when traffic is less. How does a massive SEMI navigate that left turn heading south over the bridge? Beats me. How many of us remember how much traffic got pulled in from the fires from Kenwood when HWY 12 was closed? They used WSR to access Arnold. when fighters and sheriffs told Kenwood neighbors to evacuate immediately! What happens if we have another evacuation for fire on two lane Arnold Drive and narrow bridge road through our tiny Glen Ellen?. We voluntarily evacuated the morning of October 9th at 3:30 am and Arnold was backed up with traffic all the way to the golf course trying to get out of town. There was a long waiting line just to get gasoline at the 76 station that night. That kind of traffic congestion was truly a nightmare with a strong wind breathing fire down our backs from the north. I still have PTSD from the fear that I wouldn't be able to leave Glen Ellen fast enough in my vehicle in case of fire danger. May we be blessed with. more awareness and critical thinking skills of remembering our past before allowing high density planning to be on our one and only major road.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: [Deb and Rory Pool](#)
To: [Nina Bellucci](#)
Subject: Winters Project PLP17-0034
Date: September 17, 2019 9:03:54 AM
Attachments: [Winters Project.2019.docx](#)

EXTERNAL

Good Morning Nina,

Attached is a letter from Rory & I concerning the Winters Project in Glen Ellen, to have on hand for the upcoming Conceptual Design Review meeting on 9/18/19.

Thank you,

Deb Pool
13588 Railroad Ave
Glen Ellen

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: [Kevin Schuh](#)
To: [Nina Bellucci](#)
Subject: Rustic Apartments and Shops
Date: September 17, 2019 10:32:48 PM

EXTERNAL

I live in the Glen Ellen area and wanted to provide my feedback on the Rustic Project:

PRO:

I really like this project overall and I like the footprint of the buildings and parking. Having the parking behind the buildings creates a much nicer curb appeal and makes it pedestrian friendly. The housing is greatly needed in this area and is welcome as long as we also think of the future of the corridor and what it needs to be in the future. Combined retail and residential is the best option here. This property is bookended on Arnold by other commercial properties so it only makes sense to infill with more commercial. Earlier plans had retail on the first floor and residential upstairs facing Arnold Drive. That is a win for everyone.

CON:

This area is supposed to be designated as a commercial/retail corridor to help develop a thriving town center for Glen Ellen. I am not clear as to why the county is not enforcing this requirement for this project? By allowing the commercial element to be removed from this project are you not setting up the rest of the area to lose more of its commercial/retail space and instead turn everything into apartment buildings? When the vacant lot down the street gets developed will it not end up as basic apartments that give the developer the biggest return? Will the current retail across the street be converted into apartments in the future? Why is the county plan not being followed?

This project is well laid out and brings in needed residential units but Glen Ellen also deserves a town center that is full of restaurants, shops and cafes surrounded by residential. This is a great opportunity for the county to put that vision in motion by following the county plan to develop this block into a commercial/retail space on the ground level. Please do not be short sighted on this and give it up for a quick fix or the entire plan for this area will regress and fall apart.

Thank You,
Kevin Schuh

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,

do not click any web links, attachments, and **never** give out your user ID or password.

From: [SANDY STRASSBERG](#)
To: [Nina Bellucci](#)
Subject: Permit Sonoma File PLP17-0034.
Date: September 16, 2019 4:47:57 PM

EXTERNAL

Ms. Bellucci,

I feel this project is out of scale to Glen Ellen. It's too big, provides too much housing in our downtown area, and will undoubtedly light up our dark sky at night like Disneyland.

I live up the hill from that corner; Arnold Drive has become quite congested and just turning from Carquinez is problematic.

I have lived here 39 years and do not want to set a precedent of a big project like Mr Winter proposes. We are a small town. We live here for that reason and I have invested in my property to stay here the rest of my life. It will impact me and our town greatly. How can someone just come in and change the character of the town because he has the money to do so?

Sincerely,

Sandy Strassberg

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

From: [Stacey Vilas](#)
To: [Nina Bellucci](#)
Subject: Hearing file PLP17-0034 Glen Ellen
Date: September 16, 2019 5:39:35 PM

EXTERNAL

Dear Nina Bellucci and other Sonoma Permit Planners,

I have concerns regarding the Rustic Shops & Apartments project located at 950 & 987 Carquinez Avenue and 13651 & 13675 Arnold Drive, Glen Ellen (parcel numbers 054-290-084 & 054-290-057)

I live in Glen Ellen near the proposed project and strongly believe the increase of housing and commercial shops at this corner would gravely effect traffic safety. The corner where the proposed development is has a high volume of motor vehicle traffic during morning and evening commutes on weekdays, and heavy tourist traffic on weekends. Pedestrian traffic is high due to several restaurants, mornings and evenings every day of the week. On weekends there is higher volumes of pedestrians from the wine tasting crowds and there are also quite a few residents in Glen Ellen that walk, bike and run in the area every day.

The post office is around a tight corner from the proposed development on Arnold and already has traffic issues with vehicles traveling S/B Arnold too fast then having to slow for turning vehicles into the lot.

In addition, the vehicles come out of the lot off a small street (O'Donnell Lane) with limited views. The proposed project would add a driveway with additional vehicles coming in and out of Arnold Drive across from O'Donnell Lane intersection adding to traffic chaos.

The design of the building is a concern because Glen Ellen is a quaint historic town. I'm not sure this design fits in with the ambiance of the community. I am not advocating for no change, or no housing. I am advocating for design that fits with the general guidelines of the town.

I am also very concerned about changing the zoning to workforce housing combining zone and the slippery slope that has for our future as a historic town. We currently don't have the infrastructure to handle the increased activities of these buildings. And we do not want to widen the roads, add sidewalks or bike lanes, add streetlights or add stoplights.

I appreciate that Marty Winter wants to improve and develop property in Glen Ellen. I'm hoping his project can be designed to fit in with the community as a whole and still provide him with the capitol investments appropriate for investors.

Thank you for your time, I'm happy to share more of my thoughts if needed.

Stacey Vilas
PO Box 697
13650 Gibson St
Glen Ellen, CA
707-996-1293

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: Justine Ashton <justine_ashton@icloud.com>
Sent: September 16, 2019 3:11 PM
To: Chelsea Holup
Cc: justine_ashton@icloud.com
Subject: Glen Ellen Properties design /mixed use project/ PLP17-0034

EXTERNAL

PLP17-0034

Design Review Committee

Dear Members

The proposed mixed use project is too big for our town

Too high
Too long
Too wide

Also

I am deeply concerned about the proposed removal of the redwood trees on the property.
They are majestic and historic

Years ago a design for a new market was brought before the residents of Glen Ellen

It went through at least three or four design reviews

After much consideration our town ended up with a magnificent building !

A building
That "fits"
Not as tall or wide or long

The Glen Ellen Village Market complements the other structures in town

all of the redwood trees on the property were saved

Please lesson the scale and scope of the current design for this mixed use project in Glen Ellen.

And please save the redwood trees.

Sincerely yours
Justine Ashton
Glen Ellen resident

Sent from my iPhone

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

Chelsea Holup

From: Deborah Baratta <barattas@icloud.com>
Sent: September 14, 2019 8:02 AM
To: Nina Bellucci
Subject: Permit Sonoma File PLP17-0034

EXTERNAL

Glen Ellen proposed building
Sept 18 meeting

AS a resident of Glen Ellen for 18 years I am not opposed to the construction of a new building(s) in our town. I especially embrace the removal of the dilapidated triplex to accommodate this structure. However, the design could be more appealing, more "cottage-like" to fit into the town rather than boldly standing out as this design suggests. (Albeit better than the first proposed design). Perhaps a third design is warranted that maybe looks more 1930's or 40's in style rather than 1980's. This one looks like an office building that belongs in Santa Rosa.

But my biggest concern is the magnificent redwood tree that should be incorporated into the design rather than being destroyed. That tree is PART of Glen Ellen and needs to remain.

Deborah Baratta
P.O. Box 2104
Glen Ellen, CA 95442

Sent from my iPad

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

Chelsea Holup

From: sondra bernstein <figgirl1@gmail.com>
Sent: September 15, 2019 5:58 PM
To: Nina Bellucci
Subject: Mordechai Winter project

EXTERNAL

Hi there!

Marty asked me to drop you a note and I am more than happy to do so!! He has been our landlord since 1997 at the fig cafe in Glen Ellen and I am grateful for him.

He has been talking about a residential project for a few years now and there is no better time than now to have some reasonable housing options in Glen Ellen. I believe the existing units need some work.

In my opinion, Glen Ellen is a community that cycles in business. Some years, we are going strong and others we can hear the crickets in the creek. We could definitely use some revitalization, love that he will have off street parking for the tenants and we really need some love since the fires.

I am leaving Tuesday for a few weeks to go out of town but I am more than happy to discuss this at your convenience when I return in October.

Thank you for considering this!



- [the girl & the fig](#)
- [the fig cafe & winebar](#)
- [the girl & the fig CATERERS!](#)
- [girl.fig.store](#)
- [fig cakes & sweets](#)
- [Suite D](#)
- [the fig rig](#)
- [Rhône Around the World Wine Club](#)
- [#figchronicles](#)
- [sonoma figbits](#)
- [Sonoma FIG Foundation](#)



Listen to the latest episode of our podcast, The Bite Goes On, [here](#).



THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: JOAN BOURG <dirtgirls@aol.com>
Sent: September 12, 2019 1:12 PM
To: Nina Bellucci
Cc: dirtgirls@aol.com
Subject: Glen Ellen carquinez project

EXTERNAL

dear ms Bellucci;

Pardon my typing, i have a cut and fat band aid on a mAIN typing finger, and it's messing me up !
As a Sonoma valley native, and Glen Ellen homeowner, i have driven and walked by this location a million times.
I have seen the proposed build via e mail, and it looks totally out of scale with this location and homey feel of this corner. It looks like it will occupy the whole 2 lots?

Will there be any landscaping to Soften this behemouth?

Any space for people to sit or enjoy the land????

Or the fact they are living in downtown GE. A gift in itself Sonoma valley Glen Ellen and surrounds, are all about open space , preserving a look and feel of our home, alsong with architecture worthy of the beauty fo the land.

THIS looks like those cheap builds you see , using a lot of " face plywood" areas, flat and reflective and ugly, with those combined ugly staircases, which has more ugly face plywood, then many tiny windows. The whole thing looks cheap and out of scale ! I'll not mince words.

Glen Ellen downtown is historic, and new construction there should reflect this. !!!!!

this design is not that, and so so so out of place !!!

Does the staircase face Carquinez ? Or Arnold ?

Not that it would change anything. You could not avoid the gain t face of this thing.

This project needs design upgrades !!!!! It's awful. Please help us here. We need style with the practical of this structure.

Thank you for your ear and time .

I used spell check after all 🙄

Respectfully

Joanie Bourg

Sent from my iPad

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

Chelsea Holup

From: patricia chiono <patriciachiono@gmail.com>
Sent: September 10, 2019 10:33 AM
To: Nina Bellucci
Subject: Project in downtown Glen Ellen

EXTERNAL

I think this was is a horrific design and one that will have a large impact ti a corner that is not safe. It does not fit nro the surrounding environment and will increase traffic in an area that is not designed for that type of residential living.

Patricia Chiono

--

Patricia Chiono
Dovetail Farm
Glen Ellen, CA.95442
C. 917 583 6996

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: patricia chiono <patriciachiono@gmail.com>
Sent: September 16, 2019 12:36 PM
To: Nina Bellucci
Subject: Re: Project in downtown Glen Ellen

EXTERNAL

Dear Ms. Bellucci,

I wanted to go on record with my objections and concerns for the property Marty Winter's is proposing in downtown Glen Ellen (Permit Sonoma File PLP17-0034).

First of all, I find the timing for the meeting to be objectionable because many of us cannot attend. I also find that in Glen Ellen's desire to allow people to rebuild and increase the housing supply they are ignoring the reason many of us moved here in the first place... for a historic and charming community with low density and low profile building structures.

While it is important to provide more housing, doing it so on a historic street that was saved in the fires because of its history while other homes were allowed to burn, I find is reprehensible. My street was left uninhabitable because the fire company made a decision to save the village which is what this man is asking to destroy.

And on a less personal note, this small village cannot handle that sort of density, additional parking spaces and that sort of hideous architecture on that small corner. I am on that street everyday. The proposed building will be an eyesore and will take away from the small feel of this community as this project fronts the road. It is also a dangerous corner as it is and the addition of such a large structure that does not fit in with the neighborhood sets a precedent for denser housing that is hard to reverse. That area is a very visible representation of the village and the proposed structure is out of scale for that site.

To be more articulate here's what I find it reprehensible...

1. The building/s is not consistent with Glen Ellen design guidelines and it is out of character to the look and feel of the village. Many of us bought here and many of us have chosen to rebuild here because we loved the historic aspect of the village.
2. There are too many proposed buildings on this site and it is out of scale with the rest of the village as it is very visible.
3. The entire project is visually unattractive and inconsistent with current and/or historic qualities. It is built in an area that has major traffic and pedestrian problems already with the restaurants, Post Office and Bodega. It will create more traffic problems and parking problems. I do not feel Mr. Winters has made any attempt to share this design with the village. If his vision was in keeping with the village, many of us would not object. He was asked to do this by the Glen Ellen Forum and he did not.
4. I also object to someone who did not lose their neighborhood, their village and their wonderful trees... developing this area with no consideration for the village. The trees should remain as we have lost so much and so many of our residents, by that I mean the beautiful Oak trees that have been here before Mr. Winters was even born.

5. This is a quaint and charming village that I chose to live in when I moved from New York several years ago. I have grown up coming here for the past 60 years as a child and an adult. One of the things that has always given me great joy was the drive up Arnold, the historic buildings and the quaint low lying buildings, the drive across the bridge to the turn and up the little road, with its low lying structures, continuing up Arnold and back to 12. Having lived in many places in New York and traveled extensively throughout the world, Glen Ellen is a unique village. There are very few villages that have such a low lying profile and such history.

Benicia is a good example of a town that has maintained its historic aspect while larger homes and buildings are built outside of the downtown area. Vallejo is an example of what happens when you start destroying the original architecture. It is hard to go backwards and reestablish the original feel of what a city or village has that makes it special.

In closing, I think allowing this building begins to break down the integrity of this small village in a way it would be hard to turn back on the clock on if it proceeds. Maybe if our developer could choose an architect that is sensitive to the nature of this area we might have different feelings. No one is against progress, but destroying the historical aspects of a community is a sin.

Sincerely,
Patricia Chiono

Patricia Chiono
5220 Warm Springs Road
Glen Ellen, CA
95442

Bellucci <Nina.Bellucci@sonoma-county.org> wrote:

Thank you for your comment. We will distribute it to the Design Review Committee members for their review.

I will also add you to the interested parties list for this project, so you are notified of project updates and meeting or hearing dates.

Thank you,

Nina Bellucci

Planner II

www.PermitSonoma.org

County of Sonoma

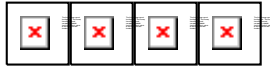
Planning Division | Comprehensive Planning

[2550 Ventura Avenue, Santa Rosa, CA 95403](http://2550.Ventura.Avenue.Santa.Rosa.CA.95403)

On
Tue,
Sep
10,
2019
at 7:09
PM
Nina

Direct: 707-565-1236 |

Office: 707-565-1900 | Fax: 707-565-1103



OFFICE HOURS: Permit Sonoma's public lobby is open Monday through Friday from 8:00 AM to 4:00 PM, except Wednesdays, open from 10:30 AM to 4:00 PM.

From: patricia chiono <patriciachiono@gmail.com>
Sent: Tuesday, September 10, 2019 10:33 AM
To: Nina Bellucci <Nina.Bellucci@sonoma-county.org>
Subject: Project in downtown Glen Ellen

EXTERNAL

I think this was is a horrific design and one that will have a large impact ti a corner that is not safe. It does not fit nro the surrounding environment and will increase traffic in an area that is not designed for that type of residential living.

Patricia Chiono

--

Patricia Chiono
Dovetail Farm
Glen Ellen, CA.95442
C. 917 583 6996

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: Ann Deseran <ahdeseran@gmail.com>
Sent: September 15, 2019 1:08 PM
To: Nina Bellucci
Subject: Marty Winter project - Glen Ellen

EXTERNAL

My husband and I are writing you in regards to our concern about aspects of the proposed development by Marty Winters in Glen Ellen.

We live at 13606 Railroad St - just across Carquinez from the project.

While we agree with the many folks in our community who have expressed concerns about the appearance of the development and the large number of rental units planned for this our single-family-home village, our main concern, like many others, focuses on the number of cars allowed - 23. With the possibility of another development just across the street (Sorkin), which would allow another 10 cars, and the likelihood that parking for even more cars would be needed, in the case of 2-car renters, you've suddenly created a whole new traffic issue - not only pulling onto Carquinez but even more importantly pulling out from Carquinez onto Arnold.

It is difficult to imagine how the corner of Carquinez and Arnold could handle that much more traffic. It's already a dangerous intersection, given that cars are now allowed to park on the east side of Arnold in front of the McCormick Mercantile Co store. Turning left onto Arnold off of Carquinez is terrible visibility-wise. The traffic study which accompanies this proposal is out-dated. The statistics used come from 2015 and 2016, which was before the McCormick store opened and the cars parked there.

If you have questions, please feel free to email us or call us at 707 217 0977.

Ann and Forrest Deseran

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

Chelsea Holup

From: Howard Epstein <hepstein@gmail.com>
Sent: September 16, 2019 7:29 AM
To: Nina Bellucci
Subject: Sonoma File PLP17-0034

9/12/19

To Whom It May Concern,

I have reviewed the real estate development project proposed by Mr W. It is a welcome addition to Glen Ellen. The design is in keeping with the style and bulk are at best moderate in size. Mr Winter will attract a few new people and some much needed rental housing.

I have a home in Glen Ellen that suffered a complete loss in the 2017 fire. I will not commit so much time, effort and money to such a heavily damaged area. I am not appreciated, not opposed so strongly as some have done.

All the people who say they have better ideas had an equal opportunity to be heard. Please approve the project as proposed.


Howard Epstein
Glen Ellen, Ca

EXTERNAL

Howard Epstein
415-710-1302

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

Chelsea Holup

From: Greg Guerrazzi <gregguerrazzi@vom.com>
Sent: September 16, 2019 2:23 PM
To: Nina Bellucci
Subject: PLP17-0034 - Carquinez & Arnold Dr - Glen Ellen

EXTERNAL

Hello Ms. Bellucci, my wife Mary Guerrazzi and I have resided at 13480 Mound Avenue in Glen Ellen since 1994. Access to our property is via the Arnold Drive and Carquinez Avenue intersection.

Please confirm receipt of this email and that these comments will be entered into the record for PLP17-0034.

We are very concerned that the Rustic Shops & Apartments development proposed under PLP17-0034 will destroy the nature of our village. I understand that this project is only under Design Review at this time, however below is a listing of our concerns.

- 1) The proposed zoning change to "Workforce Housing Combining Zone" is not consistent with the County General Plan.
- 2) Traffic – Need revised traffic study. 15 residential units will generate far too many vehicle trips with the only access driveway on Carquinez Avenue. The volume of traffic will greatly impact the Arnold Drive/Carquinez intersection and the cross walk located at this intersection. The line of sight at this intersection is poor and the adjacent restaurants already generate traffic and parking issues at this intersection. The proposed 15 residential units is far too dense for Carquinez Avenue and the Arnold Drive intersection.
- 3) The Glen Ellen Local Area Design Guidelines and the historic nature of our village must be adhered to and preserved. The proposed development does not adhere to the guidelines and is in contrast with the historic nature of our village. The Arnold Drive frontage of a massive 22'+ sloped composition shingle roof is not compatible with the design guidelines or the historic nature of our village. The east and west elevations are also obtrusive and not compatible.
- 4) 15 residential units on .85 of an acre in this location is far too dense and not compatible with the guidelines or historic nature of our village.
- 5) If approved this development will be an overbearing feature in our village, is visually obtrusive, will set a precedent and will forever change the character and nature of our historic village.
- 6) The developer has not considered or solicited input from the Glen Ellen community even after being directed to do so by the SVCAC.
- 7) The residential density cannot be supported by the infrastructure in the area such as parking, pedestrian traffic, drainage and circulation on surface streets, which are all in poor condition.
- 8) Tree removal – The report clearly states that many trees will be removed to accommodate the construction. The large redwood must be preserved. This report is over 2.5 years old and should be updated to address how the development footprint can be revised to preserve more trees.
- 9) Glen Ellen is very slowly recovering from the 2017 wildfires, and I understand the need for housing, however this proposal is out of scale, character and the historic nature of the village of Glen Ellen.

- 10) A development designed to specifically align with the historic nature of the village taking into considerations of traffic, density and aesthetics to preserve the small town character should be required.
- 11) The developer appears to be attempting to maximize rental units with low cost design and construction materials.

Thank you for your time and consideration.

Please do not hesitate to contact me with questions or for more detailed information.

Best Regards,
Greg Guerrazzi
(707) 935-1111

COMMUNICATIONS CONTAINED IN THIS TRANSMISSION ARE PRIVILEGED & CONFIDENTIAL



Virus-free. www.avast.com

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: mary@winecountryexcursions.com
Sent: September 16, 2019 3:00 PM
To: Nina Bellucci
Cc: Chelsea Holup
Subject: Glen Ellen Rustic Shops and Apartments

EXTERNAL

Dear Nina,

I am writing on behalf of **Marty Winters proposed plans for 13651, 13675 Arnold Drive, 950/987 Carquinez, Rustic Shops & Apartments Proposal PLP17-0034.**

Please confirm receipt of this email and that these comments will be entered into the record for PLP17-0034.

My husband (Greg Guerrazzi) and I own two travel companies (**Wine Country Excursions and Wine Country Trekking**) that send people to the village of Glen Ellen every year. The visitors lodge, dine and shop in Glen Ellen creating income for the County. We chose this village in all of Sonoma County to place our visitors because of its charm and historic character.

We also live in Glen Ellen. We live two streets away from the above proposed project and walk, bike and drive past that location several times a day. We chose to live in Glen Ellen for the exact reason that I send my customers here - it is completely, wonderfully charming.

The proposed plan above does not fit in with any of the current buildings (housing or commercial) in the town of Glen Ellen. In fact, these buildings are the exact opposite of charm. They have no character, no distinction (no decks, porches, terraces, french doors, window ledges) and look surprisingly like cheap condos from a 1970's ski resort.

Aside from the unattractive facade here are other issues I have with the project and recommend that it not pass Design Review:

1.

The project is an entire block of our very small town - this block is roughly 25% of the commercial village. Given the enormous significance of the appearance and quality of this portion of our village we (concerned citizens of the Glen Ellen Forum) approached Mr. Winters and asked him if we could have input in the building design - make comments to his architect, etc... He seemed open to that but went ahead and had the design done without input.

When his first design was rejected by the Planning Department he came up with the proposed project above after being TOLD to have input from the community by the SVCAC. This rejection of input from the community does not sit well with those of us that live here. If it were a house or one building it would be entirely different but this is a large scale project for a very small village.

2.

The density of the project is out of scale with the rest of the town. It is a village with houses and some commercial buildings - not apartment complexes. 15 units on .85 of an acre is much too dense. A design with commercial below and apartments/condos above would have been more appropriate for this section of Arnold Drive and would have provided business opportunities. As for the Carquinez Street side of the project a remodel of the existing lovely homes and keeping the old trees would be a much better option to keep our village "charming". One of the homes is a Victorian and should probably be considered for the historic register.

3.

Currently there is a redwood tree on the property that is very large and beautiful. It is most likely around 200 years old. It has coexisted with the current cottages on the property and I am greatly disheartened that it is being removed in the above plans.

4. Mr. Winters also owns the businesses on the opposite side of Arnold Drive. As a landlord he has not made any improvements to those buildings in the 25 years we have lived in Glen Ellen. Currently they are vacant and have been for some time - eroding the vibrancy of our village. I am worried about him being an absentee landlord for 15 more units (or any) in the village.

We are open to working with Mr. Winters and exploring an attractive addition to our little village - one that will have charm, character, occupancy and vibrancy. **This proposal is not that addition.**

Thank you.

Mary Guerrazzi
707-935-4496



THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

Vicki A. Hill, MPA
Environmental Planning

3028 Warm Springs Road
Glen Ellen, CA 95442
(707) 935-9496
Email: vicki_hill@comcast.net

September 16, 2019

DELIVERED VIA EMAIL

Please distribute copies of this letter to DRC members.

RE: Comments on Application # PLP17-0034, Glen Ellen Proposal “Rustic Shops and Apartments” for September 18, 2019 DRC meeting

Dear PRMD Staff and Design Review Committee Members:

I’m a professional land use planner and CEQA specialist with over 30 years of experience in reviewing and designing city and county land use plans and conducting environmental assessments for public agencies. I’m also a 25 year resident of Glen Ellen. As a planner, I have serious concerns about the above-referenced development proposal in downtown Glen Ellen (specific issues are identified below). Please incorporate these comments into the public record and give careful consideration to my concerns. I request that the DRC reject this proposal and require the applicant to work with the community to develop a viable project that is compatible with the very small Glen Ellen Village.

I appreciate the applicant’s efforts to revise the design. However, in my professional opinion, **the current Glen Ellen proposal involves inappropriate and precedent-setting rezoning to a high-density Workforce Housing Combining district, which would result in a project that remains out of scale and has the potential to result in substantial adverse impacts on our small village.**

While this current proposal may appear nonthreatening to those who are unfamiliar with the Glen Ellen community, the project represents a large part of the downtown core (which is only two blocks long) and will dramatically change the character of our village. As a planner, it is disheartening to see that a proposal is being considered that **is clearly inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.** With the devastating loss of established neighborhoods during the 2017 fires, it is more important than ever to protect the quaint, small town feel that the community values so much.

I urge the County to consider a scaled-down development and more appropriate design that is consistent with Glen Ellen’s small downtown historic charm reflected in the Glen Ellen Development and Design Guidelines. It should be noted that the SVCAC directed the applicant to work with the community to address community concerns about the size and appearance of his proposal. Other than

presenting preliminary sketches of the project at an August Glen Ellen Forum meeting, there has been no effort to actually work with the community. The project, as currently proposed, is not scaled down from the proposal reviewed by the SVCAC earlier this year. Also, I believe there is a misunderstanding about demand for commercial uses in Glen Ellen. The vacant commercial buildings across the street from the project site are also owned by the project applicant. It appears that they have been vacant for several years, primarily due to rents being charged that are beyond the market rate for Glen Ellen. There may be demand for commercial uses, but not at the unrealistic rate that is being charged. Adding a few small non-chain shops and renting them at reasonable rates could add to the small town feel of Glen Ellen.

Although housing is important for Glen Ellen, the bottom line is that the size and magnitude of the project simply doesn't "fit in." There are numerous planning concerns associated with this proposal, as summarized below.

Workforce Housing (WH) Combining Zone Concerns: The proposed Workforce Housing Combining Zone is particularly problematic and could set a significant growth-inducing precedent for future projects in downtown Glen Ellen. I disagree with the staff report statement that "The parcels meet the criteria for application of the Workforce Housing (WH) Combining Zone."

The stated purpose of the WH zone is: "to increase housing opportunities for Sonoma County's local workforce in areas that are close to employment and transit." Glen Ellen is not a substantial employment center, nor does it provide adequate transit to employment centers. The regulation states that "The WH Combining Zone can be applied to properties within an urban service area that are also within 3,000 feet of a transit center, or to an employment node with at least three acres of commercial zoning or 10 acres of industrial zoning." There is no transit center in Glen Ellen and very little commercial zoning so this zone district is inappropriate.

The WH Combining Zone allows a density of 16 to 24 dwelling units per acre, with additional density allowed under the County's density bonus programs for affordable units. Furthermore, the regulation **requires a minimum density of 16 units per acre** as stated in the ordinance:

"Workforce housing projects shall conform to the residential densities and development standards listed in Section 26-24-030 (R3 High Density Residential), except as set forth below: 1) **Workforce housing projects shall have a minimum residential density of sixteen (16) units per acre** and a maximum residential density of twenty four (24) units per acre based on the calculation of density unit equivalents for High Density Residential provided in Section 26-24-030. Additional density may be granted in compliance with Article 89 (Affordable Housing Program)."

There is no option to provide less than 16 units per acres. This high density zone is completely out of scale with existing housing density and existing zoning. There is no place in downtown Glen Ellen

where housing density is remotely close to this density. This combining zone is appropriate for urban areas, not rural villages. While the community supports housing in Glen Ellen for local residents, the amount of housing that would be allowed to be concentrated on these small parcels is completely out of character with surrounding land uses and would not be supported by appropriate infrastructure (roads, parking, services, transit, etc.). Furthermore, it is likely that other downtown parcels would seek the WH zone to increase density far beyond existing allowed levels. Finally, studios and one bedroom apartments do not provide for families in need of housing. Yes, the County needs housing, but not at this density in our tiny village. There must be some other way to allow the applicant to develop a housing-only project, without adding the WH zone district and I encourage the County to investigate alternative solutions.

The zoning would be applied to two parcels, totaling .85 acre, which could result in 20 units on the site, or more, if a density bonus granted. This would be a dramatic change from the existing 4 residential units on the project site. The WH ordinance also requires that:

“(d) The proposed rezoning is consistent with the overall goals, objectives, policies, and programs of the General Plan and any applicable Area or Specific Plans as amended from time to time.”

This zone district is not consistent with the General Plan provisions for Glen Ellen. Sonoma County General Plan Policy 20i requires that new uses in the Glen Ellen area meet the following criteria:

- The size, scale, and intensity of the use is consistent and compatible with the character of the local community,
- Capacities of public services are adequate to accommodate the use and maintain an acceptable level of service,
- Design and siting are compatible with the scenic qualities and local area development guidelines of the local area.

There are clear inconsistencies with bullets 1 and 3 above, as the high density zone district is not compatible with the local community, nor is it compatible with the scenic qualities or local development guidelines.

The County staff report states that: “the WH Combining Zone would allow residential development of 16-24 units per acre **in addition** to the uses allowed by the base zoning district.” Does that mean an even higher residential density may be allowed? The potential for even higher density on the sites would represent a significant impact on the downtown area.

Land Use Compatibility: Land use compatibility is a critical issue yet it is often overlooked. These types of impacts may be hard to quantify, but they’re real. Uses that are developed at densities and intensities greater than surrounding uses have the potential to become a focal point and erode the

existing land use character of the small downtown area. It is undeniable that this project will have adverse land use and quality of life impacts on Glen Ellen and its residents.

Aesthetic Impacts and Community Character: An independent and thorough analysis of visual and aesthetic impacts by experienced professionals is necessary to inform decision makers. The project design includes little visible open space or landscaping to soften the buildings' appearance. **The proposed large mass structures will degrade the visual qualities of the area.** The large sloping solid roof creates a visually unappealing view from public streets (Carquinez and Arnold Drive) and from land uses on the opposite side of the street. There are no features or materials incorporated into the design to reduce effects of massing or minimize the highly dense appearance of development on the site. Features such as a stepped back second floor, breaks in the building exterior, and more compatible materials and colors (instead of the orange wall color) would help reduce impacts. Also, it appears that the project would be in conflict with the Scenic Resources (SR) combining district regulations, which state that "structures shall use natural landforms and existing vegetation to screen them from view from public roads."

The buildings will not be consistent with Glen Ellen policies regarding design and massing. For example, Sonoma County General Plan Policy 20i requires that new uses in the Glen Ellen area meet criteria noted above (see discussion under Workforce Housing). Clearly, the proposed project is not consistent with bullets 1 and 3. The Glen Ellen Development and Design Guidelines are intended to ensure that the size, scale, and appearance of new development projects are compatible with the existing local land uses.

Traffic, Circulation, and Parking: Traffic impacts need to be assessed through an independent traffic analysis, not an analysis conducted for the applicant. Observation and common sense indicate that there are valid circulation, parking, and line of sight concerns. The Carquinez/Arnold Drive intersection is in an awkward location, just a block down from the stop sign at Arnold and Warm Springs. Directing traffic to Carquinez to access the new parking lot will create many more left turns onto Carquinez from Arnold Drive. The proposed 23 parking spaces do not seem adequate to accommodate 15 new housing units plus the commercial space and existing residence. The parking area is very tight and does not provide adequate turning/maneuver space for the two way traffic that will be using it. Adjacent properties will be subject to substantial impacts from parking lot use. Also, residents will likely park in front of the buildings on Arnold Drive, for better access to their units, thus creating competition for onstreet parking. Another potential impact is that community residents will increase use of the unpaved Railroad Street to avoid negotiating the Arnold Drive/Carquinez intersection.

Tree Removal and Landscaping: Because of the overly large building footprint, most mature trees will be removed from the project sites, including removal of an ancient redwood tree, large pine tree, and heritage oak trees. This is unacceptable, as there will be nothing left to screen or at least soften the appearance of these large unattractive buildings. As seen in the building elevations, only minimal

landscaping is proposed, with no screening vegetation. No landscaping is shown in front on Carquinez. The stark appearance will significantly detract from Glen Ellen's visual qualities. Given the large number of trees lost during the 2017 fires, every attempt to preserve existing mature vegetation should be made. The tree report is out of date and is based on a different development proposal. It should be updated to reflect current conditions; also, further analysis of tree health conditions, particularly the redwood, pine and oak trees should be investigated. Without further analysis, the health of the redwood tree should not be used as an excuse to remove it.

Site Drainage and Containment: There is no information on how onsite drainage will be handled, particularly given all the new impervious surfaces. Measures to contain runoff onsite should be incorporated into the design and described, in order to do an independent analysis.

Cumulative Effects: While impacts in issues like traffic, circulation, visual, and land use may not be individually significant, when combined together they result in substantial impacts. These aggregate effects can cause the demise of local land use character and quality of life. For example, the existing Accessory Dwelling Unit (ADU) ordinance allows second units on single-family parcels, in effect doubling the density in single family zones in Glen Ellen. Furthermore, there is a development across the street from the proposed project that is adding residential units. Also, there are several parcels, including property on Carquinez, which may soon transfer ownership and will likely undergo redevelopment. If the current proposal is approved, the WH zone district will become an attractive tool for developers wishing to substantially increase density.

CEQA Requirements: Given the potential for significant impacts in regard to substantial density increase, growth-inducement, land use compatibility, visual effects, drainage, tree removal, and traffic issues, a full Environmental Impact Report (EIR) should be required for this proposal.

Conclusion

This is a significant project for downtown Glen Ellen and will permanently change the town's character and will set precedent for future development.

Please recommend revision of the proposed zone change and site design to ensure impacts on our small town are avoided.

Regards,



Vicki A. Hill, MPA

Environmental Planning Consultant

Chelsea Holup

From: Vicki Hill <vicki_hill@comcast.net>
Sent: September 16, 2019 2:42 PM
To: Nina Bellucci
Cc: Chelsea Holup
Subject: RE: Comments on Glen Ellen Rustic Shops and Apartments proposal, PLP17-0034, downtown Glen Ellen
Attachments: Comment letter to DRC 9-16-19.pdf

EXTERNAL

Hello Nina,

Attached are my comments on the above-referenced proposal in Glen Ellen, to be considered for the September 18, 2019 DRC meeting. Please forward these comments to the DRC members and any other relevant County staff. I realize that some of my comments may extend beyond the review authority of the DRC but wanted to cover all concerns that may be considered in determining application completeness and the level of CEQA review.

Regards,
Vicki A. Hill
Environmental Planner
(707) 935-9496

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: Alice Horowitz <oneallicat@gmail.com>
Sent: September 15, 2019 9:34 AM
To: Nina Bellucci
Subject: Marty Winter Permit Sonoma File PLP17-0034

EXTERNAL

Dear Ms. Bellucci,

I am writing to submit for the record my concerns regarding Marty Winter's proposed plans for redevelopment of his parcels in downtown Glen Ellen (Permit Sonoma File PLP17-0034).

While I personally support additional housing, Glen Ellen, with limited infrastructure and services, simply cannot handle the sort of density proposed by this project. Traffic and parking are increasingly becoming problematic in our downtown core, and I fear that, if approved for workforce overlay rezoning, this project will set a dangerous precedent thus opening the door to future projects that will overwhelm us.

In addition to my concerns re density, I take issue with the following:

1. Massing/density on site is out of scale and will present a major change to the look and feel of the village.
2. Appearance of the buildings is not consistent with Glen Ellen design guidelines.
3. The large mass of roof is not sufficiently broken up.
4. The entire project is visually unattractive and inconsistent with current and/or historic qualities.
5. Although directed by SVCAC to work with the local community through the Glen Ellen Forum to revise his plans, Mr. Winter never attempted to do so. He did attend a GE Forum meeting in August to talk about his new plans where he showed us a graphic or two, but he did not make his plans available for anyone to review. He said he would share them with the Glen Ellen Forum so they could be posted on glenellen.org, but to my knowledge, he never did. (Mr. Winter's plans are now available on the GE Forum website because they were requested from Permit Sonoma by concerned community members.) In essence, the community had no opportunity to review the new plans right before or right after the meeting, and no attempt was made on Mr. Winter's part to include concerned community members in his revisions. This, to me, falls quite short of "working with the community."
6. I have lived in downtown Glen Ellen for 20+ years and have seen a large increase in traffic and parking problems. Circulation can be particularly tricky when cars and pedestrians are coming and going from the post office and convenience store, also when making the turn on and off Carquinez from Arnold. I am worried that the density of this project will exacerbate these issues.
7. This project calls for the removal of many trees, several of which are quite large, old, and to my untrained eye, healthy. Given all the trees and landscaping lost in the 2017 fire, do these heritage trees (they have been residents of this area much longer than we have!) really need to be cut down?

In closing, I and many others hope the County will not allow Mr. Winter, a non-resident developer with a less than stellar reputation for taking good care of his properties, to dramatically affect our village that has already

been devastated by the loss of established neighborhoods. We must preserve the quaint residential character that gives Glen Ellen the small town feel the RESIDENT community, our second-homers, and our tourist guests so value.

Sincerely,
Alice Horowitz

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: Sanford Horowitz <sanfordhorowitz@gmail.com>
Sent: September 15, 2019 4:24 PM
To: Nina Bellucci
Subject: Marty Winters permit Sonoma File PLP17-0034

EXTERNAL

Hello Ms Bellucci:

I am Sanford Horowitz, a 25 year resident of Glen Ellen and I write to express my concern re the above (subject line) proposed development. Simply put, it is not a compatible project for the character of Glen Ellen. Traffic and parking is a delicate balance in our small Village and this project is an overreach by an out of town developer who has shown little regard (beyond profit) for Glen Ellen. Allowing this development would set a terrible precedent as to design, and moreover density. Further, the proposed plan to remove beautiful trees is unfathomable.

Please do not approve this proposed development. Feel free to contact me for more details.

Sincerely

Sanford Horowitz

Sent from my iPad

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

Chelsea Holup

From: Diana Knott <dianaknott711@aol.com>
Sent: September 16, 2019 11:10 AM
To: Nina Bellucci
Subject: Permit Sonoma File PLP17-0034

EXTERNAL

Ms. Bellucci:

I am not able to attend the meeting on Wednesday, Sept. 18 but would like to submit comments on this project. I live in Glen Ellen and am concerned with aspects of this proposed development.

1. Rural Glen Ellen has a limited infrastructure and cannot handle higher density in its downtown core.
2. We are currently experiencing a huge increase in our downtown traffic, particularly from the bridge to the intersection of Arnold & Warm Springs Rd. This traffic is made worse by cars & trucks entering and exiting the Post Office and small grocery store next to it. People that live on residential streets off of Arnold in this downtown area have a difficult time turning onto Arnold because of the heavy traffic coming from both directions.

We also have a residential street parking problem. Parking is increasingly overflowing onto the residential streets.

3. This project is out-of-scale for this location and will add to our existing traffic problems in this 3-4 block area.
4. TREE REMOVAL: Glen Ellen lost a lot of mature trees in the Fire of 2017. Residents are very concerned about preserving what we have left, especially trees that border our sidewalks in the downtown. These trees have a direct impact on shade and the beauty of our town. We would like to see these trees protected from removal, including our giant Redwood in that 2-block area.

I hope you will consider these important points at the Wednesday meeting before decisions are made.

I sincerely hope the County will not allow Glen Ellen to lose its beautiful small town feel.

Thank you for your consideration,

Diana Knott

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: mary@winecountryexcursions.com
Sent: September 16, 2019 3:00 PM
To: Nina Bellucci
Cc: Chelsea Holup
Subject: Glen Ellen Rustic Shops and Apartments

EXTERNAL

Dear Nina,

I am writing on behalf of **Marty Winters proposed plans for 13651, 13675 Arnold Drive, 950/987 Carquinez, Rustic Shops & Apartments Proposal PLP17-0034.**

Please confirm receipt of this email and that these comments will be entered into the record for PLP17-0034.

My husband (Greg Guerrazzi) and I own two travel companies (**Wine Country Excursions and Wine Country Trekking**) that send people to the village of Glen Ellen every year. The visitors lodge, dine and shop in Glen Ellen creating income for the County. We chose this village in all of Sonoma County to place our visitors because of its charm and historic character.

We also live in Glen Ellen. We live two streets away from the above proposed project and walk, bike and drive past that location several times a day. We chose to live in Glen Ellen for the exact reason that I send my customers here - it is completely, wonderfully charming.

The proposed plan above does not fit in with any of the current buildings (housing or commercial) in the town of Glen Ellen. In fact, these buildings are the exact opposite of charm. They have no character, no distinction (no decks, porches, terraces, french doors, window ledges) and look surprisingly like cheap condos from a 1970's ski resort.

Aside from the unattractive facade here are other issues I have with the project and recommend that it not pass Design Review:

1. The project is an entire block of our very small town - this block is roughly 25% of the commercial village. Given the enormous significance of the appearance and quality of this portion of our village we (concerned citizens of the Glen Ellen Forum) approached Mr. Winters and asked him if we could have input in the building design - make comments to his architect, etc... He seemed open to that but went ahead and had the design done without input. When his first design was rejected by the Planning Department he came up with the proposed project above after being TOLD to have input from the community by the SVCAC. This rejection of input from the community does not sit well with those of us that live here. If it were a house or one building it would be entirely different but this is a large scale project for a very small village.
2. The density of the project is out of scale with the rest of the town. It is a village with houses and some commercial buildings - not apartment complexes. 15 units on .85 of an acre is much too dense. A design with commercial below and apartments/condos above would have been more appropriate for this section of Arnold Drive and would have provided business opportunities. As for the Carquinez Street side of the project a remodel of the existing lovely homes and keeping the old trees would be a much better option to keep our village "charming". One of the homes is a Victorian and should probably be considered for the historic register.
3. Currently there is a redwood tree on the property that is very large and beautiful. It is most likely around 200 years old. It has coexisted with the current cottages on the property and I am greatly disheartened that it is being removed in the above plans.
4. Mr. Winters also owns the businesses on the opposite side of Arnold Drive. As a landlord he has not made any improvements to those buildings in the 25 years we have lived in Glen Ellen. Currently they are vacant and have been for some time -

eroding the vibrancy of our village. I am worried about him being an absentee landlord for 15 more units (or any) in the village.

We are open to working with Mr. Winters and exploring an attractive addition to our little village - one that will have charm, character, occupancy and vibrancy. **This proposal is not that addition.**

Thank you.

Mary Guerrazzi
707-935-4496



THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: Brad McCarty <mccarbc@gmail.com>
Sent: September 11, 2019 3:57 PM
To: Nina Bellucci
Subject: Rustic Shops and Apartments" project (Permit record number: PLP17-0034)

EXTERNAL

Hello, my name is Brad McCarty and I'm a full-time resident of Glen Ellen residing at 1175 London Ranch Rd about 1,000 ft from the project site. I will be out of the country during the Sept 18th conceptual design review meeting so I'm sending in my comments below.

I'm writing to oppose the "Rustic Shops and Apartments" project (Permit record number: PLP17-0034) as it's currently designed. I'm writing only in opposition to the architectural design of the project buildings. I'm not opposed to the zoning change to Workforce Housing Combining Zone per se but if the architects cannot create a more contextually congruent design to accommodate that increase in density, then I would be opposed to the zoning change also. In other words, the design of the project buildings should not be compromised solely in order to accommodate the increase in housing density.

I would also be strongly opposed to the project if the residential units are eligible to be used as vacation rentals. If one of the goals of the project is to increase workforce housing then that housing should be added to the "X Vacation Rental Exclusion Combining District". We certainly do not need a large concentration of vacation rentals in the middle of our Town Center.

Regarding the design, I strongly feel that the design of the buildings and property layout are completely at odds with the character of "Town Center" of Glen Ellen as described in the "Glen Ellen Development and Design Guidelines". We have very small Town Center and this project comprises a large percentage of that footprint.

From "Glen Ellen Development and Design Guidelines" page 6 describing the "Town Center":

"The varied size and style of structures contribute to the town's picturesque character."

Much of charming character of Glen Ellen is the varied architectural style of its buildings. That diversity reflects a more organic, smaller scale and longer-term development. I.e. new buildings were built independently, not en masse, and over time they aged and gained character. Eventually some were replaced with buildings of different architectural styles and purposes. That process has happened slowly over decades: the town reflects its many-year history by maintaining different and varied styles over those years.

In contrast, this project proposes 3 new buildings with exactly the same contemporary architectural style with the 2 most visible buildings facing Arnold Dr being identical copies. Worse yet, that style is the lackluster, cookie-cutter, multi-unit apartment building style that is apparently the most inexpensive and therefore unimaginative type of construction that we see all over Sonoma County when the primary driver of development is return-on-investment at the expense of local character.

New development doesn't need to be so uninspired, there are examples in the City of Sonoma of new developments that are more in keeping with the local character. Two examples are the developments at 383 W Napa St and 839 W Spain St. These developments have multiple buildings that are newly built but are not

cookie-cutter styles of each other: the varied designs give the feel of a more organic and integrated neighborhood than the designs for this project.

In summary, this project is admirable in its attempt to increase housing in Glen Ellen but its design is completely at odds with the character of the Town Center of the town. It will be a contemporary blemish on the village and certainly will be regretted by locals and tourists alike with any sense of the local history and this community. Please do not approve the project in its current design and please stress to the project team the importance of complying with the intent of G.E. Design Guidelines. Additionally, please ensure that whatever residential units get built are added to the "X Vacation Rental Exclusion Combining District" to prevent converting the units to vacation rentals.

Brad McCarty
1175 London Ranch Rd
Glen Ellen, CA, 95442
mccarbc@gmail.com

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: Kevin PADIAN <kpadian@berkeley.edu>
Sent: September 15, 2019 7:12 PM
To: Nina Bellucci
Subject: Comment on "Rustic Shops" proposal in Glen Ellen

EXTERNAL

15 September 2019

I write to object to the plans for Project PLP17-0034, submitted by Mr. Marty Winters, for the rebuilding of the "Rustic Shops and Apartments" in Glen Ellen, located at 950 & 987 Carquinez Avenue and 13651 & 13675 Arnold Drive, Glen Ellen (parcel numbers 054-290-084 & 054-290-057).

In contrast to another property owner who is rebuilding on a site just north of Mr. Winters, on Arnold Drive, Mr. Winters shows little interest in responding to the concerns of the community. In two public meetings, and in response to neighbors of his proposed project and other Glen Ellen residents, as well as those of County officials, he has only grudgingly acknowledged the need to comply with regulations. Nevertheless his project, as I am able to understand it from the limited documents on line, is still deficient in many respects.

1. At a Glen Ellen Forum meeting two months ago, Mr. Winter was asked about "affordable housing" in his buildings. He responded to the effect that he would comply with legal requirements. It now seems clear that he has elected to do the minimum possible. For example, he proposes to build several one-bedroom apartments on the second floor of his structure. This would be sub-optimal for parents with children, exactly the demographic we need to encourage in Glen Ellen. I urge you to reject his proposed design on the grounds that it does not reflect the needs of the community, even if it is technically legal.
2. Mr. Winter revealed at a second Glen Ellen Forum meeting that there would be parking for residents but no parking for the "rustic shops" he proposes. This is unacceptable. Arnold Drive is a busy thoroughfare. Parking can only be parallel to the road; it cannot be diagonal. And Mr. Winter should not assume that he can prevail on the generosity of other merchants with spaces for their customers, at least not without working out a substantial and permanent leasing arrangement. If this is still the configuration with his most recent design, I urge you to reject it.
3. I cannot find in any of the documents published on the website a true rendition of what the design of this building would look like from the street. The drawing on the main page is clearly of the back (east) side of the building, whereas the side that faces Arnold Drive, with the proposed shops, would be on the west side. Mr. Winters' preliminary drawings of the front side, displayed at the first Glen Ellen Forum meeting, were impossibly generic and ugly, resembling a La Quinta Inn reject that would be a visual blight on the community. This is not how we do things in Glen Ellen.

We don't want a cheap-looking, highway-exit piece of crap architecture. This is an historic town. Yes, the Glen Ellen Market may not be in the classic historical design tradition, but that ship sailed decades ago. We can't allow another optic assault on Glen Ellen. It would be so easy for Mr. Winter to have his cheap architect

design something generic that at least fits the overall design of the community. Instead he seems to be hiding the clear possibility that he wants to push his abortive nightmare right through the process. I urge you to reject this application until the entire community can see what this building is supposed to look like from the outside front. And not just a geometric design. The palette of colors is not enough. We need a sense of design and texture. His neighbor to the north produced a perfectly acceptable and understandable rendering, with the input of residents. Why can't he?

The hitch is that Mr. Winter, if he had any respect or regard for his neighbors and our town, would understand that with a modicum of effort he would be hailed and applauded by the townspeople, of whose opinions he is abundantly aware. Instead he clings stubbornly to his dictum, his God-given right to inflict whatever visual monstrosity he wants on the community, because he can. And you know what: he doesn't live here. So he could care less.

Please send this design back to hell. Do not pass "Go." Do not collect \$200. Glen Ellen deserves better, and so do its merchants, its tourists, and its heritage. Thanks for your consideration.

Kevin Padian
5430 O'Donnell, Glen Ellen

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: Mark Speer <msspeermd80@gmail.com>
Sent: September 13, 2019 11:30 AM
To: Nina Bellucci
Subject: Glen Ellen

EXTERNAL

Dear Nina;

My name is Mark Speer, and have a house on Carmel Ave. I just want to state 3 points about compact housing in Glen Ellen.

- 1). Glen Ellen is not the place for big development .
- 2). Parking issues would be a big issue for the proposed area, especially on weekends.
- 3). The development would ruin the feel of a tourist village.

Thank you for your time.

Sincerely;
Mark Speer.

13734 Carmel Ave.
Glen Ellen

Sent from my iPad

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

Chelsea Holup

From: drstollmeyer <drstollmeyer@gmail.com>
Sent: September 15, 2019 11:55 AM
To: Nina Bellucci
Subject: Permit Sonoma File PLP17-0034

EXTERNAL

Permit Sonoma

Attn.: Nina Bellucci

We wish to offer some comments on Permit Sonoma File PLP17-0034

We are very happy to see something being done with that property which will be of more practical use to our small community of Glen Ellen. At the same time, we feel that the proposal before you is very much out of scale with the other buildings in our Village.

As lay people and simple residents of the Village, we believe that our Village has building guidelines and are not sure whether this proposed project conforms to them or not, but we doubt it.

We would also ask Permit Sonoma to consider what devastation and trauma the residents of our Village have sustained in the past two years and that we are especially concerned at this time for the preservation of what's left of our small community and its residents' feelings. Perhaps our residents could be involved in finding a mutually satisfactory solution with the developer.

Thank you for your consideration,

David & Vicki Stollmeyer

1455 Hill Rd,

Glen Ellen, CA 95442

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: Dan Thomas-Grant <dansgrant@gmail.com>
Sent: September 16, 2019 10:47 AM
To: Nina Bellucci
Subject: Re: Please add me to the interested parties list for PLP17-0034

EXTERNAL

Hello Nina,

I may not be able to make it to the meeting on Wednesday as I work. However I would like to make a couple of points.

- I am very concerned about the rezoning request to allow this much housing in our small downtown area. If you approve this one, then I am sure there are others that will then do the same and we could be left with a very different Glen Ellen than the one that the majority of homeowners here want. The density of housing is just too large & will negatively impact the village and increase traffic in the village.
- I am also concerned by the removal of the large tree - the tree appears healthy and should be kept.
- The architecture is not in keeping at all with the wine country village at all.

Many thanks,
Dan

On Mon, 16 Sep 2019 at 10:12, Nina Bellucci <Nina.Bellucci@sonoma-county.org> wrote:

Thank you Dan, we have added you to the list of interested parties. I have attached the courtesy notice that was sent out before we received your email. You'll continue to receive all legal notices and updates about the project. Thank you!

Nina

Nina Bellucci
Planner II
www.PermitSonoma.org
County of Sonoma
Planning Division | Comprehensive Planning
2550 Ventura Avenue, Santa Rosa, CA 95403
Direct: 707-565-1236 |
Office: 707-565-1900 | Fax: 707-565-1103

OFFICE HOURS: Permit Sonoma's public lobby is open Monday through Friday from 8:00 AM to 4:00 PM, except Wednesdays, open from 10:30 AM to 4:00 PM.

-----Original Message-----

From: Dan Grant <dansgrant@gmail.com>

Sent: Friday, September 13, 2019 5:44 PM

To: Nina Bellucci <Nina.Bellucci@sonoma-county.org>

Subject: Please add me to the interested parties list for PLP17-0034

EXTERNAL

Thanks

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: Vicki Hill <vicki_hill@comcast.net>

Sent: Thursday, May 14, 2020 1:51 PM

To: HousingSites <HousingSites@sonoma-county.org>

Subject: ADDITIONAL Comments on Sonoma County "Rezoning Sites for Housing Project" EIR Scope

EXTERNAL

Hello,

Please see attached additional comments that I have on the above-referenced EIR scope and process.

Will the scoping comments be posted somewhere since we can't go into the County to review the comments?

Regards,
Vicki Hill

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

3028 Warm Springs Road
Glen Ellen, CA 95442
(707) 935-9496
Email: vicki_hill@comcast.net

May 14, 2020

DELIVERED VIA EMAIL

Please distribute copies of this letter to all concerned County staff members.

RE: ADDITIONAL Comments on Sonoma County “Rezoning Sites for Housing Project” EIR Scope, regarding Glen Ellen parcels, # 054-290-057 and # 054-290-084 (GE-1 and GE-2)

Dear PRMD Staff:

As a follow up to the scoping meeting held on May 6, 2019, I am submitting the following additional comments on the above-referenced housing rezoning EIR scope.

1. Alternatives

There appears to be a misunderstanding that the SVCAC somehow directed staff and the above-referenced Glen Ellen parcels’ property owner to pursue the Workforce Housing (WH) Zone District. While it is true that SVCAC indicated that additional housing and less or no commercial uses be developed on these two parcels, they did not indicate that they wanted to see a five-fold increase in residences (from 4 existing to 20 allowed under WH zone) on this small .85 acre property. Furthermore, the WH zone district has a minimum density requirement (estimated to be 16 units on the Glen Ellen property) so the property owner cannot even choose to develop it at a lower density. As I pointed out in my comment letter of May 4, 2020, that densification is completely out of scale with Glen Ellen, a village that contains maybe a total of 500 homes spread throughout a rural area.

There must be an alternative that allows housing on the site, without this dramatic mandated increase in number of units. Please evaluate such an alternative that allows housing at a reasonable density consistent with other land use densities in the village of Glen Ellen.

2. Piecemeal Planning Process

The scoping meeting explanation of why this separate rezoning process is going forward (especially during this difficult pandemic) separate from the Housing Element update was insufficient. Resolution of housing issues and identification of housing sites should be a comprehensive process which is all part of the Housing Element update. Also, the process must consider current and planned development that is occurring, particularly in Glen Ellen, which is more than satisfying its fair share of housing.

3. Misleading Terminology

Both County staff and EIR consultants stated in email and during the scoping meeting that “no rezoning is proposed at this time.” That is an inaccurate and misleading statement that needs to be corrected and avoided. The proposed project is a rezone project, by definition. Even though not all of the parcels may be ultimately rezoned, we must assume that they are being considered for rezoning. The statement that “no rezoning is proposed” implies that there will be some future planning and evaluation process, which is incorrect. This EIR is the only CEQA analysis that will be conducted for the rezone and that needs to be clear to the public.

4. Parcel Screening Process

The screening process and criteria for selecting sites to rezone need to be made public and thoroughly reviewed. Also, the EIR consultant stated that parcels could not be added or deleted from the project. I question this assertion, given CEQA guidelines for evaluating alternatives. There could be alternatives that have a different set or subset of properties for rezoning. As EIRs are developed, new alternatives may be identified.

5. Noticing of Proposal and EIR Scoping

Notices to adjacent properties should be provided now, to allow nearby property owners to comment on the EIR scope and EIR analysis. If notices are delayed until the Board gets ready to take action on the rezoning, it will be too late for meaningful public input. It seems that the importance of engaging the community is somewhat dismissed because not all of the parcels will ultimately be rezoned.

Thank you for taking the time to consider my comments on the EIR scope and process.

Regards,

A handwritten signature in blue ink that reads "Vicki A. Hill". The signature is written in a cursive, flowing style.

Vicki A. Hill, MPA

Environmental Planning Consultant

From: wendy Krupnick <wlk@sonic.net>

Sent: Wednesday, May 13, 2020 8:14 AM

To: Susan Gorin <Susan.Gorin@sonoma-county.org>; district4 <district4@sonoma-county.org>; district5 <district5@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Shirlee Zane <Shirlee.Zane@sonoma-county.org>; Jane Riley <Jane.Riley@sonoma-county.org>; Tennis Wick <Tennis.Wick@sonoma-county.org>; HousingSites <HousingSites@sonoma-county.org>

Subject: Rezoning Sites for Housing Project

EXTERNAL

Dear Supervisors and Planners,

Please see the attached personal comments regarding the Environmental Impact Report for proposed housing sites for rezoning.

Thank you for your consideration of my views.

Best wishes,

Wendy

May 13, 2020

To: Sonoma County Board of Supervisors:

Susan Gorin, Chair; James Gore; Lynda Hopkins; David Rabbitt; Shirlee Zane

Tennis Wick, Director Permit Sonoma

Jane Riley, Acting Deputy Director Permit Sonoma

cc: Nina Bellucci, Planner

From: Wendy Krupnick

4993 B. Occidental Rd.

Santa Rosa, 95401

Re: Rezoning Sites for Housing Project– Comments on Notice of Preparation of Environmental Impact Report

Dear Supervisors and Planners,

This letter is submitted as a concerned citizen and property owner and not representing any organization at this time.

I appreciated the opportunity to participate in the scoping session for the EIR on proposed sites for housing rezoning on May 6. I had serious concerns about this proposal prior to this session and these concerns were amplified by what I learned in this session and from looking more closely at the map of proposed sites.

A basis for this project is stated as, “All jurisdictions within California are required to plan for their projected growth, including having adequate sites zoned for housing to meet their identified housing need.” Yet a current analysis of projected housing need has not been done. According to the 2018 Sonoma County General Plan Progress Report, the county only needed to build/permit 68 units through 2023. Apparently projected housing need is at least in part determined by RHNA and those numbers will not be available for around a year, according to the MTC/ABAG schedule.

It is clear to most of us that what is really needed is truly affordable housing. The crises our region has endured in recent years plus lack of affordable housing has led to a net loss in county population and increase in homelessness. Multiple housing projects have been built in the last two years and are in the process of completion now, most which are medium density homes and relatively few of these units are “affordable”.

A number of questions I have are listed below. I learned that the EIR does not address the merit of the project, just potential environmental impacts. But since environmental impacts of any development are inevitable, it seems imperative that alternatives – such as no re-zoning due to no demonstrated need for the types of housing that would be feasible at these sites and the availability of recently built housing and sites in areas already designated as priority for housing – should be considered.

Will this study take into consideration needs for different types of housing, eg. levels of affordability and numbers in households? Will it assess current housing being built and

projects in the pipe-line to meet each of these levels of need? Will it assess the rapidly changing scenario of existing housing? Potential for shifting zoning and use in current urban retail, commercial and industrial areas?

Sadly, there are many retail sites that have closed and offices that are or will be vacant. Most of these are in city centers so close to services and would make great live/work sites or apartments, which are in need. Also, there is great potential to re-claim homes that had been converted to office use. A friend is a therapist and had space in one of the many buildings in Santa Rosa that had been a residence and was converted to spaces for therapists or other types of office work. She and all of the others who had been renting space in that building have pulled out as they all are going to continue to see patients/clients remotely. This must be happening on wide scale which will make those buildings available for housing again.

A thorough study of housing and potential housing availability within city centers should be done before rezoning any sites in urban fringe areas.

As to the specific sites being proposed, I looked at those in areas of the county I am familiar with – south Santa Rosa, Graton, Forestville and Larkfield. I was surprised that most of these were deemed to meet the stated criteria as there are no food markets, pharmacies, banks, libraries and very limited transit options near all of these sites. Most are not pedestrian or bike friendly unless one was very committed and in good physical condition so individual car use, with resulting increase in vehicle miles traveled, would result.

On the other hand, several in south Santa Rosa are zoned Rural Residential and have a history, if not current use, for small scale food production. Several sites in the other areas have this history and potential as well. Your Board has advocated for creation of a “food belt” around the cities as well as more urban agriculture and there has been discussion about increasing support for food production in RR and AR zones. At this time of serious threat to the global and national food system and enormous food need, it would be a big loss to commit these properties to housing which may not be needed and lose their potential to help feed their local communities while mitigating climate change by capturing carbon.

In addition, several of the sites in Graton, Forestville and Larkfield have a number of big trees. These are providing habitat, shade and carbon capture as well.

With inevitable environmental impacts, lack of proven need for more medium density housing, our rapidly changing economic situation and serious depletion of public funds, and the fact that the Housing Element of the County General Plan must be updated by 2020, I feel that this project should be folded into the Housing Element Update process where it can be evaluated in a more complete context.

Thank you for considering my comments.

The following transcript is from the chat function of the public scoping meeting held on May 6, 2020. A recording of the scoping meeting is available at this link:

<https://www.youtube.com/watch?v=Ql0H4hy0ubc&feature=youtu.be>

Fred Allebach (to Organizer(s) Only): 6:43 PM: where exactly is Agu 1 and Agu 3?, please give street address

Steve Birdlebough (to Everyone): 6:45 PM: What happens if the frequency of bus service is reduced before the EIR is complete, and the location no longer meets the threshold requirements?

Fred Allebach (to Organizer(s) Only): 6:47 PM: When does the project itself get decided on, separate from CEQA and enviro impacts? Or is CEQA identical to the project here?

Rue (to Everyone): 6:50 PM: When would the "baseline" be established? Will that determine the No Alternative alternative? Pre or Post fire events?

Teri Shore (to Everyone): 6:51 PM: How do you get in line for public comment?

Caitlin Cornwall (to Everyone): 6:52 PM: Why are the various housing-relevant processes not part of a unified process? (these housing sites, Housing Element, portions of General Plan)

Steve Birdlebough (to Organizer(s) Only): 6:52 PM: Will there be a stress-based assessment of the route that pedestrians and cyclists would take between a residence and the closest bus stop?

Vicki Hill (to Everyone): 6:53 PM: If rezoning is not proposed at this time, then what is the actual scope of the EIR? The title of the Project is "Rezoning Sites for Housing Project. That statement about no rezoning seems to be inaccurate and misleading.

Conference Web North (to Teri Shore): 6:53 PM: Hi Teri, you can send a comment to the organizers channel by text. Otherwise we will unmute and ask for comments from people by last name in groups to reduce the chance of everyone speaking at the same time.

Janver Holly (to Everyone): 6:53 PM: We do not want our property included in this. How do we opt out?

Teri Shore (to Everyone): 6:54 PM: What????

Teri Shore (Private): 6:54 PM: What???? Text from phone??????

Teri Shore (Private): 6:55 PM: There is no way to raise your hand or any way to ask to make public comment.

Fred Allebach (to Organizer(s) Only): 6:55 PM: I studied the map in great detail and Agu 1 and Agu 3 seems to be right on top of Sonoma Creek, please send Agu 1 and Agu 3 addresses to fallebach@gmail.com, thx

gaylord schaap (to Organizer(s) Only): 6:55 PM: Where is the local transportation service for the GUE parcels?

Teri Shore (Private): 6:55 PM: I'm not on the phone. How do we do text? Only in chat?

Teri Shore (Private): 6:56 PM: I thought that we had up to 3 minutes to talk but you are not giving that option. Please help public comment.

Caitlin Cornwall (to Everyone): 6:56 PM: People who want to make a public comment could put their names in the chat, and then you could take them in order.

Drew Chan (to Everyone): 6:56 PM: Will there be subsequent environmental documentation for each location when a specific development is proposed on a particular site? Or will this EIR fulfill the CEQA requirement for each project site?

Teri Shore (to Everyone): 6:57 PM: How do people who are on video provide public comment up to 3 minutes?

Jacque - Forestville skatespot (to Everyone): 6:58 PM: could a re-zoned property include a small community park?

Teri Shore (to Everyone): 6:58 PM: I would like to be called on for public comment.

mary (to Everyone): 6:58 PM: Can any properties be added to this project or is it too late? how can properties be taken out of the plan?

Steve Birdlebough (to Organizer(s) Only): 6:59 PM: Is convenient access to grocery shopping a factor in the assessment of whether a site is a good candidate for re-zoning.

Fred Allebach (to Everyone): 7:00 PM: I would like to get in line for a verbal GoTo public comment

mary (to Everyone): 7:00 PM: will the sites be rated or just a go forward or not?

Conference Web North (to Teri Shore): 7:01 PM: Hi Teri, verbal comments will be taken after the text/chat comments.

Kristin (to Everyone): 7:01 PM: How will the Program EIR accelerate the entitlement process for housing proposals located at a parcel highlighted in this process?

Conference Web North (to Teri Shore): 7:03 PM: Hi Teri, we will unmute participants at that point but webcam functionality will not be included.

Steve Birdlebough (to Organizer(s) Only): 7:05 PM: How will assumptions be developed as to the number of housing units to occupy each property?

Teri Shore (Private): 7:05 PM: got it. finally. sorry. new platform not Zoom!

Rue (to Organizer(s) Only): 7:07 PM: Thank you.

Vicki Hill (to Everyone): 7:08 PM: How will you determine which potential zone district may be applied to each parcel for purposes of conducting impact analysis?

Jacque - Forestville skatespot (to Everyone): 7:09 PM: please repeat what you said about parking and scoping. it is included?

Rue (to Organizer(s) Only): 7:09 PM: Will housing be required to be affordable or will zoning be the only factor?

mary (to Everyone): 7:10 PM: Is traffic included in CEQA review?

Vicki Hill (to Everyone): 7:11 PM: Will alternatives be considered that include less density than the Workforce Housing zone?

Steve Birdlebough (to Organizer(s) Only): 7:12 PM: How will the number of parking spaces be determined for each property?

Rue (to Organizer(s) Only): 7:12 PM: With the zone changed - maximum density won't necessarily be required. Does that mean housing could be built at the minimum allowed and not achieve affordable housing?

david storer (to Everyone): 7:12 PM: why are sites being looked at in a City's SOI?

Caitlin Cornwall (to Everyone): 7:13 PM: What is the process for defining the array of alternatives you analyse?

Owner (to Organizer(s) Only): 7:13 PM: How is projected housing need determined? Seems that this will change significantly in upcoming years.

Rue (to Organizer(s) Only): 7:14 PM: Thanks Jane

david storer (to Everyone): 7:14 PM: Hi Jane

Fred Allebach (to Everyone): 7:14 PM: hi david

Fred Allebach (to Everyone): 7:16 PM: what level of Density Bonus Program projects are you expecting? This would be best for deed restricted Affordable Housing

Teri Shore (Private): 7:17 PM: OK, since you clearly do not want to go to actual public comment, here are my questions and comments: 1. The NOP says the priority is for "by right medium density housing", but the presentation only mentions workforce housing overlay. What has changed? 2. Since you don't have any new RHNA numbers how can you do a project or a baseline on an unknown number or need? 3. Since the county is meeting RHNA now under current Housing element, why do you need to go outside of it? Are you going to analyze what is already in the Housing element? The Housing Element is due to be complete in December 2022 so why aren't you combining these processes? And also do you have our CEQA comments. Jane does but not sure about consultants. I may need to leave the call.

Teri Shore (Private): 7:17 PM: I'm not on the phone

dedee rogers (to Everyone): 7:28 PM: I am working with the owner of 220 Hatchery any thoughts of re zoning? What happens to our tentative map for single family homes if we go a different route? Thank you

dedee rogers (to Everyone): 7:32 PM: namaste

Rue (to Organizer(s) Only): 7:32 PM: Please include in your analysis consideration of achieving affordability or not - what the range would be of achieving RHNA

Caitlin Cornwall (to Everyone): 7:33 PM: Comment about the process: the ability to comment and ask questions without spending hours driving to and from Santa Rosa is wonderful. A boost to democratic participation.

Rue (to Organizer(s) Only): 7:33 PM: ditto Caitlin

The following comments were submitted through the Sonoma County Rezoning Sites for Housing EIR Public Input App during the NOP comment period. The application is available at the following link:

<https://rincon.maps.arcgis.com/apps/CrowdsourcingPolling/index.html?appid=f8c05d3e11234dd488257ef5024314d9>

Commenter: Gaylord Schaap

We are owners and would like to find out what this does to our property right on this parcel

Commenter: Maud Hallin

Considering the present difficulty to hire staff for both local hotels, restaurants, grocery stores, etc. I believe more consideration for housing for some low income people is imperative. This would allow people to actually walk to work.

Commenter: Mike Witkowski

This project does not fit into the small town feel of Glen Ellen

Commenter: Vicki A Hill

My concerns regard land use, visual, policy consistency, transportation, biological resources, cumulative impacts, and growth inducement. Please see my comment letter. This rezone site is not appropriate in the small village of Glen Ellen.

Same comments as on GE-1; note that there is no way to select multiple CEQA categories

Commenter: Jeff Hansen

I am writing to express my opposition to the proposed rezoning of this site in Glen Ellen and request that these two parcels be removed from consideration. These sites in the center of the village are inappropriate for increased housing density due to the lack of infrastructure, roadways, and public services and are inconsistent with the semi-rural character of the village. Basic services such as water are already strained and unable to provide service to EXISTING housing in the district. This i

Commenter: Jacque Brazier

Forestville Skatespot and Supervisor Hopkins are currently in discussions with TPW and General Services (including a letter of intent to license) about utilizing this site for Affordable housing

with a public skatepark (skateboarding, scooters, in-line skates and bmx). Funding for the skatepark will be sought from CA State Parks Program Grant this fall/winter.

Commenter: Dan Bumgartner

LAR-1 is the Church and accompanying field we own and occupy. We don't know how our property ended up on this list. We have submitted an email and letter asking that it be removed. Thanks so much.

Commenter: Tom Conlon

In addition to the default No Project option, EIR should assess alternative land uses for this unique parcel including its potential to provide valleywide benefits such as enhanced flood control, groundwater recharge, local food production, biological resource protection, etc.

Parcel is in Flood Zone 3A and adjacent to confluence of 2 creeks, Agua Caliente, Sonoma. EIR must fully assess increased seasonal variability of precipitation, runoff, stream flows, and increased risk of extreme floods (IPCC Special Report on Climate Change and Land 2019; IPCC Special Report on Global Warming of 1.5C 2018, Sonoma Water Local Hazard Mitigation Plan, 2018; North Bay Climate Adaptation Initiative, Climate Ready Sonoma County: Climate Hazards and Vulnerabilities Feb. 2015).

Parcel is in Flood Zone 3A and adjacent to confluence of 2 creeks, Agua Caliente, Sonoma. EIR must fully assess water storage, recharge, and water quality enhancement potential of this site.

Land Use & Planning In addition to the default No Project option, EIR should assess alternative land uses for this unique parcel including its potential to provide valleywide benefits such as enhanced flood control, groundwater recharge, local food production, biological resource protection, etc.

Hydrology Parcel is in Flood Zone 3A and adjacent to confluence of 2 creeks, Agua Caliente, Sonoma. EIR must fully assess water storage, recharge, and water quality enhancement potential of this site.

Parcel is in Flood Zone 3A and adjacent to confluence of 2 creeks, Agua Caliente, Sonoma. EIR must fully assess increased seasonal variability of precipitation, runoff, stream flows, and increased risk of extreme floods (IPCC Special Report on Climate Change and Land 2019; IPCC Special Report on Global Warming of 1.5C 2018, Sonoma Water Local Hazard Mitigation Plan, 2018; North Bay Climate Adaptation Initiative, Climate Ready Sonoma County: Climate Hazards and Vulnerabilities Feb. 2015).

Appears to be an excellent site for higher density housing, provided that safer bicycle & pedestrian access to nearby schools, shopping, and neighborhood parks can be improved.

Appears to be an excellent site for higher density housing, provided that: 1) Daytime transit service headways at nearby bus stop are reduced to <20 minutes, and 2) safe bicycle & pedestrian access to nearby schools, shopping and neighborhood parks can be improved.

Appears to be an excellent site for higher density housing, provided that: 1) Daytime transit service headways at nearby bus stop are reduced to <20 minutes, and 2) safe bicycle & pedestrian access to nearby schools, shopping and neighborhood parks can be improved.

Appears to be an excellent site for higher density housing, provided that: 1) Daytime transit service headways at nearby bus stop are reduced to <20 minutes, and 2) safe bicycle & pedestrian access to nearby schools, shopping and neighborhood parks can be improved.

Appears to be an excellent site for higher density housing, provided that: 1) Daytime transit service headways at nearby bus stop are reduced to <20 minutes, and 2) safe bicycle & pedestrian access to nearby schools, shopping and neighborhood parks can be improved.