



Housing Element Update

Final Environmental Impact Report
Responses to Comments on the Draft EIR

SCH#2022060323

prepared by

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Appendix A Public Comments Letters on the Draft EIR

Acronyms and Abbreviations

AFY	acre-feet per year
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CEQA	California Environmental Quality Act
DOF	California Department of Finance
ESD	equivalent single family dwelling
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GSP	Groundwater Sustainability Plan
LID	Low Impact Development
MS4	Municipal Separate Storm Sewer System
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
PG&E	Pacific Gas and Electric Company
SVCAC	Sonoma Valley Citizens Advisory Commission
SWPPP	Stormwater Pollution Prevention Plan
UGB	Urban Growth Boundary
USA	Urban Service Area
VMT	vehicle miles traveled
WUI	Wildland Urban Interface

1 Introduction

1.1 Purpose of the Response to Comments on the Draft EIR

This document contains responses to comments received on the Draft Environmental Impact Report (Draft EIR) prepared for the Sonoma County Housing Element Update (project). The Draft EIR identifies the likely environmental consequences associated with development facilitated by the proposed project and recommends mitigation measures to reduce potentially significant impacts. This document, together with the Draft EIR, constitutes the Final EIR for the proposed project.

1.2 Environmental Review Process

Pursuant to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

The County of Sonoma distributed a Notice of Preparation (NOP) of the Program EIR for a 30-day agency and public review period commencing June 15, 2022, and closing July 15, 2022. In addition, the County held a virtual Scoping Meeting on June 28, 2022 at 6:00 p.m. The meeting was aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members, and at receiving comments on the scope and content of the EIR. Due to the COVID-19 pandemic, the virtual meeting was held through an online meeting platform and a call-in number.

The Draft EIR was made available for public review for a 55-day comment period that began on December 28, 2022 and ended on February 23, 2023. The Notice of Availability of a Draft EIR was posted with the County Clerk, sent to the State Clearinghouse, mailed to local and state agencies, published in the newspaper, and emailed to interested parties. Property owners and neighbors within 300 feet of proposed inventory sites received the Notice of Availability by mail including project contact information to address questions and receive written comment. In addition, the Planning Commission received verbal comments on the Draft EIR during the public hearing on February 2, 2023.

The County received 271 individual written comments on the Draft EIR. Copies of written comments received during the comment period are included in Section 3 of this document.

1.3 Document Organization

This document consists of the following chapters:

- **Section 1: Introduction.** This chapter discusses the purpose and organization of this response to comments Document and the Final EIR and summarizes the environmental review process for the project.
- **Section 2: Master Responses.** This chapter includes responses to similar comments that were received by multiple commenters. These responses are aggregated to provide for one succinct response for each subject area.

- **Section 3. Written Comments and Responses.** This chapter contains reproductions of all comment letters received on the Draft EIR. A written response for each CEQA-related written comment received during the public review period is provided. Each response is keyed to the corresponding comment.
- **Section 4: Public Hearing Comments and Responses.** This chapter contains a summary of comments received during the Planning Commission public hearing held on June 28, 2022. A written response to CEQA-related comments is provided.
- **Section 5: Revisions to the Draft EIR.** Changes to the Draft EIR that have been made in light of the comments received are contained in this chapter.

1.4 Draft EIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when comments on the Draft EIR or responses thereto identify “significant new information.” Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The comments, responses, and Draft EIR amendments presented in this document do not constitute such “significant new information;” instead, they clarify, amplify, or make insignificant modifications to the Draft EIR. For example, none of the comments, responses, and Draft EIR amendments disclose new or substantially more severe significant environmental effects of the proposed project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed project’s significant effects.

Since publication of the Draft EIR, County staff developed a list of “Recommended Inventory Sites” based on public input, site-specific analysis of suitability for inclusion in the Housing Element site inventory, changes in site circumstances, and other factors. Twenty-one of the Rezoning Sites are not included in staff’s list of Recommended Inventory Sites (GEY-2, GUE-1, GUE-2, GUE-3, LAR-2, LAR-5, LAR-6, FOR-2, FOR-5, FOR-6, GRA-5, SAN-1, SAN-3, SAN-5, GLE-1, GLE-2, PEN-5, PET-1, PET-2, PET-3, and PET-4). Two new sites were added to the proposed inventory that would not require rezoning to a higher density to allow housing (GLE-3, GLE-4), while seven were removed from the inventory (PEN-11, PEN-12, GUE-5, GUE-6, FOR-7, SAN-13, and SAN-14). Overall, the changes to the “Recommended Inventory Sites” list results in a decrease in the number of housing sites and in the buildout as a result of implementation of the Housing Element; in addition, all five new sites were the subject of previous certified CEQA documents. Accordingly, impacts related to growth facilitated by the Housing Element would in general be lesser than those identified in the Draft EIR. Additionally, the Housing Element now contains Programs 4b and 4c. Program 4b states the County will rezone the 30.32 acres of land, located at Guerneville Road and Lance Drive within an unincorporated island in the City of Santa Rosa (identified as SAN-18, SAN-19, and SAN-20) to match the rezoning and the North Station Area Specific Plan adopted

by the City following certification of an EIR for the North Station Area Specific Plan. Implementation of this program will also be done in compliance with CEQA. Program 4c states the County has identified the existing County administrative center campus as able to accommodate future housing. Implementation of this program would be subject to future CEQA review. The necessary changes to reflect the addition of the five new inventory sites and Programs 4b and 4c in Section 2, *Project Description*, of the EIR are provided in Section 5, *Revisions to the Draft EIR*, of this Final EIR. Although there are new sites on the housing opportunity sites list, the environmental impacts related to future development facilitated by the Housing Element on these sites has been adequately addressed in the Draft EIR, and no substantial revisions were necessary. This is not considered to be significant new information requiring recirculation.

2 Master Responses

This section presents responses to comments that were made by more than one commenter. Responses to specific comment letters may refer the commenter to one or more of the master responses presented herein.

As a general introduction, it should be noted that this Final EIR's conclusions on the character and significance level of environmental impacts are supported by substantial evidence, which is presented in the Draft EIR and further clarified in this Final EIR (specifically Sections 2, 3, and 4, which provide responses to comments received on the Draft EIR). The County acknowledges that some commenters disagree with some conclusions in the Draft EIR. Consistent with the intent of CEQA and the CEQA Guidelines for its implementation, this Final EIR also includes the differing opinions presented by the commenters. As stated in the *CEQA Guidelines* (Section 15151), disagreement among commenters, including experts, does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts; this is done in this Final EIR.

2.1 Master Response EXST: Existing Conditions

Commenters expressed concern regarding existing environmental conditions, hazards, utilities, and general infrastructure availability. Commenters highlighted many of the existing conditions of the County and its ability to adequately support housing and population growth. Commenters state general conditions regarding sites in the County.

The commenters refer to existing conditions within the County and perceived issues with the above referenced areas, such as concerns regarding existing traffic congestion and natural hazards (e.g., existing wildfire and flood risks). The Draft EIR includes a discussion of existing conditions related to individual impact areas and specific to *CEQA Guidelines* Appendix G questions. Individual impact areas include a discussion of the existing conditions which are then compared to the anticipated change induced by the project. While the concerns of the commenters regarding the issues listed above are noted, they are deemed to be adequately discussed in the Draft EIR. No revisions to the Draft EIR are necessary in response to this comment.

2.2 Master Response SITE: Site Selection

Commenters asked about the site selection process and suggested alternative sites to include or specific sites to exclude from the proposed project.

This comment is on the project rather than the Draft EIR so requires no further response but will be considered by the County's decision-makers as part of the adoption process. As noted in Section 2.5, *Project Background* (page 2-3 of the Draft EIR), the sites were identified during the previous Rezoning Sites for Housing Project. For that selection process, from December 2018 through the end of March 2019 the County asked for the public's help in identifying sites, and almost 200 sites were nominated. County staff evaluated all nominated sites to determine if they met the basic eligibility criteria. Of those original sites, the County narrowed its list to 59 Potential Sites based on these four basic requirements:

1. Site must be located in the unincorporated County.

2. Site must be located within an established, General Plan-designated Urban Service Area where public sewer and water service is available.
3. Site must not be located within a voter-approved Community Separator.
4. If a site is near an incorporated city, it must be located within that city's voter-approved Urban Growth Boundary.

As part of the Rezoning Sites for Housing project, the County noticed property owners and conducted outreach. The County sent out letters to property owners of Rezoning Sites on September 10, 2019 and updated letters on March 5, 2020, informing property owners of the environmental review process; publication of the NOP; the 30-day scoping period; and the scoping meeting at the Sonoma County Board of Supervisors Chambers on April 2, 2020. The NOP for the Rezoning Sites for Housing EIR dated March 11, 2020, and a revised NOP dated April 17, 2020 were both sent to property owners on record. The County then sent out letters again to the property owners of Rezoning Sites on November 24, 2021, informing property owners of the environmental review process.

In addition to the above-listed criteria, the General Plan sets forth additional criteria to be used in considering which sites to rezone for housing (existing Housing Element Policy HE-2f and Programs 11 and 20). These factors include proximity to jobs, transit, services, and schools.

At the time of the publication of the Draft EIR on December 28, 2022, the County identified 79 total sites for the 6th cycle Housing Element site inventory that would satisfy the RHNA allocation. Of these 79 sites, the 59 Rezoning Sites were included and the remaining 20 sites on the proposed inventory were already zoned for residential units at an adequate density to meet the County's RHNA goals and do not require rezoning. Since the publication of the Draft EIR on December 28, 2022, the County added five additional inventory sites and removed seven as described in Section 1.4 of this document. Following review of input from the public and its own analysis, staff's final list of sites recommended for rezoning includes 38 of the 59 analyzed Rezoning Sites, and five additional inventory sites. However, the environmental analysis in the Draft EIR included all 59 sites as a conservative assumption.

2.3 Master Response HE: Dissatisfaction with the Housing Element and/or Rezoning Sites

Commenters expressed dissatisfaction with the number of Rezoning Sites proposed in the Housing Element Update. Commenters requested the removal of several sites.

The Housing Element Update aims to encourage development of housing within the County. However, the Housing Element Update does not propose specific projects. A site on the list of Rezoning Sites does not guarantee that the site will or will not be developed. Similarly, a site on the list of Rezoning sites does not guarantee that the site will or will not be rezoned, as that decision is up to the decision-makers. This comment, and comments similar, will be noted and passed onto decision-makers. However, expressions of opinion relating to the proposed project are not related to the adequacy of the analysis and conclusions in the EIR.

2.4 Master Response UTIL: Utility Availability

Commenters expressed concerns regarding water supply availability and available capacity of wastewater treatment systems.

Please refer to Section 4.18, *Utilities and Service Systems*, for a full analysis of available utilities in the County and the expected impact of the proposed project on such services. As stated therein, it was determined that all impacts related to utilities and service systems would be considered less than significant.

The Draft EIR addressed water supply availability and available capacity of wastewater treatment systems. As described in Section 4.18, *Utilities and Service Systems*, development facilitated by the project on Rezoning Sites would create additional demand for water supply and wastewater capacity in the unincorporated county. Each water service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide water service to the Rezoning Sites. In addition, California American Water – Larkfield prepared a Water Supply Assessment (Appendix WSA) detailing its ability to provide water service to the Rezoning Sites within its service area. With the implementation of proposed capital improvement projects, development facilitated by the project on the Agua Caliente, Glen Ellen, Larkfield, Sonoma, Santa Rosa, Forestville, Graton, Guerneville, Penngrove, and Petaluma Sites would have access to adequate water service. Information was not provided by California American Water – Geyserville. Furthermore, the Rezoning Sites that are not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. Because development facilitated by the project would occur within designated Urban Service Areas, existing water infrastructure exists at most of the Rezoning Sites. As described above, some sites are not adjacent to existing water pipelines, and could require the construction of expanded water supply facilities, including upgraded pipeline and potentially new pumps, to develop at the densities contemplated by this project. This impact would be potentially significant and Mitigation Measure UTIL-1 would be required.

In addition, as described in Appendix WSS, each wastewater service provider was contacted and assessed in the Water and Sewer Study for its ability to provide wastewater service to the Rezoning Sites. However, the Rezoning Sites that are not currently directly adjacent to wastewater collection infrastructure (pipelines) were not fully evaluated in Appendix WSS for adequate sewer capacity (GEY-1, LAR-7, FOR-1, FOR-2, FOR-6, GRA-4, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4). Therefore, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required. Additionally, the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5¹, and PET-1 through PET-4 is either unknown or limited. These sites would require the construction of expanded wastewater facilities, including upgraded pipelines and potentially new pumps. Generally, the ground disturbance required to construct these upgrades would occur in previously disturbed or developed areas, such as public rights-of-way, reducing the potential for environmental impacts. Compliance with mitigation measures in EIR, including Mitigation Measures BIO-1 through BIO-17, CUL-1 through CUL-9, and TCR-1 through TCR-5, would minimize impacts to sensitive environmental resources where upgrades require off-site construction for the expansion of wastewater services. Therefore, the proposed project would not result in construction or relocation of wastewater facilities such that significant environmental impacts would result.

¹ GRA-4 is located outside the Graton Community Services District (GCSD) service area and sphere of influence, and would require annexation to GCSD, as described in Appendix WSS.

As stated in Section 4.18, *Utilities and Service Systems*, several of the Rezoning Sites are not adjacent to existing water or wastewater infrastructure and require further evaluation at the project level during the plan review and permit approval phase. Mitigation Measure UTIL-1 would be required to reduce impacts related to water supply and wastewater system sufficiency to a less than significant level. With implementation of Mitigation Measure UTIL-1, development on Rezoning Sites GUE-1, GUE-2, FOR-1, FOR-2, FOR-4, FOR-6, GRA-1 through GRA-5, LAR-1 through LAR-8, PEN-2, PEN-4, PEN-9, PET-1, SAN-1, SAN-3, SAN-5 through SAN-8, SAN-10, and SON-1 through SON-4 would be adequately served by water and wastewater service providers. However, there is not substantial evidence to determine that development on Rezoning Sites GEY-1 through GEY-4 would be adequately served by California American Water – Geyserville. Therefore, impacts would be significant and unavoidable

Additionally, after the Final EIR comment period, the County received correspondence from Forestville Water District regarding the District's capacity to serve new development. In a follow-up meeting on May 24, 2023 with the General Manager and the District Engineer, Forestville Water District indicated that the District's current wastewater treatment capacity is unknown, and that unprogrammed improvements to the system will be required to address the District's compliance with Water Board standards for wastewater discharge. Based on this most recent communication, further details and information regarding the District's capacity is not available. Mitigation Measure UTIL-1 would continue to apply to sites as listed in the paragraph above.

Please note that the Draft EIR is not required to reduce all potential impacts to a less than significant level, but is required to discuss available and feasible mitigation measures that could reduce potential impacts. The commenter is correct that the project would result in significant and unavoidable impacts to the environment. To that end, to certify the EIR and approve the project, the County Board of Supervisors would need to adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County's decision to approve the project that balances the project's economic, legal, social, technological or other benefits against its unavoidable environmental risks.

2.5 Master Response FIRE: Wildfire

Commenters expressed concerns regarding wildfire impacts.

The County acknowledges that there is an existing wildfire risk in various locations throughout the County. However, in *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal.4th 369 (2015), the California Supreme Court held that CEQA generally does not require analysis of how existing hazards or conditions might impact a project's future users or residents, unless the project might exacerbate existing environmental hazards. Therefore, Section 4.19, *Wildfire*, of the Draft EIR analyzed whether development facilitated by the project on Rezoning Sites may have a significant adverse impact if the Rezoning Sites are in or near (within 2 miles of) SRAs or Very High FHSZs by resulting in any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment

4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

The following text provided on page 4.19-28 of the Draft EIR describes the reasoning behind the significant and unavoidable wildfire impact:

With implementation of Mitigation Measures WFR-1, WFR-2, and WFR-3, the risk of loss of structures and the risk of injury or death due to wildfires would be reduced. These measures would make structures more fire resistant and less vulnerable to loss in the event of a wildfire. These measures would also reduce the potential for construction to inadvertently ignite a wildfire. However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation. Thus, this impact would remain significant and unavoidable.

The Draft EIR is not required to reduce all potential impacts to a less than significant level, but is required to discuss available and feasible mitigation measures that could reduce potential impacts. As referenced in the above excerpt from the Draft EIR, Mitigation Measure WFR-1 requires the implementation of wildfire risk reduction measures, Mitigation Measure WFR-2 requires the use of fire-resistant vegetation native to Sonoma County in project landscape plans, and Mitigation Measure WFR-3 implements structure location criteria to reduce the risk of structure damage.

Please note that the Draft EIR is not required to reduce all potential impacts to a less than significant level, but is required to discuss available and feasible mitigation measures that could reduce potential impacts. The commenter is correct that the project would result in significant and unavoidable impacts to the environment. To that end, to certify the EIR and approve the project, the County Board of Supervisors would need to adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County's decision to approve the project that balances the project's economic, legal, social, technological or other benefits against its unavoidable environmental risks.

2.6 Master Response EMG: Emergency Access

Commenters expressed concerns regarding emergency access to the Rezoning Sites.

As outlined in Section 4.9, *Hazards and Hazardous Materials* (page 4.9-13 of the Draft EIR), there are no proposed physical changes such as roadway construction that would interfere with or impair emergency response or evacuation. The project would not result in changes to emergency evacuation routes, nor would it substantially increase traffic or roadway congestion such that use of an evacuation route would be hindered.

Development facilitated by the project on Rezoning Sites would accommodate future population growth and would increase VMT in the county. This could lead to incrementally increased congestion in some locations during emergency evacuations. However, as described in Impact HAZ-4 (page 4.9-13 of the Draft EIR), the County reviews and approves projects to ensure that emergency access would meet County standards. Future projects facilitated by the project, as well as all development in the County, must comply with road standards and are reviewed by the Permit Sonoma Fire Prevention Division to ensure compliance with state and local Fire Safe Standards, including that development would not interfere with evacuation routes and that roads and driveways provide unobstructed traffic circulation during a wildfire emergency and would not impede the effectiveness of evacuation plans. Requirements for the selection and identification of evacuation routes, including criteria based on

relative safety of the roadway infrastructure and existing traffic conditions. [OBJ] The plan covers evacuations due to wildfires, floods, landslide, debris flows, dam failure, tsunamis, chemical spills, and terrorism. [OBJ]

In addition, as noted in Section 4.19, *Wildfire* (pages 4.19-26 of the Draft EIR), access to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater. Laughlin Road near GUE-1 through GUE-3 does not appear to meet this requirement, and these sites have been added to the list of sites on page 4.19-26. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways would be required. Those improvements would require a County encroachment permit if on a public right-of-way. Given that specific road widening locations have not been identified, it would be speculative to analyze potential impacts at this time. However, if it is determined that road widening is needed to access Rezoning Sites for future development, road widening would require site-specific CEQA compliance that could include additional mitigation measures for aesthetics, and biological resources, cultural and tribal cultural resources, among other issues.

Please refer to Impact WFR-1 on page 4.19-24 of the Draft EIR, which describes the project's potential impacts related to impairment of adopted emergency response or emergency evacuation plans. As stated therein, the County's Emergency Operations Plan (2014) identifies main transportation routes, including Highway 101, State Route 12, State Route 116, State Route 37, State Route 128, and State Route 1. State Route 116 provides north-south connectivity between Forestville, Graton, and Sebastopol. Impact WFR-1 states:

While the increase in population that would result from project implementation is beyond County General Plan growth projections, the county is experiencing an overall housing shortage and has identified a need for new housing in areas already designated for urban growth. The project would be consistent with this identified housing need and the newly adopted RHNA allocation, as described in Section 4.14, *Population and Housing*. The project would help to meet the County's housing need and would be consistent with its RHNA allocation for the 6th Housing Element cycle. The Rezoning Sites are located in existing service areas and are adequately served by emergency services, and the population growth in these areas would not put unanticipated strain on emergency evacuations plans or routes. Therefore, the population increase encouraged by the project would not impair adopted emergency response and emergency evacuation plans. Additionally, as described in Section 4.15, *Public Services and Recreation*, the project would not result in the need for new or expanded emergency services, including police and fire protection. Therefore, the implementation of emergency response procedures would not be affected. The County's Emergency Operations Plan establishes the emergency management organization for emergency response, establishes operational concepts associated with emergency management, and provides a flexible platform for planning emergency response in the county. Development facilitated by the project on Rezoning Sites would be constructed in accordance with federal, state, regional, and local requirements, which are intended to ensure the safety of county residents and structures to the extent feasible. Compliance with these standard regulations would be consistent with the County's Emergency Operations Plan. The project would not impair an emergency response or emergency evacuation plan and impacts would be less than significant.

While not required to mitigate a CEQA impact, the County is adopting a standard condition of approval for development facilitated by the project on Rezoning Sites that for projects in a high or very high fire hazard severity zone, there must be at least two points of ingress/egress.

2.7 Master Response TRA: Traffic Congestion

Commenters expressed concerns regarding traffic congestion and level of service (LOS).

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior to SB 743, CEQA analysis typically treated automobile delay and congestion as an environmental impact. Instead, SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reducing greenhouse gas emissions. In November 2017, the Governor's Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743, which recommend using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The Guidelines required all jurisdictions in California to use VMT-based thresholds of significance by July 2020. Because LOS impacts are no longer considered significant impacts under CEQA, therefore, traffic congestion-related mitigation measures are not required. Therefore, traffic congestion was not analyzed in the Draft EIR based on this state law. Refer to Section 4.16, *Transportation*, of the EIR for more transportation analysis.

However, Appendix TRA of the Draft EIR includes an LOS-based congestion analysis for informational purposes. Please refer to Appendix TRA of the Draft EIR for congestion effects at specific intersections near the Rezoning Sites. As described therein, no near-term congestion improvements would be necessary as a result of the project; however, fair share funding of cumulative scenario traffic congestion improvements would be necessary.

3 Written Comments and Responses

This chapter includes written comments received during the circulation of the Draft EIR prepared for the Sonoma County Housing Element Update Project, and responses to those comments.

The Draft EIR was made available for public review for a 55-day comment period that began on December 28, 2022 and ended on February 23, 2023. Sonoma County received 275 comment letters on the Draft EIR. The commenters and the page number on which each commenter’s letter appear are listed in the table below.

O-2	Trish Tatarian, Conservation Co-Chair, Milo Baker Chapter of the California Native Plant Society
O-3	Lucy Hardcastle, President, Forestville Planning Association Board of Directors
O-4	Gary Harris, Forestville Chamber of Commerce
1	Rebecca Mateja
2	Greg Tatarian
3	Brian Bollman
4	Josette Brose-Eichar
5	Jim Bell
6	Matt O’Donnell
7	Rick Maifeld
8	Stacie Gradney
9	Colin Baptie
10	Elissa Rubin-Mahon
11	Becky Boyle
12	Jim Severdia
13	Kim Thatcher
14	Jonathan Teel
15	Jamie S.
16	Sean Maley
17	Sue Zaharoff
18	Arelene Warner
19	Neil Shevlin
20	Becky Boyle
21	Janice Stenger
22	Dan O’Leary
23	Karyn Pulley
24	Chris Bross
25	Cindy Romero

Letter No. and Commenter	
26	Daneene Bell
27	Denise Mobley
28	Leila Anderson
29	No Name – Letter with Signature Sheet
30	Meagan Nolan
31	Neil Shevlin
32	Oscar Ayala
33	Rio Olesky
34	Sally Percich
35	Sean Maley
36	Janice Stenger
37	Kelly Joyce
38	Louis Hughes
39	Lucy Hardcastle
40	Mary Mount
41	Nick Pulley
42	Tim Pariarca and James W.
43	Adele Westling
44	Andrea Oreck
45	Becky Boyle
46	Durs Koenig
47	Geary Do
48	Mary Helt
49	Roberta Schepps
50	Stacie Gradney
51	Sydne Acks
52	Linda Hunter
53	Lynn Woolley
54	Lynn Woolley
55	Micahel Gomez
56	Olga Gishizky
57	Patricl Reesnik
58	Robin Bens
59	Sandra Reilly
60	Patricia Kremer

Letter No. and Commenter	
61	Patti Sinclair
62	Robert Grandmaison
63	Susan Ament
64	Janice Stenger
65	John Ryan
66	Kenneth Billheimer
67	Maggie Mayo
68	Patricia Kremer
69	Stacie Gradney
70	Vicki A. Hill
71	William Helt
72	Anne Marie and Eugene Calhoun
73	Becky Boyle
74	Betty Brachman
75	Dan O'Leary
76	G.W. Duvall
77	Karyn Pulley
78	Kon Zaharoff
79	Larry Martin
80	Marilyn and David Kinghorn
81	Scott Lietzke
82	Stephanie Blumenthal
83	Alicia Chazen
84	Amanda Shone
85	Angelica Jochim
86	Arleen Zuniga
87	Cailin Marigold
88	Christopher DeWolf
89	Frank Zanca
90	Herman J. Hernandez
91	Jonathan Teel
92	Laurel Anderson
93	Leigh Hall
94	Michael Cuoio
95	Rick Sanfilipo
96	Robert Grandmaison
97	Ashley Nolan
98	Doug Thorogood
99	Jeanne Reggio

Letter No. and Commenter	
100	Kenneth Koutz
101	Leo Chyi
102	Mark Ballard
103	Mary Mount
104	Michael Korreng
105	Paige MacDonnel
106	Patrick Waters
107	Paul Paddock
108	Rick Harrington
109	Sandy Strassberg
110	Sharon Smith and David Watson
111	Suan and Ron Reed
112	Brad Wallace
113	Cassandra Shafer
114	David Kristof
115	Melody Clark
116	Kris Nevius
117	No Name – Letter with Signature Sheet
118	Lorin and Rebecca McClendon
119	Mark Dutina
120	Kathy Rodriguez
121	Mike Bojanowsk
122	Mona Behan and Alan Crisp
123	Nancy Dempster
124	Robert Davis
125	Vikki Miller
126	Adele Turk
127	Alice Horowitz
128	Anna Narbutovkih
129	Becky Boyle
130	Becky Boyle
131	Becky Boyle
132	C.L. Tree
133	C.L. Tree
134	C.L. Tree
135	Cheryl A. Franzini
136	Francisco Saiz Norma Saiz, Richard Halgren, Julie Clark, Gino Franceschi, and Karen Franceschi ,
137	Joseph and Deborah Votek

Letter No. and Commenter	
138	Kate Farrell
139	Larry Loebig
140	Larry Boebig
141	Larry Loebig
142	Larry Loebig
143	Larry Loebig
144	Larry Loebig
145	Nina Rosen
146	Richard Evangelisti
147	Rodney E. O'Neal
148	Rory Pool
149	Stacie Gradney
150	Tammy Melton
151	Greg Carr
152	Alanna Spencer
153	Ann Dexheimer
154	Arlene Irizary
155	Arlene Irizary
156	Brice Dunwoodie
157	Celeste Johansson
158	Grace Knight
159	Jeanne Reggio
160	Joshua Peterson
161	Kenneth Smith
162	Laura Hanson
163	Louis Hughes
164	Mart Anne Gustafson
165	Omar Percchich and Kelly Joyce-Perchich
166	Renee Tchirkine
167	Robert Grandmaison
168	Roger Peters
169	Ron Redmon
170	Sachiko Williams
171	Sally Olson
172	Soichiro Takahashi
173	Tara Underly
174	Vesta Copestakes
175	Vikki Miller

Letter No. and Commenter	
176	William McAfee
177	Aaron Dornstreich
178	Aaron Dornstreich
179	Aaron Dornstreich
180	Aaron Dornstreich
181	Aaron Dornstreich
182	Aaron Dornstreich
183	Aaron Dornstreich
184	Aaron Mason
185	Amber and Todd Grey
186	Anna Hayman
187	Anne Kuschner
188	Aram Sarkissian
189	Aram Sarkissian
190	Aram Sarkissian
191	Aram Sarkissian
192	Arch Zellick and Mary Neuberger
193	Audrey Kung
194	Barbara Delonno
195	Bill Avellar
196	Bob and Lucy Hardcastle
197	Bonnie Smith
198	Brenda Stivers
199	Burt Cohen
200	Charles and Anne Watson
201	Chris Romano
202	Christine Johansson
203	Cynthia Berman
204	Dan and Sunoma Northern
205	Dane Riley
206	Daniel Bontecou
207	Dave Doty
208	Dave Gebow
209	Davin Goldstein
210	Dennis O'Rourke
211	Dennis Sharp
212	Diana Hindley
213	Don Jackson

Letter No. and Commenter	
214	Elisabeth Westerfield
215	Erin Jones
216	Gillian Hayes
217	Greg Guerrazzi
218	Harriet Katz
219	Janice Stenger
220	Janice Stenger
221	Jared McConnell
222	Jaye Griffiths
223	Jim Smith
224	John Kiriakopolos
225	Joshua Beniston
226	Judith Farina
227	K. Brooks
228	Kat Deaner
229	Kon Zaharoff
230	Leslie Markham
231	Lindsey Sullivan
232	Lisa Nahmanson
233	Lois Pearlman
234	Larna Catford
235	Madeline Solomon
236	Marci Mascorro
237	Marilyn Cannon
238	Mark Berry
239	Mark Molofsky
240	Mary Clare Cawley
241	Megan Cohen
242	Melissa Kemp
243	Micahel Kane
244	Michael Nichols
245	Mike and Susan Ryan
246	Michell S. Genser
247	No Name
248	Patricia Brunelle
249	Roberta Schepps
250	Robin Shopbell
251	Sabrina Zola

Letter No. and Commenter	
252	Scott Ruthrauff
253	Soichiro Takahashi
254	Steve and Andrea Perry
255	Susan Mulcahy
256	Susan Zielger
257	Suzi Molofsky
258	Tamara Sarkissian
259	Tamara Sarkissian
260	Tamara Sarkissian
261	Tamara Sarkissian
262	Tim and Kathy Dellinger
263	Toby Barber
264	Vikki Miller
265	Wayne Weeks
266	Andy and Renee Tchirkine
267	Anita Das
268	Caitlin Marigold
269	Janice Stenger
270	Tre Gibbs
271	Rick Savel

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1). Comments received from agencies are labeled with an “A” preceding the first number of the comment letter and the number assigned to each issue (e.g. A-1.1), and comments received from organizations are labeled with an “O” preceding the first number of the comment letter and the number assigned to each issue (e.g., O-1.1).

EIR Agency Comment A-1

COMMENTER: Erin Chappell, Regional Manager, California Department of Fish and Wildlife Bay Delta Region

DATE: February 8, 2023

Response A-1.1

The commenter states that the California Department of Fish and Wildlife (CDFW) is considered as both a Trustee Agency and a Responsible Agency.

The comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.2

The commenter states that the project has the potential to result in take of plants and/or animals listed under the California Endangered Species Act (CESA). The commenter opines that a CESA Incidental Take Permit (ITP) must be obtained and encourages early consultation due to the possibility of significant modification to the project and mitigation measures in order to obtain a CESA Permit.

The comment is noted. Please see Responses A-1.7 and A-1.8 regarding special-status plant species.

Response A-1.3

The commenter states that the project would impact streams and therefore a Lake and Streambed Alteration (LSA) Notification(s) may be required and obtained from the CDFW.

The comment is noted. Please refer to Response A-1.14 regarding potential impacts to streams.

Response A-1.4

The commenter states that the CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds, and that migratory birds are also protected under the federal Migratory Bird Treaty Act.

The comment provides potential applicants with information on protections for nesting and migratory birds and does not pertain to the adequacy of the Draft EIR. The EIR notes the federal Migratory Bird Treaty Act in the section covering federal regulations in Section 4.2.2 of Section 4.2, *Biological Resources*, of the Draft EIR. The comment is noted, and no response is required.

Response A-1.5

The commenter provides a summary of the project, the project's location, and the project's timeframe.

The comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.6

The commenter states that an EIR is appropriate for the project based on the project's avoidance of significant impacts on biological resources with implementation of mitigation measures.

The comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.7

The commenter states that Mitigation Measure BIO-2 of the Draft EIR may not reduce impacts to CESA listed and other special-status plant species to less-than-significant. The commenter opines that the appropriate survey methodology, specific protocols, and adequate review and approval by CDFW are not included in Mitigation Measure BIO-2 and recommends altering the measure to incorporate the CDFW edits to ensure impacts are less than significant.

While Mitigation Measure BIO-2 of the Draft EIR would be sufficient to ensure special-status plant species surveys are conducted such that impacts to federally or state-listed plants or species with a CRPR of 1B or 2B are reduced, revisions have been made to incorporate the commenter's recommendations into Mitigation Measure BIO-2. Changes to Mitigation Measure BIO-2 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-30 of the Final EIR has been revised with the following (changes shown in ~~strikeout~~/underline):

BIO-2 Special Status Plant Species Surveys.

If the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for ~~significant~~ impacts to federally or state-listed plants or ~~regional population level impacts to~~ species with a CRPR of 1B or 2B from project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Surveys shall be conducted following CDFW's 2018 Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (<https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants>) and, as applicable, the Santa Rosa Plain Conservation Strategy Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present, or any formal updates of these protocols. The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. More than one year of surveys may be required to establish that plants are absent, and the above Santa Rosa Plain Conservation Strategy Appendix D requires a minimum of two years of surveys, which shall be implemented unless otherwise approved in writing by CDFW. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. The project shall obtain written approval of the survey reports from CDFW prior to the start of construction, unless otherwise approved in writing by CDFW. If any special-status plants are observed, the Project shall: 1) avoid all direct and indirect impacts to the special-status plants, and 2) prepare and implement an avoidance plan that is approved in writing by CDFW prior to Project start. If CESA listed plants are observed and impacts cannot be avoided, the Project shall obtain a

CESA ITP from CDFW. For impacts to federal Endangered Species Act (ESA) listed plants, the Project shall obtain authorization from USFWS.

Response A-1.8

The commenter opines that Mitigation Measure BIO-4 under Section 4.4, pages 4.4-30 and -31 of the Draft EIR, may not reduce impacts to CESA listed and other special-status plant species to less-than-significant levels because mitigation ratios for impacts to CESA listed plants are not included. The commenter acknowledges that Mitigation Measure BIO-4 includes a restoration ratio of 1:1 for impacts to these species but opines that this may result in significant net loss of the impacted plant species and that higher ratios are often applied.

As described in Mitigation Measure BIO-4, mitigation would be required at a ratio no less than 1:1 for impacts to special-status plant species. The commentor is correct in stating that this compensatory mitigation is often required at a higher ratio, but this is determined on a project-specific basis in coordination with CDFW and USFWS, as applicable. Applying a 3:1 ratio for all projects under the Housing Element Update would limit the project proponent the flexibility to determine mitigation ratios with respect to quality of existing habitat at a given site. With this flexibility in mind, revisions have been made to Mitigation Measure BIO-4 for added clarity and to incorporate recommended language provided by CDFW. However, the minimum mitigation ratio for impacts to special-status plants remains at 1:1. Changes to Mitigation Measure BIO-4 do not rise to the level of “new information” as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Pages 4.4-30 and -31 of the Final EIR has been revised with the following (changes shown in ~~strikeout~~/underline):

BIO-4 Restoration and Monitoring, and Habitat Compensation.

Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as ~~and if~~ applicable) for each species as a component of habitat restoration, unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 1:1 mitigation to impact ratio shall be provided, which may include either the purchase of credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the Project in perpetuity, unless otherwise approved in writing by CDFW. A qualified biologist shall prepare and submit a restoration plan to the County and CDFW for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization ~~may will~~ be obtained from ~~required by~~ these agencies.) The restoration plan shall include, at a minimum, the following components [...]

Response A-1.9

The commenter opines that Mitigation Measure BIO-5 under Section 4.4, page 4.4-31 of the Draft EIR, may not reduce impacts to CTS to less-than-significant levels because adequate survey and habitat compensation requirements for impacts to CTS are not included.

Mitigation Measure BIO-5 requires that for projects located within the Santa Rosa Plain Area, surveys must be conducted in accordance with CDFW, National Marine Fisheries Service (NMFS), and/or USFWS protocols prior to issuance of any construction permits. While Mitigation Measure BIO-5 of the Draft EIR would be sufficient to ensure CTS surveys are conducted in accordance with agency protocols, revisions have been made to incorporate the commenter's recommendations into Mitigation Measure BIO-5 for clarity and to ensure habitat compensation requirements are specified. Changes to Mitigation Measure BIO-5 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-31 of the Final EIR has been revised with the following (changes shown in ~~strikeout~~/underline):

BIO-5 Endangered/Threatened Species Habitat Assessments and Protocol Surveys, CDFW and USFWS Authorization and Habitat Compensation

Specific habitat assessments and survey protocols are established for several federally- and state-listed endangered or threatened species. If the results of the project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat assessments/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005) with prior written approval from CDFW and USFWS. Due to numerous documented occurrences of CTS in the Santa Rosa Plain in conjunction with the documented dispersal distances for the species of up to 1.3 miles, it has been established that CTS are present within many grassland and vernal pool habitats within the Santa Rosa Plain rendering surveys unnecessary, and therefore any protocol CTS surveys shall be approved in writing by CDFW and USFWS prior to conducting the survey and habitat compensation for impacts to CTS habitat shall be provided by the Project pursuant to the Santa Rosa Plain Conservation Strategy even if survey results are negative, unless otherwise approved in writing by CDFW and USFWS. If impacts to grassland or vernal pool habitat will occur, the Project shall consult with CDFW to determine if a CESA ITP for CTS is warranted. If CESA listed animal species such as CTS cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to Project construction. For impacts to ESA listed wildlife species such as CTS, the Project shall obtain authorization from USFWS. While often consistent with the Santa Rosa Plain Conservation Strategy, the CESA ITP habitat compensation requirements may differ from it based on a site-specific analysis. If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys.

Response A-1.10

The commenter opines that Mitigation Measure BIO-6 under Section 4.4, pages 4.4-31 through -33 of the Draft EIR, may not reduce impacts to endangered or threatened animal species such as Coho salmon and steelhead and their habitats to less-than-significant levels because adequate mitigation measures to avoid seasonally timed migration of salmonids are not included.

As described in Mitigation Measure BIO-6, projects occurring within/adjacent to aquatic habitats shall be restricted to completion between April 1 and October 31 to avoid impacts to sensitive aquatic species. This seasonal work window is intended to coincide with the dry season while also allowing for an adequate and realistic window for construction activities to occur. Mitigation Measure BIO-6 is also intended to be applied to projects evaluated in the Project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1. This initial project specific assessment would identify sensitive aquatic habitat features versus those that do not support wildlife that may potentially benefit from limiting the work window. As such, reducing the work window to June 15 to October 15, as recommended by the measure proposed by CDFW, would be determined as appropriate during the project specific evaluation and through coordination with permitting agencies. As such, no revisions to the Draft EIR are required in response to this comment.

Response A-1.11

The commenter recommends adding further species-specific mitigation measures to reduce impacts to CESA listed species to less-than-significant levels. These measures address “no-disturbance” to California Freshwater Shrimp Habitat, Swainson’s hawk protocol surveys and avoidance, northern spotted owl surveys and avoidance, and tricolored blackbird surveys and avoidance.

As the Draft EIR is a programmatic-level evaluation of biological impacts, Mitigation Measure BIO-1 requiring biological resources screening and assessments for projects that involve ground disturbance would determine whether specific projects have potential to impact special status biological resources including CESA listed species. Following this project-specific assessment, several measures included in the Draft EIR would be incorporated as applicable to address potential impacts to these species. For instance, Mitigation Measure BIO-5 requires that where the project-specific biological analysis has identified suitable habitat for federally- and/or state-listed species, protocol habitat assessment/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of construction permits. Additionally, several avoidance and minimization measures are listed in Mitigation Measure BIO-6 to ensure impacts to listed species are reduced to less-than-significant levels. Finally, Mitigation Measure BIO-10 requires projects that involve construction, grading, vegetation removal, or other project-related improvements to conduct nesting bird surveys during the nesting season (between February 1 to September 15). Therefore, impacts to these CESA listed species would be appropriately mitigated for under the Draft EIR, and surveys beyond the preconstruction nesting bird surveys required by Mitigation Measure BIO-10 (refer to Response A-1.13 for revisions to this measure) are not warranted. As such, no revisions to the Draft EIR are required in response to this comment.

Response A-1.12

The commenter provides comments on Section 4.4, page 4.4-33 and page 4.4--34, of the Draft EIR. The commenter states that the project is within the wintering distribution of burrowing owl in Sonoma County. The commenter opines that Mitigation Measure BIO-7 of the Draft EIR may not reduce impacts to wintering burrowing owl to less-than-significant levels because adequate avoidance and mitigation measures are not included. The commenter states that burrowing owl is a California Species of Special

Concern, therefore, if wintering burrowing owls are present on or adjacent the project site, project impacts to burrowing owl would be potentially significant. The commenter recommends adding the mitigation measure proposed by the CDFW to the Draft EIR to ensure impacts are less than significant.

As described above under Response A-1.11, the Draft EIR is a programmatic-level evaluation of biological impacts and Mitigation Measure BIO-1 of the Draft EIR requires biological resources screening and assessments for projects that involve ground disturbance. This initial assessment would determine whether specific projects have potential to impact special status biological resources including burrowing owl and other California Species of Special Concern. Following this project-specific assessment, several measures included in the Draft EIR would be incorporated as applicable to address potential impacts to these species. Mitigation Measure BIO-5 requires that where the project-specific biological analysis has identified suitable habitat for special-status species, protocol habitat assessment/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of construction permits. This would include implementation of surveys for burrowing owl following the 2012 *Department of Fish and Game Staff Report on Burrowing Owl Mitigation* survey methodology.

Finally, Mitigation Measure BIO-10 requires projects that involve construction, grading, vegetation removal, or other project-related improvements to conduct nesting bird surveys during the nesting season (between February 1 to September 15). Therefore, impacts to wintering burrowing owls would be appropriately mitigated for under the Draft EIR, and surveys beyond the protocol level surveys required by Mitigation Measure BIO-5 and preconstruction nesting bird surveys required by Mitigation Measure BIO-10 (refer to Response A-1.13 for revisions to this measure) are not warranted. As such, no revisions to the Draft EIR are required in response to this comment.

Response A-1.13

The commenter comments on Section 4.4, page 4.4-35, of the Draft EIR. The commenter opines that Mitigation Measure BIO-10 may not be adequate to avoid impacts to special-status and common nesting raptors such as the white-tailed kite as adequate survey areas and avoidance buffers are not included. The commenter recommends revising Mitigation Measure BIO-10 in the Draft EIR with the mitigation measure proposed by the CDFW to ensure impacts are less than significant.

While Mitigation Measure BIO-10 of the Draft EIR would be sufficient to preclude impacts to nesting birds that nest in vegetation such as trees and shrubs, revisions have been made to incorporate the commenter's recommendations into Mitigation Measure BIO-10 for clarity and to ensure survey buffers are appropriate. However, the survey window prior to construction has been retained at 14 days to allow project proponents enough time to coordinate with qualified biologists to conduct appropriate surveys at individual project sites. Changes to Mitigation Measure BIO-10 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-35 of the Final EIR has been revised with the following (changes shown in ~~strikeout~~/underline):

BIO-10 Pre-Construction Surveys for Nesting Birds for Construction Occurring within Nesting Season.

For projects that require construction, grading, the removal of trees or vegetation, or other project-related improvements, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds ~~covered by the CGFC no~~

more than within 14 days prior to project activities vegetation removal and shall conduct additional surveys if there is a lapse of 14 days or more in construction activities. The surveys shall include the entire disturbance area plus at least a 200 500- foot buffer around the project site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 250 feet for non-raptor bird species and at least 150 500 feet for raptor species, unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion.

Response A-1.14

The commenter comments on Section 4.4, page 4.4-37, of the Draft EIR. The commenter states and opinion that Mitigation Measure BIO-14 included in the Draft EIR may not reduce impacts to riparian habitat to less-than-significant levels. The commenter also states that the project may result in a violation of Fish and Game Code section 1600 et seq. as the Draft EIR does not require projects to submit an LSA Notification to CDFW and comply with the related LSA Agreement, if issued. The commenter also opines that Mitigation Measure BIO-14 does not require an adequate mitigation to impact ratio based on acreage and linear feet of impacts to riparian habitat to off-set potential losses or adequate revegetation ratios for riparian tree removal. The commenter recommends that the Draft EIR incorporate the revisions to Mitigation Measure BIO-14 proposed by the CDFW to the Draft EIR to ensure impacts are less than significant.

As described under Mitigation Measure BIO-15 of the Draft EIR, if potentially jurisdictional features are identified by the project specific Biological Resources Screening and Assessment under Mitigation Measure BIO-1, a qualified biologist will prepare a jurisdictional delineation. Following the delineation, a preliminary delineation report will be submitted to the County, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Under Mitigation Measure BIO-15, if CDFW asserts its jurisdictional authority, then a LSA Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction and implementation of the measures set forth by CDFW during the permitting process would be required.

As described in Mitigation Measure BIO-14, habitat mitigation would be required at a ratio no less than 1:1 for impacts to sensitive natural communities including riparian areas and waters of the state or waters of the U.S. While a 3:1 mitigation ratio may be desirable for permitting agencies, this is determined on a project-specific basis in coordination with CDFW, USFWS, RWQCB, and USACE, as applicable. Applying a 3:1 ratio for all projects under the Housing Element Update would limit the project proponent the flexibility to determine mitigation ratios with respect to quality of existing habitat at a given site. With this flexibility in mind, revisions have been made to Mitigation Measure BIO-14 for added clarity and to incorporate recommended language provided by CDFW. However, the minimum mitigation ratio for impacts to sensitive natural communities including riparian areas and waters of the state or waters of the U.S remains at 1:1. Changes to Mitigation Measure BIO-14 do not rise to the level of “new information” as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-37 of the Final EIR has been revised with the following (changes shown in ~~strikeout~~/underline):

BIO-14 Permitting and Restoration for Impacts to Sensitive Natural Communities, Waters, and Wetlands

Impacts to sensitive natural communities (including riparian areas and waters of the state or waters of the U.S. under the jurisdiction of the CDFW, USFWS, ~~or~~ RWQCB, or USACE) shall require that the Project: 1) submit an LSA Notification to CDFW (for impacts to streams or lakes and associated riparian habitat) and comply with the Final LSA Agreement, and 2) obtain authorization from RWQCB and the USACE (for impacts to Waters of the U.S. or State including wetlands pursuant to the Clean Water Act). Impacts shall be mitigated as required by agency permits and at a minimum 1:1 mitigation impact ratio through the funding of the acquisition and in-perpetuity management of similar habitat, in-kind credits purchased from a conservation or mitigation bank, or on-site or off-site habitat restoration based on area and linear distance for permanent impacts, unless otherwise approved in writing by the agencies. Temporary impacts shall be restored on-site. The applicant shall provide funding and management of off-site mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction). Internal mitigation lands (internal to the Rezoning Sites), or in lieu funding sufficient to acquire lands, shall provide habitat at a minimum 1:1 ratio for impacted lands, comparable to habitat to be impacted by individual project activity. The applicant shall submit documentation of mitigation funds to the County. Please be advised that CDFW may not accept in-lieu fees as an appropriate method to mitigate impacts to streams or lakes and associated riparian habitat.

1. Restoration and Monitoring. If sensitive natural communities cannot be avoided and will be impacted by future projects, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. All temporary impacts to sensitive natural communities shall be fully restored to natural condition.

2. Sudden Oak Death. The applicant shall inspect all nursery plants used in restoration for sudden oak death. Vegetation debris shall be disposed of properly and vehicles and equipment shall be free of soil and vegetation debris before entering natural habitats. Pruning tools shall be sanitized.

Habitat restoration shall occur in the same calendar year as the impact onsite or as close to the site as possible within the same stream or watershed and may consist of restoration or enhancement of riparian habitat. If mitigation is not possible within the same stream or watershed, mitigation ratios may increase at the discretion of CDFW.

To mitigate for the removal of trees, replacement trees shall be planted at the below minimum replacement to removal ratios:

- 1:1 for removal of non-native trees;
- 1:1 for removal of native trees other than oak (Quercus sp.) up to 3 inches diameter at breast height (DBH);
- 3:1 for removal of native trees other than oak 4 to 6 inches DBH;
- 6:1 for removal of native trees other than oak greater than 6 inches DBH;
- 4:1 for removal of oak trees up to 6 inches DBH;
- 5:1 for removal of oak trees greater than 6 inches to 15 inches DBH; and
- 10:1 for removal of oak trees greater than 15 inches in diameter

Replacement tree plantings shall consist of five-gallon or greater saplings and locally-collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three acorns planted at an approximately two-inch depth to minimize predation risk. Large acorns shall be selected for plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they are planted.

The Project shall monitor and maintain, as necessary, all plants for five years to ensure successful revegetation. Planted trees and other vegetation shall each have a minimum of 85 percent survival at the end of five years. If revegetation survival and/or cover requirements do not meet established goals as determined by CDFW, the Project is responsible for replacement planting, additional watering, weeding, invasive exotic eradication, or any other practice, to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for five years after planting.

Response A-1.15

The commenter states that an LSA Agreement obtained for the project would likely require the recommended mitigation measures provided by CDFW, as applicable.

The comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.16

The commenter asks that any special-status species and natural communities detected during project surveys be reported to California Natural Diversity Database (CNDDDB).

The comment is noted. Any special-status species and natural communities detected during project surveys will be sent to the CNDDDB for reporting. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response A-1.17

The commenter states that the project would have an impact on fish and/or wildlife and an assessment of environmental document filing fees is necessary. The commenter also states that the payment of environmental document filing fee is required for the project approval to be operative, vested, and final.

The comment is noted. The applicant will submit applicable environmental document filing fees upon filing of the Notice of Determination. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

EIR Organization Comment O-1

COMMENTER: Trish Tatarian, Conservation Co-Chair, Milo Baker Chapter of the California Native Plant Society

DATE: January 25, 2023

Response O-1.1

The commenter offers thanks for the opportunity to comment on the Draft EIR. The commenter states that the Milo Baker Chapter of the California Native Plant Society is dedicated to protecting native plants and habitats in Sonoma County and is interested in protective measures for these resources. The commenter therefore requests that several issues with the Draft EIR are addressed. The commenter states an understanding that the Draft EIR is intended to allow for rezoning to allow new housing. The commenter states an opinion that not enough examination of the Rezoning Sites occurred as a part of the biological analysis in the Draft EIR. The commenter opines that special-status species may be overlooked on sites included in the Draft EIR. The commenter requests that this is addressed in the Draft EIR.

As described under Section 1.2 of the Draft EIR, on page 1-1, this Draft EIR is a programmatic document, presenting a regionwide assessment of the impacts of the proposed project. As such, analysis of site-specific impacts of individual projects is not required at this time in the programmatic EIR, unless components of the program are known in sufficient detail. Due to the high-level planning effort for the project, this programmatic Draft EIR serves as a first tier CEQA environmental document which will support second-tier environmental documents, if required, for development facilitated by the project on any of the 59 Rezoning Sites. To that end, individual specific environmental analysis of each project will be performed as necessary by the County prior to each project being considered for approval. This would include adherence to Mitigation Measure BIO-1 of the Draft EIR, requiring a qualified biologist to perform a biological resources screening and assessment for projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal (e.g., demolition of existing buildings and redevelopment construction, etc.). Following this initial project-specific assessment, additional measures would be required as needed. Therefore, site-specific biological assessments would be required under the Draft EIR. As such, no revisions to the Draft EIR are required in response to this comment.

Response O-1.2

The commenter opines that several Rezoning Sites identified in the Draft EIR require further analysis. The commenter states a concern that these Rezoning Sites will not receive further analysis because of previous evaluation as a part of the Draft EIR. The commenter provides an example of Rezoning Site GUE-4, stating that this site is in the riparian zone of Fife Creek. The commenter opines that with climate change, Fife Creek likely will flood and recommends that appropriate setbacks be applied to riparian areas to account for climate change effects. The commenter states an opinion that the current setbacks applied by the County for streams would be inadequate, and that this should be addressed in the Draft EIR.

Regarding concerns about further environmental analysis for the Rezoning Sites, the commenter is asked to please refer to Response O-1.1 above for a detailed description of the site-specific biological assessment required for all projects involving ground disturbance.

In response to concerns about project placement near riparian zones and stream habitat, pursuant to Mitigation Measure BIO-15 in the Draft EIR, areas identified by the project-specific biological assessment (Mitigation Measure BIO-1) as containing potentially jurisdictional features must contract a qualified biologist to complete a jurisdictional delineation. This delineation would determine the extent of jurisdiction for CDFW, USACE, and/or RWQCB, and result in avoidance of these areas to the maximum extent possible. Due to the programmatic nature of the project, a precise, project-level analysis of all specific impacts associated with individual projects on potentially jurisdiction features is not possible at this time, and the site-specific analysis is required to verify features present. Additionally, under Mitigation Measure BIO-15, if after reviewing the site-specific delineation report a permitting agency asserts its jurisdictional authority, then the project proponent would be required to seek regulatory permitting and implement the measures set forth by the agency asserting jurisdiction during the permitting process. Further, Mitigation Measure BIO-16 requires that projects are designed to avoid potential jurisdictional features and that all construction activities be buffered from these features by at least 50 feet. Therefore, jurisdictional features and associated habitats would be identified on a site-specific basis as required under the Draft EIR. As such, no revisions to the Draft EIR are required in response to this comment.

Response O-1.4

The commenter opines that Rezoning Sites SAN-9 and SAN-10 are in areas that support California tiger salamander (CTS) and further that these areas contain wetlands and vernal pools that have not been delineated. The commenter recommends that this be addressed in the Draft EIR.

Mitigation Measure BIO-5 included in the Draft EIR requires that for projects containing potentially suitable habitat present for state- and/or federally-listed species, including CTS, surveys conducted in accordance with relevant protocols be completed in accordance with agency standards. Additionally, the commenter is asked to please refer to Response X.9 below for the fully revised text of Mitigation Measure BIO-5 to include specific protocols to survey for CTS within the Santa Rosa Plain as requested by CDFW. Therefore, impacts to CTS and their habitats would be appropriately mitigated for under the Draft EIR, and surveys beyond the protocol level surveys required by Mitigation Measure BIO-5 (refer to Response A-1.9 for revisions to this measure) are not warranted. As such, no revisions to the Draft EIR are required in response to this comment.

Response O-1.3

The commenter states that Rezoning Site GRA-2 identified in the Draft EIR is in riparian habitat adjacent to Atascadero Creek. The commenter opines that there are likely several special-status plant species that occur at this Rezoning Site. The commenter states an opinion that there is a potential for the range of Pitkin marsh lily to expand to this Rezoning Site under climate change conditions. The commenter opines that the largest threat to the survival of this species is loss and habitat disturbance resulting from residential development. The commenter expresses concern that development along Atascadero Creek may remove habitat that the lily could move into. The commenter further references indirect effects to habitat that rural residences, driveways, and agricultural operations may have including increased runoff, nutrient loading, erosion, sedimentation, and changes in soil pH. The commenter recommends that these items are addressed in the Draft EIR.

As described above, Mitigation Measure BIO-1 requires a site-specific biological resources screening and assessment to evaluate potential habitat including sensitive habitats such as riparian areas prior to project approval. This initial assessment would identify potential habitat for special-status species such as the Pitkin marsh lily and other special-status plants. Pursuant to Mitigation Measure BIO-2, if the

project specific biological assessment determines there is potential for impacts to special-status plant species due to project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Following this assessment, if special-status plants are found and would be directly impacted, implementation of Mitigation Measure BIO-3 would require projects to be re-designed to avoid impacts to these plant species and their surrounding habitats. Therefore, sensitive communities, special-status plant species, and associated habitats would be identified on a site-specific basis and avoidance of these species would occur as required by the Draft EIR. As such, no revisions to the Draft EIR are required in response to this comment.

In response to the comment regarding indirect effects from development including runoff, nutrient loading, erosion, sedimentation, and changes in soil pH, Mitigation Measure BIO-6 requires best management practices for sedimentation and erosion control as well as buffers from riparian habitat and/or water bodies, which would reduce and/or avoid impacts to these habitats. Additionally, Section 4.10, *Hydrology and Water Quality*, contains information regarding best management practices to control runoff, as well as Sonoma County Code governing water quality discharges from project sites. As such, no revisions to the Draft EIR are required in response to this comment.

Response O-1.5

The commenter states that Rezoning Site AGU-2 is in Sonoma Creek. The commenter acknowledges that housing already exists within the associated riparian zone but states an opinion that it would be inappropriate to put more development along the creek and that this may compromise the Sonoma Creek flood plain. The commenter recommends that this be addressed in the Draft EIR.

The commenter is asked to please refer above to Response O-1.2 regarding concerns about project placement near riparian zones and stream habitat. With implementation of Mitigation Measure BIO-15 and BIO-16 impacts to stream habitat and riparian zones would be evaluated and mitigated for on a site-specific basis. As such, no revisions to the Draft EIR are required in response to this comment.

EIR Organization Comment O-2

COMMENTER: Lucy Hardcastle, President, Forestville Planning Association Board of Directors

DATE: February 12, 2023

Response O-2.1

The commenter introduces themselves and expresses concerns regarding additional population in Forestville in regards traffic congestion. The commenter states their understanding of RHNA, and requests recognition on their perspectives.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response O-2.2

The commenter expresses concern regarding lack of road infrastructure and emergency evacuation. The commenter also expresses concern regarding future parking and traffic in Forestville.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure and Master Response EMG for additional information regarding emergency evacuation. Please refer to Section 4.16, *Transportation*, of the Draft EIR for a full analysis of potential transportation impacts induced by the proposed project. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response O-2.3

The commenter states that Rezoning Site FOR-1 is acceptable, but that the site has a contamination issue. The commenter states traffic will be a concern due to a nearby school.

This comment is noted. Please refer to Section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR for a detailed analysis pertaining to potential hazards and proposed mitigation measures. The EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. As discussed therein, compliance with all applicable regulations relating to site remediation would minimize impacts to development at Rezoning Site FOR-1 to a less than significant level.

Regarding the existing school and potential traffic, please refer Master Response EXST and Section 4.16, *Transportation*, of the Draft EIR for a full analysis of potential impacts to transportation.

Response O-2.4

The commenter expresses opposition to Rezoning Site FOR-2. The commenter states the roadways surrounding this site are inadequate to support future development.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element and Master Response EXST regarding the existing conditions of services and infrastructure.

Response O-2.5

The commenter states there is other affordable housing located near Rezoning Sites FOR-3, FOR-5, and FOR-6. The commenter states that they approve of the existing density at those sites. The commenter states that these sites would be appropriate for a skatepark.

This comment is noted. Please refer to Master Response SITE and Master Response HE for additional detail on the Rezoning Site selection process and conditions of the proposed project. As stated in Master Response HE, a site on the list of Rezoning sites does not guarantee that the site will or will not be rezoned, as that decision is up to the decision-makers.

Response O-2.6

The commenter expresses opposition to Rezoning Site FOR-4 stating that the site would introduce health and safety concerns about evacuation.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites, and Master Response EMG regarding emergency evacuation.

Response O-2.7

The commenter expresses concerns regarding traffic near Rezoning Site FOR-7.

This comment is noted. Please note that Site FOR-7 is not a Rezoning Site.

Please refer to Section 4.16, *Transportation*, of the Draft EIR for a full analysis of potential impacts to transportation. However, please refer to Master Response TRA regarding traffic congestion. please note that on September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB However, Appendix TRA of the Draft EIR includes an LOS-based congestion analysis for informational purposes. As shown in Appendix TRA of the Draft EIR, traffic volumes in Forestville were calculated for the Front Street (Hwy 116)/Mirabel Road intersection. As shown in the informational analysis provided in Appendix TRA, full buildout of the Forestville and Guerneville Rezoning Site could degrade roadway level of service (LOS) operations to LOS E, and the intersection also meets the peak hour signal warrant for signalization. The improvement measure provided for informational purposes is program-related development to fund the construction of a traffic signal or roundabout at the intersection, either of which would result in the intersection operating at LOS B conditions in both the AM and PM peak hours.

Response O-2.8

The commenter summarizes upcoming public participation and states they are grateful for the opportunity to bring the community together.

This comment is noted. The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

EIR Organization Comment O-3

COMMENTER: Gary Harris, Forestville Chamber of Commerce

DATE: February 13, 2023

Response O-3.1

The commenter introduces themselves and the Forestville Chamber of Commerce.

The comment does not pertain to the adequacy of the Draft EIR, and no response is required.

Response O-3.2

The commenter asks how growth in Forestville will be mitigated, with specific questions regarding FOR-2, which would require being annexed to the sewer district and connection to a sewer line. The commenter states they have seen sewage spill out of a manhole cover.

This comment has been noted. Please refer to Master Response UTIL regarding concerns about the existing sewer system.

Response O-3.3

The commenter is concerned about flooding and drainage issues, and is worried development of FOR-2 will exacerbate that problem.

Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR for detail pertaining to impacts of flooding induced by the proposed project. As stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding would be less than significant.

Response O-3.4

The commenter expresses concerns with traffic including that the existing downtown crosswalks appear inadequate and unsafe and increased traffic may exacerbate this problem. The commenter asks how this would be mitigated.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response O-3.5

The commenter opines a different property downtown would be more suitable for high-density housing.

This comment has been noted. Please refer to Master Response SITE.

Response O-3.6

The commenter expresses approval of site FOR-1 but expresses concerns regarding existing contamination and whether its owners will sell the property.

This comment is noted. Please refer to Section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR for a detailed analysis pertaining to potential hazards and proposed mitigation measures. The EIR

identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. As discussed therein, compliance with all applicable regulations relating to site remediation would minimize impacts to development at Rezoning Site FOR-1 to a less than significant level.

Response O-3.7

The commenter states there are few job opportunities in the area, which would require new residents to commute, which would result in more traffic and the need for improved roads, traffic lights, and crosswalks. The commenter asks how that will be mitigated.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Response O-2.7, above, for information regarding impacts to traffic and transportation for the Rezoning Sites located in Forestville.

Response O-3.8

The commenter attaches a letter written six years ago and opines on the nature of the Housing Element process and states they do not feel represented and should have been consulted more.

The comment does not pertain to the adequacy of the Draft EIR, and no response is required. The attached comment letter does not refer to and is not about the Housing Element Update or EIR. Refer to Master Response HE regarding dissatisfaction with the Housing Element process.

EIR Public Comment 1

COMMENTER: Rebecca Mateja

DATE: December 28, 2022

Response 1.1

The commenter expresses concern regarding the current availability of water resources and asks why more homes will be built when existing water sources are inadequate.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Refer to Section 4.10, *Hydrology and Water Quality*, and Section 4.19, *Utilities and Service Systems*, for impacts of the project relating to water.

EIR Public Comment 2

COMMENTER: Greg Tatarian

DATE: January 3, 2023

Response 2.1

The commenter states their qualifications as a bat specialist consultant. The commenter opines that sections 2 and 3 of Mitigation Measure BIO-7 included in the Draft EIR are not sufficient to prevent direct mortality of roosting bats and may result in loss of large numbers of bats potentially roosting in buildings, trees, or other features within Rezoning Sites. The commenter also opines that these measures may result in costly delays to project schedules if roosting bats are found to be present during the recommended seasonal period. Further, the commenter states that section 4 of Mitigation Measure BIO-7, requiring pre-construction surveys for roosting bats, may be misconstrued as effective for roosting bats.

This comment provides a summary of the commenters overall concerns and introduces the commenter's qualifications. The comment is noted and passed on to the County decision-makers. Please refer to Responses 2.2 through 2.4 below for details on the changes made to MM BIO-7 as it relates to bat avoidance and minimization measures.

Response 2.2

The commenter states that section 2 of Mitigation Measure BIO-7 assumes bats are active throughout the year, and opines that this is not true, making the surveys included in the measure ineffective. The commenter also states that only requiring surveys if a colony is present is insufficient and that section 2 of Mitigation Measure BIO-7 does not account for bat presence in buildings during maternity season and does not address all habitat types/features used by bats. The commenter goes on to list what they see as appropriate steps required in surveying where a project may impact bat roosting activity. To rectify these insufficiencies and provide appropriate mitigation for roosting bats, the commenter recommends altering Mitigation Measure BIO-7 such that surveys only occur when bats are active (from approximately April 1 through mid-October). The commenter also notes that if a maternity colony of special-status bat species is suspected, additional mitigation outside of preventing direct mortality is required. The commenter recommends that this would require more accurate surveys to identify bats species and quantify population size. The commenter notes that night emergence surveys are generally the most accurate method, and that conducted properly these surveys are also the least negatively impactful to the colony.

As MM BIO-7 is currently written in the Draft EIR, section 2 of the measure requires a qualified biologist to conduct a survey of existing buildings prior to construction to determine if bat species are present. The commenter is correct that this measure also only requires further surveys if a colony is observed in any structure. The commenter is also correct that as the measure is currently written, surveys would be required outside the maternity season (November through March). Revisions have been made to incorporate the commenter's recommendations into MM BIO-7 and to ensure that surveys are adequately conducted for special-status bat species. Changes to MM BIO-7 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-33 of the Final EIR has been revised with the following (changes shown in ~~strikeout~~/underline):

BIO-7 Non-listed Special Status Animal Species Avoidance and Minimization

The project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall identify some or all the below measures that will be required and applicable to the individual project: [...]

2. ~~Prior to construction, a qualified biologist shall conduct a survey of existing buildings to determine if bats are present~~ removal or alteration of trees and structures that may serve as roosting habitat for special-status bat species, a qualified biologist shall conduct a focused survey of all trees and structures to be removed or impacted by construction activities to determine whether active roosts of special-status bats are present on site. The survey shall be conducted during the non-breeding season (November through March) during seasonal periods of bat activity (April 1 through October 15). The biologist shall have access to all structures and interior attics, as needed. If a colony of bats is found roosting in any structure, tree or other habitat, further surveys, such as night emergent surveys, shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.). Tree or structure removal shall be planned for either the spring or the fall and timed to ensure both suitable conditions for the detection of bats and adequate time for tree and/or structure removal to occur during seasonal periods of bat activity exclusive of the breeding season, as described below. Trees and/or structures containing suitable potential bat roost habitat features shall be clearly marked or identified. If no bat roosts are found, the results of the survey will be documented and submitted to the County within 30 days of the survey, after which no further action will be required.

Response 2.3

The commenter states that section 3 of Mitigation Measure BIO-7 included in the Draft EIR does not account for the likely presence of maternity colonies in buildings during maternity season and does not address other habitat types and features used by bats. The commenter recommends that human eviction of bats as detailed in section 3 of Mitigation Measure BIO-7 would need to occur only during seasonal periods of bat activity; before winter torpor and before maternity season (from about March 1 to April 15), and after young are self-sufficiently flying to and from the natal roost and no longer relying on milk from their mothers (September 1 through about October 15). The commenter notes that these periods are conservative to protect all bat species in the region and account for a range of dates in birth, development, and volancy (ability to fly).

As Mitigation Measure BIO-7 is currently written in the Draft EIR, section 3 includes requirements for exclusion measures if roosting bats are present in a building during the daytime but are not part of an active maternity colony. This measure requires that maternal bat colonies are not disturbed. The commenter is correct that this measure does not address other habitat types or features where bats may roost. Revisions have been made to incorporate the commenter's recommendations into Mitigation Measure BIO-7 and to ensure that maternity colonies are appropriately avoided during maternity season and that other habitat features are addressed. Changes to Mitigation Measure BIO-7 do not rise to the level of "new information" as defined in Section 15088.5 of the *CEQA Guidelines*, and thus recirculation of the Draft EIR is not required. Page 4.4-34 of the Final EIR has been revised with the following (changes shown in strikeout/underline):

BIO-7 Non-listed Special Status Animal Species Avoidance and Minimization

The project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall identify some or all the below measures that will be required and applicable to the individual project: [...]

3. ~~If bats are roosting in the building during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not re-enter the structure. Maternal bat colonies shall not be disturbed. If day roosts are present, the biologist shall prepare a site-specific roosting bat protection plan to be implemented by the contractor following the City's approval. The plan shall incorporate the following guidance as appropriate:~~

- When possible, removal of trees/structures identified as suitable roosting habitat shall be conducted during non-seasonal periods of bat activity, including the following:

- a. A Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs.

- Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs.

- If a tree /structure must be removed during the maternity season and is identified as potentially containing a colonial maternity roost, then a qualified biologist shall conduct acoustic emergence surveys or implement other appropriate methods to further evaluate if the roost is an active maternity roost. Under the biologist's guidance, the contractor shall implement measures that consist of (or exceed) the following:

- a. Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs.

- b. Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs.

- Tree removal procedures shall be implemented using a two-step tree removal process. This method is conducted over two consecutive days and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on day one. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed to not return to the roost that night. The remainder of the tree is removed on day two.

- Prior to the demolition of vacant structures within the project site, a qualified biologist shall conduct a focused habitat assessment of all structures to be demolished. The habitat assessment shall be conducted enough in advance to

ensure the commencement of building demolition can be scheduled during seasonal periods of bat activity (see above), if required. If no signs of day roosting activity are observed, no further actions will be required. If bats or signs of day roosting by bats are observed, a qualified biologist will prepare specific recommendations such as partial dismantling to cause bats to abandon the roost, or humane eviction, both to be conducted during seasonal periods of bat activity, if required.

Response 2.4

The commenter opines that pre-construction surveys for roosting bats should only be conducted as confirmation that all previous efforts to assess potential bat habitat and project-specific measures to prevent direct mortality have been effective. The commenter opines that if pre-construction surveys are conducted during winter months, the presence of roosting bats may go undetected, and mortality of bats may occur. Further, the commenter opines that if surveys are conducted during maternity season and bats not previously found are present, construction delays would occur. The commenter states that assessment of habitat for bats must be conducted by a qualified biologist early in the project, resulting in recommendations to be implemented during the appropriate seasonal periods. Finally, the commenter opines that it is inappropriate and in violation of laws and regulations to capture and relocate native wildlife species without permits issued by the California Department of Fish and Wildlife (CDFW). The commenter recommends that for these such actions, approval must be issued by CDFW.

Please refer Response 2.2 and 2.3 above for the fully revised text of Mitigation Measure BIO-7 to include specific survey requirements, avoidance measures, and tree/structure removal requirements. Implementation of this measure as revised above would assess habitat for bat species during the appropriate seasons and avoid impacts to special-status bat species if they are found to be present. Additionally, section 8 of the Mitigation Measure BIO-7 includes requirements to consult with CDFW if special-status bat species may be present and impacted by project activities. As such, no revisions to the Draft EIR are required in response to this comment.

EIR Public Comment 3

COMMENTER: Brian Bollman

DATE: January 11, 2023

Response 3.1

The commenter states that while the Housing Element Update may be to comply with state law, the Housing Element Update and Draft EIR should include several observations, presented in the comments below.

This comment is noted, and the commenter is correct that purpose of the document as described in Section 2.7, *Project Objectives*, includes complying with State housing law. Please refer to Master Response HE regarding opposition to the Housing Element, and the specific responses below.

Response 3.2

The commenter states that Sonoma County's population is in its sixth year of decline.

This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.3

The commenter states that until recently, the United States and California experienced an increase in the size of housing units, resulting in much larger square footage per person.

This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.4

The commenter states that the number of persons per unit has decreased steadily in the United States and has been decreasing in Sonoma County.

This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.5

The commenter states that vacancy rates drop during periods of prosperity, and during times that the economy worsens, people move together in order to save money.

This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.6

The commenter claims that a recent audit by the state found that the methodology used for calculating housing needs exaggerates actual housing needs.

Please refer to Master Response HE regarding opposition to the Housing Element. This comment does not pertain to the analysis presented in the Draft EIR. This comment has been noted.

Response 3.7

The commenter states that the Association of Bay Area Governments (ABAG) bases its housing allocation on regional needs, and that this is not a functional or realistic practice because the Regional Housing Needs Assessment (RHNA) process used by ABAG shifts the burden of building new housing to outlying communities, such as Sonoma County.

Please refer to Master Response SITE for information on Rezoning Site selection and Master Response HE regarding opposition to the Housing Element. The commenter's dissatisfaction with RHNA calculation methodology does not pertain to environmental analysis in the EIR, but has been noted.

Response 3.8

The commenter concludes that the Draft EIR does not address potentially catastrophic environmental consequences of the RHNA process.

This comment relates to the comments above regarding the commenter's concern with the RHNA calculation methodology. Please refer to Master Response HE regarding opposition to the Housing Element. Please refer to the Draft EIR for the analysis of potential impacts resulting from the proposed project. This comment has been noted.

EIR Public Comment 4

COMMENTER: Josette Brose-Eichar

DATE: January 11, 2023

Response 4.1

The commenter asks if the 1,904 permitted vacation rentals are included in the 10,769 vacant housing units recorded in Sonoma County. The commenter asks if they are, why, as vacation rentals are occupied by short term renters.

Please note that the number of permitted vacation rentals was sourced from County documents, and the total number of vacant housing units was sourced from the Department of Finance. According to the Department of Finance (2023) “vacancy rates are based on 2020 Census benchmark data, adjusted to incorporate the directional changes described by the latest available ACS data. Exact data on foreclosures or other housing market indicators are not reliably available to adjust vacancy rates and are not used.” Additionally, the commenter is citing the environmental setting in Section 4.14, *Population and Housing*, which provides context for the analysis. The analysis under Impact PH-1 and Impact PH-2 do not rely specifically on the vacancy rate for their analysis and conclusions.

Response 4.2

The commenter refers to a comment they left previously, where they state that the census data used is inaccurate and suggests that the County undertake a survey to determine the most accurate number of vacant units.

This comment has been noted and passed onto decision-makers.

Response 4.3

The commenter includes a list of census definitions for the terms “For occasional use,” “Units Occupied by Person with Usual Residence Elsewhere,” “Other vacant,” and “Seasonal Vacant Units.”

This comment does not pertain to the proposed project. This comment has been noted.

Response 4.4

The commenter asks why the real percentage of vacant units has not been shared. The commenter states that they find it hard to believe that there are as many vacant units as shown in the Draft EIR. The commenter states that census data may not be the most accurate source of information on vacant housing.

Please refer to Response 4.1. This comment has been noted and passed onto decision-makers.

EIR Public Comment 5

COMMENTER: Jim Bell

DATE: January 14, 2023

Response 5.1

The commenter expresses concerns regarding existing issues such as, but not limited to, traffic and road upkeep, water supply, power, sanitation, wildfire, schools, aesthetics, hazardous waste, law enforcement, fire protection, and homelessness. The commenter states that many of the existing issues have not been abated and asks how the County expects to abate future issues.

Please refer to Master Responses EXST, UTIL, FIRE, and EMG for information regarding existing conditions of services and infrastructure, impacts to the sanitation system, wildfire concerns, and emergency evacuation.

For additional information on each of the issue areas listed by the commenter, please refer to the Draft EIR. Information regarding aesthetics may be found in Section 4.1, *Aesthetics*, of the Draft EIR. Information regarding power may be found in Section 4.6, *Energy*, of the Draft EIR. Information regarding hazardous waste may be found in section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR. Information regarding schools, law enforcement, and fire protection may be found in Section 4.15, *Public Services and Recreation*, of the Draft EIR. Information regarding transportation impacts may be found in Section 4.16, *Transportation*, of the Draft EIR. Information regarding impacts to water supply and waste management may be found in Section 4.18, *Utilities and Service Systems*, of the Draft EIR. Information regarding wildfire may be found in Section 4.19, *Wildfire*, of the Draft EIR. Homelessness is not a CEQA-required topic.

EIR Public Comment 6

COMMENTER: Matt O'Donnell

DATE: January 26, 2023

Response 6.1

The commenter states that they incorrectly identified a site address in their original letter and corrects the address to 3280 Hicks Road. The commenter expresses opposition to the proposed rezoning of 3280 Hicks Road. The commenter expresses concern regarding impacts to the rural nature of the area, and strain additional development will put on water supply.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure and Master Response HE regarding opposition to the Housing Element. This comment has been noted.

Response 6.2

The commenter expresses concerns regarding road width, pedestrian safety, high vehicle speeds, inadequate sidewalks and pedestrian facilities, and increased traffic near the Rezoning Site.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure. This comment has been noted.

Response 6.3

The commenter states that since there is no street parking and no walkable commercial stores, future residents may be car-dependent. The commenter expresses concerns regarding the addition of impervious surfaces used to create additional parking at the site.

Please refer to Master Response EXST.

As stated in Section 4.16, *Transportation*, the design of development facilitated by the proposed project on any of the Rezoning Sites is not known at this time. Each development project would be reviewed by the County and required to be consistent with appropriate regulations and design standards set forth by applicable plans, programs, and policies. This would include compliance with regulations pertaining to parking associated with the development of a site.

Response 6.4

The commenter states that the site is located at the top of a hill and expresses concern stating that additional cemented or impervious surfaces may increase runoff, potentially flooding existing resident backyards along Jannette Avenue.

Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. As stated therein, development facilitated by the project would alter the existing drainage patterns in the Rezoning Sites through introduction of new impervious surfaces and infrastructure. However, the Sonoma County General Plan includes goals and policies that are intended to reduce flood hazards through minimal alterations to designated floodplains, which would reduce the potential for increased susceptibility to flooding on or offsite. The Sonoma County Zoning Code implements this General Plan goal and policies through Sonoma County Code Chapter 7B, Flood Damage Prevention, which regulates grading and

building in FEMA-designated areas of special flood hazard (including floodways and floodplains), and by the F1 and F2 combining districts under the Zoning Code (Chapter 26) , which provide land use regulation for properties in floodways and provide for protection from hazards and damage that may result from flood waters in floodplain areas.

Implementation of these goals, policies, and ordinances would ensure that the runoff from development facilitated by the project on Rezoning Sites does not exceed the capacity of existing and future storm drain systems. The project would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

Response 6.5

The commenter states that development of the site would create additional light pollution, and construction noise at the project site would be disruptive to the peaceful nature of the area.

Please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As stated therein, Mitigation Measure AES-2 would be implemented in order to reduce potential impacts of light and glare. Mitigation Measure AES-2 includes, but is not limited to, requiring low-mounted and downward casted lighting, restrictions on lighting at the periphery of sites, prohibition of flood lights, and requirement that all lighting plans shall be designated to meet the appropriate Lighting Zone standards from Title 24 or successor regulations. Section 4.13, *Noise*, of the EIR analyzes noise levels. Impact NOI-1 discusses that construction noise would be subject to Mitigation NOI-1 through NOI-6, and that impacts would be less than significant with mitigation.

Response 6.6

The commenter expresses concern regarding the Graton Fire Station on Hicks Road. The commenter states that the Graton Fire Station has increased traffic in the area and thus increased noise from sirens. In addition, the commenter states that the County may be adding sewer access for trucks to bring wastewater from Occidental to the end of Hicks Road.

This comment does not pertain to the proposed project, but rather to existing conditions. Refer to Master Response EXST.

Response 6.7

The commenter expresses concern that an increase in the local population due to future development will make evacuation during an emergency difficult.

Please refer to Master Response EMG for information regarding emergency evacuations. This comment has been noted.

Response 6.8

The commenter states that the site is currently zoned for eight additional accessory dwelling units (ADUs). The commenter states that there are more preferable areas for development in Sebastopol.

Refer to Master Response SITE and Master Response HE. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 6.9

The commenter includes their original letter with the incorrect address.

This comment has been noted and the correct address has been noted above in Response 6.1.

EIR Public Comment 7

COMMENTER: Rick Maifeld

DATE: January 27, 2023

Response 7.1

The commenter expresses concern regarding the impacts of Rezoning Sites in Forestville. The commenter expresses concern regarding strain on law enforcement, garbage collection, water, and traffic. The commenter asks how property values of existing residents will be impacted by the project.

Please refer to Master Response SITE for information on the Rezoning Site selection process and Master Response HE regarding opposition to the Housing Element. Please refer to Master Response TRA regarding traffic congestion.

For additional information on each of the issue areas listed by the commenter, please refer to the Draft EIR. Information regarding impacts to law enforcement may be found in Section 4.15, *Public Services and Recreation*, of the Draft EIR. Information regarding transportation impacts may be found in Section 4.16, *Transportation*, of the Draft EIR. Information regarding impacts to water supply and waste management may be found in Section 4.18, *Utilities and Service Systems*, of the Draft EIR.

EIR Public Comment 8

COMMENTER: Stacie Gradney

DATE: January 27, 2023

Response 8.1

The commenter asks why Sebastopol is not on the list of rezoned areas and whether areas further east were considered. The commenter expresses opposition to Rezoning Sites in Forestville stating that development will ruin the area, overcrowd classrooms, and attract crime.

Please refer to Master Response SITE for information on the Rezoning Site selection process and Master Response HE regarding opposition to the Housing Element. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements. For additional information regarding impacts to schools and law enforcement, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR.

EIR Public Comment 9

COMMENTER: Colin Baptie

DATE: January 28, 2023

Response 9.1

The commenter opines that Table 4.5-5 on page 4.4-21 of the Draft EIR is inaccurate because it does not include federally designated critical habitat for northern spotted owl that the commenter claims is located within five miles of the Guerneville BSA. The commenter further states that a pair of nesting northern spotted owls were observed in August 2020 less than three miles from the Guerneville BSA as part of a survey for the Silver Estates Timber Harvest Plan. The commenter expresses concern at this omission.

As described in Appendix BIO of the Draft EIR, designated northern spotted owl critical habitat unit 11: Interior California Coast, subunit ICC-6 is in the Mayacamas Mountain Range located approximately 3.42 miles east of the Agua Caliente BSA and 4.01 miles northeast of the Sonoma BSA. This critical habitat is located approximately 21 miles east of the Guerneville BSA as shown by the U.S. Fish and Wildlife Service's *Critical Habitat Portal*. The commenter is asked to please refer to Response A-1.9 for a full description of the endangered/threatened species habitat assessments, protocol surveys, and avoidance required for projects where state- and/or federally- listed species have potential to occur. No revisions to the Draft EIR are required in response to this comment.

Response 9.2

The commenter poses a question asking why six housing sites are listed in Guerneville, while only four of these sites are included in the Guerneville BSA.

Table 2-2 of the Draft EIR describes the entire housing inventory site information which includes all 79 sites identified for the 6th cycle Housing Element to satisfy the RHNA allocation. Of these 79 sites, there are 59 Rezoning Sites that are viable for rezoning to accommodate new housing. The remaining 20 sites on the inventory are already zoned for residential units at an adequate density to meet the County's RHNA goals and do not require rezoning. GUE-5 and GUE-6 listed on Table 2-2 are not planned for rezoning under the Housing Element Update, and therefore were not included in the BSA for biological resources analysis as no changes to zoning are planned. Table 2-3 of the Draft EIR shows all Rezoning Sites and their proposed land use designations and zoning districts under the Housing Element Update. As such, no revisions to the Draft EIR are required in response to this comment.

EIR Public Comment 10

COMMENTER: Elissa Rubin-Mahon

DATE: January 28, 2023

Response 10.1

The commenter expresses opposition to the increase in potential housing in Forestville. The commenter states that Forestville is unincorporated and lacks adequate services to support the influx of new residents.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure and Master Response HE regarding opposition to the Housing Element. This comment has been noted.

EIR Public Comment 11

COMMENTER: Becky Boyle

DATE: January 30, 2023

Response 11.1

The commenter points to page 4.15-11 of the Draft EIR and states that Forestville is taking on a burden of the state's housing quota in comparison to other unincorporated areas in Sonoma County. The commenter states that a 25 percent increase in population is too much for Forestville and the area does not have the infrastructure to support that growth.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure, and Master Response SITE for information on the Rezoning Site selection process. This comment has been noted.

The commenter uses a quote from the EIR of "could be dominant" to refer to the population increase, but that language was used in regards to the visual assessment in Section 4.1, *Aesthetics*, not with regard to the population increase itself.

Response 11.2

The commenter states that the Draft EIR is incorrect on page 4.1-18 of the Draft EIR. The commenter asserts that there is no school located across from site FOR-2 on Mirabel Road.

The commenter is correct. Page 4.1-18 of the Draft EIR is revised as follows:

On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

This change to the existing setting description does not affect the aesthetics analysis that follows.

Response 11.3

The commenter states that the roads around Rezoning Site FOR-2 are not adequate to support an increase in population. The commenter states that the roads are small and have existing safety hazards, and that increasing the population would pose a risk to bicyclists and pedestrians in the area. The commenter claims there is no mention that the roads in Forestville are small country roads.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure. The EIR acknowledges that access roads in the vicinity of FOR-2 may be narrow on page 4.19-26 of the EIR. Impacts relating to bicycle and pedestrian safety are discussed in Section 4.16, *Transportation*, of the EIR, under Impact TRA-1. As stated therein, no significant impacts would occur.

Response 11.4

The commenter states that the Draft EIR does not include a discussion on displacement, loss of character, threat to local businesses, community conflicts, pollution-related health conditions, parking, and sanitation needs.

Please refer to pages 4.14-9 and 4.14-10 of Section 4.10, *Population and Housing*, of the Draft EIR for information regarding displacement. As discussed therein, some of the Rezoning Sites contain existing housing or other structures that could be removed during project implementation. However, the proposed project would enable development in the Unincorporated County that could result in a net

increase of 3,312 residential units on the Rezoning Sites. One of the fundamental goals of the project is to provide more housing development opportunities throughout the County and meet countywide housing inventory requirements. Thus, Mitigation Measure PH-1 requires that replacement housing be made temporarily available for any displaced existing residents prior to the demolition of existing housing on any of the Rezoning Sites.

Threats to local businesses, community conflicts, and parking are not required topics under CEQA.

The commenter does not specify the type of health impacts they are referring to. For information regarding impacts to air quality, please refer to Section 4.3, *Air Quality*, of the Draft EIR. For information regarding impacts to hazards please refer to Section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR. For information regarding impacts to noise, please refer to Section 4.13, *Noise*, of the Draft EIR.

Refer to Section 4.1, *Aesthetics*, regarding visual character.

In regards to sanitation needs, please refer to Master Response UTIL.

Response 11.5

The commenter asks where there is a discussion on how the County plans to widen roads, add left turn lanes, round-a-bouts, and crosswalks for pedestrian safety. The commenter asks where a road safety study may be found.

Please refer to Section 4.16, *Transportation*, of the EIR for information regarding traffic safety. Currently, no road widening, addition of turn lanes, roundabouts, or crosswalks is proposed. Need for infrastructure improvements would be ascertained on a project-by-project basis when individual developments are proposed.

Response 11.6

The commenter states that there is no inclusion of feasible mitigation measures in the Draft EIR addressing the aesthetic impacts of Rezoning Sites FOR-1, FOR-3, and FOR-5. The commenter states that these sites would have significant and unavoidable impacts.

The commenter is correct in their assertion that aesthetic impacts to Rezoning Sites FOR-1, FOR-3, and FOR-5 would be significant and unavoidable.

As discussed in Section 5 of the Draft EIR, *Other CEQA*, CEQA requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in significant and unavoidable aesthetic impacts. Although development facilitated by the project on Rezoning Sites would be required to implement mitigation measures, impacts would remain significant and unavoidable because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines.

Response 11.7

The commenter notes that Tables 4.9-1 and 4.9-2 in the Draft EIR show that Rezoning Sites FOR-1, FOR-5, and FOR-6 are listed as being on “Existing Hazardous Material Contamination.” The commenter states that the Draft EIR does not include a study describing the potential health risks to future residents, students near the Rezoning Sites, and impacts to the surrounding community. The commenter states that they do not see a study on how these hazardous materials may impact water resources near the Rezoning Sites.

Table 4.9-1 of the EIR shows Rezoning Sites near schools, not those specifically with contamination, which are listed in Table 4.9-2. The commenter is correct that FOR-1, FOR-5, and FOR-6 are included on this table.

As determined in Section 4.9 of the Draft EIR, *Hazards and Hazardous Materials*, development within 0.25 mile of the sites identified in Table 4.9-2 would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. The agency responsible for oversight would determine the types of remediation and cleanup required, and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. Development facilitated by the proposed project on Rezoning Sites would be required to be in compliance with applicable regulations such as the California Health and Safety Code in order to reduce potential impacts to existing and future residents to a less than significant level.

Refer to Impact HWQ-3 in Section 4.10, *Hydrology and Water Quality*, regarding analysis of the potential for polluted runoff. This impact was found to be less than significant due to implementation of goals and policies in the County General Plan and adherence to Sonoma County Code regarding implementation of BMPs to control runoff.

Response 11.8

The commenter states that in Section 4.15.1a: Fire Protection, EMT response times are shown as prior to when departments were combined. The commenter states that they do not see a study regarding ratio of emergency calls per capita.

As noted under Table 4.15-1 in Section 4.15, *Public Services and Recreation*, the Russian River FPD, Rincon Valley FPD, and Forestville FPD were recently consolidated with the Bennett Valley, Bodega Bay, Mountain Volunteer, and Windsor FPDs as the new Sonoma County Fire District; and the Valley of the Moon FPD and Glen Ellen FPD were recently consolidated with the Mayacamas FPD as the new Sonoma Valley FD. The purpose of the consolidations was to address service level deficiencies that existed in the smaller respective agencies.

CEQA guidelines require an analysis of service ratios and response times, which are analyzed under Impact PS-1 of Section 4.15. The ratio of emergency calls per capita is not required to be analyzed under CEQA.

Response 11.9

The commenter quotes from the EIR and asks if, considering there would be a significant and unavoidable impact regarding greenhouse gas emissions, it would make more sense to build development in a less car dependent area. The commenter asks if it would be advisable, particularly for low-income residents, for future development to be centered near urbanized areas with additional services.

Please refer to Master Response SITE regarding information on the Rezoning Site selection process. This comment has been noted and passed onto decision-makers.

Response 11.10

The commenter states that Forestville does not have enough existing commercial services to support future population growth.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure. This comment has been noted.

Response 11.11

The commenter expresses understanding of State housing requirements and why the County must comply. The commenter states that Forestville is being pushed beyond what the area can realistically support.

Please refer to Master Response HE regarding opposition to the Housing Element. This comment has been noted.

Response 11.12

The commenter urges that the County choose the alternative where all six parcels in Forestville are not rezoned. The commenter asks that the same consideration be given for any sites with hazardous histories.

Please refer to Master Response SITE for information on Rezoning Site selection and Master Response HE regarding opposition to the Housing Element. This comment has been noted and passed onto decision-makers.

Response 11.13

The commenter asks that the County avoid considering sites FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, and FOR-6 at minimum. The commenter asks that the County find other sites where future residents will have adequate commercial services, better roads, and the least amount of impacts to the environment.

Please refer to Master Response EXST regarding existing conditions of services, Master Response SITE for information on Rezoning Site selection, and Master Response HE regarding opposition to the Housing Element. This comment has been noted and passed onto decision-makers.

EIR Public Comment 12

COMMENTER: Jim Severdia

DATE: January 30, 2023

Response 12.1

The commenter states that prior to the release of the Draft EIR, they were not given notice of the potential rezoning in Sonoma County. The commenter expresses concern particularly for site SAN-10 and the lack of notice they were given.

Please refer to Master Response HE regarding opposition to the Housing Element. This comment has been noted. The commenter's concern regarding noticing has been forwarded to County staff.

Response 12.2

The commenter objects to the inclusion of site SAN-10. The commenter states that rezoning of the site would negatively impact the enjoyment of their property. The commenter suggests that APN 044-141-045 or APN 044-141-005 should be considered instead of site SAN-10.

Please refer to Master Response HE regarding opposition to the Housing Element and master Response SITE for information on Rezoning Site selection. This comment has been noted.

Response 12.3

The commenter states that the Draft EIR is incorrect in stating that there is public sewer and water service available in the area. The commenter notes that the nearest sewer line to SAN-10 is approximately 2,000 feet away. The commenter states that APN 044-141-045 has sewer mains much closer and should be considered.

The EIR correctly identifies that SAN-10 is not directly adjacent to existing wastewater collection systems on page 4.18-2 of the EIR, and for that reason, includes it on the list of sites required to implement Mitigation Measure UTIL-1. Please refer to Master Response SITE regarding Rezoning Site selection and Master Response UTIL regarding sewer system infrastructure. This comment has been noted.

Response 12.4

The commenter suggests that SAN-10 should not be included and instead it should be passed over so that consideration to the last extension of the Community Separator in the area may be provided. The commenter suggests that the RR3 zoning designation of the eastern portion of the parcel should remain in place so it may function to keep the separator in place. The commenter states the Community Separator between the Santa Rosa Avenue commercial corridor, and the Mountain View Avenue rural residential area will have much more continuity, be much more complete, and will follow logically.

This comment has been noted and passed onto decision-makers.

Response 12.5

The commenter notes that SAN-10 is one of the few parcels in the area with split zoning that should be maintained. The commenter states that the issue pertaining to the split zoning should be resolved before site SAN-10 is considered in the Housing Element Update.

This comment has been noted and passed onto decision-makers.

Response 12.6

The commenter states that they have additional objections to the substance of the Draft EIR and inventory, noted in the following comments. The commenter states that they have only cursorily looked over the Draft EIR. The commenter asks at what level of error causes lack of trust in the work presented in the Draft EIR.

Please refer to Master Response HE regarding opposition to the Housing Element, and responses to specific comments in Letter 12. Please refer to Section 5, *Revisions to the Draft EIR*, which lists revisions made to the document. This comment has been noted.

Response 12.7

The commenter states that Figure 4.1-36 is incorrect and that what is shown in that figure is the eastward view, the same as Figure 4.1-35.

The commenter is correct. Page 4.1-34 of the EIR has been revised as follows:

Figure 4.1-1 SAN-10 Viewed from the Southern Boundary, Looking ~~East~~West

Response 12.8

The commenter states that the APNs presented in Table 2-2 for sites SAN-10, SAN-13, SAN-14, and SAN-16 do not match the APNs located in the Sonoma County Parcel Viewer.

The APN for site SAN-10 in the EIR is correct. The following revisions to the addresses for sites SAN-13, SAN-14, and SAN-16 were made on page 2.7 of the EIR: The following revisions to the addresses for sites SAN-13, SAN-14, and SAN-16 were made on page 2.7 of the EIR:

Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
SAN-13	3847 Santa Rosa Avenue 3855 Santa Rosa Avenue	134-181-046	Santa Rosa	2-7	No
SAN-14	3847 Santa Rosa Avenue 3845 Santa Rosa Avenue	134-181-047	Santa Rosa	2-7	No
SAN-16	3445 Brooks Avenue 3452 Brooks Avenue	134-132-067	Santa Rosa	2-7	No

Response 12.9

The commenter states that Table ES-1 and Table 4.1-6 reference Mitigation Measure AES-5; however, under Project Impacts and Mitigation Measures in Section 4.1, Aesthetics, does not contain a Mitigation Measure AES-5.

Table ES-1 in the Executive Summary of the EIR only contains Mitigation Measures AES-1 and AES-2. However, the commenter is correct in stating that Mitigation Measure AES-5 was inadvertently included in Table 4.1-6, but not included in the analysis presented in section 4.1 of the Draft EIR. Corrections have been made to Table 4.1-6 in Section 4.1, *Aesthetics*. Those changes are also reflected in Section 5, *Changes to the EIR*. These changes don't warrant recirculation or change any impacts or findings of the EIR.

EIR Public Comment 13

COMMENTER: Kim Thatcher

DATE: January 30, 2023

Response 13.1

The commenter states that they do not understand why such an increase in housing in Forestville can be approved considering existing water supply inadequacies.

Please refer to Master Responses EXST regarding existing infrastructure Master Response and HE regarding opposition to the Housing Element. Impacts related to water are analyzed in Section 4.18, Utilities and Service Systems.

Response 13.2

The commenter asks how the residents of Forestville are expected to be a part of the decision making process when times chosen for meetings are during normal working hours. The commenter asks how their voice may be heard in the future.

This comment has been noted and passed onto County staff and decision-makers. Additionally, comments on the Draft EIR could be sent in via email or mail at any time during the 55-day public comment period.

EIR Public Comment 14

COMMENTER: Jonathan Teel

DATE: January 31, 2023

Response 14.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 14.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Construction-related traffic impacts are discussed on in Section 4.16, *Transportation*, of the EIR, on page 4.16-16. As stated in Section 4.19, *Wildfire*, of the EIR, “[p]rior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways could be required. Those improvements would require a County encroachment permit if on a public right-of-way” and Mitigation Measure TRA-2, which requires a construction traffic management plan, would be required, and with incorporation of mitigation would reduce impacts to a less than significant level.

Response 14.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Master Response UTIL regarding water and wastewater systems, and Master Response EXST regarding the current condition of the pump station. As stated in Section 4.18, *Utilities and Service Systems*, on page 4.18-15 of the Draft EIR, “several of the Rezoning Sites are not adjacent to existing water or wastewater infrastructure and require further evaluation at the project level during the plan review and permit approval phase. Mitigation Measure UTIL-1 is required to reduce impacts related to water supply and wastewater system sufficiency.” This mitigation measure would ensure future development would be adequately served by providers, and would result in less than significant impacts on the Rezoning Sites, with the exception of GEY-1 through GEY-4.

Response 14.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sites are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

This comment is noted. Please refer to Master Response EXST. Table 4.19-2 of the EIR identifies the Guerneville sites as in a Moderate Fire Hazard Severity Zone (FHSZ) as indicated in the adopted 2007

CALFIRE FHSZ Viewer, but the Guerneville sites are now shown as in a High FHSZ in the more recent 2022 Draft CALFIRE FHSZ Viewer which has not yet been adopted.

A portion of GUE-3 and GUE-4 is within the FEMA-mapped floodway and an additional portion is within the FEMA-mapped 100-year floodplain, while GUE-2 is outside of FEMA-designated floodplains; refer to Figures 4.10-4 (as revised) and 4.10-5 of the EIR. As discussed under Impact HWQ-4 of Section 4.10, *Hydrology and Water Quality*, of the EIR, development in the 100-year floodplain would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes the prohibition of fill in County-identified special flood hazard areas (refer to Section 7B-12 of the Sonoma County Code of Ordinances), and requiring review and approval of proposed drainage facilities by Permit Sonoma. Rezoning Sites that are within the Floodway Combining District (F1) or Floodplain Combining District (F2) would be required to comply with County requirements as stated in Articles 56 and 58, respectively, of the Sonoma County Code of Ordinances. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project. Impacts related to flood flows would be less than significant.

As acknowledged in Section 4.7, *Geology and Soils*, Sonoma County is subject to risks associated with potentially destructive earthquakes, and as stated on page 4.7-3 of the EIR, GUE-3 and GUE-4 contain soils with high or very high liquefaction levels. As addressed on page 4.7-26 of the EIR, compliance with mandatory California Building Code requirements, implementation of General Plan goals and policies, and compliance with applicable laws and regulations would reduce impacts related to liquefaction to a less-than-significant level.

Response 14.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Aesthetic impacts are analyzed in Section 4.1, *Aesthetics*, of the Draft EIR. As discussed on page 4.1-5 of the EIR, trees and woodlands are determined to be a distinctive part of the Sonoma County visual landscape and form an important visual resource where they occur. Table 4.1-3 in the EIR shows rezoning sites with Zoning and General Plan designations that protect visual resources, including rezoning sites GUE-2, GUE-3, and GUE-4 which are zoned as Valley Oak Habitat Combining District. Trees are discussed in the assessment of the visual quality of sites GUE-2, GUE-3, and GUE-4 on pages 4.1-11 and 4.1-12 of the EIR. Impact AES-3 also mentions that “[t]he project would facilitate development projects at some sites that could introduce incongruous styles and massing or could degrade visual character through the necessary removal of existing, mature trees. New development that is incompatible with the natural and built conditions as they exist could cause a significant impact to the visual quality by changing the visual nature of the site from open space to densely developed residential properties, or by introducing structures with unremarkable design into a neighborhood with a distinctive character informed, in part, by the architecture. This would result in significant impacts on 25 Rezoning Sites with high site sensitivity where development would be dominant or codominant, and sites with moderate sensitivity where development would be dominant, including GUE-4. Even with incorporation of Mitigation Measure AES-1 for screening vegetation, because development on the Rezoning Sites that are facilitated by the project cannot be made to comply with discretionary, subjective design guidelines, projects on these 25 sites, it may substantially degrade the existing visual character or quality of public views of the site and its surroundings. Thus, impacts would remain significant and unavoidable.

Response 14.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Consistency with the Sonoma County General Plan and Plan Bay Area 2050 are analyzed in Section 4.11, *Land Use and Planning*. As shown in Table 4.11-3, the project is consistent with the vast majority of relevant policies in the County General Plan, and a project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation.

As stated in Section 4.11 regarding Plan Bay Area 2050, “The proposed project would result in an increased availability of housing and affordable housing for all income levels in the Unincorporated County, following buildout of the Rezoning Sites. Additionally, the Rezoning Sites are located in Urban Service Areas near developed urban areas, which would result in the development of housing near existing community resources in a manner that promotes more inclusive communities. As such, the project would be consistent with the themes described above.”

It is unclear what the commenter is referring to as “Housing Element policy,” but the Housing Element undergoes review and certification by the California State Department of Housing and Community Development (HCD) to ensure it meets requirements.

Response 14.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element.

EIR Public Comment 15

COMMENTER: Janice Stenger

DATE: January 31, 2022

Response 15.1

The commenter asks that the County appoint a resource bureau where they may find data that is not publicly available. The commenter suggests that a meeting for the owners of the rezone sites should have been considered.

Information used to create the Draft EIR is publicly available. Please consult Section 7, *References*, of the EIR. Suggestions for an in-person meeting regarding rezoning have been noted and passed onto decision-makers, though may be infeasible due to the countywide scale of the project.

Response 15.2

The commenter suggests that representatives from RR Sanitation (Russian River County Sanitation District) and information on the existing bus system should have been included in public meetings. The commenter states that data on public transportation ridership, crime statistics, information on fires started by arsonists, and emergency ambulance rides in Guerneville is difficult to find.

Available information from Sonoma County Transit is included in Section 4.16.1 of the EIR. Additionally Russian River County Sanitation District was consulted and is included on Table 4.18-2 and analyzed throughout Section 4.18, *Utilities and Service Systems*, in the EIR. More information regarding the Russian River County Sanitation District can be found in Appendix WSS.

Response 15.3

The commenter states a link to the Draft EIR is not provided on the County website, and that the existing link leads to an error message. The commenter states that a print copy of the Draft EIR should have been kept in local libraries. The commenter asks if the County needs a planning department, as they disagree with the County delegating planning responsibilities to outside consultants.

The Draft EIR was and remains available on the County website at:

<https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement/>. Copies of the Draft EIR were available at the following public libraries:

- Petaluma Regional Library
- Guerneville Regional Library
- Healdsburg Regional Library
- Sonoma Valley Regional Library
- Roseland Regional Library
- Santa Rosa Central Library

Response 15.4

The commenter asks if they can be assured that the sewer district now follows federal government mandates. The commenter expresses concern regarding the number of sewer line hookups the sewer district has added. The commenter notes that sewer charges have increased for existing residents. The commenter expresses dissatisfaction with the existing sewer system infrastructure and summarizes historical issues with the system. The commenter states generally that the Draft EIR utilizes incorrect and out-of-date data.

Please refer to Master Response UTIL regarding sewer system infrastructure and Master Response EXST regarding existing conditions of the sewer system. This comment does not pertain to impacts of the proposed project. The commenter's assertion of errors in the EIR does not point to specific issues, but revisions to correct typographical and other errors are listed in Section 5, *Revisions to the EIR*.

Response 15.5

The commenter states that the increase in future residents will create a difference in the environment, and notes that there are rules, such as Fire Safety Ordinance 6184, that restrict building on dead-end roads and cul-de-sacs. The commenter states that the photo of Guerneville used in the Draft EIR is unflattering and expresses discontent that their parcel does not appear in the image.

Please refer to Section 4.19, *Wildfire*, of the Draft EIR for additional information regarding wildfire impacts relevant to the proposed project. As stated therein, any development facilitated by the proposed project on Rezoning Sites would be required to comply with all applicable local, State, and federal regulations regarding wildfire and wildfire safety.

In regard to the images used in the Draft EIR, Figure 4.1-5 shows GUE-2 and GUE-3 from Cutten Avenue.

Response 15.6

The commenter states that the FEMA flood map is dated and does not accurately reflect what flood patterns look like near site GUE-3. The commenter states that during floods, water can rise and stretch past Watson Road.

This comment is noted. Please refer to Master Response EXST regarding existing and historical issues regarding flood risk. This comment does not pertain to impacts caused by the proposed project. Additionally, the EIR uses the most updated flood information available from FEMA, which is from 2008, rather than the 1950s as asserted by the commenter.

Response 15.7

The commenter asks if PG&E's description of wildfire conditions or the County's description should be trusted. The commenter notes that their area is in a "High Hazard" area according to the Wildfire Risk Index. The commenter includes an image. The commenter adds that other maps show their area being at high risk of liquefaction.

Please refer to Figure 4.19-3 in Section 4.19, *Wildfire*, of the Draft EIR. As stated therein, the figure relies on the current Fire Hazard Severity Zones from CAL FIRE. CAL FIRE determines fire hazard severity based on factors including fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread. PG&E's community wildfire safety program relies on a Fire-Threat Map of California created by the California Public Utilities Commission to show places with a high risk of wildfires that could put people

and property in danger. The Wildfire Risk Index was developed for a non-regulatory program, the Community Wildfire Prevention Plan, and as noted on the website the Wildfire Risk Index has not yet been formally reviewed or adopted by the resource agencies, and is subject to change prior to codification. Therefore, the most appropriate resource to use for CEQA analysis regarding wildfire is CAL FIRE's Fire Hazard Severity Zone maps.

Regarding liquefaction, the commenter is correct that GUE-3 contains soils with high or very high liquefaction levels, as acknowledged on page 4.7-3 of the EIR. However, as analyzed under Impact GEO-2 in Section 4.7, *Geology and Soils*, compliance with requirements of the California Building Code and implementation of the County General Plan goals and policies would reduce impacts related to liquefaction to a less than significant level.

Response 15.8

The commenter asks how their property became a by-right "target" while the County allowed for other development such as rental properties and hotels to be taken out of the housing market in West County. The commenter asks if an alternative would be to eliminate vacation rental properties, and states that this is their preference.

This comment does not pertain to the contents of the Draft EIR, but it has been noted and passed onto decision-makers.

Response 15.9

The commenter suggests that all public meetings should be held in person in order to increase public participation. The commenter asks how many properties are being taken away from parcel owners.

This comment does not pertain to the contents of the Draft EIR, but it has been noted and passed onto decision-makers.

EIR Public Comment 16

COMMENTER: Sean Maley

DATE: January 31, 2023

Response 16.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 16.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 16.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 16.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 16.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 16.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 16.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 17

COMMENTER: Sue Zaharoff

DATE: January 31, 2023

Response 17.1

The commenter states that they oppose the rezoning of site FOR-2 in Forestville. The commenter expresses concerns regarding the areas existing infrastructure, future traffic and truck routes, emergency egress, water supply, pedestrian safety, limited fire and police services, parking, and runoff. The commenter states that rezoning site FOR-2 would end Forestville.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element. Please refer to Master Response EXST regarding existing services and infrastructure. Refer to Master Response TRA regarding traffic congestion. Refer to Master Response UTIL and Section 4.18, *Utilities and Service Systems*, regarding water supply and infrastructures. Refer to Master Response EMG regarding emergency egress. Pedestrian safety is analyzed in Section 4.16, *Transportation*, of the EIR. Refer to Section 4.15, *Public Services and Recreation*, regarding fire and police services. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

EIR Public Comment 18

COMMENTER: Arelene Warner

DATE: February 1, 2023

Response 18.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 18.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents. The commenter expresses concern regarding the deterioration of Laughlin Roads due to an increased number of vehicles using the road.

Refer to Response 14.2.

Response 18.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages. The commenter states that existing residents are currently burdened by a sewer tax.

Refer to Response 14.3.

Response 18.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sites are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 18.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 18.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 18.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 19

COMMENTER: Neil Shevlin

DATE: February 1, 2023

Response 19.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 19.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 19.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 11\4.3.

Response 19.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 19.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 19.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 19.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 20

COMMENTER: Becky Boyle

DATE: January 31, 2023

Response 20.1

The commenter expresses concerns regarding the increase in future population in Forestville. The states that Forestville has inadequate infrastructure to support future development.

Refer to Response 11.1

Response 20.2

The commenter states that there is not a school directly across the street from Rezoning Site FOR-2.

Refer to Response 11.2.

Response 20.3

The commenter expresses concern regarding the road encircling Rezoning Site FOR-2. The commenter states that the roads near all Rezoning Sites located in Forestville are small county roads.

Refer to Response 11.3.

Response 20.4

The commenter expresses concern regarding urban renewal effects, displacement, loss of character, threat to local businesses, community conflicts, pollution-related health conditions, parking, and sanitation.

Refer to Response 11.4.

Response 20.5

The commenter asks where there is a discussion on how the County plans to widen roads, add left turn lanes, round-a-bouts, and crosswalks for pedestrian safety. The commenter asks where a road safety study may be found.

Refer to Response 11.5.

Response 20.6

The commenter states that there is no inclusion of feasible mitigation measures in the Draft EIR addressing the aesthetic impacts of Rezoning Sites FOR-1, FOR-3, and FOR-5. The commenter states that these sites would have significant and unavoidable impacts.

Refer to Response 11.6.

Response 20.7

The commenter notes that Tables 4.9-1 and 4.9-2 in the Draft EIR show that Rezoning Sites FOR-1, FOR-5, and FOR-6 are listed as being on “Existing Hazardous Material Contamination.” The commenter states that the Draft EIR does not include a study describing the potential health risks to future residents, students near the Rezoning Sites, and impacts to the surrounding community. The commenter states that they do not see a study on how these hazardous materials may impact water resources near the Rezoning Sites.

Refer to Response 11.7.

Response 20.8

The commenter states that in Section 4.15.1a: Fire Protection, EMT response times are shown as prior to when departments were combined. The commenter states that they do not see a study regarding ratio of emergency calls per capita.

Refer to Response 11.8.

Response 20.9

The commenter asks if, considering there would be a significant and unavoidable impact regarding greenhouse gas emissions, it would make more sense to build development in a less car dependent area. The commenter asks if it would be advisable, particularly for low-income residents, for future development to be centered near urbanized areas with additional services.

Refer to Response 11.9.

Response 20.10

The commenter states that Forestville does not have enough existing commercial services to support future population growth.

Refer to Response 11.10.

Response 20.11

The commenter expresses understanding of State housing requirements and why the County must comply. The commenter states that Forestville is being pushed beyond what the area can realistically support.

Refer to Response 11.11.

Response 20.12

The commenter urges that the County choose the alternative where all six parcels in Forestville are not rezoned. The commenter asks that the same consideration be given for any sites with hazardous histories.

Refer to Response 11.12.

Response 20.13

The commenter asks that the County avoid considering sites FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, and FOR-6 at minimum. The commenter asks that the County find other sites where future residents will have adequate commercial services, better roads, and the least amount of impacts to the environment.

Refer to Response 11.13.

EIR Public Comment 21

COMMENTER: Janice Stenger

DATE: December 31, 2022

Response 21.1

The commenter expresses opposition to the proposed project.

This comment is not relevant to the environmental impact analysis of the proposed project. This comment has been noted.

Response 21.2

The commenter expresses concerns regarding wildfire risk and wildfire mapping. The commenter states that there are incongruencies between County maps and PG&E fire maps.

Please refer to Figure 4.19-3 in Section 4.19, *Wildfire*, of the Draft EIR. As stated therein, the graphic relies on the most up-to-date data obtained from CAL FIRE. CAL FIRE determines fire hazard severity based on factors including fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread. PG&E's community wildfire safety program relies on a Fire-Threat Map of California created by the California Public Utilities Commission (CPUC) called the CPUC High Fire Threat District map to show places with a high risk of wildfires that could put people and property in danger of utility-associated wildfires. CEQA analysis regarding wildfire is based on CAL FIRE fire hazard severity zones in the currently adopted fire hazard severity zone maps. Additionally, the CAL FIRE maps were last updated in 2007. While CALFIRE is currently working on updating them using 2022 data, and released draft maps in 2023, the new maps have not yet been adopted. As such, the currently adopted 2007 versions of CALFIRE Wildfire maps were used in the wildfire analysis for this project.

Response 21.3

The commenter expresses concerns regarding traffic in Guerneville.

Rezoning Sites in Guerneville may be accessed by roadways at least 20 feet in width or greater; however, future development facilitated by the project on Rezoning Sites would need to ensure that adjacent roads meet County width requirements. Refer to Master Response EXST regarding the current dead-end roadways and Master Response EMG.

While not required by CEQA, as discussed in Response O-2.7, a congestion-based LOS analysis was done for information purposes. As shown in Appendix TRA of the Draft EIR, traffic volumes in Guerneville were calculated for two intersections: Armstrong Woods Road/River Road and State Route 116/River Road, for informational purposes. Full buildout of all four Rezoning Sites in Guerneville would result in an increase of no more than 133 peak hour trips, or approximately 1,330 daily trips at these intersections. As shown in the informational analysis provided in Appendix TRA, full buildout of Guerneville Rezoning Sites would not degrade roadway level of service (LOS) operations beyond LOS B, where roadway operations occur with low delay, good progression, and/or short cycle lengths.

Response 21.4

The commenter expresses opposition to the proposed Rezoning Sites in Guerneville. The commenter expresses opposition to Proposition 19 and expresses concerns regarding the future of their property. The commenter asks how the proposed project will impact the rental market and expresses discontent with the number of short-term rentals in the area.

This comment does not pertain to the environmental analysis or conclusions of the Draft EIR. This comment has been noted.

Response 21.5

The commenter expresses concern and frustration with short-term rentals. The commenter asks if the removal of a local school is indicative of the town's decline.

This comment does not pertain to the environmental analysis or conclusions of the Draft EIR. This comment has been noted.

Response 21.6

The commenter describes the purpose of the Workforce Housing (WH) Combining Zone. The commenter asks a series of questions regarding whether or not their property and the property of another community member were appropriately chosen to be included as Rezoning Sites. The commenter claims that the General Plan was updated two years ago and asks why the proposed project was not included as part of that update.

The commenter is incorrect that the General Plan was updated two years ago. The last comprehensive update to the General Plan was in 2008. This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and identification. Regarding updates to the General Plan and Housing Element, the County Housing Element is a component of the County General Plan that primarily addresses housing matters for the unincorporated areas of Sonoma County. Under State law, the Housing Element must be updated on an eight-year cycle, which is overseen by the California Department of Housing and Community Development (HCD). The County Housing Element is currently being updated for the sixth cycle, which encompasses the 2023-2031 planning period. The proposed project provides evidence of the County's ability to accommodate the Regional Housing Needs Assessment through the year 2031, as established by the Association of Bay Area Governments (ABAG), and identifies the rezone program needed to reach the required housing capacity.

Response 21.7

The commenter expresses discontent regarding the amount of notice they received about the Draft EIR. The commenter states that their local library had not received a copy of the Draft EIR. The commenter expresses dissatisfaction with public meetings being held virtually.

The County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction*, on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation*. Refer also to past noticing regarding the Rezoning Sites for Housing Process in Master Response SITE.

Nonetheless, this comment is not relevant to the environmental impact analysis of the proposed project. The commenters opinion is noted and has been passed on to decision-makers. Section 150587(g) of the *CEQA Guidelines* says the lead agency should furnish copies of the EIR to the public library systems, but not that it is required. However, the County made the document available at six Sonoma County libraries. Refer to Response 15.3 regarding the EIR's presence in area libraries, and online at <https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement/>.

Response 21.8

The commenter states that the residents on Laughlin Road, Valley Lane, and Cutten Drive did not receive adequate notification of the Rezoning Sites located on Laughlin Road. The commenter expresses concerns regarding increased traffic and wildfire risk in the area including on dead-end roads.

This comment has been noted. Refer to Response 21.7 above.

Please refer to Response 21.3 regarding traffic impacts resulting from development of the Rezoning Sites in Guerneville. Please refer to Master Response FIRE regarding wildfire risk and evacuation. Refer to Response 21.2 regarding the difference between PG&E and CAL FIRE fire designations. Refer to Master Response EMG regarding evacuation access concerns.

Response 21.9

The commenter provides a summary of historical sewer issues and expresses concerns regarding the existing sewer system in Guerneville.

This comment has been noted. Please refer to Master Response UTIL regarding concerns about the existing sewer system. As stated therein, "the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. These sites would require the construction of expanded wastewater facilities, including upgraded pipelines and potentially new pumps."

Response 21.10

The commenter expresses concerns regarding existing flood conditions near the Rezoning Sites.

This comment is noted. Please refer to Master Response EXST regarding existing conditions. . Refer to Figure 4.10-5 for a FEMA floodplain map of the Guerneville site. GUE-2 is near but not within the 100-year floodplain.

Response 21.11

The commenter includes a copy of a separate letter submitted to the County.

Please refer to EIR Public Comment 15 for a full summary of the attached letter and responses to each concern raised therein.

EIR Public Comment 22

COMMENTER: Dan O'Leary

DATE: January 31, 2023

Response 22.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 22.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 22.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 22.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sites are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 22.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 22.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 22.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 23

COMMENTER: Karyn Pulley

DATE: January 31, 2023

Response 23.1

The commenter states that their comments are regarding site FOR-2. The commenter asks what changes would be imposed on their land and if they would be forced into guidelines for future property changes.

Please refer to Master Response HE regarding the purpose of the proposed project. This comment has been noted and passed onto decision-makers. Rezoning would not force changes to the existing uses on-site; however, if rezoning is approved, future land use changes on the site would be subject to the applicable zoning code requirements for that zone.

Response 23.2

The commenter states that they have no intention of selling their land. The commenter states that they will be submitting further comments.

Please refer to Master Response HE regarding opposition to the Housing Element. This comment has been noted and passed onto decision-makers. Rezoning, or consideration of a site for rezoning, does not require intentions to sell land.

EIR Public Comment 24

COMMENTER: Chriss Bross

DATE: February 1, 2023

Response 24.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR. The commenter expresses particular concern regarding the health and safety of residents, and expresses concerns about emergency evacuation in the event of a flood.

Refer to Response 14.1.

Response 24.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 24.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 24.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sites are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 24.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 24.5.

Response 24.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 24.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 25

COMMENTER: February 1, 2023

DATE: Cindy Romero

Response 25.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 25.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 25.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 25.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 25.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 25.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 25.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 26

COMMENTER: Daneene Bell

DATE: February 1, 2023

Response 26.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR. The commenter expresses particular concern regarding the health and safety of residents, and expresses concerns about emergency evacuation in the event of a flood.

Refer to Response 14.1.

Response 26.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 26.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 26.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sites are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 26.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 26.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 26.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 27

COMMENTER: Denise Mobley

DATE: February 1, 2023

Response 27.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1

Response 27.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 27.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 27.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 27.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 27.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14..6.

Response 27.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 28

COMMENTER: Leila Anderson

DATE: February 1, 2023

Response 28.1

The commenter expresses concern regarding egress from Forestville in the event of a wildfire, and how an increase in future population may create additional evacuation challenges. The commenter states that it is unlikely more water will become available in the future, and that it is unlikely that fires will stop.

This comment has been noted. Please refer to Master Response FIRE for information regarding wildfire impacts and emergency evacuation.

EIR Public Comment 29

COMMENTER: Neighbors of FOR-2

DATE: February 1, 2023

Response 29.1

The commenter requests that FOR-2 be removed from the rezoning plan due to reasons stated in Alternative 3 of the EIR, as they believe the cost of mitigation makes the project too expensive and there is a risk that the property will never be developed.

This comment has been noted and passed onto decision-makers. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites.

Response 29.2

The commenter summarizes the Land Use Element of the County General Plan and states the project slated for FOR-2 is inconsistent with the existing General Plan.

Consistency with the Sonoma County General Plan is analyzed in Section 4.11, *Land Use and Planning*. As shown in Table 4.11-3, the project is consistent with the vast majority of relevant policies in the County General Plan, and a project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation.

Response 29.3

The commenter expresses concern with additional residents including potential multi-story buildings blocking scenic vistas and overlooking backyards, noise levels, and nighttime light and glare. The commenter states there are no sidewalks and narrow roadway shoulders, and that traffic increases would make walking less safe and desirable. The commenter points out an error regarding identification of a school near FOR-2.

Regarding impacts to scenic vistas please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As discussed under Impact AES-1 there are four Rezoning Sites that would have significant impacts to scenic vistas. However, this does not include Rezoning Site FOR-2 or any other Rezoning Site located in Forestville. As discussed under Impact AES-2, several Rezoning Sites in Forestville border a state scenic highway and scenic resources could be affected if individual projects are visible from these roadways. However, there is no feasible mitigation measures available, as development facilitated by the proposed project on Rezoning Sites cannot be made to comply with subjective design guidelines, and thus projects on these ten sites may remove or damage scenic resources within a State-designated highway, particularly by changing the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Regarding impacts due to light and glare, impacts would be less than significant with mitigation incorporated. Mitigation Measure AES-2 would be implemented requiring that all project designs shall

include specific exterior lighting plans that meet the minimum requirements. With implementation of AES-2, impacts from light and glare would be reduced to a less than significant level.

Please refer to Section 4.13, *Noise*, of the Draft EIR for a full analysis of potential noise impacts induced by the proposed project. As stated therein, impacts to noise could be significant. However, compliance with all applicable noise regulations and implementation of the proposed mitigation measures would reduce all noise impacts to a less than significant level.

Regarding the Forestville Youth Park, the commenter is correct, and the EIR has been revised to correctly identify the Forestville Youth Park

Response 29.4

The commenter expresses concern regarding existing traffic levels on Mirabel Road relating to truck trips, fast-moving traffic, no turn lanes, and limited sight lines. The commenter offers information regarding the feasibility of exit points for the parcel and estimations of traffic levels.

Refer to O-2.7 regarding traffic levels on Mirabel Road.

Response 29.5

The commenter claims that the community funded Forestville Youth Park would see a considerable increase in use that would lead to physical deterioration of the facility, and pedestrian safety crossing Mirabel Road to access the park would be a safety concern.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As stated therein, development facilitated by the project on Rezoning Sites would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other objectives and would not increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facility would occur or be accelerated.

In addition, pursuant to Sonoma County Code Section 20-65, project applicant(s) for development facilitated by the proposed project on Rezoning Sites would be required to pay park fees in the amount of \$3,678 per residential unit in order to offset impacts related to increased demand at existing recreation facilities.. Subdivision projects must dedicate parkland or pay an in-lieu fee pursuant to Sonoma County Code Section 25-58. Therefore, impacts to parks would be less than significant.

Response 29.6

The commenter provides background information on sewer lines in the vicinity of FOR-2, and states the EIR does not define if the existing line in Hwy 116 is capable of handling the increased output from the FOR-2 project. The commenter notes that if it is insufficient, the line would have to be re-engineered and replaced under Caltrans oversight, and that the if a development is approved on FOR-2, it should require sewer connections.

This comment is noted. Please refer to Master Response EXST regarding existing conditions of services and infrastructure. Please refer to Master Response UTIL for information regarding the existing sewer system and planned improvements. Additionally, there are no known capacity issues in the collection system, pursuant to discussions with the general manager, as discussed in Appendix WSS of the EIR. However, further hydraulic analysis may be required by Forestville Water District prior to construction approval for individual developments.

Response 29.7

The commenter states FOR-2 is 33 yards from a moderately high fire zone and quotes the EIR regarding emergency access during evacuations.

The commenter's quotation is not a direct quote, but generally accurate. Page 4.19-26 of the EIR states that "[a]ccess to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater, and access to Rezoning Sites GUE-1 through GUE-3 also appear not to meet this requirement. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways ~~would~~ could be required." The commenter does not bring up any concerns with the analysis presented in the EIR; no changes are warranted.

Response 29.8

The commenter restates their position regarding the FOR-2 rezoning.

Refer to Response 29.1.

EIR Public Comment 30

COMMENTER: Meagan Nolan

DATE: February 1, 2023

Response 30.1

The commenter states that they are a co-inheritor of the property at 6934 Mirabel Road. The commenter asserts that they have no intention of selling the property.

This comment has been noted. It does not pertain to the analysis or conclusions in the EIR.

EIR Public Comment 31

COMMENTER: Neil Shevlin

DATE: February 1, 2023

Response 31.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 31.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 31.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 31.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 31.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 31.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 31.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 32

COMMENTER: Oscar Ayala

DATE: February 1, 2023

Response 32.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 32.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 32.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 32.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 32.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 32.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 32.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 33

COMMENTER: Rio Olesky

DATE: February 1, 2023

Response 33.1

The commenter states that the roads surrounding site FOR-2 are not built to withstand future development and population increases. The commenter expresses concern regarding pedestrian and bicyclist safety on these roads.

Refer to Response 14.3.

Response 33.2

The commenter states that the Draft EIR does not include a discussion on displacement, loss of character, threat to local businesses, community conflicts, pollution-related health conditions, parking, and sanitation needs.

Refer to Response 14.4.

Response 33.3

The commenter asks where there is a discussion on how the County plans to widen roads, add left turn lanes, round-a-bouts, and crosswalks for pedestrian safety.

Refer to Response 14.5.

Response 33.4

The commenter asks where a road safety study may be found. The commenter expresses concern regarding potential accidents and the safety of residents.

Refer to Response 14.5.

Response 33.5

The commenter states that there is no inclusion of feasible mitigation measures in the Draft EIR addressing the aesthetic impacts of sites FOR-1, FOR-3, and FOR-5. The commenter states that these sites would have significant and unavoidable impacts.

Refer to Response 14.6.

Response 33.6

The commenter notes that Tables 4.9-1 and 4.9-2 in the Draft EIR show that sites FOR-1, FOR-5, and FOR-6 are listed as being on "Existing Hazardous Material Contamination." The commenter states that the Draft EIR does not include a study describing the potential health risks to future residents, students near the sites, and impacts to the surrounding community. The commenter states that they do not see a study on how these hazardous materials may impact water resources near the sites.

Refer to Response 14.7.

EIR Public Comment 34

COMMENTER: Sally Percich

DATE: February 1, 2023

Response 34.1

The commenter expresses opposition to the rezone site located at 6898 Nolan Road (FOR-2). The commenter expresses concern regarding increased traffic and inadequate availability of water resources. The commenter notes that there is no sewer system in place in the neighborhood surrounding the site.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and Master Response UTIL regarding sewer system infrastructure.

Response 34.2

The commenter states that 6555 Covey Road (FOR-1) and 6220 Highway 116 (FOR-3) are both acceptable sites.

This comment has been noted and passed onto decision-makers.

Response 34.3

The commenter states that Forestville does not have the infrastructure for a 50 percent increase in population.

This comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Response 34.4

The commenter suggests that rezoning only one vineyard property in the Forestville area would solve the housing shortage.

This comment has been noted. Refer to Master Response SITE.

EIR Public Comment 35

COMMENTER: Sean Maley

DATE: February 1, 2023

Response 35.1

The commenter states that they are a resident on Laughlin Road and expresses opposition to rezoning sites on Laughlin Road and Cutten Drive.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 35.2

The commenter asks how the County will handle flooding on Armstrong Woods Road if evacuation is necessary.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuations. Refer to Section 4.10, *Hydrology and Water Quality*, of the EIR for additional information relating to flooding analysis.

Response 35.3

The commenter states that risk of wildfire has increased and future development in the area may be catastrophic.

This comment has been noted. Please refer to Master Response FIRE regarding wildfire risk.

Response 35.4

The commenter states that Laughlin Road and Cutten Drive are narrow, with some areas allowing only one car to pass at a time. The commenter asks how the County plans on addressing this issue.

This comment has been noted. Please refer to Master Response EXST regarding existing conditions of services and infrastructure.

Response 35.5

The commenter states that the area already experiences traffic congestion, especially during crush season. The commenter expresses concern regarding how an increase in future vehicles will impact traffic.

Refer to Comment O-2.7 regarding analysis of congestion under CEQA. As shown in Appendix TRA of the Draft EIR, traffic volumes in Guerneville were calculated for two intersections: Armstrong Woods Road/River Road and State Route 116/River Road, for informational purposes. Full buildout of all four Rezoning Sites in Guerneville would result in an increase of no more than 133 peak hour trips, or approximately 1,330 daily trips at these intersections. As shown in the informational analysis provided in Appendix TRA, full buildout of Guerneville Rezoning Sites would not degrade roadway level of service (LOS) operations beyond LOS B, where roadway operations occur with low delay, good progression, and/or short cycle lengths.

Response 35.6

The commenter states that Laughlin Road dead-ends making ingress and egress challenging, especially during an evacuation event.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation. Refer also to Master Response EXST regarding the existing dead-end.

Response 35.7

The commenter asks how the County plans to address the present condition on the sewer system.

This comment has been noted. Please refer to Master Response UTIL for information regarding concerns about the existing sewer system. Refer also to Master Response EXST, as this comment relates to existing problems with the sewer system.

EIR Public Comment 36

COMMENTER: Janice Stenger

DATE: February 2, 2023

Response 36.1

The commenter asks if it is true that if there are state or Federal funds use for future development, the units can't be provided to locals only or people who are returning to the area that were born there. The commenter asks if this would be due to the cost of housing. The commenter asks if it would be true that future development would be for people from any state in the country or other counties in the state.

This comment is not relevant to the environmental impact analysis of the proposed project. The cost of housing and future residents who may reside in new developments is not determined through CEQA. Restricting who may potentially reside in future developments based on past or existing connection to the county would be a violation of the Fair Housing Act.

Response 36.2

The commenter asks if developers can get a "pass" and build higher cost housing. The commenter asks if a trailer park could be developed there.

This comment is not relevant to the environmental impact analysis of the proposed project. The cost of housing is not determined through CEQA. Regarding the question of whether or not a trailer park may be developed, development would be based on site-specific proposals or development applications received after rezoning takes place.

EIR Public Comment 37

COMMENTER: Kelly Joyce

DATE: February 2, 2023

Response 37.1

The commenter states that they are a resident of Forestville. The commenter expresses concern regarding pedestrian safety in the area. The commenter states that due to the unsafe road conditions, they drive their child to school rather than having their child cross the street, which would take less time if there were safer crossings.

Please refer to Master Response EXST regarding existing roadway problems. The situation the commenter is describing currently exists and the comment is not caused by the project.

Response 37.2

The commenter states that floods happen several times a year near the Packing House Road development, which cut off access in both directions on Highway 116.

Please refer to Master Response EXST regarding existing flooding problems. The situation the commenter is describing currently exists and the issue is not caused by the project.

Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to comply with the SWRCB Construction General Permit, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for projects that disturb one acre or more of land. Additionally, as discussed on page 4.10-26 of the Draft EIR, development facilitated by the proposed project on Rezoning Sites would not exceed the capacity of existing or planned stormwater drainage systems. As stated therein, development facilitated by the project on Rezoning Sites would alter the existing drainage patterns in the Rezoning Sites through introduction of new impervious surfaces and infrastructure. However, the Sonoma County General Plan includes goals and policies that are intended to reduce flood hazards through minimal alterations to designated floodplains, which would reduce the potential for increased susceptibility to flooding on or off site.

Implementation of these goals and policies would ensure that the runoff from development facilitated by the project on Rezoning Sites does not exceed the capacity of existing and future storm drain systems. The project would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

Response 37.3

The commenter understands the need for increased housing, but believes that a 37 percent increase in the population of Forestville would be unfeasible. The commenter asks how the County plans to move forward with future development without having a plan for potential infrastructure changes.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and Master Response SITE for additional information regarding the Rezoning Site selection process. Refer to Master Response UTIL regarding impacts to utility infrastructure.

Response 37.4

The commenter expresses concerns regarding how future development will impact emergency evacuation in the area.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation.

EIR Public Comment 38

COMMENTER: Louis Hughes

DATE: February 2, 2023

Response 38.1

The commenter expresses opposition to rezoning sites in Forestville and states the area does not have the infrastructure necessary to support the proposed growth. The commenter states that future plans for development should be thoroughly thought out.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element and Master Response UTIL regarding existing services and infrastructure concerns.

Response 38.2

The commenter states that it feels that state housing laws are forced on communities.

This comment is not relevant to the environmental impact analysis for the proposed project. This comment has been noted.

EIR Public Comment 39

COMMENTER: Lucy Hardcastle

DATE: February 2, 2023

Response 39.1

The commenter states that increased traffic and difficulty finding parking in downtown Forestville will negatively impact the quality of life for residents. The commenter states that existing plans to upgrade sidewalks and crosswalks will eliminate parking.

As shown in Appendix TRA of the Draft EIR, traffic volumes in Forestville were calculated for one intersection: State Route 116/Mirabel Road, for informational purposes. Full buildout of all six Rezoning Sites in Forestville would result in any new deficiencies. However, as discussed in Appendix TRA, since all of the development is not anticipated to be built in the near-term, the substantial effects noted may take years to materialize. Thus, no near-term intersection improvements have been identified as required. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 39.2

The commenter states that adding over 600 housing units will result in gridlock and overcome Forestville's ability to handle the flow of traffic. The commenter expresses concern regarding stalling quarry trucks and diesel particulate matter that could collect in the area, and how this particulate matter will impact restaurant outdoor seating operations.

Please refer to Response 39.1 regarding anticipated traffic. In regard to air quality concerns, please refer to Section 4.3, *Air Quality*, of the Draft EIR. As stated therein, vehicle trips for development facilitated by the Housing Element on the Rezoning Sites were calculated using the daily VMT and are expected to increase over existing zoning by 93,260 VMT, a number developed during the transportation assessment. The proposed net percentage VMT increase associated with the proposed project (approximately 836 percent) would be less than the net percentage population increase (approximately 896 percent). Therefore, the project's VMT increase would not conflict with the BAAQMD's 2017 *CEQA Air Quality Guidelines* operational plan-level significance thresholds for criteria air pollutants, and would be consistent with the 2017 Clean Air Plan. In addition, operation of development facilitated by the proposed project on Rezoning Sites does not involve designated sources of toxic air contaminants; therefore, the project is not considered a source of toxic air contaminants. Impacts to air quality would be less than significant.

Response 39.3

The commenter states that affordable housing is welcomed but asks that the County plans all future development thoughtfully and considers existing infrastructural inadequacies.

This comment has been noted and passed on to decision-makers for their consideration.

EIR Public Comment 40

COMMENTER: Mary Mount

DATE: February 2, 2023

Response 40.1

The commenter expresses opposition to the project

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 40.2

The commenter states that there is no ability to widen Laughlin Road or Cutten Drive. The commenter states that Laughlin Road is a dead-end road, as is Armstrong Woods Road which regularly floods. The commenter expresses concern regarding emergency evacuation.

This comment has been noted. Please refer to Response 35.5 regarding road widths of Laughlin Road and Cutten Drive. Please refer to Master Response EMG regarding emergency evacuation.

Response 40.3

The commenter states that the sewer system is outdated and would need a complete overhaul. The commenter asks what the County plans.

This comment has been noted. Please refer to Master Response UTIL regarding concerns about the existing sewer system.

Response 40.4

The commenter asks that development be considered for Santa Rosa, Windsor, and Healdsburg instead. The commenter suggests that there is more open space in those areas.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process. The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within other cities in the county as they are separate jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Healdsburg and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 41

COMMENTER: Nick Pulley

DATE: February 2, 2023

Response 41.1

The commenter states that they live at site FOR-2. The commenter shares about their family history at this site and the importance of the site to them. The commenter states that they only recently became aware of the rezoning of the site and expresses frustration with the lack of communication they have received. The commenter states that they have no intention of selling their property.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 41.2

The commenter states that they hope rezoning of the site will not impede their ability to use the land for agriculture.

This comment is not relevant to the environmental impact analysis of the proposed project. This comment has been noted. Continuation of existing uses would not be affected by the rezoning.

EIR Public Comment 42

COMMENTER: Tim Patriarca and James Wong

DATE: February 2, 2023

Response 42.1

The commenter expresses opposition to Rezoning Site GRA-4.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element and Rezoning Site selection.

Response 42.2

The commenter states that the roads near Rezoning Site GRA-4 lack sidewalks, shoulders, and lighting. The commenter expresses concern regarding road safety.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure. This comment has been noted.

Response 42.3

The commenter expresses concerns regarding increased use of groundwater. The commenter states there is no parking available in the area, and due to a lack of commercial services in the area, future residents will be car-dependent.

Please refer to pages 4.10-25 and 4.10-26 of Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. As stated therein, policies under General Plan Goal WR-4 encourage water conservation, which would decrease the project's demand on water throughout the County and therefore decrease the demand on local groundwater supplies. Compliance with these existing requirements would ensure that impacts to groundwater supplies would be less than significant.

Regarding the commenter's concern on traffic, please refer to Section 4.16, *Transportation*, of the Draft EIR. As stated under Impact TRA-1 starting on page 4.16-14, average total home-based vehicle miles travelled (VMT) per resident would decrease minimally with implementation of the project. However, VMT per resident would be 16.0, above the threshold value of 13.0. For this reason, Mitigation Measure TRA-1 will be implemented aiming to reduce overall VMT through various trip reduction programs such as, but not limited to, bicycle programs, bus service enhancements, and carpool programs.

Regarding the commenter's concerns about existing parking and nearby commercial services, please refer to Master Response EXST. This comment has been noted. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 42.4

The commenter states that the parcels surrounding Rezoning Site GRA-4 are open space, two of which include historical apple orchards. The commenter states that this open space supports the local ecosystem. The commenter states that the proposed site contains heritage oaks and apple trees. The commenter asks how development is appropriate for this site.

Please refer to Figure 4.11-5 in Section 4.11, *Land Use and Housing*, of the Draft EIR. As depicted therein, Rezoning Site GRA-4 is currently zoned as rural residential with low density residential (R1) and rural

residential (RR) zoning to the south and east, and agriculture and residential (AR) to the north and west of the site. As discussed on pages 4.2-16 and 4.2-17 of Section 4.2, *Agriculture and Forestry Resources*, Rezoning Site GRA-4 is not listed as having directly adjacent agricultural uses that would fall under the Right to Farm ordinance and thus, development facilitated by the project on Rezoning Sites would not have a significant impact on surrounding agricultural lands.

In regard to the commenters' concerns about biological resources, please refer to Section 4.4, *Biological Resources*, of the Draft EIR. Under Impact BIO-1 starting on page 4.4-28, it is stated that projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal, and a project-specific biological assessment would be required through the implementation of Mitigation Measure BIO-1. Additional mitigation measures would then be required based on the result of the project-specific biological analysis and may include one or more of the additional mitigation measures (Mitigation Measure BIO-2 through Mitigation Measure BIO-12) to reduce impacts to a less than significant level. In addition, as discussed on page 4.4-39, the Sonoma County Zoning Code Chapter 26D and Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, provides for the protection of heritage and landmark trees. Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides protection for oak woodland habitats. Compliance with these ordinances would reduce impacts to either oak species to a less than significant level.

In regard to the commenter's concern about the appropriateness of Rezoning Site GRA-4, please refer to Master Response SITE. This comment has been noted.

Response 42.5

The commenter states that it is their understanding that the site is already zoned for additional development. The commenter requests that the parcel's existing zoning remains.

Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. This comment will be passed on to decision-makers.

Response 42.6

The commenter attaches a copy of an identical letter.

Please refer to Responses 42.1 through 42.5 above for a summary of the commenters' concerns and applicable responses.

EIR Public Comment 43

COMMENTER: Adele Westling

DATE: February 3, 2023

Response 43.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 43.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 43.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 43.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 43.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 43.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 43.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element. Please refer to Response 14.7.

EIR Public Comment 44

COMMENTER: Andrea Oreck

DATE: February 3, 2023

Response 44.1

The commenter states that a development sign was placed on a hillside overlooking the inland hamlet of Bodega. The commenter asks where water will be coming from to be supplied to this development. The commenter states there is no sewage treatment plant for additional residents in this sensitive watershed area.

This comment refers to a development project not associated with the proposed project or analysis provided in the Draft EIR. No response is warranted.

Response 44.2

The commenter states that two old homes and apple orchards were demolished for the development of a 164-unit housing complex on Bodega Highway. The commenter states that traffic on this road becomes backed up for miles.

This comment has been noted. Please refer to Master Response EXST regarding existing conditions of services and infrastructure. In addition, this comment refers to a development project not associated with the proposed project or analysis provided in the Draft EIR. No response is warranted.

Response 44.3

The commenter expresses opposition to the imposition of state housing laws. The commenter asserts that while more affordable housing is needed, it should not come at the expense of the quality of life for existing residents. The commenter urges the County to push back.

This comment has been noted and passed on to decision-makers for consideration. Please refer to Master Response HE regarding opposition to the Housing Element.

EIR Public Comment 45

COMMENTER: Becky Boyle

DATE: February 3, 2023

Response 45.1

The commenter points to page 4.15-11 of the Draft EIR and states that Forestville is taking on a burden of the state's housing quota in comparison to other unincorporated areas in Sonoma County. The commenter states that a 25 percent increase in population is too much for Forestville and the area does not have the infrastructure to support that growth.

Please refer to Response 11.1.

Response 45.2

The commenter states that the Draft EIR is incorrect on page 4.1-18 of the Draft EIR. The commenter asserts that there is no school located across from site FOR-2 on Mirabel Road.

Please refer to Response 11.2.

Response 45.3

The commenter states that the roads around Rezoning Site FOR-2 are not adequate to support an increase in population. The commenter states that the roads are small and have existing safety hazards, and that increasing the population would pose a risk to bicyclists and pedestrians in the area. The commenter claims there is no mention that the roads in Forestville are small country roads.

Please refer to Response 11.3.

Response 45.4

The commenter states that the Draft EIR does not include a discussion on displacement, loss of character, threat to local businesses, community conflicts, pollution-related health conditions, parking, and sanitation needs.

Please refer to Response 11.4.

Response 45.5

The commenter asks where there is a discussion on how the County plans to widen roads, add left turn lanes, round-a-bouts, and crosswalks for pedestrian safety. The commenter asks where a road safety study may be found. The commenter expresses concerns regarding pedestrian safety.

Please refer to Response 11.5.

Response 45.6

The commenter states that there is no inclusion of feasible mitigation measures in the Draft EIR addressing the aesthetic impacts of Rezoning Sites FOR-1, FOR-3, and FOR-5. The commenter states that these sites would have significant and unavoidable impacts.

Please refer to Response 11.6.

Response 45.7

The commenter notes that Tables 4.9-1 and 4.9-2 in the Draft EIR show that Rezoning Sites FOR-1, FOR-5, and FOR-6 are listed as being on “Existing Hazardous Material Contamination.” The commenter states that the Draft EIR does not include a study describing the potential health risks to future residents, students near the Rezoning Sites, and impacts to the surrounding community. The commenter states that they do not see a study on how these hazardous materials may impact water resources near the Rezoning Sites.

Please refer to Response 11.7.

Response 45.8

The commenter states that in Section 4.15.1a: Fire Protection, EMT response times are shown as prior to when departments were combined. The commenter states that they do not see a study regarding ratio of emergency calls per capita.

Please refer to Response 11.8.

Response 45.9

The commenter quotes from the EIR and asks if, considering there would be a significant and unavoidable impact regarding greenhouse gas emissions, it would make more sense to build development in a less car dependent area. The commenter asks if it would be advisable, particularly for low-income residents, for future development to be centered near urbanized areas with additional services.

Please refer to Response 11.9.

Response 45.10

The commenter states that Forestville does not have enough existing commercial services to support future population growth.

Please refer to Response 11.10.

Response 45.11

The commenter expresses understanding of State housing requirements and why the County must comply. The commenter states that Forestville is being pushed beyond what the area can realistically support.

Please refer to Response 11.11.

Response 45.12

The commenter urges that the County choose the alternative where all six parcels in Forestville are not rezoned. The commenter asks that the same consideration be given for any sites with hazardous histories.

Please refer to Response 11.12.

Response 45.13

The commenter asks that the County avoid considering sites FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, and FOR-6 at minimum. The commenter asks that the County find other sites where future residents will have adequate commercial services, better roads, and the least amount of impacts to the environment.

Please refer to Response 11.13.

EIR Public Comment 46

COMMENTER: Durs Koenig

DATE: February 3, 2023

Response 46.1

The commenter states they are a Forestville resident. The commenter states that increasing Forestville's population by 1,652, as shown on page 2-26 of the Draft EIR, is ill-advised.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites, and Master Response SITE for additional information on the Rezoning Site selection process.

Response 46.2

The commenter states that while they support affordable housing, straining the roads and services by a significant amount will diminish Forestville's character.

This comment has been noted. Please refer to Master Response EXST. Please refer to Section 4.16, *Transportation*, for a full analysis of impacts to transportation induced by the proposed project. As stated therein, while individual VMT would increase, the implementation of Mitigation Measure TRA-1 will reduce overall VMT through various trip reduction programs such as, but not limited to, bicycle programs, bus service enhancements, and carpool programs. Please refer to Section 4.15, *Public Services and Recreation*, for more information on the impacts to existing services. While the proposed project will introduce an increased demand for services, impacts to fire protection facilities, police protection facilities, schools, parks, and other public facilities would be less than significant. In addition, please refer to Master Response UTIL for information regarding impacts to the existing sewer system and Section 4.18, *Utilities and Service Systems*, for additional information on impacts to various utility systems. As stated therein, impacts to stormwater drainage, electric power, natural gas, telecommunications, and solid waste would all be less than significant. Impacts to water supply would be mitigated to a less than significant level.

Response 46.3

The commenter expresses concern regarding traffic and existing police service availability. The commenter states that residents do not want more traffic, vibration, and that existing police services that are provided by the County Sheriffs Department have very few patrols in the West County.

This comment has been noted. Please refer to Master Response EXST for concerns regarding the existing conditions of services and infrastructure.

Regarding the commenter's concern on traffic, please refer to Section 4.16, *Transportation*, of the Draft EIR. As stated under Impact TRA-1 starting on page 4.16-14, average total home-based vehicle miles travelled (VMT) per resident would decrease minimally with implementation of the project. However, VMT per resident would be 16.0, above the threshold value of 13.0. For this reason, Mitigation Measure TRA-1 will be implemented aiming to reduce overall VMT through various trip reduction programs such as, but not limited to, bicycle programs, bus service enhancements, and carpool programs.

Regarding vibration, please refer to Section 4.13, *Noise*, of the Draft EIR. As discussed under Impact NOI-1 beginning on page 4.13-14, vibration would be a concern during the construction phase of a

development facilitated by the project on Rezoning Sites. Implementation of Mitigation Measures NOI-2 through NOI-4 would be implemented to reduce construction vibration impacts to a less than significant level. As discussed on page 4.13-22, development facilitated by the project on Rezoning Sites would not involve substantial vibration sources. Operational impacts to vibration would be less than significant.

In addition, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As shown on page 4.15-12 and 4.15-13, the need for new officers would be distributed throughout the County, with no more than three new officers required at any one station. Therefore, it is not anticipated that the construction of a new police station would be required to serve development on any of the sites. However, General Plan Policy LU-4f requires the payment of fair share impact fees during the building permit process, which fund the provision of public services, including police protection services, based on projected growth. Impacts to police service would be less than significant.

EIR Public Comment 47

COMMENTER: Geary Do

DATE: February 3, 2023

Response 47.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 47.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 47.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 47.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 47.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 47.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 47.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 48

COMMENTER: Mary Helt

DATE: February 3, 2023

Response 48.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 48.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 48.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 48.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 48.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 48.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 48.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 49

COMMENTER: Roberta Schepps

DATE: February 3, 2023

Response 49.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 49.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 49.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 49.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 49.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 49.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 49.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 50

COMMENTER: Stacie Gradney

DATE: February 3, 2023

Response 50.1

The commenter states that rezoning in Forestville is not realistic. The commenter asks how the County plans to build at the Vector Unit considering the sites hazardous conditions.

As determined in Section 4.9 of the Draft EIR, *Hazards and Hazardous Materials*, development within 0.25 mile of the sites identified in Table 4.9-2, including FOR-1, FOR-5, and FOR-6, would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. The agency responsible for oversight would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells on site with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. Development facilitated by the proposed project on Rezoning Sites would be required to comply with applicable regulations such as the California Health and Safety Code in order to reduce potential impacts to existing and future residents to a less than significant level.

Response 50.2

The commenter asks how the school will accommodate an increase in the number of students. The commenter states that the local high school was closed. The commenter asks if Analy can handle more students, and notes that the school is struggling to accommodate Forestville High School students and other students in the West County.

Please refer to Section 4.15, *Public Services and Recreation*, for a full analysis of the proposed project's impact to schools. As stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Response 50.3

The commenter suggests that a skate park should be built on one of the proposed rezone parcels or leaving the parcels as they are. The commenter expresses concern regarding decreased home values. The commenter states that there are other places in the County to accommodate new development.

This comment has been noted and passed onto decision-makers. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. In addition, please refer to the No Project Alternative located in Section 6, Alternatives, of the Draft EIR. As discussed therein, buildout of the Rezoning Sites under existing conditions would not accomplish the project's objectives to update

the General Plan's Housing Element in compliance with State-mandated housing requirements, including achieving the County's RHNA.

EIR Public Comment 51

COMMENTER: Synde Acks

DATE: February 3, 2023

Response 51.1

The commenter states that an increase in density in Forestville and Guerneville will overwhelm the town and cause hardships.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and Rezoning Site selection.

Response 51.2

The commenter expresses concerns of the cumulative impacts of new residents on top of the influx of tourists seen in the summer. The commenter states that the regional parks are overused and this causes a threat to wildlife. The commenter states that the Russian River is experiencing high toxicity levels.

This comment has been noted. Please refer to Master Response EXST concerning the existing conditions of services and infrastructure.

Please refer to Section 4.15, *Public Services and Recreation*, Impact PS-2 beginning on page 4.15-12. As discussed therein, the proposed project will not have an adverse impact on police facilities or impact service ratio response times. Impacts would be less than significant.

Regarding the commenter's concern about toxicity of the Russian River, please refer to Table 4.10-3 in Section 4.10, *Hydrology*, which discusses the impairments to water bodies near the rezone sites, including impairments to the Russian River.

Response 51.3

The commenter expresses concerns regarding existing police and fire department services. The commenter expresses concerns regarding emergency access and response times.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed under Impact PS-1 starting on page 4.15-10, local fire districts are all meeting the National Fire Protection Association response time goals for rural and suburban areas. The Rezoning Sites themselves are all within 1.5 miles of the nearest fire station, and emergencies on these sites would be responded to within the response time goals. In addition, if the County requires the expansion of fire department facilities, General Plan Policy PS-3m requires the consideration of payment of impact fees to ensure fire departments are adequately funded to serve new projects, and Sonoma Valley Fire District and Sonoma County Fire District adopted impact fees in 2021 that are collected for the purpose of mitigating impacts caused by new development on each district's infrastructure. Fees are used to finance the acquisition, construction and improvement of public facilities needed as a result of this new development. Therefore, impacts regarding fire service response times and facilities were determined to be less than significant. Please refer to the footnotes in Table 4.15-5 on page 4.15-11 of the Draft EIR, where the consolidation of individual fire departments is described. These consolidations do not modify the analysis provided in the Draft EIR.

As described under Impact PS-2 beginning on page 4.15-12, the need for new police officers would be distributed throughout the County, with no more than three new officers required at any one station.

Therefore, it is not anticipated that the construction of a new sheriff station would be required to serve development on any of the sites. Therefore, impacts to police services were determined to be less than significant.

Please also refer to Master Response EMG regarding emergency access.

Response 51.4

The commenter expresses concerns regarding flooding in Forestville and emergency evacuation in the event of a flood.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation and Master Response EXST regarding existing conditions.

Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. As stated therein, development facilitated by the project would alter the existing drainage patterns in the Rezoning Sites through introduction of new impervious surfaces and infrastructure. However, the Sonoma County General Plan includes goals and policies that are intended to reduce flood hazards through minimal alterations to designated floodplains, which would reduce the potential for increased susceptibility to flooding on or off site.

Implementation of these goals and policies would ensure that the runoff from development facilitated by the project on Rezoning Sites does not exceed the capacity of existing and future storm drain systems. The project would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

Response 51.5

The commenter describes the financial, emotional, and physical hardships faced by low-income people in their community when floods occur. The commenter states that utilities and services are limited during these events, creating additional difficulties particularly for low-income individuals.

This comment has been noted and passed onto decision-makers. Please refer to Master Response EMG regarding emergency evacuation and Master Response EXST regarding existing conditions.

Response 51.6

The commenter asks if areas such as Petaluma or Rohnert Park would be good alternative locations for Rezoning Sites to address the concerns raised by the commenter.

This comment has been noted and passed onto decision-makers for consideration. Please refer to Master Response SITE for information regarding the Rezoning Site selection process.

Response 51.7

The commenter expresses care for their community and requests that the County not exacerbate the issues the commenter raised in the letter. The commenter hopes to find a solution.

This comment has been noted and passed into decision-makers for consideration.

EIR Public Comment 52

COMMENTER: Linda Hunter

DATE: February 4, 2023

Response 52.1

The commenter states that the proposed number of units in Guerneville would require new roads, infrastructure, dear lines, water sources, and introduce issues regarding floods and wildfire.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Impacts to new roads and infrastructure is addressed in the EIR in Section 4.16, *Transportation*. Water sources are discussed in Section 4.18, *Utilities and service Systems*. Flood Hazards are discussed in Section 4.10, *Hydrology and Water Quality*, and Wildfire is addressed in Section 4.19, *Wildfire*.

Response 52.2

The commenter asks that other areas are considered for housing development. The commenter states that future development would impact property values for existing homes.

This comment has been noted. Please refer to Master Response SITE in regard to the Rezoning Site selection process. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property values.

EIR Public Comment 53

COMMENTER: Lynn Wooley

DATE: February 4, 2023

Response 53.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 53.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 53.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 53.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sites are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 53.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to response 14.5.

Response 53.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to response 14.6.

Response 53.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to response 14.7.

EIR Public Comment 54

COMMENTER: Lynn Woolley

DATE: February 4, 2023

Response 54.1

The commenter asks that the County provide them with updates pertaining to the Sonoma County Housing Element.

This comment has been noted. The County has added the commenter to the mailing list for notices related to this project. Please refer to the Permit Sonoma website for updates on the Housing Element. The site may be accessed at the following link:

<https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement>

EIR Public Comment 55

COMMENTER: Michael Gomez

DATE: February 4, 2023

Response 55.1

The commenter expresses opposition to sites AGU-1 and AGU-2 given that both sites have existing development constraints. The commenter states that Sonoma Sewer and Water installed a sewer easement across their property. The commenter states that the change in zoning to the sites would impact their single-family home use and sees this as the County's first step to taking their property.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites.

Response 55.2

The commenter states that sites AGU-1 and AGU-2 are bordered by Sonoma Creek to the west and Lily Creek to the east which require riparian setbacks and reducing use of the properties.

The commenter is correct that the existing zoning for AGU-1 and AGU-2 includes the Riparian Corridor (RC) Combining Zone, specifically RC50 which indicates a 50-foot setback from riparian areas. Site-specific development proposals would be required to conform to this setback.

Response 55.3

The commenter states that AGU-1 and AGU-2 are not needed as Boyes Springs is already building new housing. The commenter states that the proposed rezoning is not good for the land, surrounding neighborhood, or environment. The commenter states that they are feeling pressure that they may have to give up their property.

Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites and the need for the project to meet the County's RHNA.

EIR Public Comment 56

COMMENTER: Olga Gishizky

DATE: February 4, 2023

Response 56.1

The commenter states that new development will lead to unsustainable use of groundwater.

Please refer to Impact HWQ-2 on pages 4.10-25 and 4.10-26 and Impact HWQ-6 on page 4.10-29 of Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. As stated therein, policies under General Plan Goal WR-4 encourage water conservation, which would decrease the project's demand on water throughout the County and therefore decrease the demand on local groundwater supplies. Additionally, compliance with the LID Manual, implementation of permanent stormwater BMPs that encourage groundwater recharge, compliance with General Plan Policy WR-2e, and compliance with all applicable policies under General Plan Goal WR- 4 would ensure that development facilitated by implementation of the proposed project on Rezoning Sites would not interfere with sustainable groundwater management planning efforts. Compliance with these existing requirements would ensure that impacts to groundwater supplies would be less than significant.

Response 56.2

The commenter states that creating urban sprawl in unincorporated West County, where traffic accidents cause fatalities, is not "environmentally" friendly.

Please refer to Master Response EXST and Section 5, *Other CEQA Required Discussions*, on pages 5-1 through 5-5 in the Draft EIR. As stated therein, the proposed project does not involve expansion of existing urban service areas and population growth related to the proposed project would not result in significant long-term physical environmental effects.

Response 56.3

The commenter states that air pollution and noise from cars and radios will be exacerbated with increased population density and believes that violence will occur.

Please refer to Master Response EXST regarding existing conditions. Please refer to Section 4.13, *Noise*, of the Draft EIR for a full analysis of noise impacts induced by the project. As shown therein, the proposed project will have some impacts to noise. However, compliance with applicable noise regulations and implementation of the mitigation measures will reduce noise impacts to a less than significant level. Please refer to Section 4.3, *Air Quality*, of the Draft EIR for a full analysis of air quality impacts. As stated therein, air quality impacts related to VMT would not conflict with BAAQMD's 2017 CEQA Air Quality Guidelines and would be consistent with the 2017 Clean Air Plan. Therefore, air quality impacts related to increased vehicle trips are less than significant.

Regarding the suggestion that increased noise will lead to violence within the community, the commenter has not substantiated this claim with evidence. Additionally, as discussed in Section 4.15, *Public Services and Recreation*, in the Draft EIR, the proposed project would not have significant environmental impacts related to the construction of new police facilities as no new facilities would be required. The project would require the addition of 12 officers to the Sonoma County Sheriff's Department to maintain current service ratios, however this addition would not necessitate the construction of new police facilities. This comment has been noted.

Response 56.4

The commenter states that the needed infrastructure to support future population growth will negatively impact the quality of life and rural aesthetic of Forestville.

This comment has been noted. Please refer to Master Response EXST regarding existing conditions and Master Response UTIL regarding the availability of utilities. Please refer to Section 4.1, *Aesthetics*, in the Draft EIR for a full analysis of aesthetic impacts. As stated therein, there would be significant impacts on community aesthetic character with rezoning of sites FOR-1 through FOR-6. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes quality of life.

Response 56.5

The commenter expresses concerns regarding existing limited parking on River Drive and states that increased populations needing to park on this road will lead to potential conflicts between residents.

This comment has been noted. Parking is not a required topic under CEQA and thus, was not included in the transportation analysis of the Draft EIR. Parking will be evaluated at the project-specific level when development proposals are received. Please refer to Master Response EXST regarding existing conditions.

Response 56.6

The commenter suggests that the County reopen Cooks Campground, assist Burkes Canoe to divert river floaters from swimming upstream disturbing waterfront residents and wildlife, and have rangers patrol the river between Forestville to Guerneville to keep the peace between river users.

This comment is not relevant to the environmental impact analysis presented in the Draft EIR. This comment has been noted and passed onto decision-makers.

Response 56.7

The commenter states that urban sprawl is not healthy and the community would be pushed beyond capacity.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites. Additionally, please refer to Section 5, *Other CEQA Required Discussions*, on pages 5-1 through 5-5 in the Draft EIR. As stated therein, the proposed project does not involve expansion of existing urban service areas and population growth related to the proposed project would not result in significant long-term physical environmental effects.

EIR Public Comment 57

COMMENTER: Patrick Reesink

DATE: February 4, 2023

Response 57.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 57.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 57.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 57.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 57.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 57.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 57.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 58

COMMENTER: Robin Bens

DATE: February 4, 2023

Response 58.1

The commenter expresses concern regarding the environmental impact on communities, particularly impacts to wetland, creeks, run-off, and natural habitat.

This comment has been noted. Please refer to Section 4.4, *Biological Resources*, of the Draft EIR for a full analysis of potential impacts to biological resources resulting from the proposed project including impacts to species habitat found in Impact BIO-1 starting on page 4.4-28, impacts to riparian habitats found in Impact BIO-2 starting on page 4.4-36, and impacts to wetlands found in Impact BIO-3 starting on page 4.4-37, other riparian resources, and habitats.

Response 58.2

The commenter expresses concerns regarding public safety.

This comment has been noted. Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR for additional information regarding police and fire service response times.

Response 58.3

The commenter expresses concerns regarding transportation and limited County bus services in Forestville.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Additionally, please refer to Section 4.16, *Transportation*, which includes discussion of impacts to the transit system starting on page 4.16-14. As stated therein, the project would not result in adverse impacts to fixed-route service. Furthermore, development facilitated by the project on Rezoning Sites would not conflict with plans, policies, ordinances, or regulations pertaining to public transit, and increased ridership is not expected to exceed available transit capacities.

Response 58.4

The commenter expresses concern regarding increased traffic in Forestville.

As shown in Appendix TRA of the Draft EIR, traffic volumes in Forestville were calculated for one intersection: State Route 116/Mirabel Road, for informational purposes. Regarding traffic congestion, please refer to Master Response TRA for an explanation as to why traffic congestion is no longer evaluated as part of CEQA. Instead, a VMT analysis is included starting on page 4.16-14 of the Draft EIR which finds that VMT impacts would be significant and unavoidable.

Response 58.5

The commenter states there is only one gas station in town.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 58.6

The commenter expresses concern regarding potential overcrowding of the local schools.

Please refer to Section 4.15, *Public Services and Recreation*, for a full analysis of the proposed project's impact to schools. As noted in Table 4.15-2 on page 4.15-3 of the Draft EIR El Molino High School was not included in the analysis and West Sonoma County Union High School is identified as serving the Forestville sites. Additionally, as stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Response 58.7

The commenter expresses concern regarding parking in Forestville.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 58.8

The commenter expresses concern regarding the water and sewer systems. The commenter states residents will become overtaxed.

This comment has been noted. Please refer to Master Response UTIL for information regarding the existing sewer system. Additionally, please refer to Section 4.18, *Utilities and Service Systems*, in the Draft EIR. As stated therein, impacts related to water demand would be significant for sites GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4 due to the lack of existing water infrastructure directly adjacent to these sites. Wastewater impacts would be significant for sites GEY-1, LAR-7, FOR-1, FOR-2, FOR-6, GRA-4, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4 due to lack of existing wastewater infrastructure adjacent to these sites. Development on these sites would be required to comply with Mitigation Measure UTIL-1 as described on page 4.18-16 of the Draft EIR, which requires documentation that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy. Water and wastewater impacts could not be adequately determined for sites GEY-1 through GEY-4 and therefore impacts resulting from development on these sites would be significant and unavoidable.

Response 58.9

The commenter states there are no proper grocery stores in the area and the single market in the area will become overburdened.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 58.10

The commenter expresses concerns regarding the lack of sidewalks and crosswalks in Forestville.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact.

Response 58.11

The commenter states that limits on upzoning for recreational vehicle parking and accessory dwelling units will need to be addressed.

This comment is not relevant to the environmental impact analysis of the proposed project. This comment has been noted and passed onto decision-makers.

For a full analysis of alternatives to the proposed project, please refer to Section 6, *Alternatives*, of the Draft EIR. In addition, as noted on page 2-25, accessory dwelling units (ADUs) are exempt under CEQA and are consistent with the General Plan and zoning as provided in state law, including density.

Response 58.12

The commenter expresses opposition to the potential volume of future development in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites. Please refer to Master Response SITE for information regarding how Rezoning Sites were selected.

EIR Public Comment 59

COMMENTER: Sandra Reilly

DATE: February 3, 2023

Response 59.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 59.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 59.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 59.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 59.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 59.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 59.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 60

COMMENTER: Patricia Kremer

DATE: February 5, 2023

Response 60.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 60.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 60.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 60.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 60.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 60.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 60.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 61

COMMENTER: Patti Sinclair

DATE: February 5, 2023

Response 61.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 61.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 61.3

The commenter states that increased traffic on Laughlin Road would further deteriorate existing roads and cause traffic congestion during the school year. The commenter states that the left and right from Laughlin Road to Armstrong Woods Road will also cause traffic delays.

This comment is noted. Please refer to Section 4.16, *Transportation*, of the Draft EIR for a full analysis of potential impacts to transportation. Please refer to Master Response TRA regarding traffic congestion.

However, please refer to Appendix TRA of the Draft EIR. Three intersections were studied in relation to the Rezoning Sites located in Guerneville: River Road (SR 116)/Armstrong Woods Road-First Street, River Road/Gravenstein Highway (SR 116), and Front Street (SR 116)/Mirabel Road. Both the River Road (SR 116) Armstrong Woods Road-First Street and River Road/Gravenstein Highway (SR 116) intersections maintain an acceptable level of service (LOS) A. Traffic at these intersections does increase to LOS B under cumulative conditions. However, LOS B does not exceed the County requirements of LOS D.

Front Street (SR 116)/Mirabel Road is a case where development at Rezoning Sites GUE-1 through GUE-4 results in a new deficiency. However, since all of the development is not anticipated to be built in the near-term, no near-term intersection improvements have been identified as required.

Please also refer to Master Response EXST regarding existing conditions of infrastructure. Roadways in the area would be subject to increased use through construction and residential traffic, which could result in accelerated deterioration. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network.

Response 61.4

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages. The commenter states that upgrades to the sewer system will increase the sewer taxes of the residents.

Please refer to Response 14.3. Please refer to Master Response UTIL. In addition, please refer to Section 4.18, *Utilities and Services Systems*, of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. Water and sewer districts charge connection fees and monthly usage fees, which are intended to cover the necessary improvements needed to serve a project site. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property taxes. Please refer to Response 14.3.

Response 61.5

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 61.6

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 61.7

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 61.8

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 62

COMMENTER: Robert Grandmaison

DATE: February 5, 2023

Response 62.1

The commenter states that they have lived near the site located at 14156 Sunset Avenue for over 30 years, and while they see the need for affordable housing, they are opposed to the proposed density at this site.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element and Rezoning Sites.

Response 62.2

The commenter states that the roadways in the area are narrow and lack sidewalks, driveway curb cuts, accessibility cuts, and gutters.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 62.3

The commenter expresses concern regarding emergency vehicle access stating that emergency vehicles are often blocked due to parked cars, and this this can lead to life endangering conditions.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation site access and Master Response EXST regarding existing conditions.

Response 62.4

The commenter states that it is currently challenging to find parking in the area, especially when summer visitors stay in rental properties surrounding the site.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please also note that the availability of parking is not an issue area evaluated by CEQA. As new development is proposed, each project will undergo individual evaluation to determine the needs of the site, including provisions for parking.

Response 62.5

The commenter states that delivery trucks occasionally refuse to make deliveries on Sunset Avenue and other nearby streets due to the narrowness and slopes of the roadways.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 62.6

The commenter states that there are no sidewalks or gutters in the vicinity of the site. The commenter states that future residents will be forced to utilize uneven pavements.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Section 4.16, *Transportation*, of the Draft EIR. As discussed on page 4.16-15, development facilitated by the project on Rezoning Sites would propose no features that would be hazardous to pedestrians, such as inadequate site distance from driveways or increased vehicle speeds in high pedestrian use areas, nor is it forecast to generate pedestrian demand that would exceed the capacity of the area's pedestrian network. In addition, in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations.

Response 62.7

The commenter states that lighting in the area is bad and that the existing tree canopy in the area blocks out light needed for safe pedestrian use.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 62.8

The commenter asks that the project at this site not be allowed to move forward with development. The commenter suggests that there are better areas to support an increase in density and offer more opportunities for public participation.

This comment has been noted and passed onto decision-makers. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites.

EIR Public Comment 63

COMMENTER: Susan Ament

DATE: February 5, 2023

Response 63.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 63.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 63.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 63.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 63.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 63.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 63.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 64

COMMENTER: Janice Stenger

DATE: February 6, 2023

Response 64.1

The commenter asks if the community is expected to accommodate an additional 500 future residents and shares concern regarding the quality of life impacted by a population increase. The commenter expresses concern regarding the road safety. The commenter expresses concern regarding biological resources and asks if redwood trees will be removed and whether animals in the surrounding apple orchard continue to be able to rest in the orchard.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Please note that quality of life is not an issue area evaluated under CEQA. In regard to road safety, please refer to Section 4.16, *Transportation*, page 4.16-18 of the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would not substantially increase hazards due to a design feature such as sharp curves or dangerous intersections. Additionally, General Plan policies CT-2w, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety, and future development would be required to comply with these policies, where applicable.

Please refer to Master Response TRA regarding traffic congestion.

Please refer to Section 4.4, *Biological Resources*, of the Draft EIR. Under Impact BIO-1 starting on page 4.4-28, it is stated that projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal, a project-specific biological assessment would be required through the implementation of Mitigation Measure BIO-1. Additional mitigation measures would then be required based on the result of the project-specific biological analysis and may include one or more of the additional mitigation measures (Mitigation Measure BIO-2 through Mitigation Measure BIO-12) to reduce impacts to a less than significant level. In addition, as discussed on page 4.4-39, the Sonoma County Zoning Code Chapter 26D and Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, provide for the protection of heritage and landmark trees. Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides protection for oak woodland habitats.

Response 64.2

The commenter asks if it's true that if there are state or federal funds used for future development, the units can't be provided to locals only or people who are returning to the area that were born there. The commenter asks if this would be due to the cost of housing. The commenter asks if it would be true that future development would be for people from any state in the country or other counties in the state.

This comment is not relevant to the environmental impact analysis of the proposed project. The cost of housing and future residents who may reside in new developments is not determined through CEQA. Restricting who may potentially reside in future developments based on past or existing connection to the county would be a violation of the Fair Housing Act.

Response 64.3

The commenter states that Fife Commons was not reserved for existing or local residents only and was opened to the general public. The commenter asks if future development will be utilized for local residents.

This comment has been noted. Please refer to Response 64.2.

Response 64.4

The commenter notes that Guerneville has been the least expensive location in the County to live. The commenter states there are no year-round jobs in the area. The commenter asks if it is California's job to provide homes for everyone who would like to live in the area. The commenter asks where this is promised in the Constitution.

This comment has been noted. Please refer to Response 64.2 regarding who may move into future developments. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Regarding the commenter's concerns about the Constitution, this comment is not relevant to the environmental impact analysis for the proposed project and no response is required.

Response 64.5

The commenter notes that there is ample discussion regarding food deserts. The commenter asks if West County is considered a food desert since it only has one market from Hacienda to the coast. The commenter asks if developers can get a "pass" and build higher cost housing or a trailer park. The commenter states that the Draft EIR violates the objectives of the General Plan and asks if it is now considered defunct. The commenter states that the Draft EIR assumes it knows better than Cal Fire, LAFCO, and other state agencies. The commenter compares the proposed project to the history of the 13 colonies fighting against the British due to taxation without representation.

This comment is noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

The cost of housing is not determined through CEQA. Regarding the question of whether or not a trailer park may be developed, development would be based on site-specific proposals or development applications received after rezoning takes place.

The commenter states that the Draft EIR violates the objectives of the General Plan and asks if it is now considered defunct.

Please refer to Section 4.11, *Land Use and Planning*, of the Draft EIR for a full analysis on project consistency. Please refer to Section 4.11, *Land Use and Planning*, of the Draft EIR for a full analysis on project consistency with the County General Plan. As shown therein, the proposed project is consistent with the majority of General Plan policies.

EIR Public Comment 65

COMMENTER: John Ryan

DATE: February 6, 2023

Response 65.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 65.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 65.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 65.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 65.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 65.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 65.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 66

COMMENTER: Kenneth Billheimer

DATE: February 6, 2023

Response 66.1

The commenter states that they are a resident of Guerneville and are located near a rezone site located on Sunset Drive. The commenter expresses opposition to future development uphill from Woodland Drive. The commenter expresses concerns regarding road safety in the area, stating that the streets are narrow, vehicles regularly exceeded posted speed limits, and developments would require cars to make sharp turns that could result in an accident.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Master Response TRA regarding traffic congestion from trip generation. It is speculative to presume that trips generated by the proposed project would result in speed limit exceedances or unsafe driving.

Regarding road safety, please refer to Impact TRA-2 on page 4.16-18 of the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would not substantially increase hazards due to a design feature such as sharp curves or dangerous intersections. Additionally, General Plan policies CT-2w, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety, and future development would be required to comply with these policies, where applicable. Roads would be required to comply with any road width standards and other road design standards present within the County Code.

Response 66.2

The commenter notes recent evacuations due to wildfires. The commenter states that in an evacuation, it is difficult to take Morningside Drive to Highway 116 as Morningside Drive is a narrow one-way road where no two cars can pass. The commenter expresses concern that an increase in population could exacerbate dangerous evacuation conditions.

This comment has been noted. Please refer to Master Response FIRE and Master Response EMG regarding the risk of wildfire and concerns about emergency evacuation.

Response 66.3

The commenter suggests that housing should be built in other areas of Sonoma County where non-seasonal jobs are available and there is existing infrastructure to support new development. The commenter expresses concerns regarding the difficult to access necessary services in the area.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites, and Master Response SITE for information on the Rezoning Site selection process. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

EIR Public Comment 67

COMMENTER: Maggie Mayo

DATE: February 6, 2023

Response 67.1

The commenter states that their comments are in regard to sites SON-1 and SON-4. The commenter asks if there has been an analysis on the impact of future development on future land use and existing well water.

Please refer to Section 4.11 of the Draft EIR, *Land Use and Planning*, for an analysis on land use and Section 4.18, *Utilities and Service Systems*, for an analysis of the projects impacts on water supply availability.

In addition, please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR for additional information on existing groundwater supplies. As discussed on page 4.10-25, General Plan Policy WR-2e, development in Class 3 water areas (i.e., marginal groundwater areas), which includes Larkfield and Glen Ellen Rezoning Sites) would be required to establish adequate groundwater quality and quantity prior to development. However, Policy WR-2e would only apply if development facilitated by the project on the Rezoning Sites would be served by a private on-site well.

Response 67.2

The commenter asks how sites SON-1 and SON-4 qualify under Government Code Section 65913.5. The commenter asks if these sites are considered to be in a “transit-rich area” or “urban infill site.” The commenter asks how the Sonoma Rental Housing Opportunity Area Program may double parcel density from 10 units, as defined in the Government Code.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria used to select sites.

As discussed under Section 2.6 on page 2-5 of the Draft EIR, the Housing Element includes a program for rezoning under SB 10 which allows local governments to increase residential density up to 10 dwelling units per parcel on eligible parcels on a transit-rich or urban infill site. However, the SB 10 rezoning program under the Housing Element would constitute a future action and would not occur on any Rezoning Sites that are rezoned by the Board of Supervisors to be included in the Housing Element Inventory.

The proposed project falls under Government Code Section 65915, rather than Government Code Section 65913.5 as the commenter suggests. Please refer to Section 2.6.5, beginning on page 2-23 of the Draft EIR for a description of the potential buildout on the proposed Rezoning Sites. In addition, the project aims to be consistent with General Plan Policy HE-3i. As described on page 4.11-39 of the Draft EIR, to the extent feasible, the Rezoning Sites are located within Urban Service Areas, with adequate water and sewer supplies (Section 4.18, *Utilities and Service Systems*, with implementation of Mitigation Measure UTIL-1), near transit (Section 4.16, *Transportation*), near neighborhood-serving commercial uses (most Rezoning Sites are near commercial areas, with the exception of GUE-2, GUE-3, GUE-4, and AGU-3), near schools (Section 4.15, *Public Services and Recreation*), and at safe distances from major roadways (Section 4.3, *Air Quality*). Thus, the proposed project fulfills the requirements established by Government Code 65915.

Response 67.3

The commenter asks if there are requirements to maintain a specific amount of open space and what those requirements are.

Please refer to Section 4.15, *Public Services and Recreation*, in the Draft EIR. Requirements pertaining to park space may be found under Impact PS-4 beginning on page 4.15-15. As stated therein, the County requires payment of development fees to fund park facilities (per Sonoma County Code Section 20-65) and requires parkland dedication or payment of in lieu fees for residential subdivision projects per Sonoma County Code Sec. 25-58 and 25-58.1, offsetting any impacts related to increased demand at existing recreation facilities, and project applicant(s) of the Rezoning Sites would be required to pay this during the permit approval process.

As noted in Section 2, *Project Description*, on pages 2-25 and 2-26 of the Draft EIR, the project proposes to amend the General Plan land use for Rezoning Sites SON-1 and SON-4 to UR 10, and proposes to rezone these sites to R3. Open space requirements for multi-family housing such as housing in the R3 zone are outlined in the Sonoma County Zoning Code Section 26-08-050 (I).

Response 67.4

The commenter asks if there will be limitations on building heights.

Restrictions on height, setbacks, and floor-area ratio, where appropriate, would follow the applicable R3 zoning requirements outlined in section 28-08-040 and -050 of the Sonoma County Zoning Code.

EIR Public Comment 68

COMMENTER: Patricia Kremer

DATE: February 6, 2023

Response 68.1

The commenter states that the community near Laughlin Road and Cutten Drive opposes the rezoning of sites GUE-2, GUE-3, and GUE-4. The commenter states that the proposed project would negatively impact roads, traffic conditions, water, sewer, redwood trees, and emergency egress for residents.

This comment is noted. Refer to Master Response SITE regarding the site selection process, Master Response HE regarding opposition to the project, Master Response EMG regarding emergency access, Master Response UTIL regarding water and sewer utilities, and Response 90.4 regarding roads and traffic conditions.

Response 68.2

The commenter states that residents in the area purchased their properties to be in an R1 zoning area. The commenter suggests there may be more suitable areas for future affordable housing development with better access.

This comment is noted. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project.

EIR Public Comment 69

COMMENTER: Stacie Gradney

DATE: February 6, 2023

Response 69.1

The commenter states that Forestville is not a town fit for an increase in population due to potential development resulting from zoning changes. The commenter suggests that the County increase public participation. The commenter includes several pages of screenshots from the Next Door app that include the opinions of other residents.

The commenter's opposition to the project is noted and will be passed on to decision-makers. Refer to Master Response HE regarding opposition to the project.

EIR Public Comment 70

COMMENTER: Vicki A. Hill

DATE: February 6, 2023

Response 70.1

The commenter expresses an opinion that sites in Glen Ellen should not be rezoned, and suggests that previous comments regarding properties in Glen Ellen were not considered in preparing the EIR. The commenter opines that the proposed high-density zoning district is out of scale. The commenter requests the Glen Ellen sites be removed from the project or an alternative zone be considered.

Please refer to Master Response SITE, Master Response EXST: Existing Conditions

Commenters expressed concern regarding existing environmental conditions, hazards, utilities, and general infrastructure availability. Commenters highlighted many of the existing conditions of the County and its ability to adequately support housing and population growth. Commenters state general conditions regarding sites in the County.

The commenters refer to existing conditions within the County and perceived issues with the above referenced areas, such as concerns regarding existing traffic congestion and natural hazards (e.g., existing wildfire and flood risks). The Draft EIR includes a discussion of existing conditions related to individual impact areas and specific to CEQA Guidelines Appendix G questions. Individual impact areas include a discussion of the existing conditions which are then compared to the anticipated change induced by the project. While the concerns of the commenters regarding the issues listed above are noted, they are deemed to be adequately discussed in the Draft EIR. No revisions to the Draft EIR are necessary in response to this comment.

Master Response SITE: Site Selection, regarding the site selection process, and Master Response HE regarding opposition to the project. The commenter's opposition to rezoning sites in Glen Ellen is noted and will be passed on to decision-makers. Please refer to Response 70.2 through 70.33 for response to specific comments provided by the commenter.

Response 70.2

The commenter states there is no justification for including parcels in Glen Ellen and notes the Sonoma Developmental Center will result in new residents.

Refer to Master Response HE regarding opposition to the project and Master Response SITE regarding the site selection process. The project objectives, described in Section 2.7, *Project Objectives*, includes identifying sites to meet the County's State-required RHNA.

Response 70.3

The commenter claims the project would be inconsistent with the intent of the Glen Ellen Policies established in the General Plan and Glen Ellen Development and Design Guidelines.

Please refer to Impact AES-3, beginning on page 4.1-56 of the Draft EIR regarding potential impacts of rezoning and future development of the Rezoning Sites as it relates to visual character or quality. As described therein, sites GLE-1 and GLE-2 have a high site sensitivity where development would be dominant, and Mitigation Measure AES-1 for screening vegetation would be required. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on

Rezoning Sites cannot be made to comply with subjective design guidelines, projects on the 25 sites (including GLE-1 and GLE-2) may substantially degrade the existing visual character or quality of public views of the site and its surroundings. Thus, impacts would remain significant and unavoidable. However, as described in Section 4.1, *Aesthetics*, future development on Rezoning Sites GLE-1 and GLE-2 would be required to comply with the Glen Ellen Design Guidelines.

Response 70.4

The commenter claims the proposal involves out of scale high-density that would result in adverse impacts to Glen Ellen.

The commenter does not specify the types of adverse impacts being referred to; however, impacts resulting from the project were analyzed throughout the EIR. Refer to Response 70.3 regarding impacts relating to visual character.

Response 70.5

The commenter claims development on Glen Ellen parcels would significantly impact community aesthetic character or conflict with the Glen Ellen Development and Design Guidelines.

The EIR discloses significant and unavoidable impact under AES-3. Refer to Response 70.3. Additionally, the WH zone minimum is 16 units per acre, not 16 units per site.

Response 70.6

The commenter claims the cumulative impact analysis is flawed because it does not consider the Sonoma Developmental Center Specific Plan, the Hanna Center development, or the Elnoka Housing project. The commenter also says Arnold Drive cannot handle the level of traffic that will result, and there is no evidence these projects were considered for cumulative analysis for transportation, land use policy consistency, greenhouse gases, visual resources, public services, or wildfire evacuation and emergency response.

Please note that there was no formal application for a Hanna Boys Center project on file with the County at the time the NOP for this project was filed. A “Builder’s Remedy” application for a Hanna Boys Center development was submitted on April 21, 2023. The baseline for analysis is typically set at the time the NOP is published, consistent with *CEQA Guidelines* Section 15125. The approach to the cumulative analysis did not require that cumulative development projects be listed in the EIR; therefore, no revisions to the EIR are necessary.

Please refer to the explanation provided under subheading *Cumulative Development* on page 4-2 of the Draft EIR. As stated therein:

CEQA Guidelines Section 15130 provides the following direction relative to cumulative impact analysis and states that the following elements are necessary for an adequate discussion of environmental impacts:

A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

Therefore, the cumulative analysis approach in the Draft EIR is appropriate for the housing element program, and individual cumulative development projects need not be identified.

The Program EIR's approach to cumulative impact analysis is further described on page 4-2. As stated therein:

...the transportation analysis considers the overall change in vehicle miles travelled (VMT) due to implementing several reasonably foreseeable development projects that would add to the Housing Element buildout. As such, the analysis in this EIR considers the cumulative impacts in the County from implementation of the Housing Element in its transportation analysis at the same time it considers the project level analysis because they are essentially one and the same. These cumulative VMT calculations are accounted for in the air quality, energy, greenhouse gas emissions, and noise analyses; therefore, these analyses would also be considered cumulative. Other impacts, such as geology and soils and cultural resources, are site specific and would not result in an overall cumulative impact from growth outside of the County.

Furthermore, the SDC Specific Plan EIR has been certified by the County Board of Supervisors; therefore, significant impacts related to this development were taken into consideration and mitigated as part of the approval process for that project. The SDC Specific Plan EIR included a description of the proposed rezonings now under consideration for the Housing Element.² Additionally, the Elnoka project is located within the City of Santa Rosa, and not near any of the Rezoning Sites. The project has a project EIR that analyzed impacts of the project.³ Significant impacts were site-specific and would not be cumulatively considerable.

Response 70.7

The commenter states the EIR must consider consistency with adopted plans and policies, and claims that the existing General Plan contains LOS policies and standards the project would violate.

Please refer to Impact LU-2 of the Draft EIR, beginning on page 4.11-30. This impact discussion includes an analysis of consistency with the County General Plan, including with Policy LU-20gg, which requires an evaluation of traffic congestion (through metrics such as LOS), for new development in Glen Ellen. As stated on page 4.11-37, "Traffic congestion is not analyzed because it may not be considered a significant impact under CEQA." Appendix TRA of the Draft EIR provides an intersection operations analysis of study area intersections, which is provided for informational purposes, and is not required to satisfy CEQA. As described therein, no near-term congestion improvements would be necessary as a result of the project; however, fair share funding of cumulative scenario traffic congestion improvements would be necessary.

Response 70.8

The commenter states that the EIR does not consider sites might qualify for the addition of ADUs.

While the commenter is correct that the ADU ordinance allows the construction of ADUs, the maximum buildout of every parcel in the vicinity of the Rezoning Sites is not considered reasonably foreseeable development, unless project applications have been submitted to the County or other approving agency.

² Sonoma Developmental Center Specific Plan Draft Environmental Impact Report. SCH # 2022020222. August 2022.
<https://www.sdcspecificplan.com/documents>.

³ Elnoka Continuing Care Retirement Community (CCRC) Project Draft Environmental Impact Report. SCH # 2017072021. April 30, 2021.
<https://www.srcity.org/DocumentCenter/View/32194/Elnoka-CCRC-Draft-Environmental-Impact-DEIR>.

Furthermore, as stated on page 2-25 of the Draft EIR, “accessory dwelling units are exempt under CEQA and are consistent with the General Plan and zoning as provided in state law, including density.”

Response 70.9

The commenter quotes from the EIR and claims the Workforce Housing designation is incompatible with the Glen Ellen parcels.

Potential impacts from land use incompatibility are discussed in Section 4.11, *Land Use and Planning*.

Response 70.10

The commenter claims the proposed rezoning of Glen Ellen parcels are in conflict with project objectives that call for new housing in urban areas.

The commenter’s opinion is noted and will be passed on to decision-makers.

Response 70.11

The commenter states the Glen Ellen parcels should be removed from consideration in Alternative 3.

Alternative 3: Fewer Rezoning Sites, was analyzed beginning on page 6-12 of the Draft EIR. This alternative would not rezone six Potential Sites determined to have greater than average environmental constraints (FOR-1, FOR-2, SON-1, SON-2, SON-3, and SON-4) as compared to the other 53 Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development (as identified in Mitigation Measure UTIL-1). GLE-1 and GLE-2 would not require these improvements, and is therefore not included in Alternative 3.

Response 70.12

The commenter asserts that the sites in Glen Ellen are not near an incorporated area or within an Urban Growth Boundary.

As shown in Figure 2-9 on page 2-17 of the Draft EIR, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Additionally, page 2-6 the Draft EIR has been revised for clarity, as there was a typographical error:

All 59 Rezoning Sites are within General Plan-designated Urban Service Areas,¹ and, if near incorporated areas, within voter-approved Urban Growth Boundaries.²

Response 70.13

The commenter asks questions regarding the proposed zoning designations in the project description.

These comments do not relate to the adequacy of the EIR, but rather are comments on the project chosen for analysis. Please refer to Master Response HE regarding opposition to the project and Master Response SITE regarding the site selection process.

Response 70.14

The commenter states that the existing allowable units on the Glen Ellen sites is incorrect in Table 2-4, as there are 4 or 5 existing units.

Table 2-4 on page 2-23 of the Draft EIR provides the total allowable dwelling units under the current designation and not the actual built units on the Rezoning Sites.

Response 70.15

The commenter asks what the X values are on page 4-1.

This sentence has been deleted from the Draft EIR, and replaced with the following language:

...As detailed in Section 2.6, *Project Characteristics*, these sites would be located within census-designated urbanized areas and urban service areas that are zoned R1 and located outside of both the high and very high fire hazard severity zones. The updated Housing Element also includes a program for rezoning under Senate Bill (SB) 10. Senate Bill 10 provides a streamlined process for local governments to increase residential density up to 10 dwelling units per parcel on eligible parcels, provided the parcel is qualified under SB 10 as a transit-rich or urban infill site. The Housing Element proposes to allow sites within census-designated urbanized areas or urban clusters and urban service areas that are zoned R1 (Low-Density Residential) and located outside of both the High and Very High Fire Hazard Severity Zones to allow additional units based on parcel size. Under the policy detailed in the Housing Element and allowed by SB 10, parcels that meet these criteria would be allowed to build a maximum of X du if they are between 10,000 square feet and 20,000 square feet in size, and a maximum of X du if they are above 20,000 square feet in size. There are over 2,000 sites in unincorporated Sonoma County between 10,000 and 20,000 square feet in size that fit these criteria and 1,000 sites in unincorporated Sonoma County above 20,000 square feet in size that fit these criteria....

Response 70.16

The commenter states that the SDC Specific Plan, which has been approved, and Hanna Center development, which has been in the works since 2004, are reasonably foreseeable projects that should be analyzed as part of the cumulative impacts analysis.

Please refer to the explanation provided under subheading *Cumulative Development* on page 4-2 of the Draft EIR. As stated therein:

CEQA Guidelines Section 15130 provides the following direction relative to cumulative impact analysis and states that the following elements are necessary for an adequate discussion of environmental impacts:

A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

Therefore, the cumulative analysis approach in the Draft EIR is appropriate for the housing element program, and individual cumulative development projects need not be identified.

Furthermore, the SDC Specific Plan EIR has been certified by the County Board of Supervisors; therefore, significant impacts related to this development were taken into consideration and mitigated as part of

the approval process for that project. The SDC Specific Plan EIR included a description of the proposed rezonings now under consideration for the Housing Element.⁴

Response 70.17

The commenter points out that Table 4.1-6 lists incorrect mitigation measures.

The commenter is correct. Table 4.1-6 has been revised as follows:

⁴ Sonoma Developmental Center Specific Plan Draft Environmental Impact Report. SCH # 2022020222. August 2022.
<https://www.sdcspecificplan.com/documents>.

Table 4.1-6 Site Impacts and Recommended Mitigation Summary

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GEY-1	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
GEY-2	Moderate	Co-Dominant	Less than significant	AES-2
GEY-3	Moderate	Co-Dominant	Less than significant	AES-2
GEY-4	Moderate	Co-Dominant	Less than significant	AES-2
GUE-1	Moderate	Co-Dominant	Less than significant	AES-2
GUE-2	Moderate	Co-Dominant	Less than significant	AES-2
GUE-3	Moderate	Co-Dominant	Less than significant	AES-2
GUE-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
LAR-1	Low	Co-Dominant	Less than significant	AES-1 , AES-2, AES-3 , AES-4
LAR-2	Low	Co-Dominant	Less than significant	AES-2
LAR-3	Low	Co-Dominant	Less than significant	AES-2
LAR-4	Low	Co-Dominant	Less than significant	AES-2
LAR-5	Low	Co-Dominant	Less than significant	AES-2
LAR-6	Low	Co-Dominant	Less than significant	AES-2
LAR-7	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
LAR-8	Low	Co-Dominant	Less than significant	AES-2
FOR-1	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-2	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-3	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-5	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-6	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
GRA-1	Low	Co-Dominant	Less than significant	AES-2
GRA-2	Low	Co-Dominant	Less than significant	AES-2
GRA-3	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
GRA-4	Moderate	Co-Dominant	Less than significant	AES-5

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GRA-5	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4, AES-5
SAN-1	Low	Dominant	Significant	AES-1 , AES-2, AES-3, AES-4, AES-5
SAN-2	Low	Co-Dominant	Less than significant	AES-2
SAN-3	Low	Dominant	Less than significant	AES-2
SAN-4	Low	Co-Dominant	Less than significant	AES-2
SAN-5	Low	Dominant	Less than significant	AES-2
SAN-6	Low	Co-Dominant	Less than significant	AES-2
SAN-7	Low	Co-Dominant	Less than significant	AES-2
SAN-8	Low	Co-Dominant	Less than significant	AES-2
SAN-9	Low	Co-Dominant	Less than significant	AES-2
SAN-10	Low	Co-Dominant	Less than significant	AES-2
GLE-1	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
GLE-2	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
AGU-1	Moderate	Co-Dominant	Less than significant	AES-1 , AES-2, AES-5
AGU-2	Moderate	Co-Dominant	Less than significant	AES-1 , AES-2, AES-5
AGU-3	Moderate	Co-Dominant	Less than significant	AES-2
PEN-1	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-2	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-3	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-5	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-6	Moderate	Co-Dominant	Less than significant	AES-2
PEN-7	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-8	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-9	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PET-1	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PET-2	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
PET-3	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PET-4	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
SON-1	Moderate	Co-Dominant	Less than significant	AES- 2 <u>5</u>
SON-2	Moderate	Co-Dominant	Less than significant	AES- 2 <u>5</u>
SON-3	Moderate	Co-Dominant	Less than significant	AES- 2 <u>5</u>
SON-4	Moderate	Co-Dominant	Less than significant	AES- 2 <u>5</u>

*The potential impact statement listed in this table coincides with the impact evaluation decision matrix in the County's Visual Assessment Guidelines (2019) and does not apply to every CEQA issue for every site. Potentially significant impacts are indicated for specific sites and mitigation measures reiterated by CEQA issue area.

Response 70.18

The commenter asserts that Mitigation Measures AES-1 is infeasible for Glen Ellen sites, and suggests measures that limit building massing, staggered heights, building materials, and other design features.

As stated under the *Significance After Mitigation* subheading on page 4.1-57, development cannot be made to comply with subjective design guidelines, and impacts would be significant and unavoidable. The commenter's suggested mitigation measures are not objective design standards, but subjective design elements, which would not be feasible as mitigation. The Zoning Code includes restrictions on height, setbacks, and floor-area ratio, where appropriate.

Response 70.19

The commenter requests clarification related to compliance with subjective design guidelines.

Objective design standards include measurable limitations, such as height, setbacks, and floor-area ratio. Subjective design guidelines are not measurable, and cannot be guaranteed, as compliance with a subjective guideline may fluctuate depending on the reviewer. Objective design standards "involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official before submittal" (California Government Code Section 65852.21[i][2]). Therefore, the Draft EIR correctly states that compliance with subjective guidelines cannot be guaranteed.

Response 70.20

The commenter states that it is unclear if architectural review for the WH zone would occur.

Applicable design reviews would still be required for sites within the WH zone. Administrative design review will continue to be required in Glen Ellen, but it will be limited to review for compliance with applicable objective standards. For all Housing Element inventory sites, housing development that is consistent with zoning would be a use by right.⁵ Zoning-consistent projects would be required to comply with applicable objective design standards (including any objective design-related standards in the General Plan and Chapter 26 of the County Code), but will not be subject to discretionary design review.

Response 70.21

The commenter asserts that the EIR's dismissal of traffic congestion impacts is in error, and that the EIR is required to address compliance with adopted land use policies.

Please refer to Response 70.7 regarding traffic congestion and consistency with County General Plan policies.

Response 70.22

The commenter asserts there is no analysis of consistency with the Glen Ellen Development and Design Guidelines. The commenter asserts that future development on Glen Ellen sites would be subject to these guidelines, and the EIR incorrectly states otherwise. The commenter states that the missing analysis constitutes deferral. The commenter asks about the difference between objective and subjective

⁵ As discussed in Section 2.6.4 of the DEIR, "by right" use means that no discretionary land use approvals and no CEQA review would be required for an application for zoning-consistent multi-family development.

guidelines. The commenter asserts that the densification of the Glen Ellen sites is a significant and unavoidable impact.

As described on page 4.1-55: “Specific design guidelines exist for the communities of Glen Ellen and Penngrove, and development in those areas would be subject to the relevant and applicable design guidelines (County of Sonoma 1990; County of Sonoma 2010).” Future development on Potential Sites GLE-1 and GLE-2 would be required to comply with the Glen Ellen Design Guidelines.

Table 4.11-3 has been revised as follows, for clarification and consistency with the analysis in Section 4.1 of the Draft EIR:

General Plan Policy	Discussion
<p><u>Policy LU-20gg</u>: Land use for the Glen Ellen area, including residential densities, shall correspond with the General Plan Land Use Element for Sonoma Valley. New development in Glen Ellen shall be evaluated in the context of the following:</p> <ul style="list-style-type: none"> (1) the relationship between growth and traffic congestion, (2) the boundaries and extent of Urban Service Areas, (3) the amount and location of recreation and visitor-serving commercial uses, (4) the need to upgrade existing structures and public infrastructure, and (5) the compatibility of rural development with protection of agriculture, scenic landscapes, and resources. <p><u>Policy LU-20hh</u>: All new development in the Glen Ellen area (as designated in the Glen Ellen Development and Design Guidelines) shall comply with the Glen Ellen Development and Design Guidelines, which are part of the County Development Code.</p>	<p>Partially Consistent. This Program EIR analyzes potential transportation impacts of GLE-1 and GLE-2 in Section 4.16, Transportation. Traffic congestion is not analyzed because it may not be considered a significant impact under CEQA. Those sites are both within the Urban Service Area for Glen Ellen and would not require expansion of or influence the boundaries of the existing Urban Service Area.</p> <p>Error! Reference source not found. shows the existing zoning of GLE-1, GLE-2, and surrounding areas. As shown therein, the recreation and visitor-serving commercial areas would not be modified by the rezoning of these sites.</p> <p>Section 4.15, Public Services and Recreation, and Section 4.18, Utilities and Service Systems, analyze whether the project would require upgrades to public facilities and infrastructure. As stated therein, no upgrades to existing facilities are anticipated for GLE-1 and GLE-2.</p> <p>Section 4.2, Agriculture and Forestry Resources, and Section 4.1, Aesthetics, analyze the potential impacts on agricultural lands and scenic resources. Sites GLE-1 and GLE-2 do not contain prime farmland, unique farmland, farmland of statewide importance, forest land, or timberland, and are not zoned or adjacent to agricultural lands.</p> <p>The project does not propose development on these sites at this time but rezoning to allow for high-density residential development, and future projects would continue to be allowed by right and would not be subject to review under the Glen Ellen Development and Design Guidelines as discussed in Section 4.1, Aesthetics. <u>In addition, as only</u> objective design standards would apply.</p>

Please refer to Response 70.19 regarding subjective versus objective standards.

Response 70.23

The commenter asserts that Impact BIO-5 does not state what the impact is, but cites county policies. The commenter asserts that heritage trees on the Glen Ellen sites would be removed, and the Draft EIR defers analysis of heritage tree removal to individual projects exempt from CEQA.

The impact statement for Impact BIO-5 on page 4.4-39 of the Draft EIR reads as follows: “Development facilitated by the project on Rezoning Sites would be subject to the County’s ordinances and requirements protecting biological resources, such as trees. Impacts would be less than significant.” This includes a statement of impacts (less than significant).

The potential for tree removal is acknowledged on page 4.4-40 of the Draft EIR; however, compliance with County-required policies related to heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) is determined to be adequate to reduce impacts to less than significant.

Response 70.24

The commenter asserts that site GLE-1 contains a well-documented historical structure, which should be addressed in more detail.

Site GLE-1 is listed in Table 4.5-1 as containing a historic-age building. As stated on page 4.5-5 of the Draft EIR: “A review of available listings of the National Register of Historic Places (NRHP), California Office of Historic Preservation, and Sonoma County Historic Landmarks failed to identify any known historical resources or historic districts in the Rezoning Sites that are designated at the federal, state, or local levels.” The structure referred to by the commenter has not been officially designated as a historical resource. Mitigation Measures CUL-1 and CUL-2 would reduce potential impacts to historical resources, and implementation of these measures would be required by the County for future development on site GLE-1, as appropriate.

Response 70.25

The commenter states that the EIR does not evaluate the appropriateness of applying the WH zone to the Glen Ellen sites. The commenter expresses support for housing, and opposition to sprawl. The commenter states that Glen Ellen is not within an Urban Growth Boundary, there is no transit, and there is no job center. The commenter asserts that applying the WH zone would be inconsistent with the zone district’s stated intent and with other land use policies.

Potential Sites GLE-1 and GLE-2 are currently zoned Limited Commercial (LC). Per Sonoma County Code Section 26-75-010, the WH Combining District may be applied to properties within designated urban service areas with LC base zoning. Therefore, sites GLE-1 and GLE-2 can have the WH Combining District applied without violating the County Code.

The commenter’s expressed opinions are noted and passed on to decision-makers for consideration.

As stated in Response 70.12, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Section 4.16 of the Draft EIR states that none of the Rezoning Sites are within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor, which includes the Glen Ellen sites. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Commercial businesses, which require employees to function, do exist in the community of Glen Ellen.

Response 70.26

The commenter asserts that the EIR does not address the WH ordinance policy d, related to consistency with Area and Specific Plans. The commenter asserts that the WH zone district is not consistent with General Plan provisions for Glen Ellen, including Policy 20i, specifically bullets 1 and 3.

The commenter is referring to Section 26-75-020 (d) of the Sonoma County Code of Ordinances. Consistency with goals, objectives, policies, and programs is provided under Impact LU-2, beginning on page 4.11-30 of the Draft EIR. As stated therein, the project would not result in a significant environmental impact from a conflict with any land use plan or policy, and impacts are less than significant.

The commenter refers to General Plan Policy LU-20i, which is related to development on Limited Commercial and Limited Commercial – Traffic Sensitive uses in the County, including in Glen Ellen. While the Glen Ellen sites are currently designated Limited Commercial, the proposed project would not change this designation, and would therefore not introduce a conflict with this policy. The addition of the WH zone would not remove or otherwise modify the requirement for future development on the Glen Ellen sites to comply with this policy.

Response 70.27

The commenter references page 4.11-43 and Table 3-1, and asserts that the cumulative land use analysis is inadequate.

The Draft EIR does not contain page 4.11-43 or Table 3-1; therefore, it appears that this comment was made in error.

Response 70.28

The commenter asserts that the density increase would result in buildings that are out of scale with existing surrounding development, with no feasible mitigation. The commenter states that a previous proposal for 15 units on the Glen Ellen sites was rejected due to mass and scale. The commenter asserts that the WH zone would require 16 units to be developed on the Glen Ellen sites, and there is no existing development in Glen Ellen that has a similar density; therefore, the commenter asserts this would be a substantial increase in density. The commenter states that a nearby property was recently redeveloped with 8 units and 2 ADUs, which exacerbates this impact.

County Code Section 26-75-050(1) state that workforce housing projects shall have a minimum density of 16 units per acre and a maximum density of 24 units per acre. As shown in Table 2-4, this corresponds to a maximum development of the Glen Ellen sites of 20 total units (18 units on GLE-1 and 2 units on GLE-2). GLE-1 is 0.73 acres in size, and GLE-2 is 0.12 acres in size, for a total of 0.85 acres. This corresponds to a combined minimum unit requirement of 13.6 (0.85 acres multiplied by 16 units per acre) with application of the WH overlay.

Aesthetic impacts associated with the increase in allowed density on all Rezoning Sites are identified and mitigated to the extent feasible in Section 4.1, *Aesthetics*, of the Draft EIR.

The cumulative development analysis is described beginning on page 4-2 of the Draft EIR. As stated therein, cumulative impacts were evaluated at a programmatic level, and specific individual projects were not identified as part of this analysis.

Response 70.29

The commenter asserts that design review does not consider density and intensity of development. The commenter asserts that compliance with General Plan policies and guidelines in order to protect Glen Ellen's rural character need to be addressed.

Impact LU-2, beginning on page 4.11-30 of the Draft EIR, discusses the project's potential environmental impacts related to conflicts with applicable plans, policies, or regulations. This impact discussion includes an assessment of potential conflicts related to rezoning of the Glen Ellen sites, and determined impacts would be less than significant. Please refer to Response 70.22 regarding adherence of future projects to the Glen Ellen Development and Design Guidelines.

Response 70.30

The commenter asserts that the Glen Ellen sites were included because the property owner had already applied for the WH zone, and asserts that no independent analysis of the appropriateness of this zone was done.

This comment is noted and will be passed on to County decision-makers. Please refer to Master Response SITE for a discussion of the site selection criterion and process.

Response 70.31

The commenter states that previous requests to look at different zone districts for the Glen Ellen sites were not considered. The commenter asserts that such an alternative could reduce impacts to traffic, aesthetics, land use inconsistencies, historic resources, and fire risk.

Please refer to Section 6.4, beginning on page 6-16 of the Draft EIR. As stated therein:

The County considered a lower density alternative, but this would not achieve project objectives because lower densities would not meet the County's 6th cycle RHNA requirements due to the limitations of finding additional sites that could support residential uses. Therefore, this alternative was rejected.

Additionally, there are no impacts specific to the Glen Ellen sites alone that the commenter's suggested alternative would result in the substantial decrease of an environmental impact or the avoidance of a significant and unavoidable impact. It should be noted that *CEQA Guidelines* Section 15126.6 explains that an EIR is not required to consider every conceivable alternative to a project, but must consider a reasonable range of alternatives. Discussion of a reasonable range of alternatives is provided in Section 6 of the Draft EIR.

Response 70.32

The commenter asserts that placing the WH zone outside of an Urban Growth Boundary would result in a growth-inducing precedent in Glen Ellen, and that this impact was not addressed in the EIR.

Growth-inducing impacts were addressed in Section 5.1 (beginning on page 5-1) of the Draft EIR. In particular, the removal of obstacles to growth is addressed in Section 5.1.3 of the Draft EIR. This analysis covers the potential growth-inducing impacts of the Housing Element Update, including the addition of the WH Combining District to certain sites within the county.

Response 70.33

The commenter states that it is important not to overtax rural infrastructure and resources, and expresses opposition to rezoning the Glen Ellen sites.

The commenter's expressed opinion and preference is noted, and is passed on to decision-makers for consideration.

EIR Public Comment 71

COMMENTER: William Helt

DATE: February 5, 2023

Response 71.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 71.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 71.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 71.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 71.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 71.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 71.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 72

COMMENTER: Anne Marie and Eugene Calhoun

DATE: February 7, 2023

Response 72.1

The commenter expresses concern regarding future density increases in Forestville. The commenter states that while they support affordable housing, the amount being proposed by the project will double the current population and is too much for the area.

Please refer to Master Response HE.

Response 72.2

The commenter asks if existing water supplies will be able to support future growth.

Please refer to Master Response UTIL. As stated therein, water supply is analyzed in Section 4.18, Utilities and Service Systems, of the EIR. Each water service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide water service to the Rezoning Sites. In addition, California American Water – Larkfield prepared a Water Supply Assessment (Appendix WSA) detailing its ability to provide water service to the Rezoning Sites within its service area. With the implementation of proposed capital improvement projects, development facilitated by the project on the Agua Caliente, Glen Ellen, Larkfield, Sonoma, Santa Rosa, Forestville, Graton, Guerneville, Penngrove, and Petaluma Sites would have access to adequate water service. Information was not provided by California American Water – Geyserville. Furthermore, the Rezoning Sites that are not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

Response 72.3

The commenter asks if the existing sewer system will be able to support future growth.

Please refer to Master Response UTIL. Wastewater systems are analyzed in Section 4.18, *Utilities and Service Systems*, of the EIR. R. As stated therein, “[d]evelopment facilitated by the proposed project would create additional demand for wastewater treatment in the Unincorporated County.” Wastewater service providers for the Rezoning sites were contacted and assessed in Appendix WSS for their ability to provide wastewater service to the Rezoning Sites.” With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. However, the Rezoning Sites that are not currently directly adjacent to wastewater collection infrastructure (pipelines) were not fully evaluated in Appendix WSS for adequate sewer capacity (GEY-1, LAR-7, FOR-1, FOR-2, FOR-6, GRA-4, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4). As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

The following revisions have been made to the Draft EIR for clarification. On page 4.18-14:

...Additionally, the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. It should also be noted that Site GRA-4 would

need to be annexed into the Graton Community Services District in order to receive wastewater collection treatment services.

On page 4.18-16, Mitigation Measure UITL-1 has been revised as follows:

Future development proposed on the following sites shall be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy:

1. Rezoning Sites that need to demonstrate capacity from the applicable water service provider: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4.
2. Rezoning Sites that need to demonstrate capacity from the applicable wastewater service provider: GEY-1, GUE-2, GUE-3, LAR-1 through LAR-8, FOR-1, FOR-2, FOR-6, GRA-4, SAN-6, SAN-7, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4.
3. Rezoning Site GRA-4 shall be annexed into the Graton Community Services District prior to development of the site.

The required documentation shall be provided to the County during the plan review and permit approval process for projects on the above-listed Rezoning Sites.

Response 72.4

The commenter states that there are no handicap accessible sidewalks. The commenter expresses concerns regarding road safety, poor road visibility, and unsafe turns during high traffic periods.

Please refer to Master Response EXST.

Response 72.5

The commenter states that they would like to build a granny unit on their property, but the permitting process has made it challenging as they are on septic.

This comment is not relevant to the proposed project. It has been forwarded on to County staff.

Response 72.6

The commenter asks if the County can make the permitting process easier to understand for residents using septic systems.

This comment is not relevant to the proposed project. It has been forwarded on to County staff.

EIR Public Comment 73

COMMENTER: Becky Boyle

DATE: February 7, 2023

Response 73.1

The commenter states that they do not understand why the Draft EIR letter the commenter previously submitted was not included in Item 2 of a Sonoma County Planning Commission meeting. The commenter asks if only three letters have been received so far.

This comment does not pertain to the adequacy of the Draft EIR, but has been forwarded to County staff for their review.

EIR Public Comment 74

COMMENTER: Betty Brachman

DATE: February 7, 2023

Response 74.1

The commenter states that they are a resident of Glen Ellen. The commenter expresses discontent with Marty Winters and states that Winters has pushed to develop the area while neglecting his own properties. The commenter requests that the County remove the two Glen Ellen parcels from consideration for rezoning.

This comment is noted. Please refer to Master Response HE.

EIR Public Comment 75

COMMENTER: Dan O'Leary

DATE: February 7, 2023

Response 75.1

The commenter expresses opposition to the rezoning of sites GUE-2, GUE-3, and GUE-4. The commenter expresses concern regarding increased risk of wildfire, flooding, emergency evacuation, the narrowness of existing roads, issues pertaining to ingress and egress, and inadequacy of existing sewer system infrastructure.

This comment is noted. Please refer to Master Response FIRE regarding fire risk. Please refer to Master Response EMG regarding concerns about emergency evacuation, including the narrowness and dead end at Laughlin Road and road closures due to flooding. Please refer to Master Response EXST regarding the existing sewer system, and Master Response UTIL regarding sewer capacity. As stated therein, "the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. These sites would require the construction of expanded wastewater facilities, including upgraded pipelines and potentially new pumps."

EIR Public Comment 76

COMMENTER: G.W. Duvall

DATE: February 7, 2023

Response 76.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Please refer to Response 14.1.

Response 76.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Please refer to Response 14.2.

Response 76.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Please refer to Response 14.3.

Response 76.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Please refer to Response 14.4.

Response 76.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Please refer to Response 14.5.

Response 76.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Please refer to Response 14.6.

Response 76.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Please refer to Response 14.7.

EIR Public Comment 77

COMMENTER: Karyn Pulley

DATE: February 7, 2023

Response 77.1

The commenter summarizes their thoughts and involvement in the process so far, and states that it is their belief that site FOR-2 is not favorable for rezoning. The commenter states that they are the owner of FOR-2 and have no desire to sell their property.

This comment is noted. Please refer to Master Response HE.

Response 77.2

The commenter states that FOR-2 serves as a watershed for the areas directly surrounding the property. The commenter expresses concerns regarding impacts to biological resources.

This comment is noted. Please refer to Master Response EXST. Furthermore, biological resources are analyzed in Section 4.6, *Biological Resources*, of the EIR.

Response 77.3

The commenter states that they have reason to believe that tribal cultural resources may be present on the site.

Potential impacts to tribal cultural resources are analyzed in Section 4.17, *Tribal Cultural Resources*, of the EIR, which acknowledges tribal cultural resources are known to exist across the County. The EIR contains mitigation measures in both Section 4.17, *Tribal Cultural Resources*, and Section 4.5, *Cultural Resources*, which would reduce impacts to a less than significant level. This mitigation measures include TCR-1 through TCR-5, which require coordination and consultant with tribes, avoidance of resources, preparation of a tribal cultural resources plan, Native American monitoring, and mitigation regarding human remains when they are expected to be present.

Response 77.4

The commenter notes that the Draft EIR requires mitigation to be implemented if site FOR-2 is rezoned. The commenter asks if this is a wise use of the land and good land management. The commenter asks how the Commission measures greenhouse gas emission, emission hazards, impacts to aesthetics, and impact to cultural resources. The commenter asks that if FOR-2 is developed, how is that managed and who that would be managed by.

The commenter is correct that mitigation would apply to the project. The commenter's opinions and questions are noted. Please refer to Section 4.3, *Air Quality* of the EIR regarding emissions, and Section 4.8, *Greenhouse Gases*, regarding impacts related to greenhouse gases. Aesthetic impacts are analyzed in Section 4.1, *Aesthetics*, and Section 4.5, *Cultural Resources*, addresses impacts to cultural resources. Individual development proposals would be reviewed by the County when submitted by developers.

Response 77.5

The commenter states there is limited transit near site FOR-2. The commenter expresses concerns regarding increased pollutants, changes in air quality, future water and sewer infrastructure improvements, service system needs, road enhancements, and increased traffic.

This comment is noted. Please refer to Master Response EXST. Air quality and pollution levels are analyzed in Section 4.3, *Air Quality* of the EIR. Please refer to Master Response UTIL regarding water and sewer infrastructure and service systems, which are analyzed in Section 4.18, *Utilities and Service Systems*, of the EIR. Transportation impacts are analyzed in Section 4.16, *Transportation*, of the EIR, and road enhancements are also discussed in Section 4.19, *Wildfire*.

Response 77.6

The commenter states that they have not been able to determine if there is any value in rezoning their land. The commenter states that FOR-2 is not a viable parcel for rezoning. The commenter asks that the County reconsider rezoning site FOR-2.

This comment is noted. Please refer to Master Response HE.

EIR Public Comment 78

COMMENTER: Kon Zaharoff

DATE: February 7, 2023

Response 78.1

The commenter asks if the County has responded to an email from another community member. The commenter asks if the County will remove site FOR-2 from further consideration.

Please refer to Master Response HE and Response to Comment 41, which is the letter the commenter is referring to.

Response 78.2

The commenter attached the email from the other community members, Nick Pulley, Kristen Krup, and Karyn Pulley. The attachment describes the commenters opposition to the rezoning of site FOR-2. The commenters state that they will not be selling their property.

Please refer to Response to Comment 41.

EIR Public Comment 79

COMMENTER: Larry Martin

DATE: February 7, 2023

Response 79.1

The commenter asks that the County consider existing traffic, water, and sewage concerns in Forestville. The commenter states that the proposed density is beyond what Forestville is able to accommodate. The commenter requests that new development occur closer to major transportation corridors and in areas with existing sewage treatment plants.

Please refer to Master Response HE and Master Response SITE. Traffic impacts are analyzed in Section 4.16, *Transportation*, and impacts relating to water and sewer capacity are analyzed in Section 4.18, *Utilities and Service Systems*, of the EIR. Refer also to Master Response UTIL.

EIR Public Comment 80

COMMENTER: Marilyn and David Kinghorn

DATE: February 7, 2023

Response 80.1

The commenter states that they were not made aware of the site being rezoned near their home. The commenter disagrees with how rezone sites were chosen and shares the belief that the actions of County Supervisors is irresponsible.

This comment is noted. Please refer to Master Response HE regarding dissatisfaction with the housing element and Master Response SITE regarding site selection.

Response 80.2

The commenter states that site FOR-1 is a hazardous waste site and developing near the site is irresponsible. The commenter states that cleanup of the site should be addressed prior to proposals for development.

This comment is noted. Please refer to Master Response EXST. The commenter is correct, and the EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. Refer also to Response O-2.3 regarding the Electro Vector site.

Response 80.3

The commenter states that there are several environmental concerns regarding site FOR-4 including risks to a nearby creek, potential flood hazards, narrow roads, and steep slopes. The commenter expresses concern about increased traffic and increased risk to other vehicles, bicyclists, and pedestrians.

Please refer to Impact HAZ-2 in Section 4.9, *Hazards and Hazardous Materials*, of the EIR regarding sites within 0.25 miles of sites listed in Table 4.9-2. Please refer to Master Response EXST regarding the existing creek in the area. Impacts related to transportation are analyzed in Section 4.16, *Transportation*. As stated in Master Response FIRE, some roads would require infrastructure improvements before development.

Response 80.4

The commenter states that several issues should be addressed prior to rezoning including, but not limited to, undergrounding utility lines, increasing water storage, addressing sewer system capacity deficiencies, and improving roadways.

Please refer to Master Response EXST. Impacts relating to roads are analyzed in Section 4.16, *Transportation*, and Section 4.19, *Wildfire*, and impacts relating to water and sewer capacity and other utilities are analyzed in Section 4.18, *Utilities and Service Systems*, of the EIR.

Response 80.5

The commenter notes that there was previously discussion about developing a bypass around Forestville. The commenter asks if this being discussed along with the proposed rezone.

This comment does not pertain to the current project and is not related to environmental impacts of the proposed project. Additionally, the bypass has no current schedule for completion by Sonoma Public Infrastructure.

Response 80.6

The commenter asks why Forestville is set to increase population by up to 25 percent rather than 10 percent, similar to other areas.

This comment is noted. Please refer to Master Response HE and Master Response SITE regarding site selection.

Response 80.7

The commenter expresses concern regarding the availability of open space in the area. The commenter asks that the Board of Supervisors put more thought into the proposed rezone prior to construction of future development.

This comment is noted. Impacts to parks are discussed in Section 4.15, *Public Services and Recreation*. This comment has been forwarded to the decision-makers for consideration.

EIR Public Comment 81

COMMENTER: Scott Lietzke

DATE: February 7, 2023

Response 81.1

The commenter expresses concern regarding existing transit, policing and public safety, existing infrastructure inadequacies, and emergency egress in Forestville. The commenter states that the Draft EIR does not adequately address these topics.

Please refer to Master Response EMG regarding evacuation and Master Response EXST regarding existing transit levels. Transportation, including public transit, is analyzed in Section 4.16, *Transportation*, and includes a mitigation for a construction traffic management plan as Mitigation Measure TRA-2. Impacts to police services are discussed in Section 4.15, *Public Services and Recreation*.

Response 81.2

The commenter expresses discontent with the level of communication and community engagement during the planning process.

This comment is noted and has been passed on to the decision-makers.

EIR Public Comment 82

COMMENTER: Stephanie Blumenthal

DATE: February 7, 2023

Response 82.1

The commenter states that the rezoning of site GRA-2 is unjustified. The commenter states that the site currently serves its intended purpose to leave sensitive lands intact. The commenter quotes from the M1 zoning designation

This comment is noted and will be passed on to decision-makers. Please refer to Master Response HE regarding dissatisfaction with the proposed project.

Response 82.2

The commenter states that site GRA-2 is zoned as F2 and lies within a floodway. The commenter quotes the County Code's restrictions for F2 zoning. The commenter states that changing this zoning would be detrimental for reasons listed below.

The commenter is correct that Figure 4.10-6 identified GRA-2 as being located partially within a floodplain. Please refer to responses to specific concerns in Response 82.3 through 82.8 below.

Response 82.3

The commenter states that Rezoning Site GRA-2 identified in the Draft EIR is situated in a riparian corridor, the Atascadero watershed/marsh, which is home to a wide variety of waterfowl, fish, reptiles, and amphibians. The commenter states an opinion that there are threatened or endangered species (coho salmon, steelhead trout, California red legged frog, California freshwater shrimp, and Pitkin marsh lily, among other special-status plants) which could be further endangered through development of this highly sensitive area and invasive plants. The commenter opines that light, glare, paving, loss of trees and shrubs, and increased flooding from loss of soil will have an adverse effect on biotic habitat and bird life, and increased flooding, and when we are facing climate change, this just doesn't seem in their best interests. The commenter further notes that the northmost end of the GRA-2 is a major point of drainage from Ross Road to the Atascadero watershed.

Section 4.4, *Biological Resources*, includes a requirement that “for those projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal (e.g., demolition of existing buildings and redevelopment construction, etc.), a project-specific biological assessment (Mitigation Measure BIO-1) would be required. Mitigation Measure BIO-1 requires a site-specific biological resources screening and assessment to evaluate potential habitat including sensitive habitats such as riparian areas and special status species prior to project approval, which would include GRA-2's riparian habitat, which is noted on page 4.4-13 of the EIR. This initial assessment would identify potential habitat for special-status species such as the Pitkin marsh lily and other special-status plants. Pursuant to Mitigation Measure BIO-2, if the project specific biological assessment determines there is potential for impacts to special-status plant species due to project development at GRA-2, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Following this assessment, if special-status plants are found and would be directly impacted at GRA-2, implementation of Mitigation Measure BIO-3 would require projects to be re-designed to avoid impacts to these plant species and

their surrounding habitats. Therefore, sensitive communities, special-status plant species, and associated habitats would be identified on a site-specific basis and avoidance of these species would occur as required by the Draft EIR. As such, no revisions to the Draft EIR are required in response to this comment.

In response to the comment regarding indirect effects from light, glare, paving, and increased flooding from loss of soils, Mitigation Measure BIO-6 in the Draft EIR requires best management practices for sedimentation and erosion control as well as buffers from riparian habitat and/or water bodies, which would reduce and/or avoid impacts to these habitats. Additionally, Impact AES-4 concludes that, with Mitigation Measure AES-2 that would require project designs to incorporate exterior lighting plans to minimize light spillover, impacts relating to light and glare would be less than significant. As such, no revisions to the Draft EIR are required in response to this comment.

Please refer above to Response O-1.2 regarding concerns about project placement near riparian zones and stream habitat. With implementation of Mitigation Measures BIO-15 and BIO-16, impacts to stream habitat and riparian zones would be evaluated and mitigated on a site-specific basis. As such, no revisions to the Draft EIR are required in response to this comment.

In reference to aquatic species, please refer to Response A-1.10. As described therein, Mitigation Measure BIO-6 requires projects occurring within/adjacent to aquatic habitats to be restricted to completion between April 1 and October 31 to avoid impacts to sensitive aquatic species.

Refer also to Response A-1.14, where it is noted that Mitigation Measure BIO-14 requires habitat mitigation at a ratio no less than 1:1 for impacts to sensitive natural communities including riparian areas and waters of the state or waters of the U.S.

Response 82.4

The commenter expresses concerns regarding pedestrian and bicyclist safety near GRA-2.

Impact TRA-2 in Section 4.16, *Transportation*, acknowledges that development may include addition of new driveways or other modifications that may affect transportation safety. As noted therein, “any modifications to public rights-of-way would be required to be consistent with appropriate regulations and design standards set forth by the County’s applicable plans, programs, and policies.” In addition, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety; therefore, consistency with County policies on traffic safety would ensure the project would not substantially increase hazards due to design features.

Response 82.5

The commenter expresses concerns regarding existing sewer system deficiencies and states that the existing treatment plant does not have capacity to support future development.

Please refer to Master Response EXST regarding the existing sewer capabilities. As stated in Section 4.18, *Utilities and Service Systems*, in the EIR, “the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. These sites would require the construction of expanded wastewater facilities, including upgraded pipeline and potentially new pumps.” Generally, the ground disturbance required to construct these upgrades would occur in previously disturbed or developed areas, such as public rights-of-way, reducing the potential for environmental impacts. Compliance with mitigation measures in this Program EIR, including Mitigation Measures BIO-1 through BIO-17, CUL-1 through CUL-9, and TCR-1 through TCR-5, would minimize impacts to sensitive environmental resources where upgrades require off-site construction for the

expansion of wastewater services. Therefore, the proposed project would not result in construction or relocation of wastewater facilities such that significant environmental impacts would result.

Response 82.6

The commenter states there is no grocery store in Graton and the nearest market is located three miles away.

This comment is noted; however, it does not pertain to CEQA analysis in the EIR.

Response 82.7

The commenter states that the area currently experiences water issues and expresses concerns regarding the availability of well water.

Please refer to Master Response EXST. The EIR analyzes impacts resulting from the project related to traffic in Section 4.16, *Transportation*, and impacts relating to water supply in Section 4.18, *Utilities and Service Systems*, of the EIR, as well as in Appendix WS. As stated on page 4.18-13 of the EIR, "Rezoning Sites not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required." Mitigation Measure UTIL-1 would require demonstration that water service providers have capacity to serve individual development proposals.

Response 82.8

The commenter offers opinions about housing policy related to affordable units and apartment leasing protocols.

This comment is noted, but does not relate to CEQA or the findings of the EIR.

EIR Public Comment 83

COMMENTER: Alicia Chazen

DATE: February 8, 2023

Response 83.1

The commenter states that they are a resident of Forestville. The commenter expresses concern regarding emergency evacuation and how an increase in the future population may complicate emergency procedures. The commenter states that the existing roads are potentially dangerous.

This comment is noted. Please refer to Master Response HE and Master Response EMG relating to emergency evacuation.

Response 83.2

The commenter states that it is not clear that existing water and sewer infrastructures are adequate to support future development. The commenter requests to see any Water and Sewer District reports on this matter.

Water and sewer infrastructure is analyzed in Appendix WSS based on outreach and coordination with sewer providers, and analyzed in Section 4.18, *Utilities and Service Systems*.

Response 83.3

The commenter states that it is their understanding that there have been requests to expand the boundaries of Forestville which were rejected due to inadequate infrastructure. The commenter states that this conflicts with the proposed project.

This comment does not pertain to the environmental impact analysis in the Draft EIR, but will be forwarded to decision-makers for their review.

Response 83.4

The commenter asks why there are no rezone sites proposed for Santa Rosa, Petaluma, Windsor, and other larger communities in Sonoma County.

The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within cities in the county as they are separate and independent jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 84

COMMENTER: Amanda Shone

DATE: February 8, 2023

Response 84.1

The commenter expresses concerns regarding the proposed rezoning of sites GLE-1 and GLE-2 located in Glen Ellen. The commenter expresses concern regarding the ownership of these sites. The commenter states that Glen Ellen does not have the infrastructure to support future development of these sites.

Please refer to Master Response HE regarding expressions of opinion relating to the rezoning sites. This comment is noted and will be passed on to the decision-makers for their review. Infrastructure such as water and wastewater systems are analyzed in Section 4.18, *Utilities and Service Systems* in the EIR.

EIR Public Comment 85

COMMENTER: Angelica Jochim

DATE: February 8, 2023

Response 85.1

The commenter expresses concern regarding the proposed project and the increase in potential units in Forestville. The commenter states that Forestville lacks the infrastructure to support future development.

This comment is noted. Please refer to Master Response HE. Infrastructure such as water and wastewater systems are analyzed in Section 4.18, *Utilities and Service Systems* in the EIR.

EIR Public Comment 86

COMMENTER: Arleen Zuniga

DATE: February 8, 2023

Response 86.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1

Response 86.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 86.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 86.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 86.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 86.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 86.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 87

COMMENTER: Caitlin Marigold

DATE: February 8, 2023

Response 87.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 87.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 87.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 87.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 87.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 11.5.

Response 87.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 87.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 88

COMMENTER: Christopher DeWolf

DATE: February 8, 2023

Response 88.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 88.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 88.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 88.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 88.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 11.5.

Response 88.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 88.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 89

COMMENTER: Frank Zanca

DATE: February 8, 2023

Response 89.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 89.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 89.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 89.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 89.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 89.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 89.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 90

COMMENTER: Herman J. Hernandez

DATE: February 8, 2023

Response 90.1

The commenter expresses opposition to rezoning sites GUE-1, GUE-2, GUE-3, and GUE-4.

This comment is noted. Please refer to Master Response HE.

Response 90.2

The commenter states that site GUE-1 is located in an area with single car access roads. The commenter states that it is their belief that the infrastructure, water, and sewer are all issues at this site. The commenter expresses concern regarding emergency evacuation at this site.

This comment is noted. Please refer to Master Response EXST regarding the existing road and site location. Please refer to Master Response HE regarding opinions about which sites should be rezoned, and Master Response EMG regarding emergency evacuation. The Draft EIR analyzes infrastructure, including water and sewer, throughout the document, especially in Section 4.18, *Utilities and Service Systems*, and Appendix WSS.

Response 90.3

The commenter states that access to and from GUE-3 is challenging, and streets in this area are narrow. The commenter states that they do not think this site should be rezoned.

Please refer to Master Response EXST regarding comments about the existing road, viewshed, and access. Please refer to Master Response HE regarding opinions about the rezoning of specific properties. Refer to Response 90.2 regarding infrastructure and evacuation analysis.

Response 90.4

The commenter expresses concerns regarding potential traffic increases near site GUE-4. The commenter states that rezoning this site does not seem feasible. The commenter expresses concern regarding traffic, infrastructure needs, and potential flooding near site GUE-4.

Please refer to Master Response EXST regarding comments about the existing road, traffic, and access. Please refer to Master Response HE regarding opinions about the rezoning of specific properties. Potential flooding impacts are addressed Section 4.9, *Hydrology and Water Quality*, of the EIR. The commenter is correct regarding the 100-year floodplain, and the EIR discloses that GUE-4 is listed as partially within the 100-year floodplain on page 4.10-9, and shows this in Figure 4.10-5. As discussed under Impact HWQ-4 of Section 4.10, *Hydrology and Water Quality*, of the EIR, development in the 100-year floodplain would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. Rezoning Sites that are within the Floodway Combining District (F1) or Floodplain Combining District (F2) would be required to comply with County Zoning Code requirements as stated in Articles 56 and 58, respectively, in Chapter 26 of the Sonoma County Code. This includes the prohibition of fill in County-identified special flood hazard areas (refer to Section 7B-12 of the Sonoma County Code), and requiring review and approval of proposed drainage facilities by Permit Sonoma. Under Sonoma County Code Sec. 7B-12, encroachment within adopted floodways, including fill, new construction, substantial

improvements, and other development, is not permitted unless it has been demonstrated through hydrologic and hydraulic analysis performed in accordance with standard engineering practice and certified by a registered professional engineer or architect licensed in the state of California that the proposed encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project. Impacts related to flood flows would be less than significant. Refer to Response 90.2 regarding infrastructure and evacuation analysis.

Regarding traffic congestion, on September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior to SB 743, CEQA analysis typically treated automobile delay and congestion as an environmental impact. Instead, SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reducing greenhouse gas emissions. In November 2017, the Governor's Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743, which recommend using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The Guidelines required all jurisdictions in California to use VMT-based thresholds of significance by July 2020. Therefore, traffic congestion was not analyzed in the Draft EIR based on this state law. Refer to Section 4.16, *Transportation*, of the EIR for more transportation analysis.

Response 90.5

The commenter expresses concern regarding road conditions near site GUE-2 and states that increases in population and road use could prevent roadway hazards. The commenter expresses concerns about infrastructure, traffic, and increasing the population of the Armstrong Valley.

Please refer to Master Response EXST regarding comments about the existing road and access. Please refer to Master Response HE regarding opinions about the rezoning of specific properties. Please refer to Response 90.2 regarding infrastructure concerns.

EIR Public Comment 91

COMMENTER: Jonathan Teel

DATE: February 8, 2023

Response 91.1

The commenter expresses opposition to the rezoning of sites GUE-2, GUE-3, and GUE-4. The commenter expresses concern regarding increased risk of wildfire, flooding, emergency evacuation, the narrowness of existing roads, issues pertaining to ingress and egress, and inadequacy of existing sewer system infrastructure.

This comment is noted. Please refer to Master Response FIRE regarding fire risk. Please refer to Master Response EMG regarding concerns about emergency evacuation, including the narrowness and dead end at Laughlin Road and road closures due to flooding. Please refer to Master Response EXST regarding the existing sewer system, and Master Response UTIL regarding sewer capacity.

EIR Public Comment 92

COMMENTER: Laurel Anderson

DATE: February 8, 2023

Response 92.1

The commenter expresses opposition to the proposed rezoning of parcels located in Forestville. The commenter states that the proposed project would negatively impact the community with regards to traffic, public water, and sewage. The commenter urges the County to consider alternatives.

This comment has been forwarded to decision-makers for this review. Please also refer to Master Response HE regarding expressions of opinions related to the rezoning. Refer to Master Response UTIL regarding infrastructure. Impacts related to transportation are analyzed in Section 4.16, *Transportation*, of the EIR; refer also to Master Response TRA regarding traffic congestion.

EIR Public Comment 93

COMMENTER: Leigh Hall

DATE: February 8, 2023

Response 93.1

The commenter requests that rezone sites GLE-1 and GLE-2 be removed from consideration. The commenter states that these parcels are located in a small town, and not in or near an urbanized area.

While Glen Ellen is not an urban area, Glen Ellen is within an urban services area, where public services are available and development is anticipated to occur. Please refer to Master Response SITE and Master Response HE.

Response 93.2

The commenter states that public transportation is very limited.

Please refer to Master Response EXST regarding existing public transportation. The current public transportation levels are an existing condition, not one caused by the proposed project.

Response 93.3

The commenter states that the Board of Supervisors recently approved an EIR for the Sonoma Developmental Center. The commenter expresses concern regarding cumulative impacts to traffic and necessary resources.

Refer to Section 4, *Environmental Impact Analysis*, of the EIR regarding cumulative development. As noted therein, “[b]y its definition, a housing element identifies the overall housing conditions and needs of a community without necessarily identifying specific projects or future development. CEQA analysis of cumulative impacts for a housing element is general in nature.”

Specifically, the Sonoma Developmental Center (SDC) Specific Plan was adopted in January 2023, after publication of the Draft EIR for the Housing Element Update project. The SDC Specific Plan had its own EIR, which can be viewed here and addresses transportation and cumulative impacts of the project: <https://www.sdcspecificplan.com/documents>. As mentioned by the comment, the SDC Specific Plan EIR has been certified by the County Board of Supervisors. As designed and adopted by the Board, the SDC Specific Plan included all feasible mitigation as policies, conditions of approval and actions in the SDC Specific Plan. The SDC EIR and the Board of Supervisors recognized unavoidable significant impacts to cultural, historic, and tribal cultural resources and to transportation. The SDC Specific Plan EIR included a description of the proposed Housing Element rezonings now under consideration in relation to the Housing Element.⁶

⁶ [Sonoma Developmental Center Specific Plan Draft Environmental Impact Report. State Clearinghouse No. 2022020222. August 2022. https://www.sdcspecificplan.com/documents.](https://www.sdcspecificplan.com/documents)

EIR Public Comment 94

COMMENTER: Michael Cuoio

DATE: February 8, 2023

Response 94.1

The commenter states that they do not endorse moving forward with the proposed project until there is concurrent commitment, finding, and improved plans to update all infrastructure needed to support existing and future residents of Forestville. The commenter requests that the County and State implement the existing and approve plans to install a bypass system on Highway 116, the associated roundabout at the intersection of Highway 116/Mirabel Road, and other commitments to transportation and public works in downtown Forestville including crosswalk systems and sidewalks.

The commenter's opinion is noted and will be passed on to decision-makers. The potential bypass is not part of the proposed project and does not relate to the project's EIR. The bypass is not currently scheduled for completion by Sonoma Public Infrastructure.

Response 94.2

The commenter expresses concerns regarding the proposed project's impacts to local schools.

Impacts to schools are analyzed in Section 4.15, *Public Services and Recreation* under Impact PS-3. As stated therein, "development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County." Based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Based on Table 4.15-6, Forestville Elementary may see an increase of 54 students, and Geyserville Unified School District an increase of five students. Applicants would pay school impact fees to applicable school districts at the time building permits are issued, to be used by Sonoma County school districts to mitigate impacts with long-term maintenance and operation of school facilities. This impact would be less than significant, as stated in the EIR.

Response 94.3

The commenter emphasizes the need for the County to fully address, fund, and plan upgrades to Forestville's infrastructure.

This comment does not directly pertain to the analysis in the EIR but will be forwarded to decision-makers for their review.

EIR Public Comment 95

COMMENTER: Rick Sanfilippo

DATE: February 8, 2023

Response 95.1

The commenter asks if anyone had driven to view the site located on Sunset Avenue (GUE-1). The commenter urges County staff to see the site in person. The commenter expresses concern regarding the narrowness of local streets and potential future congestion in the area, and the impacts of construction traffic.

The commenter's questions and opinions will be forwarded to the County decision-makers for review. Please refer to Master Response TRAre garding congestion. Roadways in the area would be subject to increased use through construction and residential traffic, which could result in accelerated deterioration. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network. Refer also to Response 21.3 regarding traffic congestion in Guerneville.

Response 95.2

The commenter expresses concern regarding local weather, moisture, and ground stability.

The commenter is expressing a statement not related to analysis in the Draft EIR. However, Section 4.7, *Geology and Soils*, of the EIR includes analysis of soil stability.

Response 95.3

The commenter asks about the reason to invest in a structure on a severely sloped hillside. The commenter states that landslides are common in this area.

Refer to Master Response EXST regarding existing landslide-prone hillsides, which are a current condition and not caused by the project.

Response 95.4

The commenter asks if the area will lose long-standing trees.

As stated in the EIR, such as under Impact AES-3, the project may result in the removal of existing, mature trees. This impact is analyzed in Section 4.1, *Aesthetics*, and under Impact BIO-5 in Section 4.4, *Biological Resources*. As stated therein, "[d]evelopment facilitated by the project would be subject to the County's ordinances and requirements protecting biological resources, such as trees... Trees to be removed have not yet been identified because individual projects have not been developed yet; however, development facilitated by the project on Rezoning Sites would potentially require some tree removal, which would be determined during the project's application process." However, development would be required to comply with goals, policies, and measures in the General Plan, including those for applications for tree removal permits and compliance with associated requirements (e.g., tree replacement), where applicable. Therefore, impacts would be less than significant.

Response 95.5

The commenter expresses discontent with the amount of notice they received on the proposed project. The commenter expresses dissatisfaction with their Guerneville's Supervisor.

The commenter's opinions are noted.

Response 95.6

The commenter suggests that there are other sites in Guerneville that should be considered instead of the proposed sites.

The commenter's opinion is noted. Please refer to Master Responses SITE and HE.

EIR Public Comment 96

COMMENTER: Robert Grandmaison

DATE: February 8, 2023

Response 96.1

The commenter states that site GUE-1 is unsuitable for future development. The commenter states that the site is currently used by the Sweetwater Springs Water District. The commenter states that worker vehicles create traffic congestion issues in this area. The commenter states that increased road use would serve as an obstacle to site access.

Refer to Master Response EXST regarding the existing use of the site and roadway conditions. Refer to Master Response TRA regarding traffic congestion .

Response 96.2

The commenter expresses concern regarding the narrowness of the roads on the nearby hillsides.

Refer to Master Response EXST about the current road width. This situation is an existing condition of the area and is not caused by the proposed project.

Response 96.3

The commenter expresses concerns regarding pedestrian safety stating that the roads in the area lack sidewalks, curbs, gutters, or ADA-compliant curb cuts and approaches.

The lack of existing sidewalks, curbs, and curb-cuts are an existing condition of the project area; refer to Master Response EXST. These current conditions are acknowledged on page 4.16-8 of the EIR. Refer to Section 16, *Transportation*, of the EIR regarding pedestrian safety. As stated under Impact TRA-1, “in compliance with the County of Sonoma’s General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.”

Response 96.4

The commenter states that the elevation of the site makes it difficult for those walking to or from town. The commenter states that the roads near the site are narrow and introduce pedestrian safety issues.

Refer to Master Response EXST about the elevation along Woodland Drive. This situation is an existing condition of the area and is not caused by the proposed project.

Response 96.5

The commenter expresses concern regarding vehicle navigability of the roads near the site. The commenter states that large vehicles are unable to access the neighborhood. The commenter expresses concerns regarding parking and overflow parking in the surrounding neighborhood.

Refer to Master Response EXST about the roadway grades and narrow roads. This situation is an existing condition of the area and is not caused by the proposed project. Refer to Section 4.16, *Transportation*, of the EIR regarding construction traffic, which includes a requirement to implement Mitigation

Measure TRA-2 by submitting a construction traffic management plan to mitigate impacts regarding construction traffic. With this mitigation, construction traffic impacts would be less than significant.

Response 96.6

The commenter objects to the proposed rezoning of site GUE-1 on Sunset Avenue in Guerneville and suggests other locations may be preferable.

Refer to Master Response SITE and HE regarding opinions on the housing sites and site selection. The commenter's opinion is noted and will be forwarded to decision-makers for consideration.

EIR Public Comment 97

COMMENTER: Ashley Nolan

DATE: February 9, 2023

Response 97.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 71.1.

Response 97.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 97.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 97.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 97.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 97.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 97.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 98

COMMENTER: Doug Thorogood

DATE: February 9, 2023

Response 98.1

The commenter expresses opposition to the proposed rezone site located at 14156 Sunset Avenue (GUE-1) in Guerneville. The commenter states that the hill where this site is located has narrow and quiet streets that would be adversely impacted by an increase in population. The commenter suggests there are other locations in Sonoma County that may accommodate an increase in traffic.

This comment is noted. Please refer to Master Response SITES, HE, and EXST regarding opinions about the rezoning of sites, and existing conditions related to narrow streets.

EIR Public Comment 99

COMMENTER: Jeanne Reggio

DATE: February 9, 2023

Response 99.1

The commenter expresses opposition to the proposed rezone site located at 14156 Sunset Avenue (GUE-1) in Guerneville. The commenter states this is an inappropriate location for additional housing due to existing road conditions.

Refer to Response EXST regarding the existing condition of GUE-1 and Response HE regarding opinions related to the rezoning. Refer to Response 95.1 regarding impacts to the road.

EIR Public Comment 100

COMMENTER: Kenneth Koutz

DATE: February 9, 2023

Response 100.1

The commenter expresses opposition to the proposed rezone of sites located on Laughlin Road and Cutten Court in Guerneville. The commenter expresses concern regarding road narrowness, lack of pedestrian facilities, existing potholes, lack of bike lanes and sidewalks, and road navigability.

Please refer to Master Response EXST regarding the street widths and road blockages. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements.

Response 100.2

The commenter states that all nearby roads originate as or are used as exit roads for Guerneville School. The commenter expresses concern regarding congestion and emergency evacuation issues due to increased traffic.

Please refer to Master Response EXST regarding existing street infrastructure, Master Response TRA regarding congestion, and Master Response EMG regarding emergency access and evacuation.

Response 100.3

The commenter states that these roads empty onto Armstrong Woods Road which dead ends. The commenter states that these roads only allow a single car to pass at a time and some are closed throughout the year due to mudslides.

Please refer to Master Response EXST regarding existing street infrastructure. This is an existing condition of the area and not caused by the proposed project. Please refer to Master Response EMG regarding emergency access and evacuation.

Response 100.4

The commenter states that Guerneville has inadequate infrastructure to support future development at the proposed site. The commenter suggests several alternative locations for future housing to be built in Guerneville such as along River Road.

Please refer to Master Response SITE regarding the site selection process. If the sites suggested by the commenter were suggested during the site selection process, they were eliminated based on the provided eligibility requirements.

Response 100.5

The commenter expresses an opinion on the Draft EIR.

The commenter's opinion is noted and passed on to decision-makers for consideration.

EIR Public Comment 101

COMMENTER: Rick Savel

DATE: February 22, 2023

Response 101.1

The commenter provides information regarding the 2016 SCWA SSMP analysis and the latest PSZ and equivalent single family dwelling (ESD) counts. The commenter would like to know how many people the 2016 SCWA SSMP analysis assumed were within the PSZ in 2016.

Please refer to Master Response UTIL and Appendix WSS for further discussions on the water and sewer system capacities. The Draft EIR assumed a conservative additional population based on the California Department of Finance's persons per household estimates for the County of Sonoma in 2019 and individual cities within Sonoma County. We cannot speculate on the method SCWA SSMP used to produce population estimates.

Response 101.2

The commenter would like to know how many persons per ESD were assumed in the 2016 SSMP modeling analysis and whether the SCWA 2016 SSMP update includes a new population baseline over the prior Plan land use element estimated population of 1,300 to 1,450 people under full build-out conditions.

Please refer to Response 101.1 regarding use of population estimate methodology conducted by SCWA.

Response 101.3

The commenter requests that specific capital improvement projects are listed in the EIR and suggests that specific revisions are needed to the agreement with Petaluma for treatment be listed.

Appendix WSS to the EIR acknowledges that a revised agreement with the City of Petaluma may be necessary, and mentions capital improvement projects, such as one that will allow the lift station to continue operating during a flood.

Response 101.4

The commenter questions the following sentence included in the EIR: "28 of the sites appear to have existing sewer infrastructure capacity in order to accommodate additional residential density due to the proposed re-zoning".

This sentence is correct based on the *Water and Sewer Study* included as Appendix WSS of the Draft EIR.

Response 101.5

The commenter opines that there should be a count of existing hookups needed for the land use plan at full buildout and a reserve capacity maintained to allow for failing septic systems in the future. The commenter further opines that this baseline information should be required before consideration of additional housing projects. The commenter requests information regarding who would be financially responsible if there are damages to the sewer system.

Although this comment does not pertain to the analysis or conclusions of the EIR, the comment is noted and will be forwarded to the decision-makers for their consideration.

Response 101.6

The commenter suggests that County staff should pursue implementation of General Plan policy PF- 1b and consider a moratorium on plan amendments and zoning changes in order to protect services to existing residents and entitlements to residents in zones that have not been connected yet.

This comment is on the project rather than the Draft EIR so requires no further response but will be considered by the County's decision-makers as part of the adoption process. Please refer to Master Response UTIL and Appendix WSS for a discussion of the existing capacities of water and sewer systems within the County.

EIR Public Comment 102

COMMENTER: Mark Ballard

DATE: February 9, 2023

Response 102.1

The commenter states they are a resident of Forestville. The commenter states that West County is in need of housing, but expresses concern regarding the existing road network and needed improvements. The commenter suggests a signal light be added at Covey Road and Front Street.

The commenter's opinion is noted and the suggestion has been forwarded to the decision-makers. Regarding the existing roadway network, see Master Response TRA regarding congestion.

EIR Public Comment 103

COMMENTER: Mary Mount

DATE: February 9, 2023

Response 103.1

The commenter expresses opposition to high-density housing Forestville. The commenter expresses concern regarding the narrowness of existing roads and potential ingress and egress issues. The commenter states there is no viable sewer in the area.

The commenter's opinion will be passed on to decision-makers for their consideration. Please refer to Master Response HE regarding opposition to the project. Please refer to Master Response UTIL regarding wastewater treatment capacity concerns. Rezoning Sites in Forestville may be accessed by roadways at least 20 feet in width or greater; however, future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements.

Response 103.2

The commenter expresses concern regarding safety and emergency evacuation difficulties that may occur due to potential population increases.

Please refer to Master Response EMG regarding emergency evacuation concerns.

Response 103.3

The commenter states that low-income housing should be placed in incorporated areas in the County near services such as stores, hospitals, culturally diverse schools, and public transit.

The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within cities in the county as they are separate and independent jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements. Sonoma County must zone sites in the unincorporated areas for housing, so by necessity the project looks at unincorporated communities. Refer to Master Response SITE for more information on site selection.

Response 103.4

The commenter suggests that sites should be centered near Healdsburg, Santa Rosa, Sebastopol, and Windsor.

Please refer to Master Response SITE for more information on site selection. Please refer to Master Response UTIL regarding wastewater treatment. Section 4.10 of the Draft EIR addresses potential water quality and flooding impacts.

EIR Public Comment 104

COMMENTER: Michael Korreng

DATE: February 9, 2023

Response 104.1

The commenter expresses concerns regarding existing traffic conditions and pedestrian safety in Forestville. The commenter suggests that Highway 116 and Mirabel Road crossing should be improved. The commenter suggests installation of a traffic light.

Please refer to Master Response EXST regarding existing traffic safety conditions and Response 119.2. This comment is noted and has been passed on to decision-makers for consideration.

Response 104.2

The commenter suggests that sidewalks should be added from proposed developments into the Downtown area of Forestville and all public transportation locations.

Page 4.16-15 of the Draft EIR states:

...in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.

Response 104.3

The commenter suggests that designated parking should be added near bus stops. The commenter states that people that use the bus will need more parking.

The commenter's opinion will be forwarded to decision-makers for their consideration. Parking is not considered an environmental impact and is not required to be analyzed under CEQA. The County Code sets parking standards for new development, and future project plans would be reviewed by County staff for the provision of parking per the code.

EIR Public Comment 105

COMMENTER: Paige MacDonell

DATE: February 9, 2022

Response 105.1

The commenter states that they live adjacent to site GUE-4 in Guerneville. The commenter expresses concern about how rezoning the parcel may impact future flooding in the neighborhood. The commenter asks why rezoning a property in an active flood zone is being considered without studies or flood mitigation for the surrounding neighborhood. The commenter states the Draft EIR does not reference such studies. The commenter expresses concerns regarding flood hazards that could occur at site GUE-4. The commenter includes images of previous floods near 16050 Laughlin Road.

As noted on page 4.10-9, GUE-4 is located partially within the 100-year floodplain. Refer to Response 90.4. Photos provided by the commenter are of existing conditions present on the project site; refer to Master Response EXST. As noted in Impact HWQ-4, individual development projects would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes achieving zero net fill within these sites following development, avoiding fill in areas that retain flood waters, and requiring review and approval of proposed drainage facilities by Permit Sonoma. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. The EIR does not include site-specific flooding studies, which would be required when individual projects come forward, because details of projects are not known at this point, and would vary by individual development proposal.

EIR Public Comment 106

COMMENTER: Patrick Waters

DATE: February 9, 2023

Response 106.1

The commenter expresses opposition to the proposed rezone site at 14156 Sunset Avenue in Guerneville because of narrow and quiet streets and that other locations may be better.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE related to the site selection process and Master Response HE related to expressions of opposition.

EIR Public Comment 107

COMMENTER: Paul Paddock

DATE: February 9, 2023

Response 107.1

The commenter states that they are the owner of site FOR-4. The commenter expresses opposition to the proposed density at the site. The commenter expresses concerns regarding site access, street narrowness, and underlying soil conditions. The commenter expresses concerns regarding the proposed density increase and type of housing proposed at the site. The commenter states that they would be in support of a density increase if the increase would be more compatible with the immediate neighborhood, community, and site conditions.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE regarding the site selection process, Master Response HE regarding project opposition, and Master Response EMG regarding site access. Information and analysis on soil conditions is available in Section 4.7, *Geology and Soils*, of the EIR.

EIR Public Comment 108

COMMENTER: Rick Harrington

DATE: February 9, 2023

Response 108.1

The commenter expresses opposition to the rezone site located at 14156 Sunset Avenue (GUE-1). The commenter states that the site is providing water storage and treatment for central Guerneville and states the opinion that the existing use is the best use for the site. The commenter states the hilltop is unsuitable and notes access concerns, as well as concerns about neighborhood character and quality. The commenter expresses opposition to the site due to potential tree removal, existing road conditions and potential increase in traffic.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project. The EIR acknowledges that tree removal may be required for some projects, as described in Response 95.4. Refer to Master Response EMG regarding access concerns. Regarding community character, please refer to Impact AES-3, beginning on page 4.1-56 of the Draft EIR in Section 4.1, *Aesthetics*, regarding potential impacts of rezoning and future development of the rezoning as it relates to visual character or quality. As described therein, site GUE-1 has a moderate sensitivity where development would be co-dominant.

Refer to Master Response EXST regarding the street widths and existing traffic safety conditions. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements. Please refer to Section 4.16, *Transportation*, of the Draft EIR regarding traffic pertaining to the proposed project.

EIR Public Comment 109

COMMENTER: Sandy Strassberg

DATE: February 9, 2023

Response 109.1

The commenter expresses opposition to the rezone sites located at APN 054-290-057 and 054-290-084 (GLE-1 and GLE-2). The commenter states that Glen Ellen is a small town, and their preference is to keep the town small. The commenter expresses concerns regarding existing road conditions and parking.

Please refer to Master Response HE and EXST. The commenter's opinion will be forwarded to decision-makers for their consideration. Parking is not considered an environmental impact and is not required to be analyzed under CEQA. The County Code sets parking standards for new development, and future project plans would be reviewed by County staff for the provision of parking per the code.

EIR Public Comment 110

COMMENTER: Sharon Smith and David Wakely

DATE: February 9, 2022

Response 110.1

The commenter expresses opposition to the amount of rezoning being proposed in Forestville.

Please refer to Master Response HE and EXST. The commenter's opinion will be forwarded to decision-makers for their consideration.

Response 110.2

The commenter summarizes concerns of another resident, stating that the Draft EIR does not discuss displacement, loss of character, threats to local businesses, community conflicts, pollution-related health conditions, sanitation needs, traffic, and road conditions citing a need for wider roads, left-hand turn lanes, roundabouts, traffic lights, street lights, and crosswalks.

Please refer to pages 4.14-9 and 4.14-10 of Section 4.10, *Population and Housing*, of the Draft EIR for information regarding displacement. As discussed therein, some of the Rezoning Sites contain existing housing or other structures that could be removed during project implementation. However, the proposed project would enable development in the unincorporated county that could result in a net increase of 3,312 residential units on the Rezoning Sites. One of the fundamental goals of the project is to provide more housing development opportunities throughout the County and meet countywide housing inventory requirements. Thus, Mitigation Measure PH-1 requires that replacement housing be made temporarily available for any displaced existing residents prior to the demolition of existing housing on any of the Rezoning Sites.

Threats to local businesses, community conflicts, and parking are not required topics under CEQA.

The commenter does not specify the type of health impacts they are referring to. For information regarding impacts to air quality, please refer to Section 4.3, *Air Quality*, of the Draft EIR. For information regarding impacts to hazards please refer to Section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR. For information regarding impacts to noise, please refer to Section 4.13, *Noise*, of the Draft EIR.

Please refer to Master Response UTIL regarding sanitation needs.

Please refer to Section 4.16, *Transportation*, of the EIR for information regarding traffic safety. Currently, no road widening, addition of turn lanes, roundabouts, or crosswalks is proposed. The need for infrastructure improvements would be ascertained on a project-by-project basis when individual developments are proposed.

Response 110.3

The commenter expresses concerns regarding fires, evacuation routes, and water supply.

Please refer to Master Response FIRE regarding wildfire, Master Response EMG regarding evacuation routes, and Master Response UTIL regarding water supply.

Response 110.4

The commenter requests that a narrower approach to development is considered in the area.

The comment is noted and will be passed on to decision-makers for review.

EIR Public Comment 111

COMMENTER: Suan and Ron Reed

DATE: February 9, 2022

Response 111.1

The commenter states that the community surrounding Laughlin Road in Guerneville are opposed to sites GUE-2, GUE-3, and GUE-4. The commenter states that there are many adverse effects noted in the Draft EIR.

Refer to Response 14.1.

Response 111.2

The commenter states that GUE-2 and GUE-3 are accessible by a one lane road which would need utility upgrades. The commenter states that road closures as a result of these upgrades will impact emergency egress for residents.

Refer to Response 14.2.

Response 111.3

The commenter states that the existing potable water and sewer systems are inadequate to accommodate growth. The commenter states that the sewer line nearest to GUE-2 and GUE-3 is connected to a pump station that regularly malfunctions, especially during floods and power outages.

Refer to Response 14.3.

Response 111.4

The commenter states that GUE-2, GUE-3, and GUE-4 are located in an area prone to wildfire, floods, and earthquakes. The commenter notes that these sights are zoned as subject to high susceptibility to liquefaction and listed as seismic category SDC D.

Refer to Response 14.4.

Response 111.5

The commenter states that scenic resources will be adversely impacted by future development. The commenter states that old growth redwoods and valley oaks will be destroyed to allow for additional infrastructure.

Refer to Response 14.5.

Response 111.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 111.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 112

COMMENTER: Brad Wallace

DATE: February 10, 2023

Response 112.1

The commenter opposes the rezoning of GUE-2, GUE-3, GUE-4. The commenter expresses concern about noise and existing road conditions including narrow roads and lack of sidewalks.

Please refer to Section 4.13, *Noise*, of the Draft EIR for information regarding noise. Refer to Master Response EXST regarding the street widths and existing traffic safety conditions. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would be required to confirm that adjacent roads meet County width requirements.

Response 112.2

The commenter expresses concerns regarding traffic on Laughlin Road related to garbage trucks and additional residents.

Section 4.16, *Transportation*, of the EIR for information regarding traffic. Please refer to Master Response TRA regarding traffic congestion concerns. Please refer to Impact UTIL-2, beginning on page 4.18-16 of the Draft EIR, regarding solid waste impacts. As noted therein adequate infrastructure existing to serve development facilitated by the project on Rezoning Sites.

Response 112.3

The commenter expresses concern about wastewater capacity and fees, water supply, and power lines.

Please refer to Master Response UTIL regarding water and wastewater service availability. In addition, please refer to Section 4.18, *Utilities and Services Systems*, of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. Water and sewer districts charge connection fees and monthly usage fees, which are intended to cover the necessary improvements needed to serve a project site. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes sewer usage fees.

Please refer to page 4.18-15 of the Draft EIR, where it is noted that existing electrical infrastructure exists near the Rezoning Sites, and it is not anticipated that the construction of new electrical transmission and distribution lines would be required.

Response 112.4

The commenter states that site GUE-4 is in a floodplain and expresses concern about flooding, groundwater recharge, and evacuation routes.

As shown in Figure 4.10-5, GUE-4 is partially within the 100-year floodplain. As acknowledged under Impact HWQ-4 on page 4.10-28, for sites partially within the 100-year floodplain, development would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes achieving zero net fill within these sites following development, avoiding fill in areas that retain flood waters, and requiring review and approval of proposed drainage facilities by Permit Sonoma. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project.

Refer to Impact HWQ-2, on pages 4.10-25 and 4.10-26 of the Draft EIR regarding potential impacts related to groundwater recharge and the construction of impervious surfaces. As stated therein, future development would be required to comply with relevant state and local standards, which would ensure that future development does not substantially interfere with groundwater recharge.

Refer to Master Response EMG regarding access and evacuation routes.

Response 112.5

The commenter expresses concern about narrow roads, access to public services and public transportation for proposed rezoning sites.

Please refer to pages 4.15-1 through 4.15-5 of the Draft EIR regarding access to public services and pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. Refer to Master Response EXST regarding existing narrow roads and transit availability. This situation is an existing condition of the area and is not caused by the proposed project.

Response 112.6

The commenter states that it is unclear if fewer units could be built on the Rezoning Sites and that they have had difficulty having questions answered during the planning process. The commenter asserts that the rezoning should not be rushed because of the state, and states an intent to litigate.

The commenter's opinion will be forwarded to decision-makers for their consideration. Please refer to Master Response HE.

New development would be required to comply with zoning requirements. County Code Section 26-08-040 states that R3 projects shall have a minimum density of 12 units per acre. Therefore, fewer units than the maximum density may be proposed, and additional approvals would not be required as long as a project meets the minimum density requirement. To provide a conservative analysis in the EIR, it was assumed that the full site acreage of each Rezoning Site would be developed at the required density. However, net density would reflect any site-specific constraints such as riparian or floodway setback, which would reduce the total amount of units that could be developed.

Please refer to Section 6.4, beginning on page 6-16 of the Draft EIR. As stated therein:

The County considered a lower density alternative, but this would not achieve project objectives because lower densities would not meet the County's 6th cycle RHNA requirements due to the limitations of finding additional sites that could support residential uses. Therefore, this alternative was rejected.

It should be noted that *CEQA Guidelines* Section 15126.6 explains that an EIR is not required to consider every conceivable alternative to a project, but must consider a reasonable range of alternatives. Discussion of a reasonable range of alternatives is provided in Section 6 of the Draft EIR.

EIR Public Comment 113

COMMENTER: Cassandra Shafer

DATE: February 10, 2023

Response 113.1

The commenter notes that they agree that affordable housing is an urgent need, but that they have some concerns.

The comment is noted and will be passed on to decision-makers for consideration.

Response 113.2

The commenter expresses concern about drought conditions and water and wastewater capacity. The commenter asks how the construction of new sewer lines to FOR-4 and how wastewater capacity improvements would be funded. The commenter asks if water rates will increase as a result of the new development.

Please refer to Master Response UTIL. In addition, please refer to Section 4.18, *Utilities and Services Systems*, of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project would have access to adequate wastewater service. Water and sewer districts charge connection fees and monthly usage fees, which are intended to cover the necessary improvements needed to serve a project site. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property taxes.

Response 113.3

The commenter expresses concern about emergency service access, emergency vehicle access and emergency evacuation routes. The commenter asks if it would make more sense to increase housing near US 101.

Please refer to Master Response EMG regarding emergency vehicle access and emergency evacuation routes and Master Response SITE regarding the site selection process.

Response 113.4

The commenter expresses concern about existing road conditions including narrow roads, and the costs and responsibility associated with road improvements.

Refer to Master Response EXST regarding the street widths and existing traffic safety conditions. This is an existing condition of the area and not caused by the proposed project. Road improvements have not been identified at this time as they relate to potential development facilitated by the project on Rezoning Sites. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements.

Revenue from the Sonoma County's Development Fees (codified in the Sonoma County Code, Section 26, Article 98) pays for selected road improvements that are required to serve new development and

maintain a safe and efficient level of service. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, including costs associated with future road improvements.

Response 113.5

The commenter expresses concern about public transportation including bus access and potential greenhouse gas emissions.

Please refer to Master Response EXST regarding existing transportation conditions. Refer to pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation, and Section 4.8, *Greenhouse Gas Emissions*, of the Draft EIR for information regarding greenhouse gas emissions.

The Draft EIR determined there is no feasible mitigation available to reduce GHG emissions from fuel consumption associated with light-duty vehicles to a less than significant level. Implementation of Mitigation Measure GHG-1 would ensure that any residential development facilitated by the proposed project on Rezoning Sites would comply with current BAAQMD GHG thresholds for individual land use projects to the extent feasible, and Mitigation Measure TRA-1 would require a Transportation Demand Management (TDM) program to reduce vehicle trips, and therefore GHG emissions associated with vehicle trips, consistent with the BAAQMD GHG thresholds.

Response 113.6

The commenter supports affordable housing within walking distance of elementary and high schools. The commenter asks if families with children will receive priority access to new housing.

This comment has been noted and has been passed on to decision-makers for consideration.

The comment regarding priority access to housing does not pertain to the analysis presented in the Draft EIR. Future residents who may reside in new developments are not determined through CEQA. Restricting who may potentially reside in future developments based on past or existing connection to the county would be a violation of the Fair Housing Act.

Response 113.7

The commenter expresses concern regarding property taxes and expresses support for more affordable housing. The commenter states that enrollment has dropped at Santa Rosa Junior College and many faculty have had their workloads and incomes reduced. The commenter questions if construction is the right decision and questions the ability to balance between sustainability, increased population, and economic equity.

This comment regarding property taxes and workload for staff at Santa Rosa Junior College does not pertain to the proposed project, but rather to existing conditions. Refer to Master Response EXST. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes economic equity.

Response 113.8

The commenter suggests that the County delay re-zoning due to concerns about water capacity, fire, transportation, air quality, and population uncertainty and states that affordable housing should focus on the 101 corridor due to these concerns.

The commenter's preference to delay the project is noted and has been passed on to decision-makers for consideration. Please refer to Response 113.2 through Response 113.7 regarding the commenter's specific concerns.

Response 113.9

The commenter suggests that sites with sewer infrastructure and road access on more than one side would be preferable to site FOR-4.

The comment is noted and will be passed on to decision-makers for consideration. Please refer to Master Response SITE regarding site selection.

EIR Public Comment 114

COMMENTER: David Kristof

DATE: February 10, 2023

Response 114.1

The commenter states that there is insufficient information in the DEIR regarding site ELD-1 and requests feedback regarding the decision to include site ELD-1.

Site ELD-1 is included in Table 2-2 on page 2-7 of the Draft EIR. As stated therein, the site is not part of the 59 proposed rezone sites; rather ELD-1 is included in the housing inventory and is currently zoned for a residential density that would allow the county to meet their RHNA requirement without rezoning the site. The proposed project would not involve any development on any of the sites, including ELD-1, and the Draft EIR impact analysis focuses on impacts related to the rezoning of sites. Because ELD-1 would not be rezoned, there are no proposed changes or development on this site as part of the proposed project, and the proposed project would not change the buildout capacity of ELD-1, it is not discussed or analyzed in depth throughout the impact analysis sections in the Draft EIR.

Response 114.2

The commenter claims that site ELD-1 was included solely for the purpose of meeting State minimum buildout requirements.

This comment is noted. The commenter is correct that site ELD-1 would help the County meet their RHNA requirements. However, ELD-1 is currently zoned for residential density sufficient to meet this requirement, and therefore rezoning would not be required.

Response 114.3

The commenter expresses concerns regarding minimum setbacks.

Restrictions on height, setbacks, and floor-area ratio, where appropriate, would follow the applicable zoning requirements outlined in the Sonoma County Zoning Code.

Response 114.4

The commenter expresses concerns about environmental impacts.

The proposed project does not itself include development on any of the rezone or housing inventory sites, including ELD-1. Environmental impacts related to the rezoning of 59 of the inventory sites (noted with a “yes” in the last column of Table 2-2 in the Draft EIR) are discussed in depth throughout each section of the Draft EIR as required by CEQA.

Response 114.5

The commenter expresses concerns about impacts to Sonoma Creek.

Impacts to biological resources, including creeks, is included in Section 4.4, *Biological Resources*, in the Draft EIR. As stated therein, impacts to creeks and wetlands would be significant and would require

mitigation measures BIO-15 and BIO-16 to reduce impacts to be less than significant. Please note that these impacts are only related to rezone sites. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites.

Response 114.6

The commenter expresses concerns about impacts caused by storm drainage outflows.

Please refer to Section 4.10, *Hydrology and Water Quality*, in the Draft EIR for a full discussion of stormwater and drainage. As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to comply with the SWRCB Construction General Permit, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for projects that disturb one acre or more of land. Additionally, as discussed on page 4.10-26 of the Draft EIR, development facilitated by the proposed project on Rezoning Sites would not exceed the capacity of existing or planned stormwater drainage systems. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites.

Response 114.7

The commenter expresses concerns about impacts to creek corridors and waterborne plants and animals.

Please refer to Section 4.4, *Biological Resources*, in the Draft EIR. As discussed therein, impacts to biological resources including special-status plants and animals could be significant and would require mitigation measures BIO-1 through BIO-17. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites.

Response 114.8

The commenter expresses concerns about parking.

Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 114.9

The commenter expresses concerns about increased traffic, especially in the cul-de-sac where 15577 Brookview Drive (ELD-1) is located.

Please refer to Master Response TRA regarding traffic impacts related to the rezone sites. The proposed project would not change the buildout capacity of ELD-1.

Response 114.10

The commenter expresses concerns regarding building height limitations.

Please refer to response 114.3, above.

Response 114.11

The commenter expresses concerns about the neighborhood's capacity to meet demands including an added sewer connection at the proposed site.

Please refer to Master Response UTIL regarding infrastructure impacts related to the rezone sites. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites, including ELD-1.

Response 114.12

The commenter expresses concerns about the neighborhood's capacity to meet demands at the proposed site including degenerative asphalt street pavement. The commenter has concerns about increased traffic on the existing street.

Please refer to Master Response EXST and TRA regarding impacts related to the rezone sites. Sites that are not to be rezoned were not included in this analysis as the proposed project would not change what could be currently developed on other housing inventory sites, including ELD-1.

EIR Public Comment 115

COMMENTER: Melody Clark

DATE: February 14, 2023

Response 115.1

The commenter expresses concerns regarding the over-development near site FOR-2. The commenter asserts that the neighborhoods surrounding the Inventory Sites are not considered.

The commenter's opposition to the project is noted and will be passed on to decision-makers for consideration. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project.

Response 115.2

The commenter expresses concerns regarding the number of homes that would be facilitated by the project.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project.

Response 115.3

The commenter expresses concern regarding sewer system capacity.

Please refer to Master Response UTIL regarding utility availability. Development facilitated by the project on Rezoning Sites would not rely on septic systems. FOR-2, the site the commenter is inquiring about, is included in Mitigation Measure UTIL-1 as it is not adjacent to existing wastewater or sewer service, as described in detail in Appendix WSS and Section 4.18, *Utilities and Service Systems*. This mitigation measure would require the future developer of the site to demonstrate capacity from the applicable wastewater service provider before development. This would likely entail an extension of the wastewater system to serve proposed development.

Response 115.4

The commenter expresses concerns regarding existing traffic on Mirabel Road and evacuation routes.

Refer to Master Response EXST regarding existing conditions. These conditions are not caused by the project or a result of the project. Please refer to Master Response EMG regarding emergency evacuation.

Response 115.5

The commenter states that there is no school on Mirabel Road near site FOR-2, but a park maintained by the community is in that area. The commenter expresses concerns regarding safety features at site FOR-2 including crosswalks. The commenter asks who will install crosswalks from FOR-2 to cross the street.

The commenter is correct, and the EIR has been revised as follows to correctly identify the Forestville Youth Park (page 4.1-18):

On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety; therefore, consistency with County policies on traffic safety would ensure the project would not substantially increase hazards due to design features.

At this time, no new crosswalks are proposed near FOR-2, as the project would implement the rezoning of FOR-2 only.

Response 115.6

The commenter expresses concerns regarding services, such as grocery stores, and notes public transportation is unreliable.

This comment pertains to existing conditions in the County. Please refer to Master Response EXST.

Response 115.7

The commenter expresses their opinion that the proposed project feels rushed.

The commenter's perspective on the project is noted and will be passed on to decision-makers for consideration.

Response 115.8

The commenter states the opinion that a better place for higher density housing would be closer to community services, shopping, transportation, employment areas. The commenter questions employment opportunities that will be available to new residents.

This comment does not pertain to the contents of the EIR. Please refer to Master Response SITE regarding site selection and Master Response HE regarding opposition to the project. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes employment opportunities for new residents.

Response 115.9

The commenter expresses concerns regarding insufficient cellular reception.

Please refer to Section 4.18, *Utilities and Service Systems*, regarding telecommunications impacts, and Master Response EXST regarding existing conditions. Impact UTIL-1 states that “[p]roject implementation requires connections to existing adjacent utility infrastructure to meet the needs of site residents and tenants... The project would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure.”

Response 115.10

The commenter asserts that additional services are needed. The commenter states the opinion that it would be better to reduce the density in the AR and RR zones or allow lot splits for new homes to gradually accommodate additional units than building high density urban style homes in this area.

The commenter's opinion on the project is noted and will be passed on to decision-makers for consideration. Please refer to Section 6.4, *Alternatives Considered but Rejected*, in the Draft EIR for a discussion of rezoning to a lower density district and why that alternative was ultimately rejected.

EIR Public Comment 116

COMMENTER: Kris Nevius

DATE: February 10, 2023

Response 116.1

The commenter states that more affordable housing is needed. The commenter expresses concerns regarding strain on the roads and sewer system.

Refer to Master Response UTIL regarding the sewer system. Development facilitated by the project on Rezoning Sites would connect to public wastewater services. Roadways in the area would be subject to increased use through construction and residential traffic, which could result in accelerated deterioration. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network.

Response 116.2

The commenter asks the County to consider reducing the number of homes proposed for Graton and for the other communities in Sonoma County.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to the project.

EIR Public Comment 117

COMMENTER: No Name – Letter with Signature Sheet

DATE: February 10, 2023

Response 117.1

The commenter expresses opposition to the inclusion of FOR-2, and insinuates that insufficient analysis was completed.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process. Please refer to Response 117.2 through 117.54 for responses to specific concerns.

Response 117.2

The commenter provides background on the community of Forestville and states the increase in population and housing units as a result of the project.

This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.3

The commenter states that most businesses in Forestville are located on SR-116. The commenter describes existing parking in the area. The commenter states that sidewalks are nonexistent, non-contiguous, or in poor condition. The commenter states there are no bike lanes. The commenter states that road crossings are not safe for pedestrians. The commenter states that there is one bus stop.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.4

The commenter states that downtown Forestville is built out. The commenter describes FOR-1, including existing groundwater contamination associated with the site.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.5

The commenter states that street lighting is only present in downtown Forestville, and notes there are minimal light emissions.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.6

The commenter states that new jobs in Forestville are rare, and most are minimum wage service industry jobs.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.7

The commenter provides a list of government services, business types, and human services in Forestville. The commenter states there are no social services or medical facilities, cell service is limited, and the closest grocery store is 1.25 miles away.

Please refer to Master Response EXST regarding existing conditions. This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.8

The commenter provides excerpts from the Sonoma County General Plan that they assert are relevant to Forestville.

This comment does not pertain to the analysis provided in the EIR, and no response is required.

Response 117.9

The commenter describes the street network and surrounding development near FOR-2. The commenter provides the existing and proposed maximum allowable density on FOR-2. The commenter states that people travel to the neighborhood around FOR-2 to walk, despite there being no sidewalks or street lights. The commenter describes existing ingress/egress to FOR-2. The commenter notes that the owner of FOR-2 has no intention of selling the property, and provides Letter 77 as an attachment. The commenter asks what is stopping the landowner from selling the ingress/egress points to FOR-2.

This comment does not pertain to the analysis provided in the EIR, and no response is required. Responses to Letter 77 are provided as Response 77.1 through Response 77.6. The County cannot prohibit the sale of property. Future development projects on FOR-2 would be required to demonstrate adequate ingress/egress, similar to development elsewhere in the county.

Response 117.10

The commenter notes that the Draft EIR identifies FOR-2 as having more environmental constraints than other Rezoning Sites. The commenter lists significant impacts associated with FOR-2 that are not listed in the Draft EIR. The commenter asks if it would be appropriate to remove FOR-2 from the list of Rezoning Sites. The commenter asks how the county will assume legal responsibility for traffic accidents, stormwater pollution, biological resource impacts, flooding, and sewer backups.

If County decision-makers approve Alternative 3 instead of the proposed project, then FOR-2 would not be rezoned.

Please refer to Impact TRA-2, on page 4.16-18 of the Draft EIR, regarding traffic safety impacts. As noted therein, the project would not substantially increase traffic hazards or result in incompatible uses and impacts were determined to be less than significant.

Please refer to Impact HWQ-3, beginning on page 4.10-26 of the Draft EIR, regarding impacts related to stormwater pollution. As described therein, future development facilitated by the project on Rezoning Sites would be required to comply with state and local laws related to stormwater pollution controls during construction and operation, and impacts would be less than significant.

Please refer to Section 4.4.3, beginning on page 4.4-27 of the Draft EIR, related to biological resource impacts. Where necessary, appropriate mitigation measures are required to reduce potential impacts to less than significant.

Please refer to Impact HWQ-4, on page 4.10-28 of the Draft EIR, regarding flood impacts. As stated therein, development facilitated by the project on Rezoning Sites would be required to comply with applicable General Plan policies and County code requirements, ensuring that impacts would be less than significant.

Please refer to Impact UTIL-1, beginning on page 4.18-22 of the Draft EIR, regarding sewer impacts. As stated therein, mitigation measures are required to ensure adequate wastewater treatment capacity is available to serve future development projects.

Response 117.11

The commenter cites HCD requirements on parcel size for affordable housing as not exceeding 10 acres. The commenter notes that FOR-2 is 13.5 acres in size, and asks if the County has prepared sufficient documentation for HCD.

The buildout calculations for FOR-2 assumed no more than 10 acres would be set aside as affordable housing, in line with HCD requirements, as discussed in Appendix D of the Housing Element.

Response 117.12

The commenter notes that the Urban Service Area boundary is misleading, and suggests a footnote be added to the map for clarity.

The Urban Service Area boundaries are designated in the General Plan, and are not directly indicative of the exact location of water and sewer infrastructure. The actual location of nearby water and sewer infrastructure for each Rezoning Site is identified in Section 4.18, *Utilities and Service Systems*, and Appendix WSS of the Draft EIR.

Response 117.13

The commenter asserts that any multi-story medium-density development would be inconsistent with the neighborhood surrounding FOR-2, and suggests a correction to the Draft EIR.

The commenter's opinion is noted. The quoted sentence does not provide inaccurate information, and the Draft EIR need not be revised.

Response 117.14

The commenter asserts that the EIR incorrectly states there are no ridgelines or open spaces visible from the neighborhood. The commenter notes that Mount St. Helena, the Santa Rosa foothills, and portions of Trenton hill are visible from Nolan Road and Giusti Road. The commenter requests this be corrected.

The following photograph was taken on April 21, 2023, of FOR-2 facing west from Mirabel Road:



As shown therein, distant views of ridgelines and open spaces are not generally visible across FOR-2. The vegetation located within and surrounding Site FOR-2 prevent distant views of such features.

Response 117.15

The commenter notes that FOR-2 is not flat, but has 2 to 9 percent slopes as stated elsewhere in the report, and requests this statement be corrected.

The following revision has been made on page 4.1-18 of the Draft EIR:

...Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, relatively flat topography, and mature vegetation on all sides (Figure 4.1-14)....

Response 117.16

The commenter notes mature redwood trees on the property do not block views of surrounding hillsides, and requests this statement be corrected.

Please refer to Response 117.14.

Response 117.17

The commenter notes that FOR-2 is not located across the street from a school and asks for this to be corrected.

The following revision has been made on page 4.1-18 of the Draft EIR:

On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

Response 117.18

The commenter asserts that the density of FOR-2 is 200% greater than the surrounding neighborhood. The commenter suggests that the site sensitivity for FOR-2 be changed from Moderate to Significant.

Please refer to Table 4.1-1 on page 4.1-2 of the Draft EIR. The County's site sensitivity criteria are provided therein. Please note that proposed density is not a factor in site sensitivity. No change to the Draft EIR is required.

Response 117.19

The commenter asserts that the light and glare analysis does not adequately analyze the existing night sky conditions, as the neighborhood surrounding FOR-2 does not contain streetlights. The commenter asserts that visitors come to the area for night sky viewing. The commenter asserts that the second or third story of new buildings would emit light, and the project would increase the instance of vehicle headlights.

Please refer to Section 4.1.6, *Light and Glare*, on page 4.1-44 of the Draft EIR. This section acknowledges the existing light and glare conditions of the Rezoning Sites, including the prevalence of night sky viewing.

Impact AES-4, beginning on page 4.1-37 of the Draft EIR, addresses potential impacts associated with new sources of light and glare. The potential impact related to light spillage from exterior lighting, interior lighting, and vehicle headlights is discussed. Mitigation Measure AES-2 would require exterior lighting to meet certain requirements, which would reduce potential impacts to less than significant.

Response 117.20

The commenter asserts that the EIR should acknowledge the existence of night sky viewing and assess the impact. The commenter asks what additional mitigation is necessary.

Please refer to Response 117.19 regarding the discussion in the EIR of night sky viewing, and light and glare impacts. Additional mitigation is not warranted, as Mitigation Measure AES-2 would reduce this impact to a less than significant level.

Response 117.21

The commenter references the description in the Draft EIR related to the presence of Important Farmland on the Rezoning Sites. The commenter includes the text of County General Plan Goal AR-3, Objective AR-3.1, Goal LU-9, and Objective LU-9.1. The commenter disagrees with the EIR's statement that FOR-2 does not contain productive, prime agricultural lands, as the current landowners assert the parcel is agriculturally important. The commenter asserts that FOR-2 is mapped as Farmland of Local Importance.

CEQA defines Important Farmland as that which is characterized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Farmland of Local Importance is not considered Important Farmland for the purposes of CEQA analysis. The information provided in the Draft EIR remains accurate and no revisions are required.

Response 117.22

The commenter requests that mitigation for rezoning FOR-2 related to Farmland of Local Importance be identified.

Please refer to Response 117.21. While the site may contain farmland of local importance, CEQA does not consider the conversion of Farmland of Local Importance to non-agricultural use to be a significant impact; thus, no mitigation is required.

Response 117.23

The commenter asserts that the Forestville boundary is not accurate relative to FOR-2 in Figure 4.4-4. The commenter asserts that stormwater runoff affecting biological resources flows north from FOR-2 via drainage ditches, seasonal creeks, and riparian corridors to the Russian River. The commenter asserts that these water ways must be investigated as Critical Habitat and Sensitive Communities. The commenter asks for the Biological Study Area for FOR-2 to be expanded to include downstream waterways.

The Biological Study Areas (BSAs) include the minimum bounding rectangle for all Rezoning Sites in each of the 11 Urban Service Areas, along with a 500-foot buffer to encompass potential impacts to biological resources, as described on page 4.4-1 of the Draft EIR. The commenters request to expand the BSA for Forestville to include features outside this boundary would not be consistent with this methodology.

Impacts related to riparian habitat and wetlands are discussed under Impact BIO-2, beginning on page 4.4-36 and BIO-3, beginning on page 4.4-37.

Critical Habitat and Sensitive Communities are defined by the US Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Wildlife (CDFW). These are described in the Draft EIR beginning on page 4.4-19. Forestville sites are not located within 5 miles of sensitive natural communities. As shown in Table 4.4-5 on page 4.4-21 of the Draft EIR, Forestville sites are located 2.55 miles from Critical Habitat for California tiger salamander, within Critical Habitat for Coho salmon, and 0.16 mile from Critical Habitat for steelhead. Impacts to special-status species and sensitive natural communities are addressed under Impact BIO-1 and Impact BIO-2, respectively.

Response 117.24

The commenter asserts that page 4.4-13 of the Draft EIR does not mention FOR-2's connectivity with the Russian River via stormwater runoff, and asks for this to be corrected.

Page 4.4-13 of the Draft EIR provides a description of the BSA for Forestville. This explanation is not intended to include an exhaustive list of all connective features. Impacts related to riparian habitat and wetlands are discussed under Impact BIO-2, beginning on page 4.4-36 and BIO-3, beginning on page 4.4-37.

Response 117.25

The commenter notes that FOR-2 is located within 0.5 mile of a known Native American cultural site, and asserts that Native American artifacts have been found on FOR-2 and the surrounding area. The commenter requests that the EIR state FOR-2's proximity to the cultural site and disclose the possibility of artifacts and human remains being present on site.

Page 4.5-4 of the Draft EIR explains:

Due to the programmatic and high-level nature of the Housing Element Update, a records search at the Northwest Information Center has not been conducted. However, archaeological sites are present throughout Sonoma County. Areas most likely to be sensitive for archaeological sites include landforms near fresh water sources.

Therefore, no specific cultural sites were disclosed in the Draft EIR. Additionally, the location of sensitive archaeological resources must be kept confidential for their protection. Impact CUL-2, beginning on page 4.5-13 of the Draft EIR, requires future development facilitated by the project on Rezoning Sites to conduct Phase I Archaeological Resources Surveys pursuant to Mitigation Measure CUL-3. Additional mitigation is included as needed, for projects in proximity to known sites or sensitive areas, including additional required studies, as appropriate.

Potential impacts related to the discovery of human remains are addressed by Impact CUL-3, on page 4.5-16 of the Draft EIR. As stated therein, existing state requirements would ensure the protection of unanticipated discovery of human remains.

Response 117.26

The commenter describes the slope of FOR-2 and mentions flooding in downhill residences from FOR-2. The commenter states that stormwater runoff is not collected in storm drains and describes the path of stormwater downstream of FOR-2. The commenter asserts that the areas collecting stormwater flows to the Russian River should be considered as Critical Habitat and Sensitive Communities. The commenter states that increased impervious surfaces on FOR-2 would increase flooding, and mitigation should be identified. The commenter asserts that stormwater was not adequately analyzed in the Draft EIR.

Please refer to Response 117.23 regarding Critical Habitat and Sensitive Communities. Please refer to Section 4.4.3, beginning on page 4.4-27 of the Draft EIR, related to biological resource impacts. Where necessary, appropriate mitigation measures are required to reduce potential impacts to less than significant.

Please refer to Impact HWQ-3, beginning on page 4.10-26 of the Draft EIR, regarding impacts related to stormwater runoff. As described therein, future development facilitated by the project on Rezoning Sites would be required to comply with state and local laws related to stormwater pollution controls during construction and operation, and impacts would be less than significant.

Please refer to Impact HWQ-4, on page 4.10-28 of the Draft EIR, regarding flood impacts. As stated therein, development facilitated by the project on Rezoning Sites would be required to comply with applicable General Plan policies and County code requirements, ensuring that impacts would be less than significant.

Additionally, page 4.18-3 of the Draft EIR notes: "Most of the Rezoning Sites are not adjacent to curb and gutter storm drains, or stormwater drains following site topography or drainage ditches."

Response 117.27

The commenter provides excerpts from the Draft EIR related to parks. The commenter notes that there are no publicly-funded parks in Forestville, and asks that the EIR clarify the addition of new park space to serve future residents.

Please refer to Impact PS-4, beginning on page 4.15-19 of the Draft EIR. As discussed therein, the County requires payment of development fees to fund park facilities (per Sonoma County Code Section 20-65) and requires parkland dedication or payment of in lieu fees for residential subdivision projects per Sonoma County Code Sec. 25-58 and 25-58.1, offsetting impacts related to increased demand at existing

recreation facilities, and project applicant(s) of the Rezoning Sites would be required to pay this fee in connection with permitting. The County has not identified a location for new parkland that would serve future Forestville residents, as no development projects on the Forestville sites has been proposed at this time. A condition of a grant from the Agricultural Preservation and Open Space District required the Forestville Downtown Park be dedicated as permanently protected and publicly accessible.

Response 117.28

The commenter notes that Forestville Youth Park and Forestville Downtown Park are owned by non-profits and available for public use. The commenter asks what population boundaries would be used to calculate population and if in-lieu fees would fund the existing privately-owned parks.

The Forestville Downtown Park is operated by a non-profit entity and the land was acquired with substantial contribution of public funds (Sonoma County Agricultural Preservation and Open Space grant). Sonoma County Regional Parks has and will continue to invest in connecting the Downtown Park to the West County Trail. As a condition of the Agricultural and Open Space grant, the Forestville Downtown Park was dedicated as permanently protected and permanently publicly accessible.

Response 117.29

The commenter expresses concerns related to increased use of Forestville Youth Park. The commenter asks what mitigation is in place for parkland degradation. The commenter asks for an analysis of privately-owned parks be added to the EIR.

Please refer to Impact PS-4, beginning on page 4.15-19 of the Draft EIR. As discussed therein, new residents facilitated by the project would increase the demand for park services. The County requires the payment of development fees to fund park facilities (per Sonoma County Code Section 20-65) and requires parkland dedication or payment of in lieu fees for residential subdivision projects per Sonoma County Code Sec. 25-58 and 25-58.1. With implementation of this requirement, impacts were determined to be less than significant, and mitigation is not required. CEQA and the *CEQA Guidelines* do not require an analysis of impacts to private facilities, including privately-owned parks.

Response 117.30

The commenter provides information regarding existing traffic on Mirabel Road. The commenter categorizes Mirabel Road as a Major Collector. The commenter asks that the Draft EIR list Mirabel Road in the Existing Street Network.

Due to the programmatic nature of the project, not all roadways adjacent to each Rezoning Site are listed in subsection *a. Existing Street Network*, beginning on page 4.16-1 of the Draft EIR. Roadways in the vicinity of all Forestville sites that are listed in this section include: State Route 116, Laguna Road, Vine Hill Road, Trenton Road, and Wohler Road. As included in Section 5 of this document, and as discussed below, Mirabel Road has been added to the discussion of the existing street network on page 4.16-5:

Mirabel Road, located north of Forestville, is a north to south collector with one lane in each direction. The road begins at the intersection with Highway 116 and ends at the intersection with River Road.

This addition to the existing setting does not change the impact conclusions in the Draft EIR.

Response 117.31

The commenter calculates daily trips at the Mirabel Road and SR 116 intersection that would be added by the project. The commenter asks the County to address existing congestion issues at this intersection.

Please refer to Appendix TRA to the Draft EIR for the traffic congestion LOS analysis, which is provided for informational purposes only. This study includes the intersection of Front Street (SR 116) and Mirabel Road as one of the study intersections for the LOS analysis. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion. Please refer to Master Response EXST regarding existing conditions.

Response 117.32

The commenter states that the EIR does not clearly include traffic mitigations for Mirabel Road and SR 116, including a roundabout.

Please refer to Response 117.31 and Master Response TRA regarding traffic congestion. Please refer to Section 4.16, *Transportation*, of the Draft EIR for the CEQA-required traffic analysis, and Appendix TRA for the informational-only LOS analysis.

Response 117.33

The commenter asserts that a traffic study should be required as mitigation for development on FOR-2.

Please refer to Response 117.31 and 117.32.

Response 117.34

The commenter describes existing access to FOR-2, as well as nearby intersections. The commenter notes there are no turn lanes, and sight distances are limited.

Please refer to Master Response EXST regarding existing conditions.

Response 117.35

The commenter asserts that the existing conditions of roadways and intersections surrounding FOR-2 are dangerous.

Please refer to Master Response EXST regarding existing conditions.

Response 117.36

The commenter references and provides excerpts from the Sonoma County Traffic Impact Study Thresholds.

This comment is noted and does not require a response.

Response 117.37

The commenter asserts that the EIR does not sufficiently analyze traffic mitigation measures and the County's plan to extend the Joe Rodota Trail Bike Path. The commenter asks how traffic mitigation will affect the construction of this trail near FOR-2.

The Draft EIR includes two mitigation measures related to transportation impacts, TRA-1 and TRA-2, provided on pages 4.16-16 and 4.16-17 of the Draft EIR. These measures would reduce vehicle miles

traveled during operation of future development facilitated by the project on Rezoning Sites and would minimize construction disruptions to existing traffic flows, respectively. The commenter does not clearly describe how these mitigation measures would result in secondary effects to planned construction in the area. Secondary effects of mitigation measures are discussed in Section 5.3, beginning on page 5-3 of the Draft EIR.

Response 117.38

The commenter asks if the EIR requires traffic signals, turn lanes, or intersection improvements on Mirabel Road and other streets near FOR-2.

The commenter is referring to traffic congestion; please refer to Master Response TRA.

Response 117.39

The commenter asks if there is any mitigation for traffic increases on Giusti Road or Nolan Road.

The commenter is referring to traffic congestion; please refer to Master Response TRA.

Response 117.40

The commenter asserts that the Draft EIR insufficiently analyzes the need for crosswalks near FOR-2. The commenter provides excerpts from the California MUTCD, and Permit Sonoma Pedestrian Policies. The commenter asks what mitigations should be added to the EIR to address road crossing safety.

Please refer to Impacts TRA-1 and TRA-2 regarding impacts to pedestrian facilities and traffic safety. As noted therein, the County of Sonoma's General Plan requires future development to provide safe, continuous, and convenient pedestrian access to local services and destinations. Furthermore, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Impacts to pedestrian facilities or traffic safety were determined to be less than significant.

Response 117.41

The commenter states that the County has been reducing the parking space requirement to increase density and reduce VMT. The commenter asserts that this strategy only works in urbanized areas with robust public transportation. The commenter notes that Forestville is rural with few jobs in walking distance of FOR-2. The commenter quotes page 4.19-26 of the Draft EIR, related to site access.

This comment does not pertain to the analysis provided in the Draft EIR, and the quoted section of the Draft EIR is provided without a comment. No response is required.

Response 117.42

The commenter asserts that the Draft EIR does not sufficiently analyze the lack of street parking near FOR-2. The commenter asks how the EIR will mitigation the issue of sufficient parking and lack of robust public transportation.

Please note that parking is not an issue area required to be evaluated under CEQA. Please refer to Master Response EXST regarding existing infrastructure, including public transportation. The Draft EIR is not required to mitigate existing conditions; therefore, no new mitigation is required.

Response 117.43

The commenter asserts that the Draft EIR does not sufficiently analyze the condition and size of the sewer pipeline serving FOR-2. The commenter describes the location and size of existing pipelines near FOR-2. The commenter notes existing issues with clogs in the pipeline. The commenter cites Sonoma County Water Agency pipeline sizing requirements.

Please refer to Master Response EXST regarding existing conditions. Project impacts related to utilities infrastructure are discussed in Appendix WSS and in Section 4.18, *Utilities and Service Systems*, of the Draft EIR. As noted on page 4.18-14 of the Draft EIR, some “sites would require the construction of expanded wastewater facilities, including upgraded pipeline and potentially new pumps.” When future development projects are proposed, necessary facility upgrades would be identified and constructed in compliance with relevant and applicable standards.

Response 117.44

The commenter suggests that the project provide sewer access to the parcels surrounding FOR-2, and asks if the EIR considers this.

Please refer to Master Response EXST regarding the existing conditions at the FOR-2 neighborhood. No wastewater facility upgrades are proposed as a part of this project at this time.

Response 117.45

The commenter asserts that FOR-2 should be added to the flow calculation related to the 6” sewer pipeline on Front Street/SR 116. The commenter asks if the County contacted the Forestville Water District regarding capacity calculations.

Project impacts related to utilities infrastructure are discussed in Appendix WSS and in Section 4.18, *Utilities and Service Systems*, of the Draft EIR. As described in Appendix WSS, Forestville Water District staff were contacted during preparation of the Water and Sewer Study. As no development projects on FOR-2 are proposed at this time, specific necessary capacity upgrades have not yet been identified.

This comment is noted and has been passed on to decision-makers for consideration.

Response 117.46

The commenter suggests that mitigation related to capacity issues related to the reduced size of the sewer line on Mirabel Road and First Street be added.

Please refer to Master Response EXST regarding existing conditions. Mitigation is only required for impacts associated with a proposed project, and are not required to address existing conditions. When future development projects are proposed, necessary facility upgrades would be identified and constructed in compliance with relevant and applicable standards.

Response 117.47

The commenter asks who is responsible for replacing 1000 feet of sewer line under SR 116.

Please refer to Master Response EXST regarding existing conditions. The segment of sewer line referenced by the commenter is associated with the Forestville Water District.

Response 117.48

The commenter notes that traffic backed up on Mirabel Road during recent wildfire evacuations. The commenter asserts that the use of existing egress routes from FOR-2 would hamper future residents ability to evacuate.

Please refer to Master Response EMG regarding emergency access.

Response 117.49

The commenter asserts that the EIR does not provide adequate mitigation for evacuation from FOR-2.

Please refer to Master Response EMG regarding emergency access. As described therein:

Development facilitated by the project on Rezoning Sites would be constructed in accordance with federal, state, regional, and local requirements, which are intended to ensure the safety of county residents and structures to the extent feasible. Compliance with these standard regulations would be consistent with the County's Emergency Operations Plan. The project would not impair an emergency response or emergency evacuation plan and impacts would be less than significant.

Therefore, mitigation is not warranted.

Response 117.50

The commenter asserts that a significant and unavoidable impact to public safety is unacceptable. The commenter asserts that the project should not continue. The commenter asserts that the EIR should evaluate wildfire risk based on recent wildfire knowledge. The commenter asserts that Moderate and High FHSZs are identical in the vicinity of FOR-2.

The commenter's opinion is noted and has been passed on to decision-makers for consideration.

Please refer to Section 4.19 of the Draft EIR. Recent wildfire activity in Sonoma County is described on page 4.19-1, and was considered as part of the existing setting for the impact analysis. Please refer to Impact WFR-2 regarding potential wildfire impacts associated with future development of the Rezoning Sites, including those that are within or near Moderate, High, or Very High FHSZs.

Response 117.51

The commenter asks that FOR-2 be removed from the Housing Element Update List based on identified significant and unavoidable wildfire impacts.

The commenter's opinion is noted and passed on to decision-makers for consideration.

Response 117.52

The commenter identifies the nearest FHSZs to FOR-2 and provides a short excerpt from the EIR. The commenter asks how road improvements and traffic mitigation measures are funded to meet road width requirements.

Please also refer to Master Response EXST regarding existing conditions of infrastructure. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would contribute to alleviating cumulative roadway deterioration impacts to the regional road network.

Response 117.53

The commenter references and summarizes an attached letter from Karyn Pulley. The commenter asks if it is the County's best interest to rezone a property against the landowner's wishes.

The letter from Karyn Pulley is included as EIR Public Comment 77 and Response 77.1 through Response 77.6 address the comments provided therein.

The commenter's question is noted and passed on to decision-makers for consideration.

Response 117.54

The commenter asks if there is a process to remove a property from the Housing Element Update.

Decision-makers will ascertain if certain properties should be removed from the Housing Element Update. This comment has been passed on to decision-makers for consideration.

EIR Public Comment 118

COMMENTER: Lorin and Rebecca McClendon

DATE: February 10, 2023

Response 118.1

The commenter expresses opposition for proposed development in Forestville and expresses concerns regarding transportation and increased population in the area. The commenter states that they agree with Lynda Hopkins reasons for opposing the project. The commenter states that they support affordable housing in cities with adequate infrastructure.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Section 4.15, *Public Services and Recreation*, and Section 4.18, *Utilities and Service Systems*, of the Draft EIR for a full analysis of infrastructure in the project area and the proposed project impacts.

EIR Public Comment 119

COMMENTER: Mark Dutina

DATE: February 10, 2023

Response 119.1

The commenter states that their property backs up to site FOR-2.

This comment has been noted.

Response 119.2

The commenter asks if crossing lights will be placed to cross Mirabel Road and Giusti Road.

Please refer to Master Response TRA regarding traffic congestion. The County conducts signal warrant analyses and updated traffic counts when identified by engineering staff as being in need of improvements. The County uses Caltrans and California Manual on Uniform Traffic Control Devices (CA MUTCD) signal warrant criteria.

Response 119.3

The commenter asks what precautions will be made for properties adjacent to FOR-2 and expresses concerns regarding dust and noise pollution.

Regarding dust exposure, please refer to Section 4.3, *Air Quality*, of the Draft EIR. As discussed therein, under Impact AQ-2 on page 4.3-16, impacts related to fugitive dust would be less than significant with the implementation of mitigation measure AQ-1 and AQ-2. As discussed under Impact AQ-3 on page 4.3-22, impacts related to toxic air contaminants (TACs) would be less than significant.

Regarding noise pollution, please refer to Section 4.13, *Noise*, of the Draft EIR for a full analysis of potential noise impacts and mitigation measures. Development facilitated by the proposed project on Rezoning Sites would be required to implement Mitigation Measures NOI-1 through NOI-7 in order to ensure that all construction and operational noise will comply applicable County standards and reduce all noise impacts to a less than significant level.

Response 119.4

The commenter expresses concerns regarding adequate police protection for the rezoning sites.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed therein, under Impact PS-2 on page 4.15-12, the proposed project will not require the development of additional police facilities and police service ratios and response times will remain adequate. Thus, impacts to police service and facilities was determined to be less than significant.

Response 119.5

The commenter asks if traffic lights will be added at River Road and Highway 116.

Please refer to Master Response TRA regarding traffic congestion. Please refer to Master Response EXST regarding existing conditions. Please refer to Impact TRA-2, beginning on page 4.16-18 of the Draft EIR, regarding traffic safety impacts associated with development facilitated by the proposed project on Rezoning Sites.

Response 119.6

The commenter asks about which public services including stores, medical services and employment opportunities will be available for new residents facilitated by the rezoning sites.

This comment does not pertain to the environmental impact analysis presented in the Draft EIR. The services listed by the commenter do not require evaluation under CEQA.

Response 119.7

The commenter asks about parking availability for new residents facilitated by the rezoning sites and expresses concerns about safety.

Please note that parking is not an issue area that is required to be evaluated under CEQA. Regarding safety, please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 119.8

The commenter expresses concerns about biological resources including birds and mammals.

Please refer to Section 4.4, *Biological Resources*, for a full analysis of potential impacts to biological resources induced by the proposed project. The species listed by the commenter are not listed as special-status species. Nesting birds are addressed under Impact BIO-1, beginning on page 4.4-28 of the Draft EIR.

Response 119.9

The commenter states that the current owners intend for the rezoning site to remain an agricultural property.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 119.10

The commenter asks if environmental tasks described in the DEIR have been considered before the rezoning site is developed.

The commenter does not specify the environmental tasks they are referring to. Mitigation Measures presented within the Draft EIR would be implemented.

Response 119.11

The commenter expresses concerns regarding water and sewer and asks if the use of septic is planned for the project.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability. Septic is not proposed for any of the Rezoning Sites.

Response 119.12

The commenter asks if the County will reimburse the commenter if they sell their property at a loss and requests that site FOR-2 be removed from the project.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property values. Please refer to Master Response HE in regard to opposition of the Housing Element or selected Rezoning Sites.

EIR Public Comment 120

COMMENTER: Kathy Rodrigues

DATE: February 14, 2023

Response 120.1

The commenter asks if the Forestville rezoning sites will be visible from Highway 116. The commenter expresses concern regarding adequate improvements to Highway 116 and Mirabel Road. The commenter notes existing issues with sidewalks and curbs in Forestville.

As discussed under Impact AES-2, several Rezoning Sites in Forestville border a state scenic highway and scenic resources could be affected if individual projects are visible from these roadways. However, there is no feasible mitigation measures available, as development facilitated by the proposed project on Rezoning Sites cannot be made to comply with subjective design guidelines, and thus projects on these ten sites may remove or damage scenic resources within a State-designated highway, particularly by changing the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Please refer to Master Response EXST regarding existing conditions of roadways, sidewalks, and curbs. Please refer to Master Response TRA regarding traffic congestion.

Response 120.2

The commenter requests additional time for public review. The commenter states that there is no school on Mirabel Road near site FOR-2, but Forestville Youth Park is in that area.

The Draft EIR was made available for public review for a 55-day comment period that began on December 28, 2022 and ended on February 23, 2023. CEQA Guidelines Section 15105(a) require EIRs to be circulated for at least 30 days and no longer than 60 days, except under unusual circumstances. Therefore, the Draft EIR was circulated for an appropriate amount of time, and no circumstances warrant a longer public review period.

The commenter is correct. Page 4.1-18 of the Draft EIR is revised as follows:

On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

This change to the existing setting description does not affect the aesthetics analysis that follows.

EIR Public Comment 121

COMMENTER: Mike Bojanowsk

DATE: February 10, 2023

Response 121.1

The commenter states that site LAR-9 is in a flood zone and states that the parcel flooded in 1995 and 2005.

The commenter is correct, and Figure 4.10-9, which shows that LAR-9 is partially within both a 100-year and 500-year flood zone has been added to the Draft EIR. These revised figures are included in Section 5 of this document. Additionally, the following revisions have been made throughout Section 4.10 of the Draft EIR to reflect inclusion of LAR-9 in the flood analysis:

On page 4.10-9:

As shown therein, the following sites are partially within the 100-year floodplain: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, ~~and~~ PEN-9, and LAR-9.

On page 4.10-29:

As stated in Section 4.10.1, *Environmental Setting*, the following Rezoning Sites are partially within a 100-year flood hazard area: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, ~~and~~ PEN-9, and LAR-9.

Even with the revisions made to the Draft EIR regarding LAR-9, as discussed in Impact HWQ-3 and HWQ-4, impacts related to flooding would be less than significant.

Response 121.2

The commenter expresses concerns about the Mark West Creek setback and states that the setback would restrict development on nearly the entire property.

LAR-9 is currently zoned with a required setback of 50 feet from Mark West Creek for development. The entire parcel is 3.04 acres and Mark West Creek crosses the southern portion of the parcel. Even with the required 50-foot setback, there still would be adequate space for development on the site.

Response 121.3

The commenter expresses concerns about parking, emergency vehicle access, and traffic near Fulton Road.

Parking is not considered an environmental impact and is not required to be analyzed under CEQA. Please refer to Master Response EMG for a discussion of emergency vehicle access. Please refer to Master Response TRA regarding traffic congestion.

EIR Public Comment 122

COMMENTER: Mona Behan and Alan Crisp

DATE: February 10, 2023

Response 122.1

The commenter expresses concerns about the potential for development facilitated by the project to increase the population in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 122.2

The commenter expresses concerns about impacts to traffic, schools, water resources, parks, wildlife, and wildfire.

Please refer to Master Response TRA regarding traffic congestion. Please refer to Section 4.4, *Biological Resources*, of the Draft EIR for a full analysis of impacts to biological resources. Please refer to Section 4.15, *Public Resources and Recreation*, of the Draft EIR for an analysis of impacts regarding schools and parks. Please refer to Section 4.10, *Hydrology and Water Quality*, and Section 4.18, *Utilities and Service Systems*, for additional information on impacts to water resources. Please refer to Section 4.4, *Biological Resources*, of the Draft EIR for a full analysis of impacts to biological resources. Please refer to Section 4.19, *Wildfire*, of the Draft EIR and Master Response FIRE for additional information regarding wildfire risk.

Response 122.3

The commenter expresses concerns about infrastructure costs pertaining to sewer lines, sidewalks, roads, and traffic features.

Costs of the improvements the commenter listed are not required to be discussed in the Draft EIR. Please refer to Master Response UTIL regarding impacts to current infrastructure including sewer infrastructure. Please refer to Master Response TRA regarding traffic congestion and congestion-related roadway improvements.

Please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 122.4

The commenter expresses concerns about access to public transportation, grocery stores, and employment opportunities.

This comment has been noted. Access to grocery stores and employment are not issue areas required to be analyzed under CEQA. Please refer to Section 4.16, *Transportation*, in the Draft EIR for a discussion of public transit. As stated therein under Impact TRA-1 on page 4.16-15 impacts to public transit facilities would be less than significant. Additionally, please refer to Master Response EXST regarding existing conditions on and near the rezone sites.

Response 122.5

The commenter acknowledges the need for more affordable housing in the area and requests that sites be chosen with regard for local character and equity. The commenter questions the site selection process and how the number of sites was determined.

This comment has been noted. Please refer to Master Response SITE regarding Rezoning Site selection.

Response 122.6

The commenter states that the owners of FOR-2 do not want to sell the land or have it rezoned; they'd like to keep it in their family and used for agricultural purposes.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

EIR Public Comment 123

COMMENTER: Nancy Dempster

DATE: February 10, 2023

Response 123.1

The commenter expresses concerns about the potential for development facilitated by the project to increase the population in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response EXST regarding the existing conditions in Forestville.

Response 123.2

The commenter states that they would like to see a balance of low-income housing while preserving many of the existing qualities in the area.

This comment has been noted. Please refer to Master Response SITE for information regarding Rezoning Site selection. Please note that the Draft EIR did consider an alternative where fewer sites would be rezoned (refer to Alternative 3 on page 6-12), and considered but rejected an alternative that would apply a lower density to the Rezoning Sites (refer to page 6-18).

Response 123.3

The commenter expresses concern regarding traffic, safety, and pollution from cars.

Please refer to Master Response TRA regarding traffic congestion.

Regarding safety, please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Regarding vehicle pollution, please refer to Section 4.3, *Air Quality*, of the Draft EIR. As discussed therein on page 4.3-16, the project's VMT increase would not conflict with the BAAQMD's 2017 *CEQA Air Quality Guidelines* operational plan-level significance thresholds for criteria air pollutants, and would be consistent with the 2017 Clean Air Plan. Therefore, air quality impacts related to additional vehicle miles travelled would be less than significant.

As discussed therein, California has implemented various measures to improve air quality and reduce exposure to traffic emissions. These include the Diesel Risk Reduction Plan, which aims to reduce particulate matter emissions from diesel vehicles. The continued electrification of California's vehicle fleet would also reduce PM_{2.5} levels, and ongoing efforts to reduce emissions from cars and trucks and to move vehicles towards "zero emission" alternatives will continue to drive down traffic pollution (CARB 2017).

Response 123.4

The commenter expresses concern regarding emergency evacuation routes.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation.

Response 123.5

The commenter expresses concern regarding traffic on Highway 116 resulting from development facilitated by sites FOR-5 and FOR-6 and sewer line capacity to site FOR-2.

This comment has been noted. Please refer to Master Response TRA regarding traffic congestion, and Master Response UTIL regarding sewer system capacity.

Response 123.6

The commenter expresses concern regarding sewer line capacity to site FOR-2.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability.

EIR Public Comment 124

COMMENTER: Robert Davis

DATE: February 10, 2023

Response 124.1

The commenter expresses concerns about the potential for development facilitated by the project to increase the population in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 124.2

The commenter expresses concern regarding water and sewer capacity and infrastructure including roads and services.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 124.3

The commenter states that there is no school on Mirabel Road near site FOR-2, but a park maintained by the community is in that area. The commenter states that the unpaved road off Van Keppel described in the Draft EIR is actually a private driveway.

Regarding the comment on there not being a school located on Mirabel Road, commenter is correct. Page 4.1-18 of the Draft EIR is revised as follows:

On Mirabel Road, the Forestville Youth Park ~~a school~~ is directly across the street from FOR-2.

Page 4.1-18 of the Draft EIR has also been revised to reflect the private driveway as follows:

FOR-4 is situated east of FOR-1 in an area accessible only by ~~unpaved roads~~ a private driveway off Van Keppel Road.

This change to the existing setting description does not affect the aesthetics analysis that follows.

EIR Public Comment 125

COMMENTER: Vikki Miller

DATE: February 10, 2023

Response 125.1

The commenter expresses concerns about the potential for development facilitated by the project to increase the population in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 125.2

The commenter expresses concern regarding water and sewer capacity and infrastructure including roads and services.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability.

Response 125.3

The commenter expresses concerns regarding the road conditions of Mirabel Road.

This comment has been noted. Please refer to Master Response EXST regarding the existing condition of services and infrastructure.

Response 125.4

The commenter expresses concerns regarding drug and alcohol abuse.

This comment is noted; however, it does not pertain to CEQA analysis in the EIR.

Response 125.5

The commenter expresses concern regarding emergency evacuation routes.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation.

Response 125.6

The commenter expresses concern regarding infrastructure capacity.

This comment has been noted. The commenter does not specify the type of infrastructure they are referring to. Please refer to Master Response EXST regarding the existing condition of services and infrastructure.

Please refer to Master Response UTIL and Section 4.18, *Utilities and Service Systems*, for information regarding wastewater, storm drainage, electricity, gas, water supply, and solid waste facilities. Please refer to Section 4.15, *Public Services and Recreation*, for additional information on impacts to fire protection facilities, police protection facilities, schools, parks, and other public service facilities.

Response 125.7

The commenter expresses concern regarding infrastructure capacity and availability of services, and opines that a housing project would be better in a more urban setting rather than in Forestville on Mirabel Road and Hwy 116 (FOR-7).

Please refer to Responses 125.3 and 125.6, above. Additionally, the Rezoning sites are currently under consideration for rezoning, and FOR-7 is not a Rezoning Site. Individual development proposals may, but are not guaranteed, to follow after rezoning. Also, note that the EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. More urban areas in the County, such as the incorporated cities and town of Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements. Sonoma County must zone sites in the unincorporated areas for housing, so by necessity the project looks at unincorporated communities. Refer to Master Response SITE for more information on site selection.

EIR Public Comment 126

COMMENTER: Adele Turk

DATE: February 10, 2023

Response 126.1

The commenter states that Forestville on Guisti Road (near FOR-2) lacks road access, sidewalks, sewer connections, and streetlights. The commenter states that grocery stores and the hospital are not easily accessible. The commenter states that heavy equipment trucks from the rock quarry and cars utilize Highway 116.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Response 123.3 for additional information regarding traffic, traffic safety, and pedestrian safety.

Response 126.2

The commenter opposes the project. The commenter suggests moving Rezoning Sites closer to a bigger town.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element and selected Rezoning Sites. Please refer to Master Response SITE regarding Rezoning Site selection.

EIR Public Comment 127

COMMENTER: Alice Horowitz

DATE: February 11, 2023

Response 127.1

The commenter expresses opposition to the Rezoning Sites located in Glen Ellen stating that the project is inconsistent with the intent of the Glen Ellen policies established in the General Plan and Glen Ellen Development and Design Guidelines.

This comment is noted. Please refer to master response HE.

Response 127.2

The commenter states that the Draft EIR does not consider the SDC Specific Plan or Hanna Center housing, hotel, and commercial development on Arnold Road. The commenter states these projects were not included in the cumulative impacts for transportation, land use, greenhouse gas emissions, visual resources, public services (specifically water and wastewater), wildfire evacuation, or emergency response.

Please refer to page 4.2 of the Draft EIR for a full discussion of how cumulative impacts were analyzed for this project as required by *CEQA Guidelines* section 15130. Refer also to Response 70.6 regarding cumulative analysis.

Response 127.3

The commenter asks how Arnold Drive is supposed to accommodate increased traffic and emergency evacuation.

Please refer to Master Response EMG for a discussion of evacuation impacts. Please refer to Section 4.16: Transportation of the Draft EIR for a full discussion of transportation impacts. Please refer to comment 123.3 for an explanation as to why traffic impacts are no longer analyzed under CEQA.

Response 127.4

The commenter asks the County to consider removing the two Glen Ellen Rezoning Sites and assign an alternative zone district that does not require a minimum number of units, as required by the WH zone.

This comment is noted. Please refer to master response HE.

EIR Public Comment 128

COMMENTER: Anna Narbutovkih

DATE: February 11, 2023

Response 128.1

The commenter opposes the proposed multi-family housing development in Guerneville located at 14156 Sunset Avenue (GUE-1). The commenter expresses concern about a narrow one-lane road and safety concerns regarding road conditions.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Regarding safety, please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. Impact TRA-2 discusses whether the project would substantially increase hazards, and as stated therein, “[t]he design of development facilitated by the project on Rezoning Sites is not known at this time. Each development project would be reviewed by the County and required to be consistent with appropriate regulations and design standards set forth by applicable plans, programs, and policies.” This impact would be less than significant.

Response 128.2

The commenter opposes short term vacation rental permits.

This comment is noted; however, it does not pertain to CEQA analysis in the Draft EIR.

Response 128.3

The commenter expresses concerns regarding environmental impacts, carbon emissions, pollution, forestry resources, and biological resources. The commenter recommends inventorying existing buildings that can be repurposed and refurbished.

Please refer to the Draft EIR for a full analysis of environmental impacts induced by the proposed project. Please refer to Section 4.3, *Air Quality*, and Section 4.8, *Greenhouse Gas Emissions*, of the Draft EIR for an analysis of impacts to air quality and emissions. Please refer to Section 4.2, *Agriculture and Forestry*, for additional information regarding impacts to forest resources. Please refer to Section 4.4, *Biological Resources*, for an analysis of the project’s impacts to biological resources.

The recommendation made by the commenter has been noted and passed onto decision-makers.

EIR Public Comment 129

COMMENTER: Becky Boyle

DATE: February 11, 2023

Response 129.1

The commenter expresses concerns regarding health pertaining to properties near wastewater treatment facilities. The commenter asks how the system will accommodate future needs.

This comment has been noted. Please refer to Master Response UTIL regarding wastewater treatment capacity impacts. Regarding potential impacts of residents near a treatment plant, CEQA focuses on disclosing the environmental effect of a proposed project on the environment (in this case, the adoption of the Housing Element), rather than the effects of the environment on potential future residents.

Response 129.2

The commenter shares an article about a hydrogen sulfide warning near the Crockett wastewater treatment plant. The commenter shares two links about the health risks of airborne pollutants from wastewater treatment plants.

This comment is regarding employees of wastewater treatment plants and is not relevant to the environmental impact analysis for the proposed project. This comment has been noted.

EIR Public Comment 130

COMMENTER: Becky Boyle

DATE: February 11, 2023

Response 130.1

The commenter shares an image of a commercial truck width requirement from the Surface Transportation Act of 1982.

This comment is noted. It does not pertain specifically to analysis in the EIR.

Response 130.2

The commenter opposes the rezone of a parcel at 6090 Van Keppel. The commenter questions how future residents could access the rezoning site. The commenter expresses concerns about emergency evacuation routes.

Please refer to Master Response HE regarding opposition to selected Rezoning Sites and Master Response EMG regarding emergency evacuation.

Regarding resident access, please note that access to future development at the rezoning site will be designed and decided on when development has been proposed and approved for the site. At this time, no development has been proposed so an exact description of what site access will look like cannot be provided.

EIR Public Comment 131

COMMENTER: Becky Boyle

DATE: February 11, 2023

Response 131.1

The commenter requests clarification regarding parcel APN #083-073-010 (FOR-4) and states that the Draft EIR reports it as 6090 Van Keppel Road, while the Zoning and Parcel Report list it as 6325 Van Keppel Rd. The commenter also requests clarification regarding a feature in the Zoning and Parcel report.

Both addresses are associated with FOR-4 (APN 083-073-010); however, in January 2023, the owner requested an address correction from 6090 Van Keppel Road to 6325 Van Keppel Road. A footnote has been added to Table 2-2 of the Draft EIR to reflect this information.

The light grey line referenced by the commenter is a topographic line, indicating elevation.

EIR Public Comment 132

COMMENTER: C.L. Tree

DATE: February 11, 2023

Response 132.1

The commenter expresses concerns about the need for more grocery stores and questions how road conditions and pedestrian access will change on Mirabel Road.

In regard to the comment about the need for grocery stores, this comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure.

Appendix TRA of the Draft EIR includes an LOS-based congestion analysis for informational purposes. As shown in Appendix TRA of the Draft EIR, traffic volumes in Forestville were calculated for the Front Street (Hwy 116)/Mirabel Road intersection. As shown in the informational analysis provided in Appendix TRA, full buildout of the Forestville and Guerneville Rezoning Site could degrade roadway level of service (LOS) operations to LOS E, and the intersection also meets the peak hour signal warrant for signalization. The improvement measure provided for informational purposes is program-related development to fund the construction of a traffic signal or roundabout at the intersection, either of which would result in the intersection operating at LOS B conditions in both the AM and PM peak hours.

Regarding safety, please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

EIR Public Comment 133

COMMENTER: C.L. Tree

DATE: February 11, 2023

Response 133.1

The commenter expresses concerns about existing road conditions at Mirabel Road including the lack of sidewalks and traffic lights at Mirabel Road & Front Street, and Covey and Front Street.

Please refer to Response 132.1, above.

EIR Public Comment 134

COMMENTER: C.L. Tree

DATE: February 11, 2023

Response 134.1

The commenter expresses concerns about traffic at Mirabel Road and River Road, parking availability and access for emergency vehicles.

Regarding traffic, please refer to Response 132.1, above. Please note that parking is not an issue area required to be analyzed under CEQA. Please refer to Section 4.16, *Transportation*, of the Draft EIR. As discussed under Impact TRA-3 beginning on page 4.16-18, compliance with Mitigation Measure WFR-1 and WFR-2, 2019 California Building Code, and relevant portions of the Sonoma County Fire Safety Ordinance would reduce impacts regarding emergency access to a less than significant level.

EIR Public Comment 135

COMMENTER: Cheryl A. Franzini

DATE: February 11, 2023

Response 135.1

The commenter states that the proposed rezoning of parcels # 054-290-057 and # 054-290-084 (GLE-1 and GLE-2) is inconsistent with Glen Ellen Development Guidelines. The commenter expresses concerns about tree removal. The commenter requests for the removal of GLE-1 and GLE-2 from the rezoning sites inventory.

This comment is noted. Please refer to Master Response HE. In regards to tree removal, please refer to Impact BIO-5 on page 4.4-39 of the Draft EIR.

EIR Public Comment 136

COMMENTER: Francisco Saiz, Norma Saiz, Richard Halgren, Julie Clark, Gino Franceschi, and Karen Franceschi

DATE: February 11, 2023

Response 136.1

The commenter expresses concerns regarding adequate infrastructure and light pollution.

Please refer to master Response UTIL for a discussion of impacts related to utility infrastructure. Please refer to section 4.1: *Aesthetics* in the Draft EIR for a discussion of light and glare impacts. As discussed therein, impacts related to light and glare would be less than significant with incorporation of mitigation measure AES-2 (found on page 4.1-58 of the Draft EIR) which would require development facilitated by the project on Rezoning Sites to meet exterior lighting requirements to reduce light and glare.

Response 136.2

The commenter expresses concerns regarding safety at schools near sites FOR-1 and FOR-4 and questions how construction hazards including the use or transport of hazardous materials near schools will be addressed.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects (such as security) of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes school security measures. In regards to the transport of hazardous material near schools, please refer to section 4.9: *Hazards and Hazardous Materials* in the Draft EIR. As stated therein, under Impact HAZ-1 on page 4.9-10, impacts related to the emissions or transport of hazardous materials within 0.25 miles of a school would be less than significant. Access to Rezoning Sites is dependent on site-specific development proposals that may be facilitated by the project. Individual development proposals would be reviewed by the County once submitted.

Response 136.3

The commenter states that the road used to access site FOR-4 is small and floods when it rains.

Please refer to Section 4.10, *Hydrology and Water Quality*, in the Draft EIR for a discussion of flood hazards. As shown in Figure 4.10-4 on page 4.10-10, Forestville does not contain any rezone sites that are within FEMA 100-year or 500-year flood zones. Refer also to Master Response EXST regarding existing conditions regarding the existing road, access, and drainage.

Response 136.4

The commenter opines that the Housing Element Update does not adequately address measures to prevent significant environmental and human impacts. The commenter expresses concerns regarding open space, transportation and traffic, infrastructure, parking, and public services.

Please refer to table 4.11-2 of the EIR, which discusses consistency with General Plan policies regarding open space. Refer also to Section 4.15, *Public Services and Recreation*. As discussed therein under Impact PS-4, impacts to parks and recreational facilities would be less than significant. Additionally, as

discussed therein, impacts to fire and police services would be less than significant. As discussed in Section 4.16, *Transportation*, on page 4.16-15, impacts to transit systems would be less than significant. In regards to adequate infrastructure, please refer to Master Response UTIL and Master Response EXST. In regards to parking, pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes parking impacts.

EIR Public Comment 137

COMMENTER: Joseph and Deborah Votek

DATE: February 11, 2023

Response 137.1

The commenter requests the removal of sites GLE-1 and GLE-2 from the rezoning sites inventory and states that the proposed rezoning of sites GLE-1 and GLE-2 is inconsistent with Glen Ellen Development Guidelines.

This comment is noted. Please refer to Master Response HE and Response 70.3.

EIR Public Comment 138

COMMENTER: Kate Farrell

DATE: February 11, 2023

Response 138.1

The commenter expresses concerns regarding two potential rezoning parcels in Glen Ellen. The commenter expresses concerns regarding evacuation routes, infrastructure, water supply, and public services including police and fire services and schools.

Please refer to Master Response EMG for a discussion of emergency access and evacuation routes. Please refer to Master Response UTIL and Master Response EXST for a discussion of infrastructure impacts. Please refer to section 4.18, *Utilities and Service Systems*, in the Draft EIR for a discussion on water supply. As stated therein, on page 4.18-13 Rezoning Sites in Glen Ellen would have adequate access to water supply and impacts would not be significant. As discussed in Section 4.15, *Public Services and Recreation*, in the Draft EIR impacts to police services, fire services, and schools would also be less than significant.

Response 138.2

The commenter states that cumulative projects in the area were not considered including 20 homes proposed for the Sonoma Developmental Center site, the recent development on the north side of Carquinez, or the newly proposed building of 660 units and a hotel across from Hanna Boys Center.

Please refer to Response 70.6 for a discussion of cumulative impacts and the approach taken in the Draft EIR as required by CEQA.

EIR Public Comment 139

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 139.1

The commenter expresses concerns regarding summer traffic and fire evacuation routes near rezoning site FOR-2.

Please refer to Master Response EMG regarding emergency access and evacuation routes. Please refer to comment O-2.7 for an explanation as to why traffic impacts are no longer analyzed as part of CEQA.

EIR Public Comment 140

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 140.1

The commenter expresses concerns regarding sidewalks, public transportation, and pedestrian access to public services near rezoning site FOR-2.

Please refer to Response 153.1 for a discussion of pedestrian safety measures included in the Draft EIR. As discussed in Section 4.16, *Transportation*, on page 4.16-15 of the Draft EIR, impacts to public transit facilities would be less than significant.

EIR Public Comment 141

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 141.1

The commenter expresses concerns regarding water and sewer services near site FOR-2.

Please refer to Master Response UTIL. In addition, please refer to Section 4.18, *Utilities and Services Systems*, of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service.

EIR Public Comment 142

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 142.1

The commenter expresses concerns regarding electricity infrastructure and potential impacts regarding fire hazard near rezoning sites FOR-2 through FOR-7. The commenter asks how energy infrastructure may impact fire hazards, and how any hazards will be mitigated.

As discussed in Section 4.6, *Energy*, beginning on page 4.6-11, development facilitated by the project on Rezoning Sites would consume approximately 216,623,500 kilowatt-hours (kWh), or 56,719 millions of British thermal units (MMBtu) per year of electricity for lighting and large appliances, and approximately 86,468,600 thousands of British thermal units (kBtu), or 86,469 MMBtu per year of natural gas for heating and cooking (see Appendix AQ for CalEEMod results). Electricity would be provided by on-site solar, Sonoma Clean Power (SCP) (the default electricity provider in the County), and/or PG&E. SCP provides electricity from cleaner power sources with lower GHG emissions than PG&E, although customers can opt out of SCP service and be provided electricity from PG&E. Development facilitated by the project on Rezoning Sites would also be required to comply with the latest version of CalGreen which would require efficient household fixtures and energy efficiency measures.

Please refer to Master Response FIRE regarding wildfire. Additionally, as stated on page 4.18-3 of the Draft EIR: “Existing overhead power lines are in the vicinity of all Rezoning Sites, except SAN-6 and SAN-7, where power lines are undergrounded.” Therefore, new powerlines, which could potentially exacerbate wildfire risk, are not a part of the project.

EIR Public Comment 143

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 143.1

The commenter expresses concerns regarding access to gas station services. The commenter questions how the gas station near rezoning sites FOR-2 through FOR-7 will accommodate an increase in population facilitated by the project.

Gasoline usage estimates are provided in Impact ENR-1, beginning on page 4.6-9 of the Draft EIR. As described therein, "vehicle fuel consumption resulting from the project would not be wasteful, inefficient, or unnecessary." CEQA does not require an analysis of gasoline station overcrowding. This comment has been noted and passed on to decision-makers for consideration.

EIR Public Comment 144

COMMENTER: Larry Loebig

DATE: February 11, 2023

Response 144.1

The commenter expresses concerns regarding electricity infrastructure and potential impacts regarding fire hazard near rezoning sites FOR-2 through FOR-7. The commenter questions how potential fire hazards will be mitigated.

Refer to Response 142.1 and Master Response FIRE.

EIR Public Comment 145

COMMENTER: Nina Rosen

DATE: February 11, 2023

Response 145.1

The commenter expresses opposition for development facilitated by the project.

The commenter's opposition to the project is noted and will be passed on to decision-makers for review. Refer to Master Response SITE and Master Response HE.

EIR Public Comment 146

COMMENTER: Richard Evangelisti

DATE: February 11, 2023

Response 146.1

The commenter states that the community surrounding Laughlin Road in Guerneville opposes the rezoning of GUE-2, GUE-3, and GUE-4.

Refer to Response 14.1.

Response 146.2

The commenter expresses concerns regarding utility availability and evacuation routes near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.2.

Response 146.3

The commenter expresses concerns regarding water and sewer services near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.3.

Response 146.4

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are within high fire hazard zones, floodplains, and earthquake risk areas and are zoned as subject to high susceptibility to liquefaction. The commenter states that building in high fire zones and floodplains is contrary to the County General Plan.

Refer to Response 14.4.

Response 146.5

The commenter expresses concerns regarding scenic resources and the potential removal of Redwood and Oak trees.

Refer to Response 14.5.

Response 146.6

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 146.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 147

COMMENTER: Rodney E. O'Neal

DATE: February 11, 2023

Response 147.1

The commenter expresses their support for more affordable housing in Forestville and opposition to vacation rentals.

This comment is noted and will be passed on to decision-makers.

EIR Public Comment 148

COMMENTER: Rory Pool

DATE: February 11, 2023

Response 148.1

The commenter expresses their concern regarding traffic Carquinez Avenue, including cumulative traffic from the Sonoma Developmental Center. The commenter opposes the removal of mature trees facilitated by the project.

Please refer to Master Response TRA for an explanation as to why traffic congestion is no longer an issue analyzed as part of CEQA. The comment regarding removal of mature trees is noted. Please refer to Impact BIO-5 on page 4.4-39 of the Draft EIR. As stated therein, the project would be subject to the County's ordinances and requirements protecting biological resources such as trees and impacts would be less than significant. Refer to Response 70.6 regarding cumulative effects.

EIR Public Comment 149

COMMENTER: Stacie Gradney

DATE: February 11, 2023

Response 149.1

The commenter expresses their concern regarding water and rural roads. The commenter states that Analy is the only high school. The commenter questions whether the elementary schools have adequate capacity to accommodate a population increase.

Please refer to Master Response UTIL and Master Response EXST. Additionally, please refer to response 46.2 regarding impacts to water supply.

Please refer to Section 4.15, *Public Services and Recreation*, for a full analysis of the proposed project's impact to schools. As stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Response 149.2

The commenter recommends rezoning in Windsor by the airport and expresses their concerns regarding views of apple orchards.

This comment is noted and will be passed on to decision-makers. Regarding views of apple orchards, please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As discussed therein, the project could have significant impacts on scenic public views including views of agriculture and viticulture.

Regarding rezoning in Windsor, the EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 150

COMMENTER: Tammy Melton

DATE: February 11, 2023

Response 150.1

The commenter opposes low-income housing in Forestville.

The commenter's opposition to low-income housing in Forestville is noted and will be passed on to decision-makers for review. Refer to Master Response SITE and Master Response HE.

EIR Public Comment 151

COMMENTER: Greg Carr

DATE: February 22, 2023

Response 151.1

The commenter requests that the project description be expanded to provide more detail on the review process for future development projects on the rezoned sites.

Please refer to Section 1.2 of the Draft EIR. As stated therein, the intent of the EIR is to enable future development by-right, without further discretionary approvals. The project would not modify the County's standard review process for future development projects on the Rezoning Sites. Existing processes, including public notification, opportunities for public involvement, and County discretionary actions would remain, where they are applicable. Individual projects may require entitlements or infrastructure improvements, which would be identified during the project application phase of future projects. Refer to Section 1.2.1, *Intent of the Project EIR*, and Section 1.2.2, *Tiering Opportunities*, for more information on subsequent analysis and approvals.

Response 151.2

The commenter questions the conclusion of no effect to wildlife, as several sites are located far from existing development, and wildlife movement could still occur on or near those sites. The commenter provides GEY-1, PEN-2, and PEN-6 as examples.

As shown in Figure 4.4-1 on page 4.4-2 of the Draft EIR, GEY-1 is located near existing development, including US-101, local roadways, and a number of built structures. As shown in Figure 4.4-9 on page 4.4-10 of the Draft EIR, PEN-2 and PEN-6 are located adjacent to existing built structures and development. The commenters assertion that these sites are wildlife movement corridors is not accurate.

The Draft EIR includes a description of the various habitat types including riparian corridors and waterways that provide wildlife movement opportunities at a local scale throughout the 11 Biological Study Areas (BSAs). Wildlife movement corridors are described beginning on page 4.4-21 of the Draft EIR. As described therein, riparian corridors, waterways, existing trails, and mapped Essential Connectivity Areas are considered wildlife movement corridors. There is no mapped Essential Connectivity Area within the Geyserville or Penngrove BSA. Wood Creek is the nearest movement corridor within the Geyserville BSA, and no movement corridors were identified in the Penngrove BSA. As stated on page 4.4-22 of the Draft EIR:

The areas surrounding the rivers and creek are primarily developed areas, including urban residential, commercial, and industrial development. Furthermore, most wildlife species that would utilize such connections are likely urban, disturbance tolerant species such as raccoon, skunk, opossum, and black tailed deer.

Developed areas of the BSA where Rezoning Sites would intersect an urban area do not function as essential connectivity areas or as important wildlife corridors due to previous use and disturbance.

Therefore, the conclusion of Impact BIO-4 is accurate. As stated therein, “development facilitated by the project on Rezoning Sites would not affect the function of creeks and riparian areas in the BSAs as local corridors for wildlife movement.” Therefore, future development on GEY-1 near Wood Creek would have a less than significant impact on wildlife movement corridors. Furthermore, Mitigation Measure BIO-1 *Biological Resources Screening and Assessment*, requires:

The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies.

This measure requires that all projects on Rezoning Sites under the Housing Element update involving ground disturbance through clearing/grading or vegetation trimming assess the project site’s potential to serve as a wildlife movement corridor and incorporate further mitigation, as applicable, to reduce impacts to less than significant. Therefore, impacts to wildlife corridors have been identified in the Draft EIR and mitigation beyond Mitigation Measure BIO-1 and subsequent measures identified by the project specific biological analysis are not warranted. As such, no revisions to the Draft EIR are required in response to this comment.

Response 151.3

The commenter asserts that the Draft EIR fails to consider future impacts related to City plans and policies. The commenter requests that Petaluma’s “Very Low Residential”, Sonoma’s “Gateway Commercial”, and Santa Rosa’s various designations be analyzed for consistency. The commenter requests that the EIR discuss the likelihood of utility extensions within UGBs.

Consistency with City General Plans and Area Plans, as applicable, is provided under Impact LU-2, in the subsections beginning on page 4.11-41. This includes a discussion of consistency with the City of Petaluma General Plan, West Petaluma Area Plan, City of Sonoma General Plan, South Santa Rosa Area Plan, and City of Santa Rosa General Plan.

Response 151.4

The commenter asserts that the Draft EIR fails to address consistency with countywide growth projections and buildout under existing Land Use Maps. The commenter asserts that consistency with Plan Bay Area 2040 is appropriate but irrelevant.

Please refer to Impact PH-1 for an analysis of unplanned population growth generated by the project. As stated therein, “substantial” population growth is defined as growth exceeding ABAG/MTC population forecasts for the Unincorporated County or exceeding the County’s forecasted population and associated housing needs. A comparison with General Plan buildout projections is provided on page 4.14-7 of the Draft EIR. As described within Impact PH-1, the project would increase buildout beyond General Plan growth projections, but would not exceed ABAG 2040 population projections or RHNA allocation requirements.

Response 151.5

The commenter asserts that the Draft EIR does not fully support consistency conclusions, and should identify inconsistencies. The commenter asserts that the project is inconsistent with Objectives LU-3.2, LU-4.1, LU-19.1, LU-20.1, and CT-4.1; and Policies LU-3c, LU-19a, LU-20oo, CT-4.2, and CT-4.3. The commenter suggests mitigation be included for individual project-level impacts.

Objective LU-3.2 and Policy LU-3c are related to growth outside of designated Urban Service Areas. As noted in Table 4.11-3 beginning on page 4.11-32, the project would encourage development within Urban Service Areas and is therefore consistent with this objective and policy.

Objective LU-4.1 relates to development where existing services are available. Table 4.11-3 notes that “there is adequate school, parks, public safety (with the payment of fair share fees for police protection), drainage, and wastewater (with implementation of Mitigation Measure UTIL-1) services and infrastructure to serve the Rezoning Sites”, and is therefore consistent with this objective.

Objective LU-19.1 and Policy LU-19a relates to zoning near Petaluma. As noted in Table 4.11-3, the project would facilitate new urban uses prior to annexation by Petaluma, and the project would be partially consistent with this objective and policy.

Objective LU-20.1 relates to coordination with the City of Sonoma. As noted in Table 4.11-3, the project would facilitate new urban uses prior to annexation by Sonoma, and the project would be partially consistent with this objective and policy.

Policy LU-20oo does not exist in the County General Plan, so it is unclear which policy the commenter is referring to.

Objective CT-4.1 and Policies CT-4.2 and CT 4.3 are related to traffic congestion. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Based on the discussion provided under Impact LU-2 of the Draft EIR, the project would not result in inconsistencies with the County General Plan which would result in a significant environmental impact due to a conflict with the plan, policy, or regulation, and impacts would be less than significant. Therefore, mitigation is not required.

Response 151.6

The commenter asserts that the Draft EIR conclusion that impacts are less than significant based on identified housing needs is incorrect. The commenter requests that Table 4.14-4 be updated to include projections from the General Plan, and base the impact conclusion on the General Plan projections. The commenter disagrees with the EIR conclusion that the project is consistent due to proposed General Plan and Zoning amendments, and calls these changes mitigation measures.

The County General Plan does not provide population, housing, or employment projections through 2040, and relies on ABAG projections for population, housing, and employment estimates through 2020. The County General Plan was adopted in 2008, and does not provide projections beyond 2020, which is now in the past. Therefore, the Draft EIR reasonably uses the ABAG projections in Table 4.14-4 for growth within the County through 2040, consistent with methodology previously used by the County, and no revisions are required.

Similarly, the population growth analysis and conclusions in the Draft EIR being based on ABAG projections is appropriate, as the County General Plan does not provide growth projections beyond 2020.

The commenter's suggestion of considering portions of the proposed project (i.e., the General Plan Amendment and Zoning Amendment) as mitigation measures is inconsistent with the *CEQA Guidelines*, as mitigation measures cannot be project components. *CEQA Guidelines* Section 15370 defines mitigation as (1) avoiding an impact by not taking certain actions; (2) limiting the degree of an action; (3) rectifying an impact through repair, rehabilitation, or restoration; (4) preservation and maintenance operations; or (5) compensation. Because the General Plan Amendment and Zoning Amendment are part of the project, it is inappropriate to extricate them from the project and consider these actions as mitigation of an impact, instead of as a necessary approval required for the project to be implemented.

Response 151.7

The commenter asserts that nighttime blasting and pile-driving will not be fully mitigated by proposed mitigation measures. The commenter suggests inclusion of a mitigation measure that prohibits nighttime blasting and pile driving.

Please refer to the following discussion from page 4.13-21 of the Draft EIR:

Impacts from general construction activities performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-1 because nighttime construction would be required to comply with the noise standards shown in Table 4.13-4 and also require a project specific noise analysis with detailed measures for reducing noise levels at noise sensitive receivers within 0.5 mile of the Rezoning Sites.

Impacts from construction using a pile driver performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-2 because nighttime pile driving would be required to comply with the noise standards shown in Table 4.13-4 and vibration standards for humans of 0.24 in/sec PPV and for structural damage of 0.4 in/sec PPV. A project specific noise and vibration analysis with detailed measures for reducing noise and vibration levels at sensitive receivers within 2.8 miles for noise and 160 feet for vibration.

Impacts from construction using a breaker performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-3 because nighttime breaker activities would be required to comply with the noise standards shown in Table 4.13-4 and also require a project specific noise analysis with detailed measures for reducing breaker noise levels at noise sensitive receivers within 0.5 mile of the Rezoning Sites.

Impacts from construction conducting blasting performed between 10 p.m. to 7 a.m. would be less than significant with implementation of Mitigation Measure NOI-4 because nighttime blasting would be required to comply with the noise standards shown in Table 4.13-4 and vibration standards for humans of 0.24 in/sec PPV and for structural damage of 0.4 in/sec PPV. A project specific noise and vibration analysis with detailed measures for reducing noise and vibration levels at sensitive receivers within 0.25 mile.

As described therein, impacts related to nighttime construction, including blasting and pile-driving, would be reduced to less than significant with adherence to Mitigation Measures NOI-1, NOI-2, NOI-3, and NOI-4. Therefore, additional mitigation is not required.

Response 151.8

The commenter requests that Table 4.15-6 be modified to include actual current school district enrollment numbers.

The most recent enrollment data was used in the Draft EIR, based on information available on July 2022 (please refer to Section 7, References, of the Draft EIR. It is not anticipated that enrollment numbers have changed substantially since July 2022 such that the conclusions of the Draft EIR are invalid.

Response 151.9

The commenter asserts that a conflict with General Plan Objective CT-4.1 and Policies CT-4.2 and CT-4.3 exists, despite the fact that traffic congestion is no longer required under CEQA. The commenter asserts that traffic congestion should be described in the EIR, and mitigation should be included.

Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Response 151.10

The commenter asserts that the Draft EIR does not provide an adequate analysis of growth inducing impacts, and should compare growth to projections in the General Plan. The commenter asserts that the use of Plan Bay Area or RHNA projections is inappropriate.

Please refer to Response 151.6 regarding the General Plan growth projections, which do not provide estimates beyond 2020.

Response 151.11

The commenter asserts that not all Rezoning Sites are located in Urban Service Areas, and most sites are located within Urban Growth Boundaries that are outside of Urban Service Areas. The commenter asserts that water and sewer extensions would result in additional growth.

Please refer to Figures 2-3 through 2-14 on pages 2-11 through 2-22 of the Draft EIR. As shown therein, each of the rezoning Sites and Other Inventory Sites are within existing Urban Service Area boundaries (grey shading), including sites that are also within Urban Growth Boundaries (dotted overlay).

As stated on page 5-2 of the Draft EIR, infrastructure upgrades “would be sized to specifically serve the individual project and site.” New infrastructure would not provide capacity for unconnected parcels to connect to the extended water and sewer infrastructure; therefore, necessary infrastructure upgrades to serve individual projects would not induce additional growth.

EIR Public Comment 152

COMMENTER: Alanna Spencer

DATE: February 12, 2023

Response 152.1

The commenter expresses concerns regarding water, sewage, accessibility to transportation, road quality, public services including police and shopping, traffic, and evacuation routes. The commenter states that conditions on Mirabel Road are dangerous due to degraded road surface which poses a threat to bicyclists and pedestrians.

Please refer to Master Response UTIL. In addition, please refer to Section 4.18, *Utilities and Services Systems*, of the Draft EIR. As stated on page 4.18-14, each wastewater service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide wastewater service to the Rezoning Sites. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. Please refer to Master Response EMG regarding evacuation routes. Please refer to pages 4.15-12 and 4.15-13, of the Draft EIR regarding police services. Please refer to Master Response TRA regarding traffic, and Response 132.1 regarding road conditions on Mirabel Road.

EIR Public Comment 153

COMMENTER: Ann Dexheimer

DATE: February 12, 2023

Response 153.1

The commenter expresses concerns regarding traffic, pedestrian safety, a sharp road curve and lack of sidewalks adjacent to rezoning sites FOR-5 and FOR-6. The commenter questions why Sebastopol and Windsor were not included in the list of rezoning sites.

Refer to Master Response EXST regarding the street widths and existing traffic safety conditions. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County width requirements. Please refer to Master Response TRA regarding traffic impacts.

In addition, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety; therefore, consistency with County policies on traffic safety would ensure the project would not substantially increase hazards due to design features.

Please refer to Master Response SITE regarding the site selection process, and Response 6.8 regarding why sites are required to be in the unincorporated County.

Response 153.2

The commenter expresses concerns regarding transportation and states that traffic would increase on the Forestville section of 116, a State Scenic Highway.

Please refer to Master Response TRA regarding traffic impacts. Please refer to section 4.1 *Aesthetics* in the Draft EIR. As stated therein impacts to State Scenic Highways, including Highway 116, could be significant and there are no feasible mitigation measures to reduce this potential impact.

Response 153.3

The commenter expresses concerns regarding the availability of shopping services and fire services. The commenter asks how fire services will be impacted, and fire or flood evacuation routes will be managed if there is an increase in population.

Please see Master Response EXST regarding existing conditions. Resident proximity to grocery stores is an existing condition of the area and not caused by the proposed project. As shown in Table 2-6 of the Draft EIR, sites FOR-5 and FOR-6 are within a designated Urban Service Area. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations.

Please see pages 4.15-10 and 4.15-11 of the Draft EIR regarding fire services. While the project would generate additional demand, it would not substantially reduce existing response times or require the construction of new or altered fire stations and development facilitated by the project on Rezoning Sites would be required to comply with existing regulations regarding fire safety. Please see Master Response EMG regarding evacuation routes.

Response 153.4

The commenter states that Forestville no longer has a high school and that parents would need to drive on the 116 to take their children to Sebastopol.

This comment has been noted. Please refer to Master Response TRA regarding traffic impacts.

Response 153.5

The commenter expresses concern regarding limited employment opportunities in Forestville and states that residents will be required to drive outside the local area to work. The commenter states that the pictures on page 128 of FOR-5 and FOR-6 appear to be incorrect.

As mentioned in response 153.3, sites FOR-5 and FOR-6 are within a designated Urban Service Area. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations.

Figure 4.1-15 and Figure 4.1-16 on page 4.1-19 of the Draft EIR were mis-labeled in the Draft EIR. Figure 4.1-15 shows Site FOR-6 from Forestville Street looking southwest, and Figure 4.1-16 shows Site FOR-5 from Forestville Street looking northwest. For clarification, Figure 4.1-15 and Figure 4.1-16 have been replaced with the following photographs of Sites FOR-5 and FOR-6, which were taken on April 21, 2023:

Figure 4.1-15 FOR-5 from Packing House Road Looking Southeast



Figure 4.1-16 FOR-6 from Forestville Street Looking Southwest



The intent of these figure revisions is to correct the previous figure labeling error of Sites FOR-5 and FOR-6. No analysis in the Draft EIR is affected by this revision, and no additional revisions are warranted.

EIR Public Comment 154

COMMENTER: Arlene Irizary

DATE: February 12, 2023

Response 154.1

The commenter opposes the rezoning of site FOR-4 and expresses concerns regarding the access road, emergency evacuation routes, and construction vehicle access. The commenter questions what infrastructure will be available regarding water, sewer, gas, and electric and questions what the costs associated with infrastructure improvements will be.

The commenter's opposition of the rezoning of site FOR-4 is noted and will be passed on to decision-makers for review. Please refer to Master Response EMG regarding evacuation routes. Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR regarding public services including police services and Master Response TRA regarding traffic.

Please refer to Section 4.18, *Utilities and Service Systems*, in the Draft EIR, and Master Response UTIL. As stated therein, impacts to electricity and wastewater would be less than significant. Impacts related to water supply would be less than significant for all sites except GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4 because these sites are not currently adjacent to water supply infrastructure. For these sites, mitigation measure UTIL-1, as described on page 4.18-17 of the Draft EIR, would be required. This mitigation measure would ensure that future development proposed on the aforementioned sites would be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy.

Water and sewer districts charge connection fees and monthly usage fees, which are intended to cover the necessary improvements needed to serve a project site. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects (such as the cost of development) of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes costs associated with utilities.

EIR Public Comment 155

COMMENTER: Arlene Irizary

DATE: February 12, 2023

Response 155.1

The commenter opposes the rezoning of site FOR-1 and expresses concern regarding toxic hazards. The commenter questions the cost of conducting assessments and remediation of hazards on the site before development and questions how it will be funded. The commenter requests the removal of rezoning site FOR-1 from the project.

This comment is noted. Please refer to Section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR for a detailed analysis pertaining to potential hazards and proposed mitigation measures. The EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. As discussed therein, compliance with all applicable regulations relating to site remediation would minimize impacts to development at Rezoning Site FOR-1 to a less than significant level.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, including costs associated with hazards assessments and remediation.

EIR Public Comment 156

COMMENTER: Brice Dunwoodie

DATE: February 12, 2023

Response 156.1

The commenter states their support of expanding affordable housing in a manner that is proportional to current population growth. The commenter expresses concern regarding the distribution of new housing units across Sonoma County and Unincorporated Sonoma. The commenter questions why the current allocations have not been further challenged by the County.

This comment is noted. Because it is not related to the Draft EIR or environmental analysis, it will be passed on to decision-makers.

Response 156.2

The commenter states that the proposed expansion in Guerneville is approximately a 40% population increase, the proposed expansion in Graton is approximately a 70% increase in population, and the proposed expansion in Forestville is approximately a 110% population increase. The commenter questions how the new housing unit allocations were determined, and which agencies or individuals are responsible for approving the housing allocations.

Please refer to Master Response SITE for a description of the site selection process.

Response 156.3

The commenter questions how the Guerneville sites were selected, which criteria was used, who was responsible for the approval of the site selection, and if Sonoma County acquires prior approval from site owners before including privately owned sites in the Housing Element. The commenter states that they have seen a letter opposing the inclusion of site GUE-1 and questions if the site will be included or removed from the Housing Element.

Please refer to Master Response SITE for a description of the site selection process. Additionally, please refer to Master Response HE.

EIR Public Comment 157

COMMENTER: Celeste Johansson

DATE: February 12, 2023

Response 157.1

The commenter states that they are a resident of Forestville and expresses concerns regarding public transportation, road infrastructure and hazards, traffic, and emergency evacuation routes during fires and floods in the area.

Please refer to Master Response EXST regarding existing infrastructure and site conditions, and Master Response EMG regarding emergency services and evacuation. Additionally, please refer to Master Response TRA regarding traffic impacts. Regarding public transportation, please see page 4.16-15 of the Draft EIR. As stated therein impacts to public transportation would be less than significant. Furthermore, construction hazards are discussed in the Draft EIR on page 4.16-18. As stated therein, the project would not substantially increase hazards due to a design feature and impacts would be less than significant.

Response 157.2

The commenter states that the proposed Housing Element would disproportionately increase the population in Forestville compared to other towns in the County, and expresses concerns regarding fire and medical services and infrastructure.

Please refer to Master Response EMG regarding emergency services. Please refer to Master Response UTIL regarding utility infrastructure and Master Response EXST regarding existing site conditions.

Response 157.3

The commenter expresses concerns regarding potential toxic hazards on the proposed rezoning sites. The commenter questions which standards will be followed to mitigate any potential hazards in the soil on the proposed rezoning sites and questions if any exemptions will be issued that would allow potentially hazardous materials to remain on the rezoning sites.

Please refer to Section 4.9, *Hazards and Hazardous Materials*, in the Draft EIR. As stated therein impacts related to hazardous materials would be less than significant with adherence to applicable regulations such as the California Health and Safety Code. For a full list of applicable regulations that the project would be required to comply with to reduce impacts to less than significant, please refer to the Regulatory Setting on page 4.9-4 of the Draft EIR.

EIR Public Comment 158

COMMENTER: Grace Knight

DATE: February 12, 2023

Response 158.1

The commenter requests the removal of rezoning sites GLE-1 and GLE-2 from the Housing Element. The commenter states that the rezoning of the unincorporated community of Glen Ellen would result in the removal of five dwelling units and trees. The commenter expresses concerns about high-density housing, and suggests it should occur near more employment opportunities and public transit. The commenter states the opinion that development facilitated by the Housing Element would be destructive to the community.

This comment is noted and will be passed on to decision-makers.

Please refer to pages 4.14-9 and 4.14-10 of Section 4.10, *Population and Housing*, of the Draft EIR for information regarding displacement. As discussed therein, some of the Rezoning Sites contain existing housing or other structures that could be removed during project implementation. One of the fundamental goals of the project is to provide more housing development opportunities throughout the County and meet countywide housing inventory requirements. Thus, Mitigation Measure PH-1 requires that replacement housing be made temporarily available for any displaced existing residents prior to the demolition of existing housing on any of the Rezoning Sites.

As stated in the EIR, such as under Impact AES-3, the project may result in the removal of existing, mature trees. Trees to be removed have not yet been identified because individual projects have not been developed yet. This impact is analyzed in Section 4.1, *Aesthetics*, and under Impact BIO-5 in Section 4.4, *Biological Resources*. As stated therein, “[d]evelopment facilitated by the project would be subject to the County's ordinances and requirements protecting biological resources, such as trees... Trees to be removed have not yet been identified because individual projects have not been developed yet; however, development facilitated by the project on Rezoning Sites would potentially require some tree removal, which would be determined during the project’s application process.” However, development would be required to comply with goals, policies, and measures in the General Plan, including those for applications for tree removal permits and compliance with associated requirements (e.g., tree replacement), where applicable. Therefore, impacts would be less than significant.

As stated in Response 70.12, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Section 4.16 of the Draft EIR states that none of the Rezoning Sites are within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor, which includes the Glen Ellen sites. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Commercial businesses, which require employees to function, do exist in the community of Glen Ellen.

EIR Public Comment 159

COMMENTER: Jean Reggio

DATE: February 12, 2023

Response 159.1

The commenter opposes the rezoning of sites GLE-1 and GLE-2. The commenter expresses concern regarding parking, transportation, employment opportunities, and cumulative development including the Sonoma Developmental Center and a proposed hotel.

This comment is noted and will be passed on to decision-makers. Please note that parking is not considered an environmental impact and is not required to be analyzed under CEQA.

As stated in Response 70.12, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Section 4.16 of the Draft EIR states that none of the Rezoning Sites are within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor, which includes the Glen Ellen sites. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Commercial businesses, which require employees to function, do exist in the community of Glen Ellen.

Please refer to Response 70.6 regarding cumulative development.

EIR Public Comment 160

COMMENTER: Joshua Peterson

DATE: February 12, 2023

Response 160.1

The commenter opposes the rezoning of site GE-1 and expresses concerns regarding infrastructure and traffic on nearby one-lane roads.

This comment is noted. Please refer to Master Response UTIL regarding infrastructure and Master Response TRA regarding traffic impacts, and Master Response EXST regarding existing one-lane roads.

Response 160.2

The commenter expresses concerns regarding the potential removal of trees on site GE-1.

Please refer to Section 4.4, *Biological Resources*, in the Draft EIR. As discussed therein, development facilitated by the project on Rezoning Sites would be required to comply with the Sonoma County Tree Protection Ordinance and Article 67 of the Sonoma County Zoning Code to protect oak woodland habitats. Adherence with these requirements would reduce impacts to be less than significant.

Response 160.3

The commenter expresses concerns regarding water, electricity, and wastewater and states that the neighborhood was subject to power outages during recent storms.

Please refer to Section 4.18, *Utilities and Service Systems*, in the Draft EIR. As stated therein, impacts to electricity would be less than significant. Refer to Master Response UTIL regarding water and wastewater impacts. For GUE-1, mitigation measure UTIL-1, as described on page 4.18-17 of the Draft EIR, would be required. This mitigation measure would ensure that future development proposed would be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy.

Response 160.4

The commenter states the opinion that there are other underutilized parcels that would be more appropriate for affordable housing.

This comment is noted and will be passed on to decision-makers.

EIR Public Comment 161

COMMENTER: Ken Smith

DATE: February 12, 2023

Response 161.1

The commenter expresses concern regarding emergency evacuation during fire on Highway 116 and River Road. The commenter expresses support for lower density zoning and low and very low density housing in Forestville.

This comment is noted. Please refer to Master Response EMG regarding emergency services and evacuation and Master Response HE regarding expressions of support or dissatisfaction with the Housing Element.

EIR Public Comment 162

COMMENTER: Laura Hanson

DATE: February 12, 2023

Response 162.1

The commenter opposes the proposed rezoning sites in Forestville. The commenter expresses concern regarding resources, traffic, water, and solid waste services. The commenter questions the need for housing in Forestville when there are new apartment complexes in Santa Rosa.

This comment is noted. Please refer to Master Response TRA regarding traffic congestion. Please refer to comment 160.3 regarding water supply impacts. As discussed on page 4.18-17 of the Draft EIR, impacts related to solid waste would be less than significant. Refer to Response 6.8 regarding housing in incorporated areas, including Santa Rosa.

EIR Public Comment 163

COMMENTER: Louis Hughes

DATE: February 12, 2023

Response 163.1

The commenter opposes proposed development in Forestville. The commenter expresses concerns regarding traffic on Highway 166, public services, and pedestrian facilities. The commenter states the opinion that multi-unit housing is more suited for urban areas.

This comment is noted. Please refer to Master Response TRA regarding traffic impacts. Regarding pedestrian facilities, please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level. Refer to Master Response TRA regarding traffic congestion. Refer to Response 6.8 regarding urban areas of the County that may be more suitable for housing.

EIR Public Comment 164

COMMENTER: MaryAnne Gustafson

DATE: February 12, 2023

Response 164.1

The commenter expresses concerns about floods, earthquake, and fire in Guerneville. The commenter states that three rezoning sites are inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element Policies. The commenter states the opinion that there are areas downtown that are more suitable for rezoning and requests that the comment period is extended.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response EXST regarding existing conditions and SITE regarding the site selection process. Table 4.19-2 of the EIR identifies the Guerneville sites as in a Moderate Fire Hazard Severity Zone. The commenter does not specify the three sites in question, but the three sites closest to the indicated address in the comment letter are sites GUE-2, GUE-3, and GUE-4. As shown in Figures 4.10-4 (as revised) and 4.10-5, GUE-3 and GUE-4 are partially within the 100-year floodplain, while GUE-2 is outside of FEMA-designated floodplains. As acknowledged in Section 4.7, *Geology and Soils*, Sonoma County is subject to risks associated with potentially destructive earthquakes, and as stated on page 4.7-3 of the EIR, GUE-3 and GUE-4 contain soils with high or very high liquefaction levels. As addressed on page 4.7-26 of the EIR, compliance with mandatory California Building Code requirements, implementation of General Plan goals and policies, and compliance with applicable laws and regulations would reduce impacts related to liquefaction to a less-than-significant level. As stated in Table 4.19-2 in the EIR, GUE-1 through GUE-4 are located in a Moderate Fire Hazard Severity Zone, and is greater than two miles from the nearest Very High Fire Hazard Severity Zone. Refer to Section 4.19, *Wildfire*, for analysis relating to Wildfire; as stated in Impact WFR-2, “[w]ith implementation of Mitigation Measures WFR-1, WFR-2, and WFR-3, the risk of loss of structures and the risk of injury or death due to wildfires would be reduced. These measures would make structures more fire resistant and less vulnerable to loss in the event of a wildfire. These measures would also reduce the potential for construction to inadvertently ignite a wildfire. However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation. Thus, this impact would remain significant and unavoidable.”

EIR Public Comment 165

COMMENTER: Kelly Joyce

DATE: February 12, 2023

Response 165.1

The commenter expresses concerns regarding the safety of pedestrians and bicyclists near rezoning sites FOR-3, FOR-5, and FOR-6. The commenter states that the area floods multiple times per year, is adjacent to water and wastewater facilities and a designated scenic highway. The commenter expresses concerns regarding fire services, nesting and foraging of wildlife and the potential to obstruct views from Conor Court.

Please refer to Master Response EXST regarding existing conditions on the rezone sites. Figure 4.10-4 on page 4.10-10 of the Draft EIR shows that none of the rezone sites in Forestville are within FEMA flood zones. Please refer to Section 4.1, *Aesthetics*, in the Draft EIR for a full discussion of impacts to scenic highways and the obstruction of views. Please refer to Master Response EMG regarding fire services and evacuations. Please refer to Section 4.4, *Biological Resources*, in the Draft EIR regarding nesting and foraging wildlife. As discussed therein, impacts to wildlife and nesting birds would be significant and mitigation measures BIO-1 through BIO-16 would be required to mitigate impacts to the extent feasible.

Response 165.2

The commenter states that the proposed population increase in Forestville is 43.6 percent. The commenter expresses concern regarding infrastructure and power outages.

Please refer to Master Response UTIL regarding utility services.

Response 165.3

The commenter states that a setback is required for water and wastewater.

This comment is noted. Restrictions on height, setbacks, and floor-area ratio, where appropriate, would follow the applicable zoning requirements outlined in the Sonoma County Zoning Code.

Response 165.4

The commenter expresses concern regarding views of the rezoning sites and nearby trees from Conor Court.

Please refer to Section 4.1, *Aesthetics*, in the Draft EIR for a full discussion of aesthetic impacts. As discussed therein, impacts to public views and scenic vistas would be significant and unavoidable.

Response 165.5

The commenter states that rezoning sites FOR-3, FOR-5, and FOR-6 are adjacent to a high fire severity zone and expresses concern regarding evacuation routes and emergency vehicle access on Packinghouse Road and Highway 116.

Please refer to Master Response EMG and Master Response FIRE.

Response 165.6

The commenter expresses concern regarding impact to community character and suggests the location would be suitable for a skate park, a dog park, and community garden.

This comment is noted and will be passed on to decision-makers.

Response 165.7

The commenter expresses concern regarding lighting impacts and views from Conor Court.

Please refer to response 165.4, above. Additionally, impacts related to light and glare are discussed on page 4.1-57 of the Draft EIR. As stated therein, impacts related to light and glare would be less than significant with the incorporation of mitigation measures AES-2 which would require development facilitated by the project on Rezoning Sites to comply with exterior lighting requirements.

Response 165.8

The commenter expresses concern wildlife corridors and states that they have seen bobcats, deer, owls, fox, coyotes, and birds.

Please refer to response 165.1, above.

Response 165.9

The commenter expresses concern regarding traffic, emergency evacuation, police services, pedestrian safety, and flooding on Highway 116. The commenter states that there are no sidewalks or bike lanes along Highway 116 or crosswalks to access the nearby elementary school.

Please refer to Master Response EMG regarding emergency evacuation. Please refer to Impact PS-2, beginning on page 4.15-12 of the Draft EIR, regarding impacts to police services. Please refer to Impact TRA-1, beginning on page 4.16-14 of the Draft EIR, regarding impacts to pedestrian facilities, and Impact TRA-2, on page 4.16-18 of the Draft EIR, regarding traffic safety impacts. Please refer to Master Response EXST regarding existing conditions. CEQA does not require projects to mitigate existing conditions or deficiencies.

EIR Public Comment 166

COMMENTER: Renee Tchirkine

DATE: February 12, 2023

Response 166.1

The commenter states an opinion that the rezoning of parcel FOR-2 is inappropriate and dangerous since Mirabel Road is a busy road with no room for sidewalks on either side. The commenter asks how the County will provide sidewalks and other ways to cross this road once development is in place.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response EXST regarding existing road conditions. Road improvements to meet County standards would be required for future projects where adequate site access does not exist.

Response 166.2

The commenter states that there is no high school, no major markets, care units, police force, or freeway access for at least 10 miles and expresses concern over the carbon footprint this project would create. The commenter asks why more of the high-density housing is not centered along the Highway 101 corridor where more major services, transit opportunities, safer roads, sewer, and police and medical are available. The commenter asks why more of the high-density housing is not centered along the Highway 101 corridor where more major services, transit opportunities, safer roads, sewer, and police and medical are available.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response EXST regarding existing conditions and Master Response SITE regarding the site selection process. As shown in Figure 2-6 of the Draft EIR, site FOR-2 is located within an Urban Service Area. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Refer to Master Response UTIL and Section 4.18, *Utilities and Service Systems*, regarding wastewater treatment and infrastructures. Refer to Section 4.15, *Public Services and Recreation*, regarding schools and public services.

As discussed in Section 4.8, *Greenhouse Gas Emissions*, beginning on page 4.8-17, GHG emissions generated during project operation would result primarily from energy usage in buildings and fuel consumption associated with light-duty vehicles. Although the County of Sonoma does not have a qualified GHG-reduction plan, there are some proposed Housing Element policies that would assist in reducing emissions. Specifically, Policy HE-3e would reduce GHG emissions through the encouragement of infill development, ultimately reducing VMT. Policies HE-3g and HE-5d would focus development in areas well-served by existing transit, which would also reduce GHG emissions by reducing VMT. Similarly, Policy HE-6f focuses on the provision of high-quality public transportation. Policies HE-6a and HE-6b would promote the conservation of energy and energy efficiency in both new and existing development, which would reduce GHG emissions by reducing overall energy usage.

Response 166.3

The commenter asks how the construction process for FOR-2 will be handled. The commenter expresses concern that during the summer months there are a lot of tourists on Mirabel Road and asks how they will be protected from traffic on Mirabel Road.

Refer to O-2.7 regarding traffic levels on Mirabel Road and refer to Master Response TRA regarding traffic impacts. Refer to Section 4.16, *Transportation*, of the EIR regarding pedestrian safety and construction traffic, which includes a requirement to implement Mitigation Measure TRA-2 by submitting a construction traffic management plan to mitigate impacts regarding construction traffic. With this mitigation, construction traffic impacts would be less than significant.

Response 166.4

The commenter expresses concern over the proposed population increase in Forestville and why this increase is so disproportional when compared to the increases proposed in other areas. The commenter expresses concern over the proposed population increase in Forestville and why this increase is so disproportional when compared to the increases proposed in other areas. The commenter suggests rezoning sites a subset of Forestville sites to provide Forestville's share of population increase.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response SITE regarding the site selection process.

Response 166.5

The commenter acknowledges the hard decisions ahead and asks that their concerns are listened to, reviewed and considered.

This comment is noted and will be passed on to decision-makers.

EIR Public Comment 167

COMMENTER: Robert Grandmaison

DATE: February 12, 2023

Response 167.1

The commenter opposes the rezoning of site GUE-1 and expresses support for the student housing for Santa Rosa Junior College.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 167.2

The commenter states that there is an error in the photograph depicting site GUE-1 and that the GUE-1 site on Sunset Avenue is occupied by water treatment facilities and an emergency generator.

River Road was used as the vantage point for evaluating the visual dominance associated with Site GUE-1. Please note that site photographs of GUE-1 were unable to be taken due to private road signage leading up to the property. An additional photograph of GUE-1 is available below, which shows Site GUE-1 from Sunset Avenue, facing northeast:



Source: Google Earth 2019

The characterization on page 4.1-11 of Site GUE-1 remains accurate:

GUE-1 is elevated but trees screen the site from the River Road and the Russian River beyond (southeast). Site sensitivity is moderate and the zoning includes the LG/116 (Highway 116 Scenic Corridor) Combining District; from River Road, the visual quality is low as roadwork, highway signage, and construction stockpiles are visible in the foreground, along with above-ground transmission lines disrupting any sense of intactness or visual unity. Despite the dense forestation in the middle ground

(Figure 4.1-4), the views lack vividness looking west from the roadway, for the same reasons. Development on the site would be dominant if significant numbers of trees were removed.

Regarding the existing wastewater treatment facilities and emergency generator, please refer to Master Response HE. As stated therein, a site on the list of Rezoning Sites does not guarantee that the site will or will not be developed.

Response 167.3

The commenter states that Guerneville is dependent upon the water supply and water treatment resources located at site GUE-1 and expresses concern that these issues are not adequately addressed in the EIR.

This comment is noted. Please refer to Master Response HE. As stated therein, a site on the list of Rezoning Sites does not guarantee that the site will or will not be developed.

Response 167.4

The commenter expresses concern regarding access to public transportation from site GUE-1 and the elevation gain required to access the site by walking. The commenter expresses concerns regarding ADA compliance and suggests that future residents may choose to drive into town which could increase traffic.

Please refer to pages 4.15-1 through 4.15-5 of the Draft EIR regarding access to public services and pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. Refer to Master Response EXST regarding transit availability. As stated under Impact TRA-1, “in compliance with the County of Sonoma’s General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.” This situation is an existing condition of the area and is not caused by the proposed project.

Response 167.5

The commenter states that there are narrow roads with adjacent steep hillsides along Sunset Avenue. The commenter states that when driving on Sunset, Morningside, Palo Alto, and Woodland, it often becomes necessary for downhill moving vehicles to reverse up the hill to allow for oncoming uphill moving vehicles to pass. The commenter expresses concern regarding emergency vehicle access, delivery truck access and emergency evacuation on narrow roads with potential future traffic increases.

Refer to Master Response EXST regarding existing narrow roads and transit availability. This situation is an existing condition of the area and is not caused by the proposed project. In addition, please refer to Master Response EMG for additional information pertaining to emergency evacuation.

Response 167.6

The commenter expresses concern regarding electric and telecommunication lines, and states that fallen tree limbs during storms and wind events often result in outages. The commenter notes that fallen tree limbs can also block roads.

This comment is not relevant to the environmental impact analysis presented for the proposed project. This comment is noted. Refer to Master Response EXST regarding existing power outages.

Response 167.7

The commenter restates their opposition to the rezoning of site GUE-1.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

EIR Public Comment 168

COMMENTER: Roger Peters

DATE: February 12, 2023

Response 168.1

The commenter questions why the EIR does not analyze cumulative impacts in detail for foreseeable known and pending projects. The commenter expresses confusion regarding if the EIR will be used for tiering.

Please refer to the explanation provided under subheading *Cumulative Development* on page 4-2 of the Draft EIR. As stated therein:

CEQA Guidelines Section 15130 provides the following direction relative to cumulative impact analysis and states that the following elements are necessary for an adequate discussion of environmental impacts:

A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

Therefore, the cumulative analysis approach in the Draft EIR is appropriate for the housing element program, and individual cumulative development projects need not be identified.

The Program EIR's approach to cumulative impact analysis is further described on page 4-2. As stated therein:

...the transportation analysis considers the overall change in vehicle miles travelled (VMT) due to implementing several reasonably foreseeable development projects that would add to the Housing Element buildout. As such, the analysis in this EIR considers the cumulative impacts in the County from implementation of the Housing Element in its transportation analysis at the same time it considers the project level analysis because they are essentially one and the same. These cumulative VMT calculations are accounted for in the air quality, energy, greenhouse gas emissions, and noise analyses; therefore, these analyses would also be considered cumulative. Other impacts, such as geology and soils and cultural resources, are site specific and would not result in an overall cumulative impact from growth outside of the County.

Please refer to Section 1.2, beginning on page 1-1 of the Draft EIR, regarding tiering opportunities from the EIR. As stated therein, the EIR would allow for CEQA tiering of future projects.

Response 168.2

The commenter notes that the Draft EIR transportation analysis uses the July 2020 SCTA travel demand model, and questions its appropriateness. The commenter asks why a list of approved, known, or reasonably foreseeable projects was not discussed. The commenter mentions the SDC and Hanna Boys projects. The commenter asks if the SCTA model includes the SDC Specific Plan and Hanna Boys Project.

Please refer to Master Response TRA and Appendix TRA to the Draft EIR regarding traffic congestion/LOS impacts. Please refer to Response 168.1 regarding the absence of a cumulative project list.

No application has been submitted for the Hanna Boys Project and the SDC Specific Plan was adopted after publication of the EIR; therefore, neither are included in the SCTA model. Refer also to Response 70.6 regarding the Sonoma Developmental Center and cumulative analysis.

The July 2020 SCTA model was the most recent model at the time the traffic modeling was completed.

Response 168.3

The commenter questions why a segment LOS analysis was not conducted for sites SON-1, SON-2, and SON-3 relative to the impacts of SDC and Hanna Boys Center on Arnold Drive.

Please refer to Master Response TRA regarding the traffic congestion analysis. Please also refer to Appendix TRA regarding the informational-only LOS analysis. As stated therein, a congestion analysis was conducted for only select intersections, not for every intersection in the vicinity of every Rezoning Site. Intersection 20 (Broadway/SR-12 and Leveroni Road-Napa Road) is the intersection nearest the SON sites that was studied.

Refer to Response 70.6 and Response 168.2 regarding the Sonoma Developmental Center and Hanna Boys Center developments.

Response 168.4

The commenter questions if the SDC and Hanna Boys Center projects were included in the cumulative analysis of population and housing.

Refer to Response 70.6 and Response 168.2 regarding the Sonoma Developmental Center and Hanna Boys Center developments and cumulative impact analysis approach.

Response 168.5

The commenter questions if the SDC and Hanna Boys Center projects were included in the cumulative analysis of wastewater treatment capacity and questions if there is adequate capacity to serve cumulative projects through 2040.

Refer to Response 70.6 and Response 168.2 regarding the Sonoma Developmental Center and Hanna Boys Center developments and cumulative impact analysis approach.

Wastewater capacity was addressed in Section 4.18, *Utilities and Service Systems*, of the Draft EIR, as well as in Appendix WSS, including capacities associated with future development on the SON sites. Information from the Sonoma Valley County Sanitation District (SVCS) can be found on page 22, which includes information on future capital projects to address capacity issues. As noted, future development would require hydraulic analysis to verify adequate capacity exists.

Response 168.6

The commenter questions if the EIR analysis assessed a change in VMT near sites PET-1 through PET-4 based on the elimination of the Bodega Market site proposed for housing.

The VMT analysis did not consider the elimination of the Bodega Market, as rezoning the site would not preclude the Market from continuing to operate as under existing conditions. Existing VMT generated by existing uses was not subtracted from the model, only new potential uses were added to the model to evaluate the VMT impacts. This provides a conservative approach.

OPR's Technical Advisory on Evaluation Transportation Impacts in CEQA states: "OPR recommends analyzing each use separately, or simply focusing analysis on the dominant use".⁷ Therefore, Appendix TRA evaluated the dominant VMT elements, which encompassed the residential uses that would be allowed by the proposed rezoning. The Bodega Market is not considered a dominant VMT element.

Response 168.7

The commenter questions why no intersection analysis was specifically included in the EIR for the Bodega Avenue and Cleveland Lane intersection. The commenter states that it seems more likely for traffic to sites PET-1 and PET-2 to use Cleveland Lane than Paula Lane.

Please refer to Master Response TRA regarding the traffic congestion analysis. Please also refer to Appendix TRA regarding the informational-only LOS analysis. As stated therein, a congestion analysis was conducted for only select intersections, not for every intersection in the vicinity of ever Rezoning Site. Intersection 19 (Bodega Avenue and Paula Lane) is the intersection nearest the PET sites that was studied. Please refer to Figure 2-12 on page 2-20 of the Draft EIR. As shown therein, Bodega Avenue and Paula Lane is the intersection nearest to all four PET sites. Please refer to Attachment B to Appendix TRA, where traffic volume figures are provided at this intersection.

⁷ https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

EIR Public Comment 169

COMMENTER: Ron Redmon

DATE: February 12, 2023

Response 169.1

The commenter states that they are living in Santa Rosa and expresses appreciation for the efforts to provide more affordable housing in Sonoma County.

This comment has been noted.

Response 169.2

The commenter expresses concerns regarding traffic near site GUE-2 that they are living in Santa Rosa and expresses appreciation for the efforts to provide more affordable housing in Sonoma County.

This comment has been noted. Please refer to Master Response TRA regarding traffic congestion.

Response 169.3

The commenter expresses concerns regarding safety, emergency access, and evacuation routes during a fire or earthquake. Specifically, the commenter states that there is a one-lane road leading to the proposed site.

This comment has been noted. Please refer to Master Responses EMG and FIRE regarding emergency evacuation, emergency access, and wildfire emergency evacuation.

Response 169.4

The commenter offers to provide alternative rezoning sites and states that there are safer options citing Fife Creek Apartments as an example.

This comment has been noted and passed onto decision-makers. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response SITE for additional information on the Rezoning Site selection process.

EIR Public Comment 170

COMMENTER: Sachiko Williams

DATE: February 12, 2023

Response 170.1

The commenter expresses concern regarding historic buildings, visual character, and vegetation and trees at sites GE-1 and GE-2.

Please refer to Section 4.1, *Aesthetics*, for information regarding the proposed project's potential impacts to visual character. As stated therein, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings, and the EIR acknowledges the significant and unavoidable impacts that may occur.

Please refer to Section 4.5, *Cultural Resources*, for additional information on potential impacts to historic resources. As stated therein, should a future project result in the demolition or substantial alteration of a historical resource, it would have the potential to materially impair the resource. Therefore, even with mitigation such, impacts may not be reduced to a less than significant level, and the impact would remain significant and unavoidable.

In regard to the commenters' concerns about trees, please refer to Section 4.4, *Biological Resources*, of the Draft EIR. Under Impact BIO-1 starting on page 4.4-28, it is stated that projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal, and a project-specific biological assessment would be required through the implementation of Mitigation Measure BIO-1. Additional mitigation measures would then be required based on the result of the project-specific biological analysis and may include one or more of the additional mitigation measures (Mitigation Measure BIO-2 through Mitigation Measure BIO-12) to reduce impacts to a less than significant level. In addition, as discussed on page 4.4-39, the Sonoma County Zoning Code Chapter 26D and Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, provides for the protection of heritage and landmark trees. Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides protection for oak woodland habitats. Compliance with these ordinances would reduce impacts to either oak species to a less than significant level.

EIR Public Comment 171

COMMENTER: Sally Olsen

DATE: February 12, 2023

Response 171.1

The commenter expresses concern regarding water and wastewater services, traffic, and emergency evacuation near the site on Nolan Road (FOR-2).

This comment has been noted. Please refer to Master Response UTIL regarding water and wastewater services. Please refer to Master Response TRA regarding potential traffic impacts. Please refer to Master Response EMG regarding emergency access and emergency evacuation.

EIR Public Comment 172

COMMENTER: Soichiro Takahashi

DATE: February 12, 2023

Response 172.1

The commenter expresses opposition to the proposed rezoning sites in downtown Forestville and expresses opposition to the development of public services nearby. The commenter makes the suggestion to concentrate more housing in downtown Santa Rosa due to the proximity and accessibility to employment opportunities.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites, and refer to Master Response SITE regarding the Rezoning Site selection process and criteria. This comment has been noted and passed onto decision-makers. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements. For additional information regarding impacts to schools and law enforcement, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR.

EIR Public Comment 173

COMMENTER: Tara Underly

DATE: February 12, 2023

Response 173.1

The commenter expresses concerns regarding water and wastewater services and roads near the proposed rezoning site on Nolan Road.

Please refer to Master Response UTIL regarding water and wastewater services, and Master Response TRA regarding roads to serve the project.

EIR Public Comment 174

COMMENTER: Vesta Copestakes

DATE: February 11, 2023

Response 174.1

The commenter welcomes affordable housing and specifies sites FOR-1, FOR-3, FOR-5, and FOR-6 as positive assets.

This comment has been noted and passed onto decision-makers.

Response 174.2

The commenter expresses concerns regarding road access, sidewalks, crosswalks, and emergency evacuation routes for sites FOR-2 and FOR-4.

Please refer to Master Response EXST regarding the existing conditions of roads. This situation is an existing condition of the area and is not caused by the proposed project.

Please refer to pages 4.15-1 through 4.15-5 of the Draft EIR regarding access to public services and pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. As stated under Impact TRA-1, “in compliance with the County of Sonoma’s General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.” This situation is an existing condition of the area and is not caused by the proposed project.

Please refer to Master Response EMG regarding emergency access and evacuation.

Response 174.3

The commenter discusses aspects of site FOR-7 including its proximity to a gas station, carwash, downtown and existing infrastructure.

FOR-7 is not a Rezoning Site; this comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Refer to Master Response TRA regarding traffic congestion. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes development cost.

Response 174.4

The commenter states that Rezoning Site FOR-1 is included in Alternatives 1 and 2, but is not included in Alternative 3. The commenter states that Rezoning Site FOR-1 is a prime location for senior housing. The commenter states that Rezoning Site FOR-1 has adequate infrastructure in the area. The commenter states that mitigating the impacts of the site’s previous use will be challenging.

As stated in Section 6.3, *Alternative 3: Fewer Rezoning Sites*, the alternative “analyzes the impacts of adding fewer Rezoning Sites to the County’s inventory of sites zoned for by-right housing development. Those sites with the most environmental constraints that would make developing sites more difficult, have greater environmental impacts, or would be more costly to develop have been removed from

Alternative 3... These six Rezoning Sites have greater than average environmental constraints compared to the other Rezoning Sites. In particular, these sites would require off-site infrastructure water and sewer improvements to serve future development.”

Please see Section 4.9, *Hazards and Hazardous Materials* regarding site-related hazard remediation. Sites with hazardous materials near the Rezoning Sites (including site FOR-1) are listed in Table 4.9-2. Development typically within 0.25 mile of sites identified in Table 4.9-2 would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. Compliance with existing State and local regulations regarding onsite hazards would reduce impacts to less than significant.

Response 174.5

The commenter states that Rezoning Sites FOR-3, FOR-5 and FOR-6 have access to the downtown area. The commenter states two of these sites are being considered for use as an Emergency Services Center. The commenter suggests that a skatepark should be developed at one of these sites.

This comment has been noted and will be passed on to decision-makers. This comment does not pertain to analysis in the Draft EIR.

Response 174.6

The commenter states that Forestville needs affordable housing for young families and low-wage workers. The commenter states that the location of future development is very important and that there are existing plans for sidewalks between Mirabel Road and Covey Road along Front Street/Hwy 116. The commenter states that infrastructure in this area is already being developed, and suggests that sites near these improvements are more affordable than sites farther away.

This comment has been noted and will be passed on to decision-makers. Please refer to Master Response EXST regarding the existing conditions of roads and infrastructure. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes development cost.

EIR Public Comment 175

COMMENTER: Vikki Miller

DATE: February 12, 2023

Response 175.1

The commenter states that they are following up from a previous comment submission and that some of their concerns were addressed in the EIR.

This comment has been noted. Please refer to EIR Public Comment Letters 125, 151, and 264 for responses to the commenter's additional concerns.

EIR Public Comment 176

COMMENTER: William McAfee

DATE: February 12, 2023

Response 176.1

The commenter expresses their opposition to the selection of sites GUE-1 through GUE-6.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 176.2

The commenter expresses concerns regarding narrow roads, water supply, and wastewater capacity.

Please refer to Master Response UTIL regarding water and wastewater concerns. Please refer to Master Response EXST regarding the existing conditions of roads. This situation is an existing condition of the area and is not caused by the proposed project. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes cost of upgrades.

Response 176.3

The commenter expresses concerns regarding the potential removal of Redwood and other trees, and community character.

In regard to the commenters' concerns about trees, please refer to Section 4.4, *Biological Resources*, of the Draft EIR. Under Impact BIO-1 starting on page 4.4-28, it is stated that projects that would result in ground disturbance through clearing/grading or vegetation trimming or removal, and a project-specific biological assessment would be required through the implementation of Mitigation Measure BIO-1. Additional mitigation measures would then be required based on the result of the project-specific biological analysis and may include one or more of the additional mitigation measures (Mitigation Measure BIO-2 through Mitigation Measure BIO-12) to reduce impacts to a less than significant level. In addition, as discussed on page 4.4-39, the Sonoma County Zoning Code Chapter 26D and Sonoma County Zoning Code Article 88, Section 26-88-010(m), *Tree Protection Ordinance*, provides for the protection of heritage and landmark trees. Article 67, *Valley Oak Habitat Combining District*, of the Sonoma County Zoning Code provides protection for oak woodland habitats. Compliance with these ordinances would reduce impacts to either oak species to a less than significant level.

Please refer to Section 4.1, *Aesthetics*, for information regarding the proposed project's potential impacts to visual character. As stated therein, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Response 176.4

The commenter states that their property borders sites GUE-1 and GUE-4 and expresses concerns regarding evacuation routes during wildfires and floods. The commenter expresses opposition to the rezoning of sites GUE-1 through GUE-6.

This comment has been noted. Please refer to Master Response EMG and FIRE regarding emergency response and emergency access. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR for detail pertaining to impacts of flooding induced by the proposed project. The EIR acknowledges GUE-4 is partially within a 100-year flood hazard area, but as described under Impact HWQ-4, increased flooding would not occur because of the project.

EIR Public Comment 177

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 177.1

The commenter expresses opposition to the proposed rezoning of the site located at 6555 Covey Road (FOR-1) in Forestville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 177.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Master Response UTIL regarding concerns about water and wastewater system impacts. In addition, please refer to Section 4.18, *Utilities and Service Systems*, of the Draft EIR. For information regarding traffic please refer to Section 4.16, *Transportation*, of the Draft EIR and Master Response TRA. For information regarding impacts to schools and law enforcement please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR; as stated therein, impacts regarding these impacts would be less than significant. Regarding evacuation, please refer to Master Response EMG.

Response 177.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

This comment has been noted. The commenter does not specify the health impacts they are referring to. For that reason, please refer to Section 4.3, *Air Quality*, or 4.13, *Noise*, for additional information pertaining to potential health impacts induced by the proposed project. Please refer to Section 4.15, *Public Services and Recreation*, for additional information regarding police and fire facilities. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

EIR Public Comment 178

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 178.1

The commenter expresses opposition to the proposed rezoning of the site located at 6898 Nolan Road (FOR-2) in Forestville. The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed. The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.1.

Response 178.2

Please refer to Response 177.2.

Response 178.3

Please refer to Response 177.3.

EIR Public Comment 179

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 179.1

The commenter expresses opposition to the proposed rezoning of the site located at 6250 Forestville Street (FOR-6) in Forestville.

Please refer to Response 177.1.

Response 179.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 179.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 180

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 180.1

The commenter expresses opposition to the proposed rezoning of the site located at 6475 Packing Housing Road (FOR-5) in Forestville.

Please refer to Response 177.1.

Response 180.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 180.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 181

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 181.1

The commenter expresses opposition to the proposed rezoning of the site located at 6090 Van Keppel Road (FOR-4) in Forestville.

Please refer to Response 177.1.

Response 181.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 181.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 182

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 182.1

The commenter expresses opposition to the proposed rezoning of the site located at 6220 Highway 116 (FOR-3) in Forestville.

Please refer to Response 177.1.

Response 182.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 182.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 183

COMMENTER: Aaron Dornstreich

DATE: February 13, 2023

Response 183.1

The commenter expresses opposition to the proposed rezoning of the site located at 6250 Forestville Street (FOR-6) in Forestville.

Please refer to Response 177.1.

Response 183.2

The commenter questions how water and wastewater will be provided, how existing road conditions will account for increased traffic, how new school-age residents will have access to schools, how law enforcement services will be provided to support an increase in population, and how evacuation routes will be safely managed.

Please refer to Response 177.2.

Response 183.3

The commenter expresses concerns regarding health and safety and restates their opposition for the rezoning sites in Forestville.

Please refer to Response 177.3.

EIR Public Comment 184

COMMENTER: Aaron Mason

DATE: February 13, 2023

Response 184.1

The commenter expresses support for medium density housing on all proposed Rezoning Sites in Forestville except FOR-4. The commenter gives some information about their connection to Forestville. The commenter expresses support for putting additional housing closer to urban and walkable areas.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 184.2

The commenter expresses support for Rezoning Sites FOR-1, FOR-3, FOR-5, and FOR-6. The commenter expresses support for Rezoning Site FOR-2 but notes it is slightly further from downtown but offers other amenities. The commenter expresses support for FOR-7.

As shown in Table 2-2 of the Draft EIR, FOR-7 is not a Rezoning Site. This comment has been noted and passed onto decision-makers. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 184.3

The commenter expresses opposition to Rezoning Site FOR-4. The commenter states that the site is located in single-family home area on the end of a dirt path. The commenter states that sidewalks, roads, and other infrastructure are needed to support development at this site. The commenter expresses concerns regarding safety. The commenter states that FOR-4 is far from downtown and amenities would not be within a walkable distance.

Regarding the existing condition of the road, please refer to Master Response EXST. This situation is an existing condition of the area and is not caused by the proposed project.

Regarding the need for sidewalks, pedestrian safety, and access to the downtown, please refer to pages 4.15-1 through 4.15-5 of the Draft EIR regarding access to public services and pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. As stated under Impact TRA-1, "in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks."

EIR Public Comment 185

COMMENTER: Amber and Todd Gray

DATE: February 13, 2023

Response 185.1

The commenter expresses opposition to the potential population increase in Forestville. The commenter expresses concerns regarding existing infrastructure, sidewalks, sewer system, transportation options, road safety, and parking.

Please refer to Master Response UTIL for concerns regarding the existing sewer system. In regard to road safety, please refer to Section 4.16, *Transportation*, page 4.16-18 of the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to comply with General Plan policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Refer also to Master Response EXST regarding concerns regarding the current lack of sidewalks, existing sewer capacity, and current lack of public transportation.

Please refer to Section 4.16, *Transportation*, regarding existing transportation options. Please refer to pages 4.16-5 and 4.16-6 of the Draft EIR for information regarding public transportation. As stated under Impact TRA-1, “in compliance with the County of Sonoma’s General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.” This situation is an existing condition of the area and is not caused by the proposed project. Please note that parking is not an issue area required to be discussed under CEQA.

EIR Public Comment 186

COMMENTER: Anna Hayman

DATE: February 13, 2023

Response 186.1

The commenter states that the community surrounding Laughlin Road in Guerneville opposes the rezoning of GUE-2, GUE-3, and GUE-4.

Refer to Response 14.1.

Response 186.2

The commenter expresses concerns regarding utility availability and evacuation routes near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.2

Response 186.3

The commenter expresses concerns regarding water and sewer services near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.3

Response 186.4

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are within high fire hazard zones, floodplains, and earthquake risk areas and are zoned as subject to high susceptibility to liquefaction. The commenter states that building in high fire zones and floodplains is contrary to the County General Plan.

Refer to Response 14.4.

Response 186.5

The commenter expresses concerns regarding scenic resources and the potential removal of Redwood and Oak trees.

Refer to Response 14.5.

Response 186.6

The commenter states that Rezoning Sites GUE-2, GUE-3, and GUE-4 are inconsistent with the goals of the County General Plan, Bay Area 2050, Housing Element Policy.

Refer to Response 14.6.

Response 186.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 187

COMMENTER: Anne Kushner

DATE: February 13, 2023

Response 187.1

The commenter expresses opposition to the two Rezoning Sites in Glen Ellen (GLE-1 and GLE-2).

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 187.2

The commenter expresses opposition to the proposed density at each site. The commenter expresses concerns regarding tree removal. The commenter expresses concerns regarding existing infrastructure and services in the area, stating that Glen Ellen does not have a robust downtown to support this level of development. The commenter states concerns regarding the analysis of cumulative projects regarding the Sonoma Developmental Center, development on the north side of Carquinez, and the Hanna Boys Center. The commenter states that the area has poor traffic and planning and expresses concerns regarding consistency with Glen Ellen Development Guidelines and cumulative development.

County Code Section 26-75-050(1) state that workforce housing projects shall have a minimum density of 16 units per acre and a maximum density of 24 units per acre. As shown in Table 2-4, this corresponds to a maximum development of the Glen Ellen sites of 20 total units (18 units on GLE-1 and 2 units on GLE-2). GLE-1 is 0.73 acres in size, and GLE-2 is 0.12 acres in size, for a total of 0.85 acres. This corresponds to a combined minimum unit requirement of 13.6 (0.85 acres multiplied by 16 units per acre) with application of the WH combining district.

Please refer to Section 6.4, beginning on page 6-16 of the Draft EIR. As stated therein:

The County considered a lower density alternative, but this would not achieve project objectives because lower densities would not meet the County's 6th cycle RHNA requirements due to the limitations of finding additional sites that could support residential uses. Therefore, this alternative was rejected.

As stated in Response 70.23, the potential for tree removal is acknowledged on page 4.4-40 of the Draft EIR; however, compliance with County-required policies related to heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) is determined to be adequate to reduce impacts to less than significant.

As stated in Response 70.12, Sites GLE-1 and GLE-2 are within a designated Urban Service Area. Page 4.6-10 of the Draft EIR states that Rezoning Sites located in existing Urban Service Areas ensures that new residences are proximate to commercial, retail, and employment destinations. Commercial businesses, which require employees to function, do exist in the community of Glen Ellen. Please refer to Response 70.22 regarding adherence of future projects to the Glen Ellen Development and Design Guidelines.

Cumulative development analysis is described beginning on page 4-2 of the Draft EIR. As stated therein, cumulative impacts were evaluated at a programmatic level, and specific individual projects were not identified as part of this analysis. Refer to Response 70.6 for specifics regarding consideration of the Sonoma Developmental Center.

EIR Public Comment 188

COMMENTER: Aram Sarkissian

DATE: February 13, 2023

Response 188.1

The commenter expresses opposition to the Rezoning Sites in Forestville. The commenter expresses concerns regarding the potential increase in population, traffic, safety, and overall quality of life. The commenter states that the following comments pertain to Rezoning Site FOR-2.

This comment is noted. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Impact PH-1, beginning on page 4.14-6 of the Draft EIR, addresses potential impacts related to unplanned population growth. As described therein, this impact would be less than significant.

Please refer to Master Response EXST regarding existing conditions. Please refer to Master Response TRA regarding traffic congestion. Please refer to Impact TRA-2, beginning on page 4.16-18 of the Draft EIR, regarding traffic safety impacts associated with development facilitated by the proposed project on Rezoning Sites.

Response 188.2

The commenter states that Mirabel Road is very busy and expresses concerns regarding traffic. The commenter asks how the County plans to facilitate safe flow of traffic.

Please refer to Master Response TRA regarding traffic congestion. Please refer to Master Response EXST regarding existing conditions. Please refer to Impact TRA-2, beginning on page 4.16-18 of the Draft EIR, regarding traffic safety impacts associated with development facilitated by the proposed project on Rezoning Sites.

Response 188.3

The commenter asks how the County plans to improve pedestrian safety in the area.

Please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 188.4

The commenter states that there is limited public transportation in Forestville. The commenter asks how the County plans to ensure the safety of pedestrians walking to the bus stops.

Please refer to Master Response EXST regarding existing conditions. Refer to Response 188.3 regarding pedestrian safety.

Response 188.5

The commenter asks how the County plans to improve transportation from Forestville to Santa Rosa and throughout the Russian River.

Refer to Section 4.16, *Transportation*, of the EIR for transportation analysis. Regarding the existing lack of public transportation, please refer to Master Response EXST as this is a current condition, not one caused by the project. As described under Impact TRA-1, the project would have a less than significant impact on public transportation. While outside the scope of CEQA, please refer to Appendix TRA of the Draft EIR for congestion effects at specific intersections near the Rezoning Sites for informational purposes. As described therein, no near-term congestion improvements would be necessary as a result of the project.

Response 188.6

The commenter asks what the County will do to improve the local elementary school to accommodate an increase in the number of students.

Impacts to schools are analyzed in Section 4.15, *Public Services and Recreation* under Impact PS-3. As stated therein, “development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County.” Based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Based on Table 4.15-6, Forestville Elementary may see an increase of 54 students. Applicants would pay school impact fees at the time building permits are issued, to be used by Sonoma County School Districts to mitigate impacts with long-term maintenance and operation of school facilities. This impact would be less than significant, as stated in the EIR.

Response 188.7

The commenter states that the existing sewer and water systems would need updates. The commenter asks what upgrades are planned. The commenter asks how the water district will accommodate the increase in population.

Please refer to Master Response UTIL regarding water and wastewater systems. As stated in Section 4.18, *Utilities and Service Systems*, on page 4.18-15 of the Draft EIR, “several of the Rezoning Sites are not adjacent to existing water or wastewater infrastructure and require further evaluation at the project level during the plan review and permit approval phase. Mitigation Measure UTIL-1 is required to reduce impacts related to water supply and wastewater system sufficiency.” This mitigation measure would ensure future development would be adequately served by providers, except for sites GEY-1 through GEY-4.

Response 188.8

The commenter states that Forestville does not have a police station and asks how the County plans on obtaining additional policing required for an increase in residents.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed therein, under Impact PS-2 on page 4.15-12, the proposed project will not require the development of additional police

facilities and police service ratios and response times will remain adequate. Thus, impacts to police service and facilities was determined to be less than significant.

Response 188.9

The commenter asks how the County plans to improve access to medical and social services.

This comment does not pertain to the environmental impact analysis presented in the Draft EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes access to medical and social services.

Response 188.10

The commenter states that it is inappropriate for communities in unincorporated Sonoma County to increase their population by 50 percent, and that Forestville is carrying a large portion of that increase.

Refer to Response 188.1 and Master Response HE.

EIR Public Comment 189

COMMENTER: Aram Sarkissian

DATE: February 13, 2023

Response 189.1

The commenter expresses opposition to the Rezoning Sites in Forestville. The commenter expresses concerns regarding the potential increase in population, traffic, safety, and overall quality of life. The commenter states that the following commenter pertains to Rezoning Site FOR-4.

Please refer to Response 188.1

Response 189.2

The commenter states that Van Keppel Road is narrow with many turns and expresses concerns regarding traffic. The commenter asks how the County plans to improve traffic safety.

Please refer to Response 188.2.

Response 189.3

The commenter asks how the County plans to facilitate the safe flow of traffic.

Please refer to Response 188.2.

Response 189.4

The commenter asks how the County plans to improve pedestrian safety in the area.

Please refer to Response 188.3

Response 189.5

The commenter states that there is limited public transportation in Forestville. The commenter asks how the County plans to ensure the safety of pedestrians walking to the bus stops.

Please refer to Response 188.4.

Response 189.6

The commenter asks how the County plans to improve transportation from Forestville to Santa Rosa and throughout the Russian River.

Please refer to Response 188.5.

Response 189.7

The commenter asks what the County will do to improve the local elementary school to accommodate an increase in the number of students.

Please refer to Response 188.6.

Response 189.8

The commenter states that the existing sewer and water systems would need updates. The commenter asks what upgrades are planned. The commenter asks how the water district will accommodate the increase in population.

Please refer to Response 188.7.

Response 189.9

The commenter states that Forestville does not have a police station and asks how the County plans on obtaining additional policing required for an increase in residents.

Please refer to Response 188.8.

Response 189.10

The commenter asks how the County plans to improve access to medical and social services.

Please refer to Response 188.9.

Response 189.11

The commenter states that it is inappropriate for communities in unincorporated Sonoma County to increase their population by 50 percent, and that Forestville is carrying a large portion of that increase.

Please refer to Response 188.10.

EIR Public Comment 190

COMMENTER: Aram Sarkissian

DATE: February 13, 2023

Response 190.1

The commenter expresses opposition to the Rezoning Sites in Forestville. The commenter expresses concerns regarding the potential increase in population, traffic, safety, and overall quality of life. The commenter states that the following commenter pertains to Rezoning Site FOR-5.

Please refer to Response 188.1

Response 190.2

The commenter states that Rezoning Site FOR-5 is a natural wetland and home to protected species. The commenter asks if the project intends to disregard environmental laws and asks when an environmental report will be done for the area.

Please refer to Section 4.4, *Biological Resources*, regarding protected species and wetlands. Please refer to Impact BIO-3 regarding jurisdictional, state, or federally protected wetlands. As discussed therein, because of the programmatic nature of the project, a precise, project-level analysis of the specific impacts associated with individual projects on potential wetlands is not possible at this time and site-specific analysis is needed to verify if wetlands are present. Development facilitated by the Housing Element Update would be subject to mitigation measures in the Draft EIR, including BIO-15 and BIO-16. Implementation of Mitigation Measures BIO-15 and BIO-16 would reduce potential impacts to federally or state-protected wetlands to less than significant levels by requiring a jurisdictional delineation be conducted on sites where wetlands are identified during implementation of Mitigation Measure BIO-1, and by requiring avoidance and minimization measures where jurisdictional features may be affected by development. Refer also to Appendix BIO, which has more information regarding biological resources, specifically the information pertaining to the Forestville Biological Study Area (BSA).

Response 190.3

The commenter asks how the County plans to facilitate the safe flow of traffic.

Please refer to Response 188.2.

Response 190.4

The commenter asks how the County plans to improve pedestrian safety in the area.

Please refer to Response 188.3

Response 190.5

The commenter states that there is limited public transportation in Forestville. The commenter asks how the County plans to ensure the safety of pedestrians walking to the bus stops.

Please refer to Response 188.3

Response 190.6

The commenter asks how the County plans to improve transportation from Forestville to Santa Rosa and throughout the Russian River.

Please refer to Response 188.5.

Response 190.7

The commenter asks what the County will do to improve the local elementary school to accommodate an increase in the number of students.

Please refer to Response 188.6.

Response 190.8

The commenter states that the existing sewer and water systems would need updates. The commenter asks what upgrades are planned. The commenter asks how the water district will accommodate the increase in population.

Please refer to Response 188.7.

Response 190.9

The commenter states that Forestville does not have a police station and asks how the County plans on obtaining additional policing required for an increase in residents.

Please refer to Response 188.8.

Response 190.10

The commenter asks how the County plans to improve access to medical and social services.

Please refer to Response 188.9.

Response 190.11

The commenter states that it is inappropriate for communities in unincorporated Sonoma County to increase their population by 50 percent, and that Forestville is carrying a large portion of that increase.

Please refer to Response 188.10.

EIR Public Comment 191

COMMENTER: Aram Sarkissian

DATE: February 13, 2023

Response 191.1

The commenter expresses opposition to the Rezoning Sites in Forestville. The commenter expresses concerns regarding the potential increase in population, traffic, safety, and overall quality of life. The commenter states that the following commenter pertains to Rezoning Site FOR-6.

Please refer to Response 188.1

Response 191.2

The commenter asks how the flow of traffic, bikes, and pedestrians will be accommodated. The commenter states there are few sidewalks, no traffic lights, no lit crosswalks, no bike lanes, and few sheriff patrols.

Please refer to Master Response EXST regarding existing conditions. Refer to Response 188.3 regarding pedestrian safety.

Response 191.3

The commenter asks how the County plans to facilitate the safe flow of traffic.

Please refer to Response 188.2.

Response 191.4

The commenter asks how the County plans to improve pedestrian safety in the area.

Refer to Response 188.3 regarding pedestrian safety.

Response 191.5

The commenter states that there is limited public transportation in Forestville. The commenter asks how the County plans to ensure the safety of pedestrians walking to the bus stops.

Refer to Response 188.3 regarding pedestrian safety.

Response 191.6

The commenter asks how the County plans to improve transportation from Forestville to Santa Rosa and throughout the Russian River.

Please refer to Response 188.5.

Response 191.7

The commenter asks what the County will do to improve the local elementary school to accommodate an increase in the number of students.

Refer to Response 188.6.

Response 191.8

The commenter states that the existing sewer and water systems would need updates. The commenter asks what upgrades are planned. The commenter asks how the water district will accommodate the increase in population.

Refer to response 188.7

Response 191.9

The commenter states that Forestville does not have a police station and asks how the County plans on obtaining additional policing required for an increase in residents.

Please refer to Response 188.8.

Response 191.10

The commenter asks how the County plans to improve access to medical and social services.

Please refer to Response 188.9.

Response 191.11

The commenter states that it is inappropriate for communities in unincorporated Sonoma County to increase their population by 50 percent, and that Forestville is carrying a large portion of that increase.

Please refer to Response 188.10.

EIR Public Comment 192

COMMENTER: Arch Zellick and Mary Neuberger

DATE: February 13, 2023

Response 192.1

The commenter states that they have many concerns regarding the plans to rezone parcels in Forestville. The commenter states that they live within 300 feet of a Rezoning Site but did not receive notification. The commenter states that their following comments are in regard to Rezoning Site FOR-4.

This comment has been noted. The commenter's concern regarding noticing has been forwarded to County staff.

Response 192.2

The commenter states that six sites have been identified in Forestville. The commenter notes that development of all of the proposed Rezoning Sites would constitute a 25 percent increase in population. The commenter states this is more than other areas in West County and that all others have a potential increase of up to 10 percent. The commenter states that Forestville is not equipped to accommodate the existing population.

The commenter is correct in their assertion that the population percentage in Forestville would increase above that of other communities in the County if full buildout of each Rezoning Site is completed. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

Response 192.3

The commenter expresses concerns regarding the lack of roads and challenges it presents during an emergency evacuation. The commenter states that without changes, this will put existing and future residents in danger.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation.

Response 192.4

The commenter states that many of the roads are small and lack sidewalks. The commenter states that the area has no stoplights and can barely handle existing traffic.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure, and Master Response TRA regarding traffic concerns.

Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact.

Response 192.5

The commenter states that Forestville lacks a police department. The commenter states there is only one small fire station and the next closest is in Graton. The commenter expresses concerns regarding the existing conditions of these services.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As stated therein, development of the Forestville Rezoning Sites would require: compliance with California Fire Code Wildland-Urban Interface (WUI) building standards for sites in the WUI; compliance with the California Fire and Building Code, which applies to construction, equipment, use and occupancy, location, and maintenance of proposed buildings and includes regulations for vegetation and fuel management; completion of a fire hazard assessment and consultation by Fire Prevention Division of Permit Sonoma; installation of automatic fire sprinkler systems per Sonoma County Code Chapters 7 and 13 and General Plan Policy PS-3I; and approval from the Fire Prevention Division during the building permit process that individual project plans meet the site access requirements and provide the required fire safety featured. These requirements would result in less than significant impacts to the increase in demand on fire protection facilities.

The increase in police service demand would result in a need for 12 officers to be added to the Sheriff's Office to maintain the existing service ratio; however, the need for new officers would be distributed throughout the County, with no more than three new officers required at any one station. The proposed project would not have a significant impact on police or fire response times.

Response 192.6

The commenter states there is only one bus line that goes through town. The commenter states it provided minimal service and would need to be upgraded to support an increase in population.

This comment has been noted. Regarding the existing lack of public transportation, please refer to Master Response EXST as this is a current condition, not one caused by the project. As described under Impact TRA-1, the project would have a less than significant impact on public transportation.

Response 192.7

The commenter expresses concerns regarding the limited availability of various commercial services in Forestville.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 192.8

The commenter states that the proposed project may introduce future developments that would conflict with the existing character of Forestville.

Please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Response 192.9

The commenter states that they do not see an analysis on the impacts to the capacity of the existing sewer and water infrastructure.

For an analysis of impacts to water and the sewer system, please refer to Section 4.18, *Utilities and Service Systems*, of the Draft EIR. Please refer to Master Response UTIL for additional information regarding impacts to the existing sewer system.

Response 192.10

The commenter states that one of the sites designated at FOR-4 can only be accessed by a gravel easement. The commenter states that development of the site would create an undue burden. The commenter states that Van Keppel is not a through road. The commenter says the project would add traffic.

Regarding the existing condition of the road, please refer to Master Response EXST. This situation is an existing condition of the area and is not caused by the proposed project. Refer also to Master Response EMG regarding a condition of approval for two points of ingress/egress for individual developments facilitated by the project. Refer also to Master Response TRA regarding traffic congestion.

Response 192.11

The commenter expresses concerns regarding emergency evacuation during a wildfire and potential safety issues that would arise with a larger population in the area.

This comment has been noted. Please refer to Master Response FIRE and Master Response EMG for information regarding wildfire risk and emergency evacuation.

Response 192.12

The commenter asks if there is enough water and sewer capacity to support future development. The commenter asks how utilities will be provided to Rezoning Site FOR-4. The commenter asks if the road will be expanded.

Please refer to Response 192.9 regarding water and sewer system infrastructure and Response 192.10 regarding road conditions.

Response 192.13

The commenter states that Rezoning Site FOR-4 is bordered by a registered toxic waste site. The commenter states that they did not see a review of groundwater contamination in the Draft EIR.

Please refer to Section 4.9, *Hazards and Hazardous Materials*, in the Draft EIR and Response O-2.3 regarding the Electro Vector site specifically. As stated therein, this site is identified in the EIR and impacts related to hazardous materials would be less than significant with adherence to applicable regulations such as the California Health and Safety Code. For a full list of applicable regulations that the project would be required to comply with to reduce impacts to less than significant, please refer to the Regulatory Setting on page 4.9-4 of the Draft EIR.

For information regarding groundwater and actions required to protect groundwater sources, please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR.

Response 192.14

The commenter states that Rezoning Site FOR-4 is near two schools and may introduce additional airborne particulates and noise during construction.

Please refer to Section 4.3, *Air Quality*, of the Draft EIR. As discussed under Impact AQ-2, the BAAQMD 2017 *CEQA Air Quality Guidelines* Basic Construction Mitigation Measures would be required for all projects to reduce temporary construction impacts through implementation of Mitigation Measure AQ-1. In addition to implementation of Mitigation Measure AQ-1, for any project (regardless of whether the development is under the jurisdiction of the NSCAPCD or the BAAQMD) that meets certain conditions and as listed in **Error! Reference source not found.**, the County shall condition development facilitated by the project on Rezoning Sites to implement BAAQMD *CEQA Air Quality Guidelines*' Additional Construction Mitigation Measures as described in Mitigation Measure AQ-2. Implementation of the required Mitigation Measures would reduce construction air quality impacts to a less than significant level.

Section 4.13, *Noise*, of the EIR analyzes noise levels. Impact NOI-1 discusses that construction noise would be subject to Mitigation NOI-1 through NOI-6, and that impacts would be less than significant with mitigation.

Response 192.15

The commenter expresses issues pertaining to drainage at the site and states that Van Keppel floods during heavy rains. The commenter states that extensive drainage work is needed if Rezoning Site FOR-4 is developed.

Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR for detail pertaining to impacts of flooding induced by the proposed project. Refer to Figure 4.10-4, which shows that none of the Forestville Rezoning Sites (including FOR-4) are within Flood Hazard Zones. Furthermore, as stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding would be less than significant.

Response 192.16

The commenter states that neighbors of future development of Rezoning Site FOR-4 would be impacted by the building's height. The commenter states that development at this site would conflict with the character of the neighborhood.

Please refer to Response 192.8 regarding impacts to visual character.

Response 192.17

The commenter states that the proposed project is not appropriate for Forestville. The commenter requests that Rezoning Site FOR-4 be removed from consideration and that the remaining sites be amended to better reflect the character of the town, needs of current residents, and needs of future residents.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. The comment will be forwarded to decision-makers for consideration.

EIR Public Comment 193

COMMENTER: Audrey King

DATE: February 13, 2023

Response 193.1

The commenter expresses opposition to the Rezoning Site at 14156 Sunset Avenue (GUE-1) because of traffic safety and lack of water utilities.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites, and Response 193.2 and 193.3 regarding specific concerns with traffic safety and lack of water utilities.

Response 193.2

The commenter expresses concerns regarding traffic safety near the site. The commenter states that there is low visibility, that streets are narrow, and that pedestrian safety is an issue. The commenter states that without improvements, accidents will increase.

Refer to Master Response EXST regarding the existing condition (no sidewalks, street width, etc.) of the existing roads. Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact.

Please refer to Master Response TRA for additional concerns regarding increased traffic.

Response 193.3

The commenter expresses concerns regarding the need for utilities such as water, sewage, and power. The commenter states that Sweetwater Springs intends to use the site for future water storage and expansion. The commenter states that it does not make sense to take land away from the water utility company.

Please refer to Section 4.18, *Utilities and Service Systems*, of the Draft EIR for a detailed analysis of the proposed project's impacts to the existing water supply, sewer system, and power. Please refer to Master Response UTIL for additional information regarding impacts to the sewer system.

The commenter's concerns regarding Sweetwater Springs' potential future expansion has been noted and passed onto decision-makers. Please refer to Master Response HE. Note that a site on the list of Rezoning Sites does not guarantee that the site will or will not be rezoned, as that decision is up to the decision-makers. Furthermore, once a site is rezoned, it may or may not be developed.

EIR Public Comment 194

COMMENTER: Barbara Delonno

DATE: February 13, 2023

Response 194.1

The commenter expresses opposition to the type of new development they are seeing in Santa Rosa stating that new developments are all attached lacking trees, yards, and privacy.

This comment is not relevant to the environmental impact analysis of the proposed project. This comment has been noted.

Response 194.2

The commenter expresses concerns regarding impacts to community character of Forestville. The commenter expresses the need for green space. The commenter expresses concerns regarding the lack of existing traffic control devices and commercial services in the area.

Please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Regarding the existing lack of traffic control devices and commercial services, please refer to Master Response EXST. Note that these are existing conditions of the area and are not products of the proposed project.

Response 194.3

The commenter expresses opposition to a 50 percent increase in population in Forestville. The commenter asks why Forestville has been chosen for so much growth. The commenter states that new development will have adverse impacts to aesthetics and states their preference for keeping density at FOR-2 lower.

This comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Note that rezoning does not guarantee that development would occur.

The commenter's preference regarding maintaining a lower density at Rezoning Site FOR-2 has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Refer to Response 193.3 regarding aesthetic impacts.

Response 194.4

The commenter expresses their desire to see a “human habitat” that allows for adequate outdoor space, gardens, and courtyards for future residents.

This comment has been noted and passed onto decision-makers. Note that no development has been proposed for the selected Rezoning Sites and future development designs will be required to comply with the applicable County zoning regulations regarding required open space.

Response 194.5

The commenter asks if the proposed development really places new residents near jobs, transit, services, and schools. The commenter states that most people will need to drive due to inadequate bus services.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

Response 194.6

The commenter expresses concerns regarding the availability of water and the impacts new development would have on water supply. The commenter asks if new development could rely on greywater systems to help with supply issues.

Please refer to Section 4.18, *Utilities and Service Systems*, for a detailed analysis of the proposed project’s impacts on water supply.

Each water service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide water service to the Rezoning Sites. In addition, California American Water – Larkfield prepared a Water Supply Assessment (Appendix WSA) detailing its ability to provide water service to the Rezoning Sites within its service area. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites on the Agua Caliente, Glen Ellen, Larkfield, Sonoma, Santa Rosa, Forestville, Graton, Guerneville, Penngrove, and Petaluma Sites would have access to adequate water service. Information was not provided by California American Water – Geyserville. Furthermore, the Rezoning Sites that are not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. As such, impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

Mitigation Measure UTIL-1 requires that future development on the proposed Rezoning Sites would be required to demonstrate that the applicable water service provider has sufficient capacity to support future developments.

Note that Objective WR-4.1 of the County General Plan does aim to increase the use of recycled water where it meets all applicable regulatory standards and is the appropriate quality and quantity for the intended use.

Response 194.7

The commenter asks about the affordability of installing solar panels on new developments. The commenter states this could bring costs down.

The commenter’s suggestion has been noted and passed onto decision-makers. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant

effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes affordability and homeowner costs. Whether individual developments would include solar panels would be determined by individual development proposals.

EIR Public Comment 195

COMMENTER: Bill Avelar

DATE: February 13, 2023

Response 195.1

The commenter expresses concerns regarding sewer capacity for the proposed Rezoning Sites in Forestville. The commenter states that development at the proposed Rezoning Sites will have adverse impacts to small town living, scenery, neighborly relationships, and the crime rate.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Please refer to Master Response UTIL regarding wastewater systems. As stated in Section 4.18, *Utilities and Service Systems*, on page 4.18-15 of the Draft EIR, “several of the Rezoning Sites are not adjacent to existing water or wastewater infrastructure and require further evaluation at the project level during the plan review and permit approval phase. Mitigation Measure UTIL-1 is required to reduce impacts related to water supply and wastewater system sufficiency.” This mitigation measure would ensure future development would be adequately served by providers, except for sites GEY-1 through GEY-4.

Please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Neighborhood relations and crime rates are not related to the analysis in the Draft EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes neighborhood relations and crime rates.

EIR Public Comment 196

COMMENTER: Bob and Lucy Hardcastle

DATE: February 13, 2023

Response 196.1

The commenter states that Forestville cannot support future population growth. The commenter expresses concerns regarding traffic, road safety and existing road conditions.

Refer to Master Response EXST regarding existing challenges to roadway infrastructure, which are not caused by the project. Please refer to Section 4.18, *Transportation*, of the Draft EIR, and Master Response TRA for additional concerns regarding increased traffic.

EIR Public Comment 197

COMMENTER: Bonnie Smith

DATE: February 13, 2023

Response 197.1

The commenter expresses concern regarding the Rezoning Site proposed for Sunset Avenue (GUE-1). The commenter expresses concerns regarding traffic safety.

Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact. Please refer to Master Response TRA for additional concerns regarding increased traffic.

EIR Public Comment 198

COMMENTER: Brenda C. Stivers

DATE: February 13, 2023

Response 198.1

The commenter expresses her opposition to rezoning properties in Guerneville, specifically GUE-2, GUE-3, and GUE-4, located off Armstrong Woods Road, which is a scenic corridor. The commenter states that residents should be included in the identification of viable housing sites. The commenter states that the DEIR notes many specific adverse effects that would impact the health and safety of current and future residents.

Please refer to Response 14.1.

Response 198.2

The commenter expresses the opinion that sites GUE-2 and GUE-3 are only accessible via one-lane roads that would require utility upgrades, upgrades which would result in road closures and severely impact emergency egress for residents. The commenter states that road work on Cutten Drive and Laughlin Road must be addressed before initiation of any construction activity, since heavy machinery would not be transported safely to these areas without causing severe access issues.

Refer to Response 14.2. Given that specific road widening locations have not been identified, it would be speculative to analyze potential impacts at this time. However, if it is determined that road widening is needed to access Rezoning Sites for future development, road widening would require site-specific CEQA compliance that could include additional mitigation measures for aesthetics, and biological resources, cultural and tribal cultural resources, among other issues.

Response 198.3

The commenter states that the lack of sidewalks or bicycle lanes poses as a safety hazard, and increasing the population would result in accidents and injuries.

Please refer to Master Response EXST regarding existing conditions of services and infrastructure.

Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact. Refer also to Impact TRA-1, which analyzes the project's impact to pedestrian facilities.

Response 198.4

The commenter states that sites GUE-2 and GUE-3 have inadequate potable water and sewer systems.

This comment has been noted. Please refer to Master Response UTIL regarding the project's impacts to the existing water and sewer systems.

Response 198.5

The commenter states that sites GUE-2 through 4 are located within a flood zone, high wildfire danger zone, liquefaction zone, and earthquake prone zone. The commenter states that residents in Guerneville are consistently on evacuation status due to floods, fires, and no electricity. The commenter expresses the opinion that the closest hospitals are 30 minutes away and the medical and policing services are inadequate and would not be able to accommodate the increase in population.

Refer to Response 14.4.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Master Response EMG regarding emergency evacuation and emergency access. For an analysis on impacts on police services, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR.

Response 198.6

The commenter expresses the opinion that site GUE-3 would result in significant biological resource impacts since it would require the removal of redwoods, which is a known habitat for California Quail, California Grey Foxes, and Osprey. The commenter states that site GUE-3 is also located adjacent to agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

Potential impacts to special-status species, including through habitat modification, are addressed under Impact BIO-1, beginning on page 4.4-28 of the Draft EIR. Please refer to Table 4.4-4, beginning on page 4.4-18 of the Draft EIR, for a list of special-status wildlife species with the potential to occur within the BSAs. As noted therein, the species mentioned by the commenter are not listed species. Impact BIO-1 includes mitigation measures for the reduction of potential impacts to special-status species, including preconstruction surveys for nesting birds and non-listed special-status species avoidance.

Please refer to Impact BIO-5, beginning on page 4.4-39 of the Draft EIR, regarding potential impacts associated with tree removal. As noted therein, compliance with County-required policies related to heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) was determined to be adequate to reduce impacts to less than significant.

The commenter is correct in their assertion that implementation of Mitigation Measure AG-1 would be required for Rezoning Site GUE-3. As described in Table 4.2-4 in Section 4.2, *Agriculture and Forestry Resources*, of the Draft EIR, Rezoning Site GUE-3 is adjacent to agriculture.

Response 198.7

The commenter states that site sensitivity should be high and visual dominance should be dominant for site GUE-3 since a significant number of redwoods and valley oak would be removed for development. The commenter states Figure 4.1-5 of the DEIR is misleading since additional photos should show the immense valley view beauty which determines the visual character of Guerneville.

Table 4.1-4 on page 4.1-8 of the Draft EIR lists GUE-3 as co-dominant with a moderate site sensitivity. These features describe the existing conditions of the Rezoning Sites, and not the conditions of the sites after construction of speculative future development.

The site sensitivity criteria are described in Table 4.1-1 on page 4.1-2 of the Draft EIR. The criteria for moderate site sensitivity is:

1. Rural land use designation or urban designation that is not low sensitivity, but which has no scenic resource designation
2. May be near a gateway or include historic resources
3. Visible because of slope (less than 30 percent) or where significant aesthetic features are visible from public roads or public uses areas (parks, trails, etc.)

This is the appropriate site sensitivity designation for GUE-3 because the site does not have a scenic resource designation and contains significant aesthetic features visible from public roads.

Visual dominance definitions are provided on page 4.1-3 of the Draft EIR. The criteria for co-dominance is: project elements attract attention equally with other features and are compatible with surroundings. Because GUE-3 is similar to surrounding parcels, this designation is appropriate.

The commenter's concern regarding the photos presented in the Draft EIR has been noted.

Response 198.8

The commenter states that rezoning of sites GUE-2 through 4 are inconsistent with the goals and policies of the County General Plan, Bay Area 2050, and the Housing Element.

Please refer to Response 14.6.

Response 198.9

The commenter expresses her discontent for the lack of notification and inclusion in the early processes of the Housing Element Update and expresses her opposition to rezoning sites GUE-2 through 4.

Please refer to Response 14.7.

EIR Public Comment 199

COMMENTER: Burt Cohen

DATE: February 13, 2023

Response 199.1

The commenter expresses opposition to Rezoning Site FOR-2. The commenter expresses concerns regarding road safety, the lack of traffic control devices, and how an increase in population in the area may increase the number of traffic accidents. The commenter states there are no sidewalks and expresses concerns regarding pedestrian safety.

Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Refer also to Master Response EXST regarding current conditions of roadways that are not a result of the proposed project.

Please refer to Section 4.18, *Transportation*, of the Draft EIR. As stated on page 4.16-18, the General Plan has several policies that require that design of future development prioritizes pedestrian safety and traffic safety. Compliance with these policies would ensure the proposed project has a less than significant impact.

Response 199.2

The commenter states that they have questions about sewage, water drainage, fire safety, evacuations, and more. The commenter states that the proposed project will impact the safety of existing residents and severely change Forestville.

This comment has been noted. Please refer to Master Response UTIL regarding impacts to the existing sewer system. Please refer to Master Response FIRE and Master Response EMG regarding wildfire risk and emergency evacuation.

Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft regarding impacts to site drainage. As stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding and drainage would be less than significant.

EIR Public Comment 200

COMMENTER: Charles and Anne Watson

DATE: February 13, 2023

Response 200.1

The commenter expresses opposition to approval of the Draft EIR and proposed Rezoning Sites in Glen Ellen. The commenter states that Glen Ellen does not fit the state's definition of an "urban growth area."

Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Please refer to Page xviii of the Draft EIR. An "Urban Growth Boundary" is defined as:

A voter designated limit to the urban development of a city.

An "Urban Service Area" is defined as:

The geographical area within the Urban Service Boundary that is designated for urban development in the Land Use Element of the County's General Plan.

Please note that there is no reference to an "Urban Growth Area" nor is there an accepted state definition of the term "Urban Growth Area."

EIR Public Comment 201

COMMENTER: Chris Romano

DATE: February 13, 2023

Response 201.1

The commenter expresses frustration with the lack of communication between the County and community members regarding the proposed project. The commenter expresses opposition to the Rezoning Sites proposed for Guerneville.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 201.2

The commenter states that there was no meaningful community consultation conducted by the County.

This comment is noted and has been passed on to the decision-makers. Refer to Master Response SITE regarding how the rezoning sites were chosen.

Response 201.3

The commenter states that Sweetwater Springs are the owners of the Rezoning Site located on Sunset Avenue and are in opposition to the proposed rezoning. The commenter states that Sweetwater Springs is in support of leaving the site vacant for future water expansion.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 201.4

The commenter states that the proposed project places a disproportionate load of new housing in the Guerneville area.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response SITE regarding the site selection process.

Response 201.5

The commenter expresses concerns regarding the existing conditions of roads in the area and states Guerneville is lacking needed road infrastructure, especially along Sunset Avenue (vicinity of GUE-1).

This comment has been noted. Please refer to Master Response EXST regarding existing conditions, including road conditions.

Response 201.6

The commenter expresses concerns regarding wildfire risk and emergency evacuation.

This comment has been noted. Please refer to Master Response FIRE and Master Response EMG regarding wildfire risk and emergency evacuation.

Response 201.7

The commenter expresses concerns regarding the direct impact of development on the surrounding neighborhoods and noise. The commenter states that new development would not include yards for recreation, that the site is too steep, and there is not adequate parking available.

Regarding community character, please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Please refer to Section 4.13, *Noise*, of the Draft EIR regarding noise impacts related to the construction and operation of development facilitated by the project on Rezoning Sites. With implementation of Mitigation Measures NOI-1 through NOI-7, noise impacts would be less than significant. Refer to Impact PS-4 regarding impacts related to recreation. The County requires payment of in-lieu fees or dedication of park land (pursuant to Sonoma County Code Section 25-58 and 25-58.1) and a parks impact fee (pursuant to Sonoma County Code Section 20-65) to offset impacts related to increased demand at existing recreation facilities, and project applicant(s) of the Rezoning Sites would be required to comply with these codes during the permit approval process. The project is not anticipated to result in the need for new or physically altered parks or recreational facilities and would not result in substantial physical deterioration of existing parks.

Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

EIR Public Comment 202

COMMENTER: Christine Johansson

DATE: February 13, 2023

Response 202.1

The commenter expresses support for affordable housing. The commenter asserts that existing infrastructure would not support larger projects, including existing roadways.

This comment has been noted. Please refer to Master Response EXST for information regarding the existing conditions of services and infrastructure.

Response 202.2

The commenter asserts that existing sewer and water systems are not adequate to serve proposed development, and that flooding is a concern.

This comment has been noted. Please refer to Master Response UTIL regarding the adequacy of sewer and water systems for the proposed project, and Master Response EXST regarding concerns about the existing sewer and water systems and existing flooding. Potential flooding impacts are addressed Section 4.9, *Hydrology and Water Quality*, of the EIR.

Response 202.3

The commenter expresses concerns regarding safety related to evacuation. The commenter notes that existing roads are in disrepair, with only one road providing ingress/egress to an area.

This comment has been noted. Please refer to Master Response EMG regarding emergency evacuation and access.

Response 202.4

The commenter states that there has been little oversight in the County regarding short-term rentals. The commenter suggests that the County put a moratorium on all new short-term rentals until other County housing goals have been achieved.

This comment has been noted and passed onto decision-makers. Note that this comment is not relevant to the environmental impact analysis presented for the proposed project.

Response 202.5

The commenter asks if the County has put effort into making it easier for residents to add ADUs to their properties. The commenter asks if this process could be streamlined.

This comment has been noted and passed onto decision-makers. It does not pertain to the impact analysis in the Draft EIR.

Response 202.6

The commenter states that septic and the existing sewage system may present issues. The commenter states that the County had been looking into allowing composting toilets, and that the commenter believes using newer technology would be a big help.

This comment has been noted and passed onto decision-makers. Please refer to Master Response UTIL for concerns regarding the existing sewer and water systems. The comment related to composting toilets has been noted and passed onto decision-makers. It does not pertain to the impact analysis in the Draft EIR. Note also that development facilitated by the project on Rezoning Sites would not require the use of septic tanks or alternative wastewater disposal systems, as described on page 4.7-28 of the Draft EIR.

Response 202.7

The commenter asks how much research has been done by the County regarding redevelopment of existing structures. The commenter states there are lots in Guerneville that could be redeveloped into multi-unit homes.

This comment has been noted and passed onto decision-makers. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

Response 202.8

The commenter asks that the County get more creative with their housing locations and building sizes. The commenter notes that their community presents limitations. The commenter asks that more opportunities to voice opinions and ideas be offered to community members before further steps are taken.

This comment has been noted. Please refer to Master Response SITE in reference to the Rezoning Site selection process and criteria. Regarding additional time for community input, the comment has been noted and passed onto decision-makers.

EIR Public Comment 203

COMMENTER: Cynthia Berman

DATE: February 13, 2023

Response 203.1

The commenter expresses opposition to the proposed project.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 203.2

The commenter states that Guerneville and Forestville do not have the infrastructure to support the proposed project. The commenter expresses concerns regarding floods, fires, and existing roads.

This comment has been noted. For concerns regarding flood, fires, and roads, please refer to Response 14.4. The sites in Forestville are not within a Fire Hazard Severity Zone, as shown in Table 4.19-2, but are within two miles of a Very High Fire Hazard Severity Zone. Reer to Section 4.19, *Wildfire* of the EIR for more information. Regarding existing infrastructure, please refer to Master Response EXST.

Response 203.3

The commenter expresses concerns regarding increased traffic and emergency evacuation. The commenter expresses opposition to the number of new cars and the amount of parking needed to support future development.

This comment is noted. Please refer to Master Response TRA regarding traffic and Master Response EMG regarding emergency evacuation.

EIR Public Comment 204

COMMENTER: Dan and Sunoma Northern

DATE: February 13, 2023

Response 204.1

The commenter asserts that the Draft EIR does not adequately analyze how individual parcels meet the HCD Guidelines for Low Income Housing.

This comment pertains to the Housing Element and is not related to analysis within the Draft EIR. The Draft EIR is not required to analyze how individual parcels are consistent with HCD Guidelines for Low Income Housing. This comment has been passed on to County decision-makers. Please note that the adequacy of sites for lower income housing is discussed in Appendix D of the Housing Element, and the Technical Background Report contains a Fair Housing Analysis in Section 4.5.

Response 204.2

The commenter expresses concerns about existing public transportation and asks what mitigation measures will be used to improve public transportation.

Please refer to Master Response EXST regarding existing conditions, including public transportation. The existing lack of adequate public transportation is a currently existing baseline condition, not one caused by the proposed project. CEQA is laid out in Section 21000 et seq of the According to the California Code of Regulations Public Resources Code (PRC). Section 21002 lays out the intent that the procedures assist lead agencies in “systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” CEQA, therefore, is focused on mitigation measures that reduce significant effects of projects under consideration, not measures to mitigate existing conditions not resulting from a project.

Response 204.3

The commenter suggests contamination on site FOR-1 should be examined and asks if contamination can be mitigated for the site to be safely developed.

Please see Section 4.9, *Hazards and Hazardous Materials* regarding site-related hazard remediation. Sites with hazardous materials near the Rezoning Sites (including site FOR-1, which is identified as containing the Electro Vector site) are listed in Table 4.9-2. While a full evaluation and analysis of specific contamination case on FOR-1 is not appropriate in a programmatic EIR, in the discussion of Impact HAZ-2, the EIR states that “[d]evelopment typically within 0.25 mile of sites identified in Table 4.9-2 would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. The agency responsible for oversight would determine the types of remediation and cleanup required, and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants.” Compliance with existing State and local regulations regarding onsite hazards would reduce impacts to less than significant.

Response 204.4

The commenter states that site FOR-6 is currently zoned industrial and asks if residential is the best rezoning designation.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. For more information on Rezoning Site selection, please refer to Master Response SITE. The EIR analyzes the project as proposed, and the final decision on rezoning is up to County decision-makers. This comment will be sent to the decision-makers for consideration.

Response 204.5

The commenter asks what mitigation will be implemented to ensure privately owned parks are not overused and degraded.

Refer to Impact PS-4 regarding impacts related to recreation. The County requires payment of park fees and parkland dedication or in-lieu fees (per Sonoma County Code Section 20-65), offsetting any impacts related to increased demand at existing recreation facilities, and project applicant(s) of the Rezoning Sites would be required to pay this during the permit approval process. The project is not anticipated to result in the need for new or physically altered parks or recreational facilities and would not result in substantial physical deterioration of existing parks.

Response 204.6

The commenter states that site FOR-1 has known groundwater contamination.

Refer to Response 204.3. No changes are suggested by the commenter, nor are any changes required to the EIR, as the EIR acknowledges this existing condition.

Response 204.7

The commenter expresses concerns about site FOR-2 including stormwater runoff, traffic safety, lack of crosswalks, proximity to High and Moderate FHSZ and SRAs, evacuation plans, wastewater, and ownership.

For information regarding stormwater runoff, please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. As stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding and drainage would be less than significant.

Regarding traffic safety, please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Regarding impacts to the existing wastewater system, please refer to Master Response UTIL. For concerns regarding wildfire risk and emergency evacuation, please refer to Master Response FIRE and Master Response EMG, as well as Section 4.19, *Wildfire*, where Table 4.19-2 acknowledges that while FOR-2 is not within a Fire Hazard Severity Zone, it is within one mile of a Very High Fire Hazard Severity Zone. Please refer to Master Response EXST regarding the existing conditions of traffic control devices in the area, such as crosswalks, and the current ownership of each parcel. In addition, please refer to Master Response HE.

Regarding the intent of a property owner to sell the property, this comment has been noted. It does not pertain to the analysis or conclusions in the EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes analysis of a property owner's estate planning.

Response 204.8

The commenter states that site FOR-4 is only accessible through an adjacent property.

This comment has been noted. Refer to Response 130.2.

Response 204.9

The commenter states that a skatepark and emergency center are planned for sites FOR-3 or FOR-5. The commenter states that sites FOR-3 and FOR-5 are within 300 feet of a wastewater treatment plant and expresses concerns about environmental justice.

This comment is noted. Please refer to Master Response SITE and Master Response HE for additional detail on the Rezoning Site selection process and conditions of the proposed project. As stated in Master Response HE, a site on the list of Rezoning sites does not guarantee that the site will or will not be rezoned, as that decision is up to the decision-makers. Furthermore, once a site is rezoned, it may or may not be developed.

Regarding the proximity of Rezoning Sites FOR-3 and FOR-5 to an existing wastewater treatment, the commenter does not specify what type of environmental justice issue they are describing. Regarding potential air quality impacts for future development at these sites, please refer to Section 4.3, *Air Quality*, of the Draft EIR, including odors, which are covered under Impact AQ-4. Regarding future residents' exposure to noise, please refer to Section 4.13, *Noise*. Environmental justice is not a specific topic required to be studied under CEQA.

Response 204.10

The commenter states that site FOR-6 is currently zoned industrial and states that rezoning will limit job opportunities.

Refer to Response 204.4.

Response 204.11

The commenter states that site FOR-6 is adjacent to a wastewater treatment plant and expresses concerns about environmental justice.

Please refer to Response 204.9.

Response 204.12

The commenter expresses concerns about community character and availability of space to develop business, commercial and industrial uses after the Housing Element Update is adopted, and that Forestville was not represented on the Housing Advisory Committee.

Regarding community character, please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity.

Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Regarding the commenter's speculation about the parcel's potential future as commercial or industrial spaces, please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

District 5, which includes Forestville, was represented on the Housing Advisory Committee.

Response 204.13

The commenter states that the Draft EIR must include mitigation measures, reduce densities or consider alternatives. The commenter suggests it would be helpful to include a matrix rating for each site based on the HCD Guidelines.

This comment is noted. Please refer to each Draft EIR section for the required mitigation for each impact area. Please refer to Section 5, *Alternatives*, for information regarding alternatives that were considered but not selected and the reasoning for each. The EIR includes a reasonable range of alternatives, and a lower density alternative is included in Section 6.4, *Alternatives Considered but Rejected*. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Refer to Appendix D of the Housing Element for a detailed analysis of the housing sites inventory.

Response 204.14

The commenter states concern about traffic, street and road maintenance, and pedestrian safety.

This comment has been noted. Please refer to Master Response TRA regarding concerns about traffic. Regarding road maintenance, please refer to Master Response EXST. The existing conditions of roads is not a result of the proposed project.

Regarding traffic and pedestrian safety, please refer to Response 204.7.

Response 204.15

The commenter quotes from the Housing Element Site Inventory Guidebook and states concern for a density of 20 units per acre.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Refer to Appendix D of the Housing Element. As stated on the HCD Building Blocks website under Analysis of Sites and Zoning, "[s]uburban jurisdictions include cities and counties located within a Metropolitan Statistical Area (MSA) and have a population of less than 2 million" and the website specifically lists Sonoma County as falling into this category.

Response 204.16

The commenter states that site-specific density information should be incorporated into the EIR.

This comment has been noted. Please refer to the Draft EIR. Please note that the Draft EIR is a programmatic EIR evaluating the rezoning of each of the Rezoning Sites and the potential impacts of increasing the density at each site. The Draft EIR does not evaluate specific development at each site, as

development has not yet been proposed. In addition, the Draft EIR does refer to specific sites and their associated impacts in each section as appropriate. The DEIR looks at the maximum buildout that could be allowed under the rezoning in order to evaluate the worst-case scenario regarding the maximum environmental impacts that may occur.

Response 204.17

The commenter expresses that there is confusion regarding site FOR-7 and states that it is mentioned in the EIR but does not appear to be a rezoning parcel. The commenter asks if it should be removed from the Draft EIR or if rezoning information should be added.

The commenter is correct that FOR-7 is not a Rezoning Site, as shown in Table 2-2. Please refer to Table 2-5 in Section 2, *Project Description*, of the Draft EIR. As stated therein, **Error! Reference source not found.** identifies the dwelling unit and population buildout potential of the 20 additional inventory sites that would not be rezoned under implementation of the project. Sites in Table 2-5, such as Rezoning Site FOR-7, are included for informational purposes because they are proposed to be included in the Housing Element Site Inventory based on their existing zoning, but were not analyzed for rezoning for the purposes of the proposed project.

Response 204.18

The commenter disputes analysis in the Population and Housing section of the EIR and states that infrastructure improvements will be required to accommodate population growth including traffic mitigation, a roundabout, and an entrance/exit to State Highway 116. The commenter also states that there is a known wastewater pipeline issue under Highway 116.

Please refer to Master Response TRA regarding traffic congestion. As described therein, no near-term congestion improvements would be necessary as a result of the project, including for the SR 116/Mirabel Road intersection, which meets the signal warrant analysis at full buildout of the Rezoning Sites; however, fair share funding of cumulative scenario traffic congestion improvements would be necessary. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would contribute to alleviating cumulative roadway deterioration impacts to the regional road network. Please refer to Master Response EXST regarding the existing conditions of roads, infrastructure, and services.

Response 204.19

The commenter suggests that the Draft EIR should be updated to reflect impacts to Forestville due to unplanned population growth and requests that the EIR specify what information is from public records or other sources.

Please refer to Section 4.14, *Population and Housing*, of the Draft EIR. As stated under Impact PH-1, “substantial” population growth is defined as growth exceeding ABAG/MTC population forecasts for the unincorporated County or exceeding the County’s forecasted population and associated housing needs.

Although the proposed project would increase the buildout potential beyond that anticipated in the current General Plan, the project would not exceed the ABAG 2040 population projections or the County’s housing requirement under the 6th cycle RHNA allocation for the 2023-2031 planning period. Furthermore, as the growth resulting from the project is anticipated and evaluated throughout this Program EIR, and the project would be adopted as an integral part of the County’s General Plan following a planning process, the population growth resulting from the project would not be unplanned.

Section 7, *References*, of the EIR contains the sources and documents consulted during the preparation of the EIR.

Response 204.20

The commenter notes that the Draft EIR determined that decreases in enrollment are anticipated with the exception of Forestville Elementary and Geyserville Unified School Districts and states more explanation or mitigation should address potential impacts to Forestville Elementary.

This comment is noted. Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. Refer to Response 94.2 regarding Forestville schools.

EIR Public Comment 205

COMMENTER: Dane Riley

DATE: February 13, 2023

Response 205.1

The commenter expresses opposition to the Rezoning Site located at 6898 Nolan Road (FOR-2). The commenter expresses concerns regarding the availability of parking, road safety and road width, and emergency access to the site. The commenter states there are very few jobs in Forestville and public transit is infrequent.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites. Please refer to Master Response EMG regarding emergency evacuation and emergency access.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure such as parking, road width, transit, and road safety. Please note that the existing conditions of each of these areas are not a product of the proposed project. Also, note that parking is not a discussion topic required to be evaluated under CEQA.

EIR Public Comment 206

COMMENTER: Daniel Bontecou

DATE: February 13, 2023

Response 206.1

The commenter expresses concern over adding 635 new units to Forestville because it would negatively impact the character, quality of life, and health of the town.

Regarding community character, please refer to Section 4.1, *Aesthetics*, of the Draft EIR. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

The commenter does not specify the type of health impacts they are referring to. For information regarding impacts to air quality, please refer to Section 4.3, *Air Quality*, of the Draft EIR. For information regarding impacts to hazards please refer to Section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR. For information regarding impacts to noise, please refer to Section 4.13, *Noise*, of the Draft EIR.

Quality of life is not related to the analysis in the Draft EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes general quality of life.

Response 206.2

The commenter expresses concern over the proposed expansion of Forestville's population by 50 percent and states this will put a strain on the town's schools, infrastructure, and emergency services.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR for an analysis of the project's impact to schools, police services, and fire services. Please refer to Master Response EMG for additional information regarding emergency access and emergency evacuation.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Note that rezoning does not guarantee that development would occur.

Response 206.3

The commenter states that this proposed rapid expansion will impact the town's character, "small town charm", and the current lack of traffic in the downtown area.

Please refer to Master Response TRA regarding concerns about traffic. Regarding community character, please refer Response 206.1.

Response 206.4

The commenter states an opinion that not one person in Forestville wants this expansion to happen and hopes this is argument enough to stop this proposal. The commenter states that it is paramount to have residents be heard in this process. The commenter states this should not be done over a Zoom meeting that most do not know about.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 206.5

The commenter expresses concern over sewage treatment. The commenter states it is crucial to have proper sewage processing facilities to avoid contamination of the Russian River. The commenter asks where a new sewage treatment facility will be built and how waste will be handled from all 6 of the proposed rezone sites throughout Forestville.

Please refer to Master Response UTIL and Section 4.18, *Utilities and Service Systems*, of the Draft EIR for a detailed analysis of the project's impact on the sewer system.

Response 206.6

The commenter expresses concern over the availability of water. The commenter asks where the water will come from to meet the additional demand brought on by the addition of 635 dwelling units.

Please refer to Section 4.18, *Utilities and Service Systems*, of the Draft EIR for a detailed analysis of the project's impact on the water supply.

Each water service provider was contacted and assessed in the Water and Sewer Study (Appendix WSS) for its ability to provide water service to the Rezoning Sites. In addition, California American Water – Larkfield prepared a Water Supply Assessment (Appendix WSA) detailing its ability to provide water service to the Rezoning Sites within its service area. With the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites on the Agua Caliente, Glen Ellen, Larkfield, Sonoma, Santa Rosa, Forestville, Graton, Guerneville, Penngrove, and Petaluma Sites would have access to adequate water service. Information was not provided by California American Water – Geyserville. Furthermore, the Rezoning Sites that are not currently directly adjacent to water supply infrastructure (GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4) were not fully evaluated in Appendix WSS for adequate water supply capacity. As such, the impacts of development on these sites would be significant and Mitigation Measure UTIL-1 would be required.

Mitigation Measure UTIL-1 requires that future development on the proposed Rezoning Sites would be required to demonstrate that the applicable water service provider has sufficient capacity to support future developments.

Response 206.7

The commenter states that they strongly believe the proposed project will have a profound and negative impact on Forestville and urges decision-makers to consider resident's concerns and reject this proposal.

This comment has been noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

EIR Public Comment 207

COMMENTER: Dave Doty

DATE: February 13, 2023

Response 207.1

The commenter asks why the proposed units in Forestville have to be half a mile from the town center.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria.

Response 207.2

The commenter asks why there were no units proposed for Healdsburg or Sebastopol.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Sebastopol, Healdsburg, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 207.3

The commenter asks why the number of housing units and potential new residents capped at a reasonable percentage of the current Forestville population.

This comment has been noted. Please refer to Master Response SITE regarding the Rezoning Site selection process and criteria. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase.

Response 207.4

The commenter states that adding 635 residential units will require doubling of the sewer plant and some of the proposed rezone sites are on land that would be needed for sewer plant expansion.

This comment has been noted. Please refer to Master Response UTIL regarding impacts to the existing sewer system.

EIR Public Comment 208

COMMENTER: Dave Gebow

DATE: February 13, 2023

Response 208.1

The commenter expresses concern over the rezoning of site GUE-1 because it would change the quiet nature of the neighborhood near the site.

The commenter's opinion is noted. Refer to Master Response HE regarding expressions of opinion regarding the project, and Master Response EXST regarding existing conditions in the County.

Response 208.2

The commenter states that Woodland Avenue, Sunset Avenue and the entire Highland Hill area is made up of shoulder-less one lane roads that could not support 50-80 more cars in the neighborhood.

Refer to Master Response EXST regarding existing single lane roads. Refer to Master Response TRA regarding traffic congestion.

Response 208.3

The commenter expresses concern over evacuations. The commenter states currently people park illegally on the streets in the Highland Hills Area and garbage trucks have a hard time getting through. The commenter expresses concern about the ability for emergency vehicles to use these streets with the addition of more people and cars.

Refer to Master Response EXST regarding the existing amount of vehicles, parking, and evacuation concerns, as this is a current situation not caused by the proposed project. Refer to Master Response EMG regarding the emergency evacuation.

Response 208.4

The commenter expresses concern over pedestrian accessibility. The commenter states that Woodland Avenue, Sunset Avenue, and Palo Alto Road are all steep. The commenter states an opinion that physically challenged/disabled people would not be able to make the hike up these roads.

Refer to Master Response EXST regarding the existing pedestrian accessibility of the neighborhood, as this is a current situation not caused by the proposed project.

Response 208.5

The commenter references the Fife Creek Commons development recently built in Guerneville as an example of a site that is appropriate because it is walkable, accessible, disabled-friendly, and has plenty of parking. The commenter states that in contrast site GUE-1 is not appropriate because it lacks all of these qualities.

The commenter's opinion is noted and will be passed on to the decision-makers. Refer to Master Response HE regarding opinions on the project.

EIR Public Comment 209

COMMENTER: David Goldstein

DATE: February 13, 2023

Response 209.1

The commenter expresses concern over water supply for new development and asks where the water will come from for new units.

Refer to Master Response UTIL regarding water. The Draft EIR addressed water supply availability in Section 4.18, *Utilities and Service Systems*.

Response 209.2

The commenter expresses concern over traffic caused by new residents and asks if the new restaurant and brewery along Highway 116 were taken into consideration when evaluating traffic impacts.

Refer to Master Response TRA regarding traffic congestion. As stated therein, “LOS impacts are no longer considered significant impacts under CEQA; therefore, traffic congestion-related mitigation measures are not required. Therefore, traffic congestion was not analyzed in the Draft EIR based on this state law. Refer to Section 4.16, *Transportation*, of the EIR for more transportation analysis. However, Appendix TRA of the Draft EIR includes an LOS-based congestion analysis for informational purposes.”

EIR Public Comment 210

COMMENTER: Dennis O’Rorke

DATE: February 13, 2023

Response 210.1

The commenter asks decision-makers to not add more housing in flood prone areas and asks that they do not allow gentrification housing.

The commenter does not state what housing site they are commenting on, but information regarding flooding can be found in Section 4.10, *Hydrology and Water Quality*. Of the 59 sites, seven sites are partially within the 100-year floodplain: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, PEN-9, and LAR-9. As analyzed under Impact HWQ-4, “[f]or the sites partially within the 100-year floodplain, development would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes achieving zero net fill within these sites following development, avoiding fill in areas that retain flood waters, and requiring review and approval of proposed drainage facilities by Permit Sonoma. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project.”

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes potential gentrification.

EIR Public Comment 211

COMMENTER: Dennis Sharp

DATE: February 13, 2023

Response 211.1

The commenter states that proposing a high percentage increase in the housing density of Forestville is irresponsible because it will put a strain on local schools and required services and create downtown traffic problems.

This comment has been noted. Impacts to schools are analyzed in Section 4.15, *Public Services and Recreation*, under Impact PS-3. As stated therein, “development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County.” Based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Based on Table 4.15-6, Forestville Elementary may see an increase of 54 students. Applicants would pay school impact fees at the time building permits are issued, to be used by Sonoma County School Districts to mitigate impacts with long-term maintenance and operation of school facilities. This impact would be less than significant, as stated in the EIR.

Please refer to Master Response TRA regarding traffic concerns.

EIR Public Comment 212

COMMENTER: Diana Hindley

DATE: February 13, 2023

Response 212.1

The commenter opposes the rezoning of GLE-1 and GLE-2 in Glen Ellen.

Please refer to Master HE regarding opposition to the Housing Element.

Response 212.2

The commenter states that the rezoning of GLE-1 and GLE-2 is unacceptable because it would have negative traffic and safety impacts, would increase noise and pollution, would remove carbon sequestering trees, lead to loss of community character, and that the area lacks local services, jobs, and public transportation. The commenter also states that the project is at odds with the General Plan policies and Glen Ellen Development Guidelines.

Please refer to Master Response TRA regarding traffic impacts and Master Response EMG regarding emergency access. Refer to Master Response EXST regarding existing lack of local services, job, and public transit. Please refer to Section 4.13, *Noise*, and Section 4.3, *Air Quality*, for analysis of potential noise and air quality impacts. As discussed therein, impacts related to noise and air quality would be potentially significant, and mitigation measures would reduce impacts to less than significant. Please refer to Section 4.8, *Greenhouse Gas Emissions*, which concludes that development facilitated by the project on Rezoning Sites would be consistent with the goals of the 2017 Scoping Plan, the Association of Bay Area Governments Plan Bay Area 2040, the County's General Plan, and the County's Climate Change Action Resolution.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, including local services and jobs. Refer to Section 4.16, *Transportation*, for discussion regarding the project's impacts to public transportation; as discussed therein, the project would not cause significant adverse impacts to public transit.

Please refer to Table 4.11-3 in Section 4.11, *Land Use and Planning*, for an analysis of the project's consistency with the County's General Plan. As demonstrated in Table 4.11-3, the proposed rezoning sites would be generally consistent with the General Plan and would be required to comply with the Glen Ellen Development and Design Guidelines.

Response 212.3

The commenter states that rezoning would cause irreparable long term damage and urges that parcels GLE-1 and GLE-2 be removed from the rezoning sites.

Please refer to Master Response HE regarding opposition to the Housing Element.

EIR Public Comment 213

COMMENTER: Don Jackson

DATE: February 13, 2023

Response 213.1

The commenter expresses their opposition to the proposed housing in Forestville and surrounding areas of the DEIR.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 213.2

The commenter states that they understand that the State and ABAG mandates the increase in high-density housing in Sonoma County, and mentions that Permit Sonoma lost the case against high number of units in rural Sonoma County.

This comment is noted and will be passed on to decision-makers for their consideration.

Response 213.3

The commenter states that the Housing Element Update would result in uncontrolled growth by more than doubling the downtown population in Forestville, leading to negative impacts on culture, personality, and functioning of the town.

This comment is noted and will be passed on to decision-makers for their consideration. Please also note that the change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Response 213.4

The commenter states that a notice for the Housing Element Update should be provided to the entire community instead of just for residents within 300 feet of proposed development parcels.

This comment is noted and will be passed on to decision-makers for their consideration.

Response 213.5

The commenter states that population growth in Guerneville would substantially impact vehicular traffic on River Road which would worsen during the summer or in the event of an emergency.

Please refer to Master Response TRA regarding traffic congestion and Master Response EMG regarding emergency access.

Response 213.6

The commenter states that the addition of 1,625 people to downtown Forestville would result in congestion on Highway 116 and would increase carbon dioxide emissions within the community.

As discussed in Section 4.8, *Greenhouse Gas Emissions*, beginning on page 4.8-17, GHG emissions generated during project operation would result primarily from energy usage in buildings and fuel consumption associated with light-duty vehicles. Although the County of Sonoma does not have a qualified GHG-reduction plan, there are some proposed Housing Element policies that would assist in reducing emissions. Specifically, Policy HE-3e would reduce GHG emissions through the encouragement of infill development, ultimately reducing VMT. Policies HE-3g and HE-5d would focus development in areas well-served by existing transit, which would also reduce GHG emissions by reducing VMT. Similarly, Policy HE-6f focuses on the provision of high-quality public transportation. Policies HE-6a and HE-6b would promote the conservation of energy and energy efficiency in both new and existing development, which would reduce GHG emissions by reducing overall energy usage. Refer also to Section 4.16, *Transportation*, of the EIR regarding an analysis of the VMT impacts of the project.

Response 213.7

The commenter expresses the opinion that even if all future residents utilized electric vehicles to reduce GHGs, there would be substantial impacts to peak electricity and the electrical grid.

As discussed in Section 4.6, *Energy*, beginning on page 4.6-11, development facilitated by the project on Rezoning Sites would consume approximately 216,623,500 kilowatt-hours (kWh), or 56,719 millions of British thermal units (MMBtu) per year of electricity for lighting and large appliances, and approximately 86,468,600 thousands of British thermal units (kBtu), or 86,469 MMBtu per year of natural gas for heating and cooking (see Appendix AQ for CalEEMod results). Electricity would be provided by SCP (the default electricity provider in the County) and/or PG&E. SCP provides electricity from cleaner power sources with lower GHG emissions than PG&E, although customers can opt out of SCP service and be provided electricity from PG&E. Development facilitated by the project on Rezoning Sites would also be required to comply with the latest version of CalGreen which would require efficient household fixtures and energy efficiency measures.

Response 213.8

The commenter questions where children will go to school.

As discussed in Section 4.15, *Public Services and Recreation*, based on school-age population statistics provided by the United States Census Bureau, development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County. The analysis conservatively assumed that all school-aged children would attend public schools.

Response 213.9

The commenter wonders what will be done to upgrade or enhance the local fire department, police department, water, and sewer systems. He expresses the opinion that service infrastructure should be put in place before units are constructed.

Please refer to Master Response UTIL regarding utility availability. Regarding fire department and police department upgrades, the analysis within the Draft EIR in Section 4.15, *Public Services and Recreation*, determined that both fire and police departments would be able to maintain acceptable service ratio response times and would not require the construction of new or upgraded facilities.

Response 213.10

The commenter states that construction of the proposed projects would disrupt the community and would worsen traffic.

This comment is noted and will be forwarded to decision-makers for their consideration. Refer to Master Response TRA regarding traffic congestion. Construction-related impacts are analyzed throughout the EIR.

Response 213.11

The commenter states that Forestville currently has a population of 3,255, and the addition of 1,625 new residents under the Housing Element Update would be approximately 51 percent of the current population. The commenter expresses the opinion that 1,625 new residents would only make up 0.33 percent of the population for Santa Rosa, which has more resources to accommodate the new residents.

The commenter is comparing the population of Forestville with the population of the entire County, including those who live in cities, with their own RHNA allocations and housing elements. Santa Rosa, for example, has a separate RHNA requirement. Additionally, the change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. This comment is noted and will be passed on to decision-makers for their consideration.

EIR Public Comment 214

COMMENTER: Elizabeth Westerfield

DATE: February 13, 2023

Response 214.1

The commenter expresses concern regarding rezone sites FOR 1 through 6 in Forestville with specific questions and concerns about FOR 2. The commenter states that Mirabel Road is the only thoroughfare from River Road to Highway 116, and the proposed project would result in unsafe flow of traffic entering and exiting Mirabel Road.

Please refer to Master Response TRA regarding traffic congestion.

Response 214.2

The commenter states that Mirabel Road only has one sidewalk on one side of the street heading towards downtown from the Youth Park, and expresses her concern regarding pedestrian safety.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Please refer to Response 123.3 for additional information regarding traffic, traffic safety, and pedestrian safety.

Response 214.3

The commenter states that Forestville has very limited and infrequent public transportation and questions how the public transportation would be able to accommodate the needs of people without cars.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. As discussed in Section 4.16, *Transportation*, the project would not cause significant adverse impacts to fixed-route service. The project would not conflict with plans, policies, ordinances, or regulations pertaining to public transit. Ridership on area transit lines is not expected to exceed available capacities with the addition of demand associated with development facilitated by the project on Rezoning Sites.

Response 214.4

The commenter expresses concern regarding pedestrian and childrens' safety since most of Mirabel Road has ditches and no sidewalk.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Refer to Response 214.2 regarding pedestrian safety.

Response 214.5

The commenter expresses concern regarding local elementary schools and the lack of teachers and classrooms to accommodate the influx in children.

As analyzed in Section 4.15, *Public Services and Recreation*, students that would reside at the Rezoning Sites would attend various schools throughout the County. A generation rate of 6.64 age 5 to 10 children per an increase of 100 people based on US Census data was used in the Draft EIR to determine the number of school aged children that would likely attend schools within the county. This estimate is conservative in that it also assumes all school aged children would attend public schools. Based on the generation rate, the number of elementary schools, declining enrollment trends across school districts within the county, and payment of impact fees required from all projects, impacts to elementary schools would be less than significant. No revisions to the Draft EIR would be necessary in response to this comment.

Response 214.6

The commenter expresses concern regarding the closed high school and questions if there are plans to bus students to Sebastopol.

As analyzed in Section 4.15, *Public Services and Recreation*, students that would reside at the Rezoning Sites would attend various schools throughout the County. No development is proposed on any of the Rezoning Sites as part of this project, and decisions regarding school transportation would be made by the applicable school districts.

Response 214.7

The commenter states that the local sewer and water system would be required to be upgraded to accommodate the increase in residents.

This comment has been noted. Refer to Master Response UTIL.

Response 214.8

The commenter questions how the Forestville water district would accommodate 283 new homes.

Refer to Master Response UTIL. Stated in Section 4.18, *Public Utilities and Service Systems*, as part of the Draft EIR process, each water service provider was contacted and assessed in the Water and Sewer Study, included as Appendix WSS to the Draft EIR, for its ability to provide water service to the Rezoning Sites. The Forestville Water District did respond to the request for information on their ability to provide water and sewer service to the Rezoning Sites and stated that, apart from site FOR-4, there would be adequate water supply capacity to all other sites within Forestville. With the exception of Sites FOR-1 and FOR-2, there would be adequate existing wastewater collection systems and wastewater capacity. For sites FOR-1, FOR-2, and FOR-4, Mitigation Measure UTL-1 would apply, which would require additional assessment for water service and sewer capacity for the applicable Rezoning Site during the plan review and permit approval process. Therefore, development on Rezoning Sites within the Forestville Water District service area would be adequately served by the water and wastewater provider. No revisions to the Draft EIR are necessary in response to this comment.

Response 214.9

The commenter expresses concerns regarding police services and questions how extra policing would be ensured.

Police department services were analyzed within the Draft EIR in Section 4.15, *Public Services and Recreation*. It was determined that the police department would be able to maintain acceptable service ratio response times and would not require the construction of new or upgraded facilities due to the potential additional population of the Rezoning Sites.

Response 214.10

The commenter questions how access to medical and social services for future residents would be improved.

Please refer to Master Response EXST regarding existing conditions, including the existing availability or lack thereof of medical and social service providers. CEQA does not require projects to mitigate existing conditions or deficiencies, and pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes medical and social services.

Response 214.11

The commenter expresses the opinion that increasing the Forestville population by 1,625 residents is increasing the size of the town by 50 percent, which would substantially impact traffic, safety, and quality of life for current residents. The commenter expresses the opinion that current infrastructure is unavailable and lacking to accommodate the increase in population.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Please refer to Master Response TRA regarding traffic congestion. Please refer to Master Response EXST regarding existing conditions.

Response 214.12

The commenter expresses the opinion that Forestville should not be required to increase its population by 50 percent to satisfy Sonoma County's housing needs.

This comment has been noted. Refer to Response 214.11 and Master Response HE. The commenter's opinion is noted and will be passed on to County decision-makers.

EIR Public Comment 215

COMMENTER: Erin Jones

DATE: February 13, 2023

Response 215.1

The commenter expresses concern regarding the proposed 30 units on the Sweetwater Springs property off of Sunset Avenue (GUE-1).

This comment is noted. Responses to specific comments are below in Responses 215.2 through 215.9.

Response 215.2

The commenter states that the addition of 30 houses in the area would put a stress on the poor infrastructure. The commenter expresses the opinion that roads are narrow and the largest entrances, Woodland Drive and Palo Alto Drive, only permit one single car to pass. The commenter states that the increase in residents would add more traffic which would gridlock the area.

Please refer to Master Response EXST regarding existing roadway infrastructure and Master Response TRA regarding traffic congestion.

Response 215.3

The commenter states that there are no sidewalks for roads in the area and expresses concern regarding pedestrian safety.

Refer to Master Response EXST regarding the existing lack of sidewalks. Please refer to Section 4.16, *Transportation*. As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access (page 4.16-14 of the Draft EIR). Additionally, as discussed under Impact TRA-2 (page 4.16-17 of the Draft EIR), development facilitated by the proposed project on Rezoning Sites would not substantially increase hazards due to sharp curves, dangerous intersections, or other design features.

Response 215.4

The commenter expresses the opinion that since Woodland Drive, Palo Alto Drive, and Morningside are the only access points to Flamingo Hill, it would be impossible to exist the area in the case of an emergency.

Please refer to Master Response EMG regarding emergency access and Master Response EXST regarding existing access points.

Response 215.5

The commenter states that the streets are located on steep hills and recommends widening the streets for safety purposes.

Please refer to Master Response EXST regarding existing infrastructure and Master Response EMG regarding emergency access.

Response 215.6

The commenter states that Woodland Drive, Palo Alto Drive, and Morningside are one lane roads and if River Road floods, then all the homes would be unable to evacuate the hill.

Please refer to Master Response EMG regarding emergency access and Master Response EXST regarding existing one lane in and one lane out roads.

Response 215.7

The commenter states that redwood trees cover a significant portion of the hill and they often fall on powerlines. The commenter states that last month's storm resulted in no power for 6 days.

Refer to Master Response EXST regarding existing conditions not caused by the proposed project. This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 215.8

The commenter states that construction on the Sweetwater water supply site would displace the current water tank which actively supplies water. The commenter expresses her concern for water supply during a fire, and states that the current water capacity would be inadequate for the additional 30 homes.

No development is currently proposed on any of the Rezoning Sites. Refer to Master Response UTIL. Impacts related to water supply are analyzed in Section 4.18, *Utilities and Service Systems*. As discussed therein, development facilitated by the project on Rezoning Sites would require implementation of Mitigation Measure UTIL-1, Water and Wastewater Provider Capacity, to ensure adequate water supply for particular rezone sites. As discussed in Section 4.19, *Wildfire*, the Board of Forestry via California Code of Regulations Title 14 sets forth minimum development standards for emergency access, including but not limited to water supply (page 4.19-26 of the Draft EIR). Development facilitated by the project on Rezoning Sites would be required to comply with this development standard.

Response 215.9

The commenter expresses the opinion that electric and water utilities would be strained, and the propane network would require an expansion or upgrade in order to supply electricity and heat.

The commenter is likely referring to the natural gas distribution system. Impacts to electricity and natural gas service systems are discussed in Section 4.18, *Utilities and Service Systems*. As discussed therein, development facilitated by the project on Rezoning Sites would require connections to existing electrical and natural gas infrastructure, which would be provided in accordance with the rules and regulations of PG&E and approved by the California Public Utilities Commission. Impacts to electricity and natural gas would be less than significant.

EIR Public Comment 216

COMMENTER: Gillian Hayes

DATE: February 12, 2023

Response 216.1

The commenter states that they requested additional time but did not receive a response, and noted that the Notice of Availability did not list a 5pm deadline for receiving comments.

Page 2 of the NOA under “Public Comments” shows that the 5 p.m. deadline is stated. The Draft EIR was made available for public review for a 55-day comment period that began on December 28, 2022 and ended on February 23, 2023. *CEQA Guidelines* Section 15105(a) require EIRs to be circulated for at least 30 days and no longer than 60 days, except under unusual circumstances. Therefore, the Draft EIR was circulated for an appropriate amount of time, and no circumstances warrant a longer public review period.

Response 216.2

The commenter states that the Housing Element Update should develop housing within the Urban Growth Boundaries of the cities in Sonoma County and closer to urban areas and available services, and not 20 to 30 minutes outside of accessible services without transit and without necessary infrastructure.

The commenter does not specify which services they are referring to. As described in Master Response SITE regarding the site selection process, site criteria include being located within a designated Urban Service Area with public sewer and water service. Please also refer to Master Response EXST regarding existing conditions.

Response 216.3

The commenter quotes from Title 7, Division 1, Chapter 3, Sections 65580(e) and (f) of the Government Code and expresses the opinion that the DEIR does not adequately analyze economic, environmental, fiscal factors, and community goals listed in the Sonoma County General Plan, and the DEIR proposes to amend the General Plan without adequate analysis of required areas.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which economic and fiscal factors. However, it should be noted that to certify the EIR and approve the project, the County would adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County’s decision to approve the project that balances the project’s economic, legal, social, technological or other benefits against its unavoidable environmental risks.

Response 216.4

The commenter expresses the opinion that the proposed project does not identify suitable sites and feasibility for development is deferred. The commenter states that Forestville and Guerneville lack infrastructure and services to accommodate more housing.

The commenter does not specify which infrastructure and services they are referring to. As described in Master Response SITE regarding the site selection process, site criteria include being located within a designated Urban Service Area with public sewer and water service.

Response 216.5

The commenter states that financial resources to make the project happen are not identified adequately as Government Code Section 65583 requires. The commenter states that population and employment trends and household characteristics are required under the code.

Government Code Section 65583 is specific to Housing Elements, and does not contain requirements for EIRs. Please refer to the Public Draft Housing Element for the requested information.

Response 216.6

The commenter states that ES-1 of the DEIR claims that all sites are adjacent to or within Urban Growth boundaries or cities in Sonoma County which is untrue. The commenter states that Forestville and Guerneville are not adjacent to UGB for any city and the nearest UGB would be Santa Rosas.

Page ES-1 states: "All Rezoning Sites near incorporated areas are within or adjacent to voter-approved Urban Growth Boundaries." This statement is referring only to Rezoning Sites that are near incorporated areas, and not all Rezoning Sites. Please refer to Figures 2-8, 2-12, and 2-13, where SAN sites are shown to be within the City of Santa Rosa UGB, PET sites are shown to be within the City of Petaluma UGB, and SON sites are shown to be within the City of Sonoma UGB. The statement on page ES-1 is correct and no revision is needed.

Response 216.7

The commenter expresses the opinion that ES-1 only discusses area plan amendments and does not describe the General Plan text amendments necessary to provide consistency throughout the General Plan.

The Housing Element includes Program 15k to adopt necessary General Plan amendments to provide consistency with the Housing Element.

Response 216.8

The commenter states that ES-2 of the DEIR claims that the project would implement General Plan policies and programs that require the County to identify urban sites near jobs and transit which may accommodate additional housing. The commenter expresses the opinion that Forestville and Guerneville do not have adequate jobs, transit, or schools as described in the DEIR Project Objectives.

Please refer to Master Response EXST regarding existing conditions, and Master Response SITE regarding the site selection process and criteria. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such,

formal analysis of economic or social impacts is not required, which includes jobs. The commenter's opinion is noted and passed on to decision-makers for consideration.

Response 216.9

The commenter states that rezoning of sites in Forestville and Guerneville would be inconsistent with General Plan policies since it would encourage sprawl and the loss of agricultural land and would be in direct conflict with Project Objectives.

Please refer to Impact LU-2, beginning on page 4.11-30 of the Draft EIR, regarding the project's consistency with General Plan policies. As stated therein, the project would not result in a significant environmental impact due to a conflict with a land use plan or policy.

Please refer to Impact AG-1, on page 4.2-15 of the Draft EIR, regarding the conversion of Important Farmland or conflicts with agricultural zoning. As stated therein, the project would not convert protected agricultural lands to non-agricultural use.

The commenter's opinion related to project objectives is noted and passed on to decision-makers for consideration.

Response 216.10

The commenter states that the DEIR does not adequately show there are available capacities for required services and jobs in the proposed locations. The commenter expresses the opinion that the project should not place disadvantaged populations, including low-income residents, in rural areas with a lack of services.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process, and Master Response HE regarding opposition to the project. Please refer to Master Response EXST regarding existing conditions and infrastructure.

Response 216.11

The commenter comments on the loss of industrial zoned land on FOR-6 and expresses the opinion that replacements should be included since there is a deficit of industrial zoned land in Forestville.

The commenter's opinion is noted and passed on to decision-makers for consideration. FOR-6 is currently vacant and is not currently being used for industrial purposes.

Response 216.12

The commenter states there is Statewide Farmland of Importance on FOR-2 and the DEIR incorrectly includes a no impact determination.

CEQA defines Important Farmland as that which is characterized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. FOR-2 is located on Farmland of Local Importance, which is not considered Important Farmland for the purposes of CEQA analysis. The impact conclusion provided in the Draft EIR remains accurate and no revisions are required.

Response 216.13

The commenter expresses the opinion that the proposed project would increase the population by 50 percent above the current population, which would produce detrimental impacts since there is a lack of proper infrastructure.

This comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Please refer to Section 4.18, *Utilities and Service Systems*, regarding potential impacts to utility infrastructure that could result from the project.

Response 216.14

The commenter states that there is a lack of access to services in Forestville and Guerneville, and by placing housing away from the urban core, the proposed project would put pressure on communities that are not prepared for development.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 216.15

The commenter expresses the opinion that the DEIR does not adequately analyze biological impacts and mitigations defer for future study. The commenter states that the DEIR should conduct a study of the Natural Diversity database and the Santa Rosa Plain Conservation Strategy, and should include a high-level biologist review for all proposed rezone sites. Therefore, if any impacts were to occur, sites could be ruled out quickly. The commenter questions why a high-level analysis was prepared for geology and soils but not for biological resources.

Please refer to Section 4.4, *Biological Resources*, and Appendix BIO to the Draft EIR. The Rezoning Sites plus a 500-foot buffer were evaluated in these sections. As described therein, a query of the California Natural Diversity Database was used to inform the list of special-status species with the potential to occur. The Santa Rosa Plain Conservation Strategy is summarized on page 4.4-26 of the Draft EIR, and incorporated into the analysis and mitigation measures as appropriate. The commenter's assertion that a high-level review of biological resources was not done is incorrect.

Response 216.16

The commenter states that all proposed sites should be analyzed for utility service and capacity now instead of later. The commenter claims that all sites in Forestville would require off-site improvements and are not feasible for development, including related to existing pipe sizing. The commenter asserts that the DEIR's analysis is inadequate and asserts that engineered studies of the sewer system, stormwater system, and water system is necessary. The commenter asserts that water quality impacts require more attention and analysis. The commenter expresses the opinion that drainage patterns should not be assumed to be no impact.

Please refer to Section 4.18, *Utilities and Service Systems*, and Appendix WSS of the Draft EIR for an analysis of water and wastewater utility infrastructure. Stormwater, water quality, and drainage impacts are addressed in Section 4.10, *Hydrology and Water Quality*. Please refer to Impact HWQ-1, beginning on page 4.10-23 of the Draft EIR, regarding water quality impacts, which were determined to be less than significant. Please refer to Impact HWQ-3, beginning on page 4.10-26 of the Draft EIR, regarding stormwater runoff and drainage impacts, which were determined to be less than significant. Because no site-specific proposals for development on the Rezoning Sites are available at this time, a programmatic analysis was conducted.

Response 216.17

The commenter states that the intersection at Highway 116 and Mirabel Road is currently at LOS F, and VMT impacts are significant and unavoidable. The commenter expresses the opinion that the significant and unavoidable finding could be avoided if the sites were located closer to urban cores. The commenter states that this VMT impact is individual but also cumulative.

Please refer to Master Response TRA regarding LOS impacts, and Master Response SITE regarding site selection criteria. Please refer to Impact TRA-1, beginning on page 4.16-14 of the Draft EIR, regarding VMT impacts. Please also refer to Section 6, *Alternatives*, for alternatives considered that could reduce significant and unavoidable impacts. Within the reasonable range of alternatives, significant and unavoidable VMT impacts would still occur.

Response 216.18

The commenter states that the housing sites should be located in other areas due to the significant and unavoidable wildfire impacts.

Please refer to Master Response SITE regarding the site selection process and criteria. Please also refer to Section 6, *Alternatives*, for alternatives considered that could reduce significant and unavoidable impacts. Within the reasonable range of alternatives, significant and unavoidable wildfire impacts would still occur.

Response 216.19

The commenter states that the DEIR incorrectly determines a less than significant determination for public services and recreation. The commenter expresses the opinion that police and fire services are inadequate, and would not be able to accommodate a larger population since staffing capacity is currently 25 to 30 percent below.

Please refer to Master Response EXST regarding the existing conditions of public service facilities. As described under Impact PS-1, beginning on page 4.15-10 of the Draft EIR, impacts to fire protection facilities would be less than significant as future development would be required to comply with existing laws and regulations regarding fire safety, and the project would not substantially reduce existing response times or require the construction of new facilities. As described under Impact PS-2, beginning on page 4.15-12 of the Draft EIR, impacts to police facilities would be less than significant as the need for new officers would be distributed throughout the county, which would not require new police facilities, and General Plan Policy LU-4f requires the payment of developer fees for the provision of public services.

Response 216.20

The commenter expresses the opinion that broadband is not available in Forestville and Guerneville and the cost to add broadband to sites would be beyond what any of the development would be required to contribute. The commenter questions what the plan is for internet and cable access.

Please refer to Master Response EXST regarding existing conditions. As noted on page 4.18-15 of the Draft EIR:

Project implementation requires connections to existing adjacent utility infrastructure to meet the needs of site residents and tenants. Based on the availability of existing telecommunications infrastructure, construction of new telephone and cable lines would not be required, and all sites would be able to connect to existing infrastructure. The project would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure. Therefore, there would be adequate telecommunications facilities to serve the future development on the Rezoning Sites and impacts related to telecommunications would be less than significant.

Response 216.21

The commenter states that the County requires 5 acres of parkland per 1,000 residents, and Forestville would require 10 more acres of parks if the sites are approved.

Potential impacts to park and recreation facilities, including the need for additional facilities, are discussed under Impact PS-4, beginning on page 4.15-15 of the Draft EIR. As described therein, the County requires payment of parks impact fees (per Sonoma County Code Section 20-65) and park dedication or in lieu fees (per Sonoma County Code Section 25-58, offsetting any impacts related to increased demand at existing recreation facilities. With payment of these fees, impacts would be less than significant.

Response 216.22

The commenter states that there is a lack of bus lines in Forestville and Guerneville, and only one bus serves the west county on Route 20. The commenter states that access to services is required by HCD and future development in Forestville and Guerneville would have a lack of access to transit.

Please refer to Master Response EXST regarding existing conditions and infrastructure. Please refer to Impact TRA-1, beginning on page 4.16-14 of the Draft EIR, regarding potential impacts to transit facilities. As noted therein, the Rezoning Sites are not within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor, and ridership on area transit lines is not expected to exceed available capacities with the addition of demand associated with development facilitated by the project on Rezoning Sites.

Response 216.23

The commenter states that curb, gutter, and sidewalks do not exist in Forestville and Guerneville or near any of the sites. The commenter expresses the opinion that investment in street and pedestrian infrastructure for all sites to transit and the downtown area would be beyond the legal nexus for the individual projects. The commenter questions how the installation of street infrastructure would be funded.

Please refer to Master Response EXST regarding existing conditions and infrastructure, including curb, gutter, and sidewalks. The Draft EIR is not required to mitigate existing conditions or deficiencies.

Existing transit access, bicycle conditions, and pedestrian facilities are described beginning on page 4.16-5 of the Draft EIR. Potential impacts to these facilities are described in Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. As noted therein:

...in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.

The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network.

Response 216.24

The commenter states that several sites are located on scenic highways (including FOR-2) and would create significant and unavoidable impacts without mitigation.

Please refer to Impact AES-2, beginning on page 4.1-55 of the Draft EIR. As noted therein, several Rezoning Sites (although not FOR-2) are located close enough to a state-designated scenic highway that project implementation could cause a significant impact. This impact is identified as significant and unavoidable, with no feasible mitigation measures available. FOR-2 is located more than 1,000 feet from State Route 116, and is separated from the scenic highway by intervening development and vegetation.

Response 216.25

The commenter states the project will increase greenhouse gas impacts and recommends placing housing closer to UGBs to reduce VMT and GHG, and proposes the location near Fulton Road which is 10 to 15 minutes closer to services with more consistent transit.

Please refer to Master Response SITE regarding site selection criteria and Response 216.6 regarding UGBs. As noted therein, several Rezoning Sites are located within UGBs. Please also refer to Section 6, *Alternatives*, for alternatives considered that could reduce significant and unavoidable impacts. Within the reasonable range of alternatives, significant and unavoidable VMT impacts would still occur.

As discussed in Section 4.8, *Greenhouse Gas Emissions*, beginning on page 4.8-17, GHG emissions generated during project operation would result primarily from energy usage in buildings and fuel consumption associated with light-duty vehicles. Although the County of Sonoma does not have a qualified GHG-reduction plan, there are some proposed Housing Element policies that would assist in reducing emissions. Specifically, Policy HE-3e would reduce GHG emissions through the encouragement of infill development, ultimately reducing VMT. Policies HE-3g and HE-5d would focus development in areas well-served by existing transit, which would also reduce GHG emissions by reducing VMT. Similarly, Policy HE-6f focuses on the provision of high-quality public transportation. Policies HE-6a and HE-6b would promote the conservation of energy and energy efficiency in both new and existing development, which would reduce GHG emissions by reducing overall energy usage.

Response 216.26

The commenter states that the DEIR's analysis of school impacts is inadequate. The commenter expresses the opinion that the increase in density provides no tax revenue since only multi-family development is included under the project, which would result in less funding for students and less teachers. The commenter states that El Molino High School recently closed and 556 students were combined into Analy High School in Sebastopol, which is now at capacity for high school students.

Schools serving the Rezoning Sites are identified in Table 4.15-2 on page 4.15-3 of the Draft EIR. As noted therein, Forestville and Guerneville are served by Forestville Union Elementary, Guerneville Elementary, and West Sonoma County Union High. El Molino High School was not included in the analysis.

School impacts are addressed under Impact PS-3, beginning on page 4.15-13 of the Draft EIR. As stated therein, while development facilitated by the project on Rezoning Sites would increase the demand for school facilities, the payment of developer fees is considered adequate mitigation of school impacts. Therefore, impact to schools would be less than significant.

Response 216.27

The commenter states that the population growth estimates are incorrect since they are based on the countywide average per household, instead of the low-income increases or average of the county which is consistently higher than the countywide average growth.

The population estimates provided in the Draft EIR are based on the California Department of Finance (DOF) data, which provides persons per household data for incorporated cities, as well as unincorporated county areas. The County determined that the unincorporated Sonoma County persons per household estimate provided by the DOF was the appropriate data source for the population estimates in the EIR. The commenter does not provide an alternate source for population projections. No revisions to the EIR are required.

Response 216.28

The commenter states that Laughlin in Guerneville is an inappropriate site since it is located within a 100-year flood zone and regularly floods.

Please refer to Master Response SITE regarding site selection criteria, and Master Response HE regarding opposition to specific sites. Potential impacts related to flooding are addressed under Impact HWQ-4 on page 4.10-28. As noted therein, GUE-4 is located partially within a 100-year flood hazard area, but future development would be required to comply with General Plan policies, including zero net fill, avoiding fill in flood water retention areas, and review and approval of proposed drainage facilities. Impacts were determined to be less than significant with compliance with applicable regulations.

Response 216.29

The commenter states that FOR-1 requires more in depth hazards analysis.

The EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Please refer to Impact HAZ-2, beginning on page 4.9-11 of the Draft EIR. As noted therein, development on FOR-1 would be preceded by investigation, remediation, and cleanup under the supervision of the RWQCB,

Sonoma County Local Oversight Program, or DTSC. The responsible agency would require the level of remediation required to reduce health risk to workers and future occupants. Compliance with existing State and local regulations would reduce impacts to less than significant.

Response 216.30

The commenter states that the Housing Element Update and DEIR are inconsistent with Policy HE-2a of the current Housing Element since there is no available infrastructure; Policy HE-3g since the proposed locations are not well served by public transit, schools and retail; and Policy HE-6g since the proposed project would increase GHG and would not provide public services.

Consistency with General Plan (including Housing Element) policies is addressed under Impact LU-2, beginning on page 4.11-30 of the Draft EIR. Policy HE-2a is addressed on page 4.11-38; as noted therein, the project is consistent with this policy by design. Please also refer to Master Response SITE regarding the site selection criteria. Please refer to Response 166.2 regarding consistency with Policies HE-3g and HE-6f.

Response 216.31

The commenter states that the Housing Element Update and DEIR are inconsistent with the General Plan Land Use Element, specifically Policy LU-15.3 since the proposed project would remove commercial centers which determines the character of the community; and Policy LU-15.4 since the proposed project would not maintain rural village through design of small scale development with substantial open space and native landscape. The commenter recommends sites to be located along Wright Road and Sebastopol Road instead of rural areas without adequate services for dense development. The commenter expresses the opinion that DEIR Alternative Option 3 for fewer rezone sites should be considered and Forestville sites FOR-1, FOR-2, and FOR-4 should be removed given the surrounding land uses and contamination on-site.

Consistency with General Plan policies is addressed under Impact LU-2, beginning on page 4.11-30 of the Draft EIR. As noted under Response 168.6, rezoning sites would not preclude existing commercial operations from continuing to operate, as under existing conditions.

The commenter does not specify which services they are referring to. As described in Master Response SITE regarding the site selection process, site criteria include being located within a designated Urban Service Area with public sewer and water service. Please also refer to Master Response EXST regarding existing conditions.

The commenter's preference for Alternative 3 is noted and passed on to decision-makers for consideration. FOR-1 and FOR-2 would not be rezoned under Alternative 3. FOR-4 was determined to have fewer constraints than the remaining sites which would not be rezoned under Alternative 3; therefore, it would continue to be rezoned under this alternative.

EIR Public Comment 217

COMMENTER: Greg Guerrazzi

DATE: February 13, 2023

Response 217.1

The commenter comments on two Glen Ellen Parcels (APN 054-290-057 and APN 054-290-084, items 65 and 66 in Housing Appendix Table) proposed for rezoning, and expresses the opinion that these sites are located outside of the urban growth boundary at an unsignalized intersection and therefore should not be upzoned.

Please refer to Response 70.12.

Response 217.2

The commenter requests the removal of the two Glen Ellen parcels due to significant impacts identified in the DEIR and the comment letter, and the consideration of an alternative zone district that reduces the number of allowed units on the site and does not require a minimum number of units.

The commenter is correct that the project would result in significant and unavoidable impacts to the environment. The Draft EIR is not required to reduce all potential impacts to a less than significant level but is required to discuss available and feasible mitigation measures that could reduce potential impacts. To that end, to certify the EIR and approve the project, the County would adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County's decision to approve the project that balances the project's economic, legal, social, technological or other benefits against its unavoidable environmental risks.

Additionally, please refer to Section 6.4, *Alternatives Considered but Rejected*, for a discussion of alternatives that would rezone at a lower density and an explanation as to why they were ultimately rejected as feasible alternatives to the proposed project.

Response 217.3

The commenter states that Glen Ellen and Sonoma Valley are currently required to accommodate approximately 700 housing units as part of the SDC Specific Plan, and expresses the opinion that the area has taken on more than its fair share of housing and should not be required to accommodate more housing that would contribute to the significant traffic impacts identified in the SDC Specific Plan.

Please refer to Response 70.16.

Response 217.4

The commenter states that the proposed development would require the removal of several heritage trees.

Please refer to Section 4.4, *Biological Resources*, in the Draft EIR. As discussed therein, development facilitated by the proposed project on Rezoning Sites would be required to comply with the Sonoma County Tree Protection Ordinance, Article 67 of the Sonoma County Zoning Code: Valley Oak Habitat

Combining District, and the Sonoma County General Plan 2020 goals and policies. With adherence to these policies, impacts to biological resources such as trees would be less than significant.

Response 217.5

The commenter states that the property owner has not stated any intention to develop the property at the proposed density, which would not conform with the scale of the site and surrounding neighborhood.

This comment is noted and will be passed on to decision-makers. The rezoning is not dependent on stated intentions to develop a property. The purpose of the rezoning is to zone enough land to meet the RHNA for the unincorporated County.

Response 217.6

The commenter states that the development of the two sites would conflict with climate change policies since the area is not served by existing or planned transit, is not located near a job center, and is not located near or adjacent to an urban growth area.

Please refer to Section 4.8, *Greenhouse Gas Emissions*, in the Draft EIR. As discussed therein, the proposed project would be consistent with the 2017 Scoping Plan, Plan Bay Area 2040, the Sonoma County General Plan, and the County Climate Change Action Resolution. Overall impacts related to greenhouse gas emissions would be less than significant. Furthermore, as discussed in Section 4.16, *Transportation*, in the Draft EIR, VMT impacts would be less than significant. Please refer to Response 200.1 regarding the urban growth area.

Response 217.7

The commenter expresses the opinion that tripling the number of housing units on the site would add to the significant impacts caused by implementation of the SDC Specific Plan and that it is not consistent with the Glen Ellen Development Guidelines.

Please refer to Response 70.16 and Response 70.3.

Response 217.8

The commenter states that the proposed rezoning is inconsistent with General Plan policies regarding Glen Ellen and is also inconsistent with Glen Ellen Development Guidelines.

Please refer to Response 70.3.

Response 217.9

The commenter expresses the opinion that the two Glen Ellen parcels involves inappropriate and precedent-setting rezoning to a high-density zoning district, which is out of scale and would result in significant adverse impacts on Glen Ellen.

Please refer to Response 70.1 and Response 70.4.

Response 217.10

The commenter states that due to the Workforce Housing zone minimum development requirements, the two Glen Ellen parcels would have to be cleared of all vegetation, including large trees, which would significantly impact the community aesthetic character and conflict with Glen Ellen Development and Design Guidelines. The commenter expresses the opinion that the mass, scale, and building coverage required to meet the density requirements would not be flexible enough to be modified in such a way as to incorporate the siting and design features outlined in the mitigation measures. The commenter recommends consideration of an alternative lower-density residential zone.

Please refer to Response 70.3 regarding Glen Ellen Development and Design Guidelines and aesthetic impacts. Please refer to Section 6.4, *Alternatives Considered but Rejected*, for a discussion of why rezoning at a lower density is not a feasible alternative to the proposed project.

Response 217.11

The commenter expresses the opinion that the proposed rezoning of the two Glen Ellen parcels would conflict with Project Objective 6, which requires new housing in urban areas near jobs, transit, and services.

Please refer to Master Response SITE for an explanation of how sites were chosen for rezoning. Not all sites chosen would individually satisfy every project objective; however, as a group of rezoning sites, the project objectives would be met.

Response 217.12

The commenter states that traffic at the Arnold Drive and Carquinez Avenue intersection is incapable of supporting the dense housing proposed. The commenter expresses the opinion that the DEIR does not adequately address the impact on traffic, emergency evacuation, disturbance of existing residents, and the historic village of Glen Ellen.

Please refer to Master Response TRA and Master Response EMG regarding traffic and emergency evacuation. Please refer to Section 4.14, *Population and Housing*, in the Draft EIR regarding disturbance of existing residents. As stated therein, with implementation of Mitigation Measure PH-1, development that would displace individuals would be required to create a County-approved relocation plan. This would reduce impacts related to the disturbance of existing residents to less than significant. Regarding historic resources, please refer to Section 4.5, *Cultural Resources*, in the Draft EIR. As discussed therein, there are no known historical resources on any of the rezone sites, however impact could be significant due to the age of some of the structures on some sites. This impact would remain significant and unavoidable. The commenter is not specific about what disturbance to existing residents they are referring to, but refer to Section 4.3, *Air Quality*, and Section 4.13, *Noise*, for impacts of the project related to air quality and noise.

Response 217.13

The commenter states that evacuation traffic and emergency vehicle service and vehicle access would be substantially impacted due to the densification of the two parcels. The commenter states that the DEIR should consider and evaluate the cumulative impact of the development proposals, such as the SDC development, Elnoka Development on Highway 12 in east Santa Rosa, and Hanna development at Arnold Drive and Agua Caliente Road.

Please refer to Response 70.6.

Response 217.14

The commenter states that the two rezone parcels represent a large part of the downtown core, and the proposed development is inconsistent with the intent of the Glen Ellen policies in the General Plan and the Glen Ellen Development and Design Guidelines.

Please refer to Response 70.3.

Response 217.15

The commenter expresses the opinion that it is important to not overtax rural infrastructure and resources. The commenter states that tripling or quadrupling the number of housing sites on the two parcels would add to the significant impacts caused by implementation of the SDC Specific Plan.

Please refer to Response 70.6 regarding cumulative impacts related to SDC development. Pursuant to CEQA Guidelines Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property taxes.

EIR Public Comment 218

COMMENTER: Harriet Katz

DATE: February 13, 2023

Response 218.1

The commenter states that constructing over 3,000 new low-income development in Forestville would result in negative impacts to traffic congestion, schooling, taxes in order to cover additional schools, and water usage. The commenter proposes the development of 500 to 600 units which would be more feasible given the existing infrastructure and resources. The commenter also states that the sites should be more evenly and fairly distributed throughout the county and in the incorporated areas as well.

The commenter is incorrect in assuming 3,000 new low-income developments are proposed. Rezoning is proposed on six sites in Forestville. Refer to Master Response TRA regarding traffic congestion.

Please refer to Section 4.15, *Public Services and Recreation*, for a full analysis of the proposed project's impact on schools. As stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Refer to Master Response UTIL regarding water usage.

The commenter's opposition to the project is noted and will be passed on to decision-makers.

EIR Public Comment 219

COMMENTER: Janice Stenger

DATE: February 13, 2023

Response 219.1

The commenter acknowledges that the Rezoning Sites are not timberland and comments on Impact AG-2 of the DEIR, and states that there are at least 25 to 30 large redwood trees in Guerneville that sequester carbon and provide shelter for animals. The commenter asks if redwood trees will be removed to facilitate sidewalks, and states that Impact AG-2 incorrectly assumes a no impact determination.

The comment regarding removal of redwood trees is noted. Please refer to Impact BIO-5 on page 4.4-39 of the Draft EIR. As stated therein, the project would be subject to the County's ordinances and requirements protecting biological resources such as trees and impacts would be less than significant.

Potential impacts to special-status species, including through habitat modification, are addressed under Impact BIO-1, beginning on page 4.4-28 of the Draft EIR. Please refer to Table 4.4-4, beginning on page 4.4-18 of the Draft EIR, for a list of special-status wildlife species with the potential to occur within the BSAs. As noted therein, the species mentioned by the commenter are not listed species. Impact BIO-1 includes mitigation measures for the reduction of potential impacts to special-status species, including preconstruction surveys for nesting birds and non-listed special-status species avoidance.

EIR Public Comment 220

COMMENTER: Janice Stenger

DATE: February 13, 2023

Response 220.1

The commenter states no picture of their house or land appears in the DEIR, and the picture that is labeled for their house is actually a second picture of GUE-1. However, it is unclear which property the commenter is referring to.

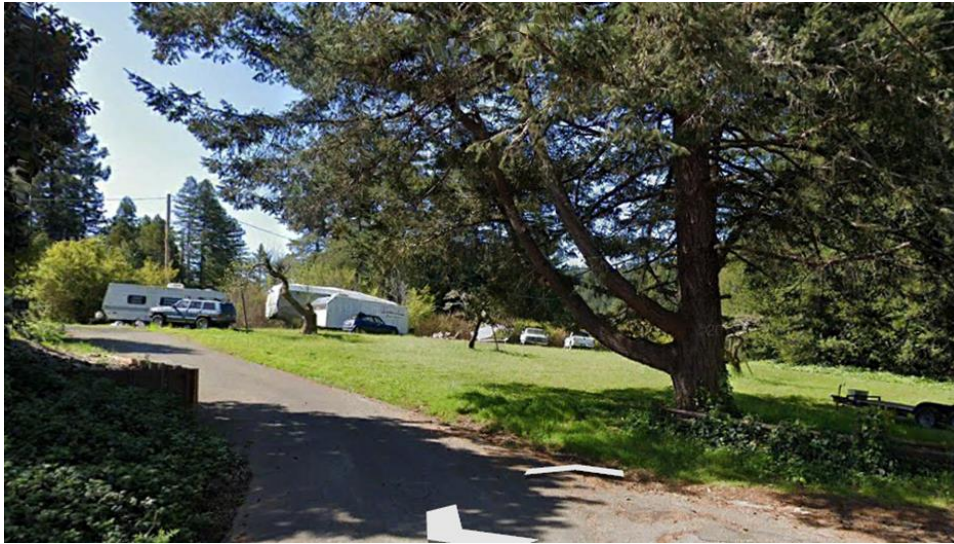
It is unclear which property the commenter is referring to; however, we presume that the commenter resides on Site GUE-2. Figure 4.1-5 on page 4.1-12 of the Draft EIR, and the preceding text describing Figure 4.1-5 on page 4.1-11 of the Draft EIR, have been revised as follows:

GUE-2 and GUE-3 are on largely undeveloped lands among single-family residences bordered by agricultural lands and wooded hillsides (Figure 4.1-5a and Figure 4.1-5b).

Figure 4.1-5a GUE-2 Looking North from Laughlin Road



Figure 4.1-5b GUE-3 Looking Westward from Cuten Avenue



Source: Google Earth 2020

This revision does not modify the conclusions of the analysis in the Draft EIR, and no further revisions are required.

Response 220.2

The commenter quotes from the Aesthetics analysis in the DEIR and states the DEIR does not mention a particular house or cottage. However, it is not clear which site the buildings the commenter references are located on.

Please refer to Section 4.1, *Aesthetics*, in the Draft EIR. As discussed therein, the proposed project could have significant impacts related to scenic resources, however with implementation of mitigation measures AES-3 and AES-4 which would reduce impacts to be less than significant.

Response 220.3

The commenter questions if their house and barn would be torn down and if their redwood trees would be removed under the project.

The proposed project does not include any development, and any development would need to be proposed by the project applicant/developer. Development would not happen without the consent of property owner.

Response 220.4

The commenter states that their family and generations before them s have lived in Guerneville all their life.

This comment is noted. This comment does not pertain to the analysis in the Draft EIR.

Response 220.5

The commenter states that there is liquefaction in the Guerneville area and provides an explanation of expansive soils.

Please refer to page 4.7-3 of the Draft EIR which includes discussion of liquefaction risk on the Rezoning sites, including GUE-3 and GUE-4. Expansive soils occur throughout the County, as discussed on page 4.7-4. As discussed under Impact GEO-2 on page 4.7-25 of the Draft EIR, with adherence to applicable laws and regulations such as CBC requirements, impacts related to liquefaction would be less than significant. Similarly, as discussed under Impact GEO-4, with adherence to applicable laws and regulations such as CBC requirements, impacts related to expansive soils would be less than significant.

Response 220.6

The commenter provides commentary about farm animals on site and states that a setback from agriculture of 200 feet would block the view and would render parts of the property undevelopable.

The commenter is correct that agriculture buffers of 100-200 feet would be required including on sites GUE-2 and GUE-3, as described under Impact AG-3 in Section 4.2, *Agriculture and Forestry*. These buffers may alter visual resources on site and would reduce total developable area.

Response 220.7

The commenter comments on GUE-4 and states that the creek floods widely on the property. The commenter claims there was contamination that originated at the County Yard which shares a fence line with GUE-4 on the north side. The commenter expresses the opinion that spawning creeks should be protected.

Please refer to Figure 4.10-5 on page Section 4.10-11 of the Draft EIR, which shows GUE-4 is partially within the 100-year flood zone. As discussed under Impact HWQ-3 on page 4.10-25, development facilitated by the proposed project on Rezoning Sites would not result in increased flooding on or off site. Additionally, as discussed under Impact HWQ-4, development on sites within a flood hazard zone would be required to comply with the Sonoma County General Plan and Sonoma County Code. Overall, impacts related to flooding would be less than significant. Table 4.9-2 details open hazardous materials cases in the vicinity of the Rezoning Sites; none are noted near the Guerneville area. The Guerneville Road Yard leaking underground storage tank case has been closed since 2005, according to information in the State Resources Control Board's GeoTracker website. The rest of the comment is noted and will be passed on to decision-makers.

EIR Public Comment 221

COMMENTER: Jared McConnell

DATE: February 13, 2023

Response 221.1

The commenter expresses disapproval of the proposed units in Forestville since there is a lack of infrastructure.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 221.2

The commenter states that future low-income residents would likely be looking for jobs which are already very few in Forestville. The commenter also expresses the opinion that necessities are expensive since there is only one grocery store in town.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the cost of groceries. Additionally, refer to Master Response EXST regarding the existing conditions of the area not caused by the project.

Response 221.3

The commenter states that Forestville does not have a good bus schedule for residents to travel to larger cities where they might work.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Additionally, please refer to Section 4.16, *Transportation*, which includes discussion of impacts to the transit system starting on page 4.16-14. As stated therein, the project would not result in adverse impacts to fixed-route service. Furthermore, development facilitated by the project on Rezoning Sites would not conflict with plans, policies, ordinances, or regulations pertaining to public transit, and increased ridership is not expected to exceed available transit capacities.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 221.4

The commenter expresses the opinion that since El Molino High School has closed down, students would be required to be bused to Sebastopol which would cost taxpayers more money.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the cost to taxpayers.

Response 221.5

The commenter states that the road in and out of Forestville sometimes floods in the winter. The commenter expresses the opinion that the town's population should not be doubled.

This comment has been noted. Refer to Master Response EXST regarding the existing flooding risk. Please refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR for detail pertaining to impacts of flooding induced by the proposed project. Refer to Figure 4.10-4, which shows that none of the Forestville Rezoning Sites are within Flood Hazard Zones. Furthermore, as stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding would be less than significant.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Note that rezoning does not guarantee that development would occur, and the decision to rezone specific parcels is up to decision-makers.

Response 221.6

The commenter raises concerns regarding the increase in population and the resulting crime and effect on his home value. The commenter asks if they would be able to build an ADU or two on their property.

Crime rates and home values are not related to the analysis in the Draft EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the future value of nearby residences. Please refer to Section 4.15, *Public Services and Recreation*, regarding potential impacts to police services (Impact PS-2) As noted therein, impacts would be less than significant.

The commenter's question regarding ADU development is not relevant to the proposed project or environmental impact analysis.

EIR Public Comment 222

COMMENTER: Jaye Deane Griffiths

DATE: February 13, 2023

Response 222.1

The commenter provides input on the property at 16050 Laughlin Road (GUE-4), which is located directly adjacent to their property. The commenter states that the rezoning would affect the safety of children walking to the elementary school, since Laughlin Road is not a pedestrian friendly road, and additional development would increase traffic. The commenter states that the property has a limited entrance and a lack of infrastructure.

Refer to Master Response EXST regarding existing pedestrian safety conditions. This is an existing condition of the area and not caused by the proposed project. Future development facilitated by the project on Rezoning Sites would need to confirm that adjacent roads meet County requirements.

Please refer to Master Response TRA regarding traffic impacts. Regarding pedestrian facilities, please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 222.2

The commenter questions whether the school would be able to accommodate an increase in children, and expresses her disapproval of rezoning the parcel at 16050 Laughlin Road (GUE-4).

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Impacts to schools are analyzed in Section 4.15, *Public Services and Recreation*, under Impact PS-3. As stated therein, “development facilitated by the project on Rezoning Sites would generate approximately 1,145 school-aged children across 11 school districts in the County.” Based on the projected decline in enrollment across school districts serving the Rezoning Sites and the estimated 1,145 new school-aged children that would result from development associated with rezoning under implementation of the project, most of the school districts would be able to absorb new and incoming students because the increases in the student population are not greater than the anticipated decreases in enrollment (with the exception of Forestville Elementary and Geyserville Unified School Districts). Applicants would pay school impact fees at the time building permits are issued, to be used by Sonoma County School Districts to mitigate impacts with long-term maintenance and operation of school facilities. This impact would be less than significant, as stated in the EIR.

Response 222.3

The commenter states that flooding on Armstrong Woods Road due to the overflow of Fife Creek is an ongoing problem. The commenter states that the property shares a several acre boundary with Fife Creek, and questions what impacts would there be in disturbing the boundary and how pervious surface run-off would affect the flow. The commenter expresses concerns regarding evacuation since the only other way to evacuate is a windy and narrow road often limited to one way traffic.

Refer to Master Response EXST regarding existing road conditions. As stated in Impact HWQ-3 on page 4.10-26, the proposed project would alter drainage patterns and increase runoff at the Rezoning Sites, but would not result in increased flooding on or offsite, or exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts regarding flooding would be less than significant.

Please see Master Response EMG regarding emergency evacuation.

Response 222.4

The commenter expresses concern that evacuations might impact groundwater flow, levels, and quality since the local water table is shallow. The commenter questions if the Department of Fish and Wildlife has been notified about development along the border of Fife Creek.

The Notice of Completion & Environmental Document Transmittal filed with the State Clearinghouse at the beginning of the comment period including Region 3 of the CDFW in the reviewing agencies checklist.

The connection between evacuations and groundwater flow levels, quality, and contamination is not clear from this comment, nor is whether the commenter is referring to existing evacuations or future evacuations that may involve developments on the Rezoning Sites. However, hydrology and water quality are discussed in Section 4.10 of the Draft EIR. Groundwater recharge from the addition of impervious surfaces is addressed under Impact HWQ-2, beginning on page 4.10-25 of the Draft EIR. As stated therein, the County requires compliance with the LID Manual, which requires implementation of permanent operational stormwater BMPs, including stormwater capture basins. Impacts were determined to be less than significant.

In response to concerns about project placement near riparian zones and stream habitat, pursuant to Mitigation Measure BIO-15 in the Draft EIR, areas identified by the project-specific biological assessment (Mitigation Measure BIO-1) as containing potentially jurisdictional features must contract a qualified biologist to complete a jurisdictional delineation. This delineation would determine the extent of jurisdiction for California Department of Fish and Wildlife (CDFW), USACE, and/or RWQCB, and result in avoidance of these areas to the maximum extent possible.

Response 222.5

The commenter questions whether the proposed development would affect the Historical Route.

The commenter does not specify which Historic Route or potential impacts of concern they are referring to; however, see Impact AES-2 in the Draft EIR regarding aesthetic impacts to scenic highways including State Route 116. As stated therein, development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, and thus projects on ten of the rezoning sites (including site GUE-1) may remove or damage scenic resources within a State-designated highway, particularly by changing the character of visual resources.

Refer to Section 4.15, *Noise*, for noise related impacts near State Route 116 and Section 4.16, *Transportation*, for traffic related impacts near State Route 116.

Response 222.6

The commenter questions if the additional traffic affecting the State and National forest was analyzed.

Please see Master Response TRA regarding traffic impacts.

Response 222.7

The commenter expresses concerns regarding pressure on the already stressed local fire stations as well as traffic.

Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed under Impact PS-1 starting on page 4.15-10, local fire districts are all meeting the National Fire Protection Association response time goals for rural and suburban areas. The Rezoning Sites themselves are all within 1.5 miles of the nearest fire station, and emergencies on these sites would be responded to within the response time goals. In addition, if the County requires the expansion of fire department facilities, General Plan Policy PS-3m requires the consideration of payment of impact fees to ensure fire departments are adequately funded to serve new projects, and Sonoma Valley Fire District and Sonoma County Fire District adopted impact fees in 2021 that are collected for the purpose of mitigating impacts caused by new development on each district's infrastructure. Fees are used to finance the acquisition, construction and improvement of public facilities needed as a result of this new development. Therefore, impacts regarding fire service response times and facilities were determined to be less than significant.

Response 222.8

The commenter raises concerns regarding parking on streets that have no sidewalks, and mentions children safety walking and bicycling on these streets.

Parking is not considered an environmental impact and is not a required topic under CEQA.

Please refer to response 222.1 regarding existing road conditions and pedestrian safety.

EIR Public Comment 223

COMMENTER: Jim Smith

DATE: February 13, 2023

Response 223.1

The commenter expresses the opinion that although affordable housing is needed in Forestville, Forestville is taking way more than their fair share of new housing units within Sonoma County.

This comment is noted. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 223.2

The commenter questions whether current utilities (water, sewer, power, roads etc.) would be able to support the additional units without major upgrades.

This comment has been noted. Please refer to Master Response UTIL regarding utility availability. Refer to Section 4.18, *Utilities and Services Systems*, for analysis of water, wastewater, and electric power. Refer to Section 4.16, *Transportation*, regarding roadways. Please refer to Master Response EXST regarding the existing conditions of services and infrastructure.

Response 223.3

The commenter questions whether increased vehicle and foot traffic has been analyzed.

Please refer to Master Response TRA regarding vehicle traffic impacts. Regarding pedestrian traffic, please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

Response 223.4

The commenter questions what the cost is to purchase a low- or moderate-income home.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the cost of purchasing a home.

Response 223.5

The commenter questions where the pedestrian crosswalk lights for Highway 116 are in downtown.

Refer to Master Response EXST regarding existing pedestrian safety conditions. This comment has been forwarded to the County.

Response 223.6

The commenter questions why the old Crinella property at Highway 116 and Mirabel Road not included in the project.

This comment has been noted and passed on to decision-makers. Please see Master Response SITE regarding the site selection process.

Response 223.7

The commenter expresses the opinion that site FOR-1 would be the best location for new housing, and a toxic cleanup may qualify for federal or State funding in order to benefit the community.

This comment has been noted. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes potential funding opportunities for the community.

Please see Section 4.9, *Hazards and Hazardous Materials*, regarding site-related hazard remediation. Sites with hazardous materials near the Rezoning Sites (including site FOR-1) are listed in Table 4.9-2. Development typically within 0.25 mile of sites identified in Table 4.9-2 would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC, before construction activities could begin. Compliance with existing State and local regulations regarding onsite hazards would reduce impacts to less than significant. Refer to Response O-2.3 regarding the Electro Vector site specifically.

Response 223.8

The commenter expresses the opinion that sites FOR-3, 5, and 6 would be good locations for new housing if the land is not needed for the Forestville Sewer Plant pond expansion.

This comment has been noted and will be passed on to decision-makers.

Response 223.9

The commenter expresses the opinion that site FOR-7 would be a good stand alone property for the project and that FOR-2 would require infrastructure updated and create traffic.

Please note that FOR-7 is not a Rezoning Site, but based on its existing zoning was included in the proposed Housing Element Site Inventory. However, this comment has been noted and will be passed on to decision-makers. Please see Master Response TRA regarding traffic impacts.

Response 223.10

The commenter expresses the opinion that site FOR-4 would be feasible if it is the parcel shown on the DEIR map and not the location at the end of the road. The commenter recommends combining FOR-4 with FOR-1 with an entrance on Covey Road.

This comment has been noted and will be passed on to decision-makers.

EIR Public Comment 224

COMMENTER: John Kiriakopolos

DATE: February 13, 2023

Response 224.1

The commenter states that the proposed housing in Forestville is out of scope, and there is a lack of infrastructure (roads, sewer, utilities) to accommodate the proposed development. The commenter provides examples and states site FOR-4 is a narrow two-lane road leading to a single private driveway, and site FOR-2 is a quiet residential area with mainly one-story homes.

Please refer to Master Response HE regarding opposition to the Housing Element. Refer to Master Response UTIL regarding sewer and utilities infrastructure. Please refer to Master Response EXST regarding existing conditions of services and infrastructure. The EIR acknowledges that access roads in the vicinity of FOR-2 may be narrow on page 4.19-26 of the EIR.

EIR Public Comment 225

COMMENTER: Josh Beniston

DATE: February 13, 2023

Response 225.1

The commenter expresses concerns regarding the proposed changes to parcels in the Forestville area, and states that the percentage of housing units proposed for Forestville should be reduced and the units should be shifted to areas with better capacity such as areas around Sonoma County airport, Larkfield, and unincorporated Petaluma. The commenter expresses the opinion that Forestville lacks sidewalks, traffic lights and other road safety measures, and has minimal access to public transit to other areas.

Refer to Master Response SITE regarding site selection, and Master Response HE regarding opposition to the Housing Element. The commenter's opinion will be forwarded to County decision-makers.

Response 225.2

The commenter expresses concerns regarding safety and congestion issues resulting from the increase in housing related to additional cars and traffic. The commenter expresses the opinion that the road corridors impacted in the proposed plans would be required to be upgraded.

Refer to Master Response TRA regarding traffic congestion issues. Traffic safety impacts associated with the proposed project are addressed under Impact TRA-2, on page 4.16-18 of the Draft EIR. Need for traffic infrastructure improvements would be ascertained on a project-by-project basis when individual developments are proposed.

Response 225.3

The commenter expresses support to adding higher density housing in some areas of Forestville, specifically Packing House Road and the Electro Vector Site. The commenter states that the Electro Vectro site is currently a public health risk and should be properly remediated and utilized for development.

Refer to Master Response SITE regarding site selection. The EIR identifies FOR-1 as containing the Electro Vector site in Table 4.9-2 of the EIR. Refer to Impact HAZ-2 regarding investigation, remediation, and cleanup before development. As discussed therein, compliance with all applicable regulations relating to site remediation would minimize impacts to development at Rezoning Site FOR-1 to a less than significant level.

Response 225.4

The commenter expresses concerns regarding the addition of 71 units on the FOR-4 site and states that the number of units proposed is far too high given the lack of infrastructure for walking and driving, and character of the area.

Refer to Master Response EXST regarding the existing lack of roadway infrastructure. Refer to Master Response HE regarding opposition to the project. The commenter's opinion is noted and will be passed onto decision-makers.

EIR Public Comment 226

COMMENTER: Judith Weller

DATE: February 13, 2023

Response 226.1

The commenter states that although they understand that there is a need for affordable housing in Forestville, they are opposed to the project due to emergency evacuations. The commenter states that during the last two fire evacuations, all evacuation routes were extremely congested.

Please refer to Master Response EXST for a discussion on existing conditions within the county and refer to Master Response EMG for a discussion on emergency access within the county.

Response 226.2

The commenter expresses concerns regarding public services and parking, and states that most local streets are packed with illegally parked vehicles, which becomes worse during summer vacation months with tourists. The commenter states that many visitors use bushes along the river and small neighborhood streets as toilets and leave large amounts of garbage.

Section 4.15, *Public Services and Recreation*, of the Draft EIR analyzes the project's potential impacts to public services within the county and in each of the areas identified for Rezoning Sites. Note that parking is not a discussion topic required to be evaluated under CEQA.

Response 226.3

The commenter states that there is only one fire station in Forestville, and sheriffs currently are understaffed and cannot respond to many of the calls they receive.

This comment is noted. Please refer to Master Response EXST for a discussion on existing conditions within the county and surrounding areas.

Response 226.4

The commenter states that there is only one grocery store for current residents and is not within walking distance of the town.

This comment is noted. Please refer to Master Response EXST for a discussion on existing conditions within the county and surrounding areas.

Response 226.5

The commenter states that there is no clinic or doctor's office in the area.

This comment is noted. Please refer to Master Response EXST for a discussion on existing conditions within the county and surrounding areas.

Response 226.6

The commenter asks to scale the project down and not to put pressure on the Forestville community.

This comment is noted and will be passed on to decision-makers for their consideration.

EIR Public Comment 227

COMMENTER: K Brooks

DATE: February 13, 2023

Response 227.1

The commenter states that the rezoning of parcels GRA-3 and GRA-5 should be reconsidered and not pursued due to significant and unavoidable impacts, which would negatively impact the area and quality of life of residents.

Please refer to Master Response HE regarding opposition to the Housing Element. The commenter does not refer to a specific impact identified in the Draft EIR.

Response 227.2

The commenter expresses the opinion that them and their neighbors would not want their property values to decrease and enjoy the semi-secluded character of the current neighborhood.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes property values.

Response 227.3

The commenter states that parcels GRA-3 and GRA-5 are two of the few parcels on the Sonoma County proposed map that have significant and unavoidable impacts, and that the County should focus on developing sites that do not have such grave impacts on the community and infrastructure.

This comment is noted and has been passed on to County decision-makers.

Response 227.4

The commenter comments on Impact AES-2, and states that the addition of 100 to 300 people under GRA-3 and GRA-5 would disrupt the scenic qualities of Highway 116 and impede on the scenic route plan.

The commenter is correct. As discussed in Section 4.1, *Aesthetics*, of the Draft EIR, potential impacts to scenic highways would be significant and unavoidable for sites including GRA-3 and GRA-5, as development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, and thus projects on ten of the Rezoning Sites may remove or damage scenic resources within a State-designated highway, particularly by changing the character of visual resources.

Response 227.5

The commenter comments on Impact AES-2, and states that the three winery tasting rooms along Highway 116 would be affected since most visitors pay to enjoy the scenic environment.

Pursuant to *CEQA Guidelines* Section 15131, economic effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic impacts is not required, which includes wineries and businesses near the project area.

Response 227.6

The commenter provides comments on Impact AES-1 and states that most mature trees would need to be removed for the development of sites GRA-3 and GRA-5, which would decrease the privacy and shade available to existing properties.

The commenter is correct that the potential aesthetic impacts to GRA-3 and GRA-5 are significant and unavoidable. Potential impacts to existing visual character and existing public views are discussed under Impact AES-3 in Section 4.1, *Aesthetics*. As discussed therein, trees may be removed and even with Mitigation Measure AES-1 for screening vegetation, the project may substantially degrade the existing visual character or quality of public views of GRA-3 and GRA-5 and their surroundings.

Response 227.7

The commenter expresses the opinion that the development of sites GRA-3 and GRA-5 would create a significant increase in daily noise, trash, and people. The commenter states that the increase in people and cars would severely impact traffic since the intersection is not constructed to handle large amounts of traffic. The commenter also expresses his concern regarding congestion during emergency situations and the safety of current residents.

Please refer to Master Response EXST regarding existing conditions and infrastructure; Master Response TRA regarding traffic impacts; and Master Response EMG regarding emergency access and evacuation.

Response 227.8

The commenter expresses his concern regarding safe traffic since there are currently no sidewalks or proper traffic accommodations.

Refer to Master Response EXST regarding the existing lack of sidewalks. Please refer to Master Response TRA regarding traffic impacts. Refer to Response 96.3 regarding pedestrian infrastructure.

Response 227.9

The commenter states that all neighboring homes surrounding sites GRA-3 and GRA-5 receive water from wells. The commenter expresses concern regarding the depletion of water supply with the increased population, and questions whether the units would be connected to public utilities.

Please refer to Master Response UTIL regarding existing utility systems. Impacts to utilities are discussed in Section 4.18, *Utilities and Service Systems*, of the Draft EIR.

Response 227.10

The commenter states that the Graton sewer is unable to accommodate the large increase in population, and questions how the proposed projects would receive sewer services. The commenter requests confirmation that the proposed developments would be connected to public utilities and septic would not be permitted.

The proposed project would not involve construction of specific housing developments or the installation of specific utility connections at this time but rather the proposed project considers the potential rezoning of properties that could accommodate housing in the future in order to meet the RHNA requirements in accordance with State housing law. Please refer to Master Response UTIL

regarding existing utility systems. Impacts to utilities are discussed in Section 4.18, *Utilities and Service Systems*, of the Draft EIR.

Response 227.11

The commenter expresses concerns regarding safety and crime since site GRA-5 would share a fence line with existing homes.

As discussed in Section 4.15, *Public Services and Recreation*, development facilitated by the project on Rezoning Sites would not result in adverse physical impacts with the construction of new or physically altered police facilities to maintain acceptable service ratio response times or other objectives.

Response 227.12

The commenter states that sites GRA-3 and GRA-5 have Sebastopol addresses and are situated in unincorporated Sebastopol, and questions why they have been classified as Graton for the Housing Element Update.

As shown in Figure 2-7 in Section 2, *Project Description*, Rezoning Sites GRA-3 and GRA-5 are within the Urban Service Area of Graton.

Response 227.13

The commenter states that them and their neighbors would like to know what the proposed building plans are. The commenter states that from the developer's website, the houses are movable units with utility hook up capability, and the Guerneville site would use septic and possible sex offenders would be living on the sites. The commenter expresses his disapproval of this type of community to be placed on sites GRA-3 and GRA-5.

The proposed project would not involve construction of specific housing development. This comment does not pertain to the adequacy of analysis within the Draft EIR.

Response 227.14

The commenter recommends the County to consider purchasing 1853 Cooper Road or 7919 Occidental Road in Sebastopol to accommodate the proposed projects, since more infrastructure would be available. The commenter also recommends allowing single-family residential homes on sites GRA-3 and GRA-5, which would add to the housing stock while keeping the historical rural look of the highway design.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers. Additionally, the EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements. For additional information regarding impacts to schools and law enforcement, please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR.

Response 227.15

The commenter requests that the County install taller fencing and landscaping around properties adjacent to site GRA-5 and that the County does not allow mobile homes within sites GRA-3 and GRA-5. The commenter also requests that the County ensures that water and sewer services be provided to sites GRA-3 and GRA-5, and that the County does not allow common bathhouses or showers.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 227.16

The commenter requests that the County rejects development proposals that would result in destruction of beauty in the area, overcrowding, and a reduced quality of life for existing residents.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

EIR Public Comment 228

COMMENTER: Kat Deaner

DATE: February 13, 2023

Response 228.1

The commenter expresses her opposition to the rezoning of site FOR-4 in Forestville, and states that the proposed increase of 1,650 residents (50 percent increase) in Forestville is negligent. The commenter states that Forestville does not have sidewalks and bike lines, and site FOR-4 is located in an area that could not handle an increase of 185 new residents. The commenter states that a housing complex with 71 units does not fit in the neighborhood.

This comment has been noted. Please refer to Master Response EXST regarding existing services and infrastructure. The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Note that rezoning does not guarantee that development would occur. Please refer to Master Response HE regarding opposition to the Housing Element or selected Rezoning Sites.

Response 228.2

The commenter expresses her desire to see a community-driven plan with growth that is compatible with the culture and feel of the existing town. The commenter states that services must be available for an increase in population.

This comment does not pertain to adequacy of analysis within the Draft EIR. Impacts to public services are evaluated in Section 4.15, *Public Services and Recreation*. As discussed therein, development facilitated by the proposed project on Rezoning Sites would not result in substantial adverse physical impacts associated with the construction of new or physically altered public facilities.

Response 228.3

The commenter expresses the opinion that sites FOR-1, FOR-3, FOR-5, and FOR-6 are more suitable for high-density development as they are located along Highway 116, and that site FOR-1 is suitable for development.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment is noted and has been passed on to County decision-makers.

EIR Public Comment 229

COMMENTER: Kon Zaharoff

DATE: February 13, 2023

Response 229.1

The commenter attaches Letter 77 and mentioned they tried to drop off the letters on February 13, and the comment period should not end on a County holiday.

Refer to Responses 77.1 through 77.6 regarding individual concerns in Letter 77. As described in Section 1, *Introduction*, the comment period ended on February 23 rather than February 13.

EIR Public Comment 230

COMMENTER: Leslie Markham

DATE: February 13, 2023

Response 230.1

The commenter expresses concerns related to FOR-2, including those related to wildfire danger, climate change, lack of water and sewer, egress and ingress, traffic, and lack of local amenities.

This comment is noted. The commenter's specific concerns are addressed in Response 230.2 through 230.28, below.

Response 230.2

The commenter expresses a preference for Alternative 3, based on identified potential significant effects, environmental constraints, and unknowns related to FOR-2. The commenter asserts that no alternative locations were considered, and indicates that the EIR identifies Alternative 3 as the environmentally superior alternative.

The commenter's preference is noted and is passed on to decision-makers for consideration.

Because the proposed project is the Housing Element Update for Sonoma County, an 'alternative location' alternative is not possible. Alternative sites were considered for rezoning; please refer to Master Response SITE regarding the site selection process.

Response 230.3

The commenter asserts that there are other sites not considered in the EIR that would have a lesser impact, require less costly infrastructure improvements, and reduce wildfire and other significant impacts. The commenter states that the County must fulfill the state mandate and also identify the environmental impacts of the chosen sites to identify housing that would not result in significant environmental damage.

The commenter does not provide specific additional sites for consideration. Please refer to Master Response SITE regarding the site selection process. The potential environmental impacts of the selected sites are addressed throughout the Draft EIR.

Response 230.4

The commenter asserts that an alternative location must be considered in an EIR, pursuant to CEQA Guidelines Section 15126.6. The commenter asks how sites were chosen, and if they are the least impactful sites.

Please refer to Master Response SITE regarding the site selection process. Because the proposed project is the Housing Element Update for Sonoma County, an 'alternative location' alternative is not possible. Additionally, alternative Rezoning Sites were considered as part of Alternative 3.

Response 230.5

The commenter states that the landowner of FOR-2 has indicated that they will not be selling their land and intend to continue agricultural use of the land. The commenter asserts that the 238-unit estimate for FOR-2 is not realistic.

The proposed project would update the County's Housing Element and would rezone a number of sites, including FOR-2. However, this action does not require development to occur on any of the Rezoning Sites, it merely allows for future development of the Rezoning Sites at a higher density. Please refer to Master Response SITE regarding the site selection process, and Master Response HE regarding dissatisfaction with the selected sites.

Response 230.6

The commenter states that there may be other sites in the County that would not result in significant adverse impacts.

This comment is noted. Please refer to Master Response SITE regarding the site selection process.

Response 230.7

The commenter provides an excerpt from CEQA Guidelines Section 15126.6, with certain sentences bolded and underlined. The commenter asserts that an alternative location should have been considered in the Draft EIR.

Please refer to Master Response SITE regarding the site selection process. Because the proposed project is the Housing Element Update for Sonoma County, an 'alternative location' alternative is not possible.

Additionally, pursuant to *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993: there is no rule requiring an EIR to explore off-site project alternatives in every case. As stated in *CEQA Guidelines* Section 15126.6(a) (emphasis added): "An EIR shall describe a range of reasonable alternatives to the project, *or to the location of the project*, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." As this implies, "an agency may evaluate on-site alternatives, off-site alternatives, or both" (*Mira Mar, supra*, 119 Cal.App.4th at p. 491, 14 Cal.Rptr.3d 308). The *CEQA Guidelines* thus do not require analysis of off-site alternatives in every case. Nor does any statutory provision in CEQA "expressly require a discussion of alternative project locations" (*Ibid.*, citing Public Resource Code Sections 21001[g]), 21002.1[a], and 21061). No revisions are required to the Draft EIR.

Response 230.8

The commenter states that FOR-2 is within an Urban Service Area, in an unincorporated area, and far from amenities.

This comment is noted. Please refer to Master Response SITE regarding the site selection process, including the criteria for selecting sites within the unincorporated county.

Response 230.9

The commenter states that the project would result in 783 new people residing on FOR-2, and 1,652 people in all of Forestville. The commenter states that this would be a sharp population increase from the existing population of 3,800 people in 2020. The commenter indicates this would increase greenhouse gas emissions, and would impact the community itself.

As shown in Table 2-4 beginning on page 2-25 of the Draft EIR, the project would result in a total population of 736 people on FOR-2, 718 people greater than under the site's existing designation. The population increase resulting from the project on Forestville sites would be 1,484 greater than under existing designations.

Impact PH-1, beginning on page 4.14-6 of the Draft EIR, addresses potential impacts related to unplanned population growth. As described therein, this impact would be less than significant.

Greenhouse gas (GHG) emission impacts are addressed under Impact GHG-1, beginning on page 4.8-17 of the Draft EIR. As stated therein, the project would increase GHG emissions, and Mitigation Measure GHG-1 would be required; however, impacts would remain significant and unavoidable.

Response 230.10

The commenter asks if this population increase would increase the demand on public services, specifically Sheriff's Office staffing.

Impacts PS-1 through PS-5, beginning on page 4.15-10 of the Draft EIR, address potential impacts related to increased demands for public services and recreation facilities, with Impact PS-2 focused on impacts to police facilities. As described therein, the increase in demand for police services would be spread throughout the county, with no more than three new officers required at any one station. General Plan Policy LU-4f requires the payment of fair share fees during the building permit process, which fund police services. This impact was determined to be less than significant.

Response 230.11

The commenter states that the increased population will add to traffic congestion, will add CO₂ to the air, and will increase impacts to road surfaces. The commenter states that it is unclear whether suggested mitigation (bus lines and bike paths) will be required. The commenter asserts that most people will continue to drive.

Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Greenhouse gas (GHG) emission impacts are addressed under Impact GHG-1, beginning on page 4.8-17 of the Draft EIR. As stated therein, the project would increase GHG emissions, and Mitigation Measure GHG-1 would be required; however, impacts would remain significant and unavoidable.

Please refer to Response 95.1 regarding roadway degradation impacts.

The commenter appears to be referring to Mitigation Measure TRA-1. The implementation of this measure is required for each future development project and requires the preparation of a Transportation Demand Management (TDM) Program. The mitigation measure provides a list of transportation demand reduction strategies that may be included in future TDM Programs; however,

the exact requirements of future TDM Programs is unknown at this time. Bus lines and bike paths are two potential reduction strategies that may be included in future TDM Programs.

Response 230.12

The commenter states that the increased housing in Forestville will have a significant impact to traffic on Mirabel Road and Front Street, which are already heavily impacted by heavy use of gravel trucks along with 'normal' traffic. The commenter states they were unable to find any reference to Mirabel Road in Section 4.16 of the EIR.

Please refer to Appendix TRA to the Draft EIR for the traffic congestion LOS analysis, which is provided for informational purposes only. This study includes the intersection of Front Street and Mirabel Road as one of the study intersections for the LOS analysis. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Response 230.13

The commenter states that Mirabel Road and Front Street have little to no shoulder, are dangerous to walk on or ride bikes on, have no sidewalks, have no bike paths, and have no traffic lights. The commenter asserts that these roads do not provide safe conditions for passage to the downtown area.

The commenter is describing the existing condition of local roadways; please refer to Master Response EXST regarding existing conditions of infrastructure. Traffic safety impacts related to implementation of the proposed project are described under Impact TRA-2.

Response 230.14

The commenter states that Forestville High School (El Molino) is no longer an option, and high school students must travel to Sebastopol or elsewhere for school. The commenter states that this adds to traffic concerns and congestion and GHG emissions, which would be exacerbated by the project.

El Molino High School was not included in the analysis—please refer to Table 4.15-2 on page 4.15-3 of the Draft EIR, where West Sonoma County Union High School is identified as serving the Forestville sites.

Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

Greenhouse gas (GHG) emission impacts are addressed under Impact GHG-1, beginning on page 4.8-17 of the Draft EIR. As stated therein, the project would increase GHG emissions, and Mitigation Measure GHG-1 would be required; however, impacts would remain significant and unavoidable.

Response 230.15

The commenter asserts that the EIR incorrectly states that a school is located across from FOR-2.

The commenter is correct; page 4.1-18 of the Draft EIR has been revised as follows:

...They are situated close to the roadway and are landscape in a varied but unified manner. ~~On Mirabel Road, a school is directly across the street from FOR-2.~~ The residential development on Mirabel Road features a less unified design than that on Giusti Road...

Response 230.16

The commenter states that the EIR identifies significant and unavoidable transportation impacts, and that Mirabel Road and Front Street are important roads to discuss related to this impact. The commenter asserts that FOR-2 has the highest population buildout of all parcels listed, but Table 4.8-6 indicates the project is consistent with reducing travel demand. The commenter asserts that this is not true for FOR-2, due to distances to work, grocery stores, high school, etc.

The commenter is referencing traffic congestion impacts, where specific roadways are typically analyzed. The EIR primarily uses VMT to assess transportation impacts, which does not necessitate the analysis of individual roadways. Please refer to Appendix TRA to the Draft EIR for the traffic congestion LOS analysis, which is provided for informational purposes only. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion.

While FOR-2 has the highest total population buildout, the maximum dwelling units per acre that would be allowed is not substantially higher than any other Rezoning Site (please refer to Table 2-3, beginning on page 2-23 of the Draft EIR). Because FOR-2 is larger in size than many other identified parcels, the total number of housing units and population that could be accommodated by this site is greater.

There is no Table 4.8-6 in the Draft EIR, so it is unclear which table the commenter is referring to.

Response 230.17

The commenter notes that FOR-2 does not have a sewer hook-up, and surrounding residences use septic. The commenter notes that water is scarce, and continued drought is predicted. The commenter asks if water will be available for future residents on FOR-2, how additional water will be obtained, where sewage would be transported, and if additional sewage ponds would be required.

As described on page 4.18-1 of the Draft EIR and in Appendix WSS to the Draft EIR, FOR-2 is located adjacent to existing water service infrastructure and would be provided water through the Forestville Water District and Sonoma Water. The discussion provided under Impact UTIL-1 includes a water demand calculation for all Forestville sites, and, based on communication with the water service provider, Forestville sites would have access to adequate water service.

Please refer to Table 4.18-2 on page 4.18-2 of the Draft EIR; as stated therein, the Forestville sites would receive wastewater treatment services from the Forestville Water District. Wastewater is treated at the District's Wastewater Treatment Reclamation and Disposal Plant, which has no existing capacity deficiencies. Impact UTIL-1 includes a wastewater generation calculation for all Forestville sites and indicates that wastewater services would be provided by the Forestville Water District. Based on communications with the District, the implementation of proposed capital improvement projects would ensure that development facilitated by the project on Rezoning Sites would have access to adequate wastewater service. However, because FOR-2 is not located adjacent to existing wastewater infrastructure, implementation of Mitigation Measure UTIL-1 would be required. This measure requires future development projects on Rezoning Sites, including FOR-2, to demonstrate adequate wastewater treatment capacity during the plan review and permit approval process. This would determine what specific infrastructure upgrades would be necessary to serve the future project.

Response 230.18

The commenter asks why FOR-2 was not eliminated from consideration, as sewer is not available at this site and water availability and wastewater treatment are unknowns for this site, requiring further study.

Please refer to Master Response SITE regarding the site selection process. While existing water and wastewater infrastructure may not exist on site for every Rezoning Site, each Rezoning Site, including FOR-2, is located within a designated Urban Service Area where public water and sewer service is generally available.

Response 230.19

The commenter asks if FOR-2 has been evaluated relative to hydrology, as it relates to recharge and impervious surfaces. The commenter states that flooding occurs on Mirabel Road during large storms, and housing developments would exacerbate the situation. The commenter asks where drainage would be directed and if it would increase flooding.

Hydrology and water quality are discussed in Section 4.10 of the Draft EIR. Groundwater recharge from the addition of impervious surfaces is addressed under Impact HWQ-2, beginning on page 4.10-25 of the Draft EIR. As stated therein, the County requires compliance with the LID Manual, which requires implementation of permanent operational stormwater BMPs, including stormwater capture basins. Impacts were determined to be less than significant.

Impact HWQ-3, beginning on page 4.10-26 of the Draft EIR, addresses the potential for projects to result in flooding. As described therein, projects would be required to comply with applicable regulations and requirements, which would ensure no alteration of existing drainage patterns in such a way that would increase flooding off-site. Impacts were determined to be less than significant.

Response 230.20

The commenter states that FOR-2 provides habitat for a number of species, including roosting and hunting ground.

Section 4.4 of the Draft EIR provides a discussion of potential impacts to protected species. Please note that only species that are protected by federal, state, or local laws and regulations are required to be discussed under CEQA. Impact BIO-1 addresses impacts related to habitat modifications, and includes Mitigation Measures BIO-1 through BIO-12 to address potential impacts.

Response 230.21

The commenter expresses concerns related to wildfire impacts related to the wildland urban interface (WUI). The commenter notes that wildfire issues have increased in recent years, with two evacuations of the community in the last few years. The commenter states that increasing the population would increase the difficulty of evacuation.

Wildfire impacts are discussed in Section 4.19 of the Draft EIR. This discussion includes a summary of recent wildfire activity in the county, as well as the identification of designated Fire Hazard Severity Zones and State Responsibility Areas within or near each of the Rezoning Sites. Please refer to Impact WFR-2, beginning on page 4.19-26 of the Draft EIR, for a discussion of impacts associated with these mapped wildfire hazard areas. Impacts associated with emergency evacuation plans are addressed

under Impact WFR-1, where it was determined that, despite the additional growth that would be facilitated by the project, the Rezoning Sites are in areas adequately served by emergency services, and there would be no unanticipated strain on emergency evacuation plans or routes.

Response 230.22

The commenter notes that the EIR provides a projection of increased wildfire events in future years. The commenter provides information from the EIR related to FOR-2, and quotes analysis provided in the EIR. The commenter asks why the EIR states that off-site road improvements 'could' be required instead of 'must' be required.

The commenter is correct, road improvements to meet County standards would be a requirement of future projects where adequate site access does not exist. The following revision has been made on page 4.19-26 of the Draft EIR:

Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways would ~~could~~ be required.

The following typographical revision has been made on page 4.19-26 of the Draft EIR:

...However, as evidenced by recent wildfires in the County, urban areas, particularly those on the outer edges of urban development, are also susceptible to wildfires, despite ~~the~~ having less abundant typical wildfire fuels.

Response 230.23

The commenter asserts that the addition of higher density housing near a WUI is a bad idea, and mentions the Tubbs fire. The commenter asserts that the fuel load on FOR-2 would be increased by future development. The commenter notes that the EIR concludes there is a significant and unavoidable wildfire impact, and states there is an even greater significant risk for FOR-2.

A high fuel load is characterized by dry, highly flammable vegetation. Future structures would be required to comply with the California Building Code (CBC) and California Fire Code (CFC) requirements, which include requirements for the placement of combustible vegetation, fire protection features, and construction with fire-resistant materials. Therefore, the replacement of dry vegetation with CBC- and CFC-compliant structures would decrease the fuel load on a site.

FOR-2 is not located within a designated FHSZ, unlike other Rezoning Sites; therefore, the commenter's assertion that FOR-2 has a greater wildfire susceptibility than other Rezoning Sites is not correct. As stated on page 4.19-27 of the Draft EIR, Rezoning Sites, including FOR-2, would be subject to the California Fire Code, Sonoma County Code, CCR Title 24 Part 2, and Board of Fire Safe Regulations in CCR Title 14. These regulations include safety measures to minimize the threat of fire, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves and vents to prevent intrusion by flame or embers; fire sprinklers in residential developments (with some exceptions); specific requirements related to exterior wildfire exposure; and minimum development standards for emergency access, fuel modification, setback, signage, and water supply. Collectively, these codes and regulations would reduce the risk of loss, injury, or death from wildfire for new residential developments encouraged by the project, but not entirely. Future development facilitated by

the project on the Rezoning Sites, including on FOR-2, would be subject to Mitigation Measures WFR-1, WFR-2, and WFR-3, which would reduce construction and operational wildfire impacts. Impact WFR-2 concludes that impacts would be significant and unavoidable, despite the implementation of these feasible mitigation measures.

Response 230.24

The commenter suggests that the best location for housing, considering climate change, drought, and wildfire, be studied. The commenter supports open space between communities, and suggests some areas be considered “off-limits” to housing.

This comment does not pertain to the analysis provided in the EIR, and no response is required. The commenter’s suggestions are noted and have been passed on to decision-makers for consideration.

Response 230.25

The commenter states that the cumulative impact discussion focuses on GHG emissions, and states that they could not find a discussion of impacts related to travel by new residents of Forestville sites.

Please refer to page 4-2 of the Draft EIR for a discussion of the cumulative impact scenario. Please refer to Impact TRA-2, beginning on page 4.16-14 of the Draft EIR for a discussion of increased VMT related to future development facilitated by the project on Rezoning Sites, including on the Forestville sites.

Response 230.26

The commenter quotes Section 5.2.1 of the EIR, and suggests consideration of alternative locations to avoid identified significant impacts.

Please refer to Response 230.2 regarding consideration of an alternative location.

Response 230.27

The commenter asserts that future development on identified Rezoning Sites will require an additional EIR. The commenter asks how this zoning change can be considered when the environmental feasibility of specific sites is unknown.

Please refer to Section 1.2 of the Draft EIR. As stated therein, the intent of the EIR is to enable future development by-right, without further discretionary approvals. If future development projects are proposed on the Rezoning Sites that require a discretionary action (e.g., a future project is not consistent with the zoning or land use designation and requires a zoning or General Plan amendment), then additional CEQA analysis may be required.

The commenter does not specify which environmental unknowns were not addressed in the EIR. All CEQA-required checklist questions were addressed in Section 4 of the EIR.

Response 230.28

The commenter indicates that Alternative 3 is environmentally superior, and is in the best interest of county residents. The commenter asserts than an alternative location should be evaluated.

The commenter’s preference for Alternative 3 is noted and passed on to decision-makers for consideration. Please refer to Response 230.2 regarding consideration of an alternative location.

EIR Public Comment 231

COMMENTER: Lindsay Sullivan

DATE: February 13, 2023

Response 231.1

The commenter expresses concerns regarding the Sunset Avenue, Guerneville site selection and states that while she is a supporter of affordable housing, the addition of 78 units on Sunset Avenue is surprising since the neighborhood is already dense. The commenter states that Sunset Avenue is a narrow, one-lane thoroughfare and it would be impossible to accommodate more parking and traffic. The commenter states that Sweetwater Springs has requested this site to be excluded from the selection process because the land might be needed for future water storage expansion. The commenter states that increasing the density would result in fire safety and evacuation risks.

This comment is noted. The Housing Element proposes to potentially add up to 78 units in this area. Although there is potential for 78 units to be added, if the site would be developed, the actual number of units would be determined at the time an application for development was submitted for the site. There is no guarantee that the site would be developed in the future. Please refer to Master Response SITE for a discussion on how sites were chosen for this effort. No revisions to the Draft EIR are necessary in response to this comment.

This comment is noted. Please refer to Master Response EXST for a discussion of existing conditions and Master Response TRA for a discussion regarding traffic congestion.

Please refer to Master Response SITE for a discussion of the site selection process. Please also refer to Appendix WSS of the Draft EIR for a discussion of utilities, including water supply in Guerneville. As stated in Appendix WSS, "Site GUE-1 houses the main storage and water treatment facilities for Sweetwater Springs Water District. As such, this site would require the treatment plant to be relocated in order to redevelop. Discussions with the District indicated that they will not give up the site." As stated in Response 231.1, there is no guarantee that the site would be developed in the future. No revisions to the Draft EIR are necessary in response to this comment.

Impacts related to Wildfire were discussed in Section 4.19, Wildfire, of the Draft EIR and were found to be significant and unavoidable with mitigation as it would not be possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires. Please also refer to Master Response FIRE for a discussion of wildfire within the county and Master Response EMG for a discussion on emergency access. No revisions to the Draft EIR are necessary in response to this comment.

Response 231.2

The commenter expresses her opposition to including housing sites in unincorporated towns since the towns lack infrastructure to support an increase in population and do not have enough jobs for long-term employment.

This comment is noted. Please refer to Master Response EXST for a discussion of existing conditions within the county. No revisions to the Draft EIR are necessary in response to this comment.

EIR Public Comment 232

COMMENTER: Lisa Nahmanson

DATE: February 13, 2023

Response 232.1

The commenter states that they are a resident of Forestville and a Forestville representative on the Lower Russian River MAC and on the Land Use Committee. The commenter expresses disapproval of the number of housing units and expresses the opinion that many of the sites chosen should be eliminated to reduce impacts. The commenter states that they have experienced fires and flooding while living in Forestville, and expresses concerns with the impact of dense housing in wildland-urban interface during evacuation periods.

This comment is noted and will be passed on to decision-makers. Please refer to Master Response EMG regarding evacuations.

Response 232.2

The commenter states that they live on a one-lane road portion of Giusti Road, and the commenter expresses concerns regarding the proposed rezoning at 6898 Nolan Road. The commenter asks how the parcel would be developed, whether it would be developed as a mini development with one ingress/egress off Mirabel Road, or would the ingress/egress be from Nolan Road between two existing homes.

Regarding resident access, please note that access to future development at the rezoning site will be designed and decided on when development has been proposed and approved for the site. At this time, no development has been proposed so an exact description of what site access will look like cannot be provided.

Response 232.3

The commenter asks how the sewer and water lines would be able to accommodate the development, as well as power infrastructure and fire lanes to fit current codes.

Please refer to Master Response UTIL regarding sewer and water infrastructure. Additionally, please refer to Master Response EMG regarding emergency services and evacuation routes. As discussed in Section 4.18, *Utilities and Service Systems*, in the Draft EIR impacts to electric power infrastructure would be less than significant.

Response 232.4

The commenter expresses concerns regarding lighting, noise, dust, and removing the apple orchard.

Please refer to Section 4.1, *Aesthetics*, in the Draft EIR. As discussed therein, mitigation measure AES-5, which sets outdoor lighting requirements, would reduce impacts related to light and glare to less than significant. Additionally, as discussed in Section 4.1, the project could have significant impacts on scenic public views including views of agriculture and viticulture. As discussed in Section 4.13, *Noise*, in the Draft EIR, impacts related to noise would be potentially significant and would require mitigation

measures NOI-1 through NOI-6. Additionally, please refer to Section 4.3, Air Quality, in the Draft EIR. As stated therein, on page 4.3-18 impacts related to fugitive dust would be less than significant as the project would be required to incorporate best management practices for the control of fugitive dust and would be required to adhere to mitigation measure AQ-1 which sets basic construction requirements to reduce emissions of reactive organic gases, nitrogen oxides, and particulate matter.

Response 232.5

The commenter raises concerns regarding fire evacuations with more residents, the lack of infrastructure, and impacts on the Lower Russian River.

Please refer to Master Response EMG regarding evacuations and Master Response UTIL regarding infrastructure impacts.

Response 232.6

The commenter expresses the opinion that the community lacks effective broadband and mobile phone connections.

Please refer to Section 4.18, *Utilities and Service Systems*, in the Draft EIR. As stated on page 4.18-15 of the Draft EIR, impacts related to telecommunications infrastructure would be less than significant.

Response 232.7

The commenter expresses the opinion that the community lacks sidewalks, bike lanes, and standard road widths. The commenter states that they don't have enough parking spaces to handle tourists in the summer.

Please refer to Master Response EXST regarding existing infrastructure in and around the rezone sites. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 232.8

The commenter states that the community does not have enough trash, recycling, and compost infrastructure which is a public health issue.

Please refer to section 4.18, *Utilities and Service Systems*, in the Draft EIR. As discussed therein, the project would not result in excess solid waste and impacts related to solid waste would be less than significant.

Response 232.9

The commenter states infrastructure impacts to current residents should be considered and further conversations on how to proceed with affordable housing need to be had.

Please refer to Master Response UTIL regarding infrastructure impacts. The rest of this comment is noted and will be passed on to decision-makers.

EIR Public Comment 233

COMMENTER: Lois Pearlman

DATE: February 13, 2023

Response 233.1

The commenter expresses opposition to the housing sites on Laughlin Road, Sunset Avenue, and Cutten Avenue. The commenter states there are steep one-lane roads and the lack of public transit would not be able to accommodate the increase in residents. The commenter opines regarding inadequate parking spaces and the proposed project would change the nature of the rural neighborhood.

Refer to Master Response EXST regarding existing conditions such as one-lane roads, distance to transit, inadequate parking.

Response 233.2

The commenter expresses the opinion that communities should get together to identify appropriate sites for high density housing. The commenter states that some of the new housing should be affordable for low-income residents, and some of it should be subsidized.

Refer to Master Response SITE regarding the site selection process. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes affordability of units.

EIR Public Comment 234

COMMENTER: Lorna Catford

DATE: February 13, 2023

Response 234.1

The commenter expresses the opinion that new housing should be located in the area south of Highway 116 and east of the walking trail.

The commenter's opinion is noted. Refer to Master Response HE.

Response 234.2

The commenter asks if housing is built on the lot behind the elementary school on Paul Paddock's driveway, would traffic enter from Van Keppel or off Highway 116. The commenter also asks how the increased traffic would affect children going to school.

The commenter is presumably referring to FOR-4. Site access would be determined on a site-specific basis once individual development proposals are submitted. Refer to Master Response TRA regarding traffic. Impacts relating to bicycle and pedestrian safety are discussed in Section 4.16, *Transportation*, of the EIR, under Impact TRA-1. As stated therein, no significant impacts would occur. As stated therein, "In addition, in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks. No features are proposed that would conflict with County or regional plans, policies or ordinances pertaining to pedestrian facilities or travel."

Response 234.3

The commenter asks if the proposed buildings off Covey Road could be hidden so they aren't visible from the road. The commenter expresses concerns regarding the safety of kids walking to and from school with increased traffic.

The commenter is presumably referring to FOR-1. Exact locations of buildings on-site, as well as full site layout plans, would be determined based on individual development proposals, once submitted. Refer to Response 234.2 regarding pedestrian safety.

EIR Public Comment 235

COMMENTER: Madeline Solomon

DATE: February 13, 2023

Response 235.1

The commenter opines that the Draft EIR process should be illegal due to inadequacies of the report and the public review period.

The commenter's opinion is noted.

Response 235.2

The commenter states that they did not receive notice of the public review and comment period and was not aware of the existence of the DEIR. The commenter requests for all Permit Sonoma documents with public comment periods relevant to Forestville to be placed in both the Forestville and Sebastopol libraries. The commenter expresses the opinion that submission of the DEIR and failure to meet the requirements for public noticing and commenting would constitute fraud, and the State should be notified.

Please refer to Response 21.7.

Response 235.3

The commenter expresses the opinion that the Electro Vectro site (FOR-1) should be removed due to the severity of contamination of both dust and groundwater. The commenter expresses the opinion that the DEIR inadequately addresses contamination on the site, and should have determined that the contamination would require significant, costly, and potentially dangerous mitigation before building housing.

Refer to Response O-2.3 regarding the Electro Vector site. The proposed project does not include any development on FOR-1 or any other site. As discussed in Section 4.9, *Hazards and Hazardous Materials*, in the Draft EIR it is noted that there is contamination on the FOR-1 site, however with required investigation, remediation and cleanup under the supervision of the Regional Water Quality Control Board, the Sonoma County Local Oversight Program, or DTSC and adherence to the California Health and Safety Code, impacts related to hazards would be less than significant. Project-specific mitigation measures are not included as part of the Draft EIR because as a programmatic EIR, in accordance with CEQA Guidelines, it is not analyzing any specific development project proposed for the FOR-1 site, or any individual site.

Response 235.4

The commenter expresses the opinion that the 6090 Van Keppel site should be removed since Van Keppel Road is inadequate and unsafe and would not be able to support the increase of 65 new residents. The commenter also states that 6090 Van Keppel is not an address since it is not associated with a parcel identified with a parcel number in the Sonoma County Assessor parcel number database. The commenter claims them and their neighbors are confused about the location of the property, and they found that the parcel is associated with a property address on Highway 116, near Forestville School.

Please refer to Response 131.1.

Response 235.5

The commenter states that the property that Permit Sonoma (but not Sonoma County Assessor) recognizes as 6090 Van Keppel is located adjacent and slightly upslope from the contaminated Forestville School, and close to and slightly downslope from the contaminated Electro Vector site (FOR-1).

Please refer to Response 131.1 regarding 6090 Van Keppel Road and Response 235.3 regarding contamination of the FOR-1 site. Refer to Master Response EXST regarding the current location and existing contamination in the Forestville area. These conditions are not caused by the project and are current baseline conditions.

Response 235.6

The commenter states that they have ideas for increasing affordable housing in Forestville and hopes to be invited to Town Hall meetings and focus groups to discuss housing. The commenter states the proposal should align with the County General Plan.

This comment is noted. Refer to Table 4.11-2 regarding consistency with specific policies in the County General Plan.

EIR Public Comment 236

COMMENTER: Marci Mascorro

DATE: February 13, 2023

Response 236.1

The commenter expresses opposition to the proposed rezoning in Armstrong Valley.

Refer to Master Response HE regarding opposition to the project.

Response 236.2

The commenter expresses the opinion that there is insufficient infrastructure to accommodate an increase in over 600 households. The commenter states that the existing sewer system is inadequate, and California Water does not have enough water stored to accommodate the additional households.

Refer to Master Response EXST regarding the existing condition of infrastructure. Refer to Master Response UTIL regarding sewer and water infrastructure.

Response 236.3

The commenter opines on California state housing policy and states that there is only one road to evacuate Armstrong Valley, and expresses concerns regarding evacuation during emergencies such as fires or floods. The commenter states that Armstrong Valley is located in an urban interface wildfire zone, and asks how affordable housing can be built with the high cost of requirements brought on by the new code.

Wildfire impacts are discussed in Section 4.19 of the Draft EIR. Impacts associated with emergency evacuation plans are addressed under Impact WFR-1, where it was determined that, despite the additional growth that would be facilitated by the project, the Rezoning Sites are in areas adequately served by emergency services, and there would be no unanticipated strain on emergency evacuation plans or routes. Refer to Master Response EMG regarding requirements for access points.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes cost of housing development.

Response 236.4

The commenter expresses the opinion that developers benefit at the detriment of the community. The commenter states that they are neither for nor against additional housing, but express disapproval of the unsustainable densities proposed for Armstrong Valley.

The commenter's opposition and opinions are noted and will be passed on to decision-makers.

EIR Public Comment 237

COMMENTER: Marilyn Cannon

DATE: February 13, 2023

Response 237.1

The commenter requests removal of site FOR-2 under Alternative 3. The commenter states that there is insufficient water and sewer to accommodate the increase in population and the density proposed is inconsistent with the neighborhood, and would substantially increase air pollution and traffic.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response TRA regarding traffic congestion. Please refer to Section 4.3, *Air Quality*, of the Draft EIR for a discussion of air quality impacts.

Response 237.2

The commenter raises concerns regarding wildfires since site FOR-2 is located approximately 99 feet from a moderately high severity fire zone. The commenter states that it is difficult to evacuate the town due to extreme congestion. The commenter asserts that adding hundreds and thousands of new residents would result in substantial impacts to traffic and safety.

Please refer to Master Response FIRE regarding wildfire impacts, Master Response EMG regarding emergency evacuation, Master Response EXST regarding existing conditions of infrastructure, and Master Response TRA regarding traffic congestion.

Response 237.3

The commenter asserts that Forestville is located away from grocery shops and hospitals, and therefore is not suitable to accommodate an increase in population. The commenter states that many large gravel trucks traverse Mirabel Road and Front Street through Forestville, and adding more vehicles would be dangerous and cause even more congestion on these two-lane roads.

Please refer to Master Response TRA regarding traffic congestion.

Response 237.4

The commenter states that since El Molino High School has been permanently closed, all high school students from Forestville who used to attend El Molino High School would be required to be transported to Analy High School. The commenter expresses his concern that students walking to the elementary Forestville School would be endangered by increased traffic since there is no buffer zone between them and cars. The commenter asserts that FOR-2 has greater than average environmental constraints.

Please refer to Master Response TRA regarding traffic congestion. Potential impacts related to pedestrian facilities are discussed under Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. Potential impacts related to traffic safety are discussed under Impact TRA-2, on page 4.16-18 of the Draft EIR.

The commenter's preference for the removal of FOR-2 is noted and passed on to decision-makers for consideration.

EIR Public Comment 238

COMMENTER: Mark Berry

DATE: February 13, 2023

Response 238.1

The commenter expresses opposition for the rezoning of sites in the Forestville area, specifically FOR-2. The commenter owns the property adjacent to site FOR-2, and states that most homes built around the dry orchard parcel (FOR-2) are single-family homes with septic systems.

The commenter's opposition is noted and passed on to decision-makers for consideration. Please refer to Master Response HE regarding opposition to specific Rezoning Sites. Please refer to Master Response EXST regarding existing conditions.

Response 238.2

The commenter expresses an opinion that the FOR-2 site is incompatible because there is no established water or sewer infrastructure; water resources are already at maximum capacity; Mirabel Road has a 45 mph speed limit and is unsafe for pedestrians and bicyclists; there are limited basic services; most trees on the parcel would be removed during construction; and development on the FOR-2 site would be inconsistent with the scale and character of the rural neighborhood. The commenter recommends for housing to be developed in communities with built-in infrastructures already that could accommodate a large population such as Santa Rosa, Rohnert Park, Windsor, and Cotati.

Please refer to Master Response UTIL regarding water and wastewater service availability, and Master Response SITE regarding the site selection criteria. Impacts relating to bicycle and pedestrian safety are discussed in Section 4.16, *Transportation*, of the EIR, under Impact TRA-1. As stated therein, no significant impacts would occur.

This comment regarding availability of basic services does not pertain to the environmental impact analysis presented in the Draft EIR.

The potential for tree removal is acknowledged on page 4.4-40 of the Draft EIR; however, compliance with County-required policies related to heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) is determined to be adequate to reduce impacts to less than significant.

Regarding community character, please refer to Impact AES-3, beginning on page 4.1-56 of the Draft EIR in Section 4.1, *Aesthetics*, regarding potential impacts of rezoning and future development of the rezoning as it relates to visual character or quality.

The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 239

COMMENTER: Mark Molofsky

DATE: February 13, 2023

Response 239.1

The commenter requests for parcels APN 054-290-057 and APN 054-290-084 to be removed from the Housing Element Update. The commenter states that the scope, scale, and proposed use exceed development envisioned for downtown Glen Ellen. The commenter states that aesthetics and construction quality would need to be a major element in any future build on the sites.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response HE regarding opposition to specific Rezoning Sites. Potential impacts related to aesthetics are described in Section 4.1, *Aesthetics*, of the Draft EIR. Additionally, please refer to Response 70.3 regarding design guidelines applicable to the Glen Ellen Rezoning Sites.

EIR Public Comment 240

COMMENTER: Mary Clare Cawley

DATE: February 13, 2023

Response 240.1

The commenter raises questions and comments on sites FOR-1, FOR-2, FOR-3, FOR-4, FOR-5, and FOR-6 of the Housing Element Update. The commenter asks how people would be able to walk on streets or cross streets safely with an increase in population. The commenter expresses concern regarding site FOR-2, and states that Mirabel Road has a speed limit of 45 mph with no sidewalks or crosswalks.

Please refer to Master Response EXST regarding existing conditions of infrastructure. Please refer to Section 4.16, *Transportation*, of the Draft EIR. As discussed on page 4.16-15, development facilitated by the project on Rezoning Sites would propose no features that would be hazardous to pedestrians, nor is it forecast to generate pedestrian demand that would exceed the capacity of the area's pedestrian network. In addition, in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations.

Response 240.2

The commenter states that the increase in population would increase the traffic in Forestville and expresses her concerns regarding a potential accident during emergency evacuation. The commenter asks if there is a plan that would address how a larger population would effectively evacuate Forestville, and what air quality impacts there are resulting from the increase in traffic.

Please refer to Master Response TRA regarding traffic congestion, and Master Response EMG regarding emergency evacuation. Traffic safety impacts associated with the proposed project are addressed under Impact TRA-2, on page 4.16-18 of the Draft EIR.

The comment regarding the potential for an accident to occur during an emergency situation, which is speculation and does not warrant a response.

Response 240.3

The commenter expresses concerns regarding utilities such as sewer, water supply, and PG&E which is already currently an issue in Forestville. The commenter states that adding a large number of people despite a significant and unavoidable finding in the DEIR for new or expanded water and wastewater facilities is inappropriate as access to running water and wastewater facilities is a basic requirement.

Please refer to Master Response EXST regarding existing conditions of infrastructure. CEQA does not require mitigation of existing conditions. Please refer to Master Response UTIL regarding water and wastewater impacts. A significant and unavoidable impact was only determined for Rezoning Sites GEY-1 through GEY-4, due to inadequate evidence of adequate utility service.

The commenter is incorrect; the Draft EIR does not state that there would be inadequate water supplies for normal, dry, and multiple dry years. As described under Impact UTIL-1, with the implementation of proposed capital improvement projects, development facilitated by the project on Rezoning Sites would have access to adequate water service.

Impacts related to PG&E service, including electric power and natural gas, are described on page 4.18-15 of the Draft EIR. As noted therein, adequate infrastructure and supply exists, and impacts were determined to be less than significant.

Response 240.4

The commenter states that there are no grocery stores in Forestville, and residents are currently travelling more than 7 miles to access grocery stores in Santa Rosa and Sebastopol. The commenter expresses the opinion that new large development should not be constructed in an area with no personal services.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure. Resident proximity to grocery stores is an existing condition of the area and not caused by the proposed project.

The commenter's opinion has been noted and is passed on to decision-makers for consideration.

Response 240.5

The commenter raises concerns regarding evacuations during wildfires, and states that the project does not analyze the ability for Forestville to evacuate safely and quickly. The commenter states that the significant unavoidable impact determination for whether the project would expose occupants and structures to wildfire risks is unconscionable and irresponsible, and high-density housing should not be allowed in the area.

Please refer to Master Response FIRE regarding wildfire impacts. The commenter's opposition to the Housing Element is noted; please refer to Master Response HE.

Response 240.6

The commenter expresses the opinion that it is unfair Forestville is being impacted more significantly than any other town and that significant impacts outlined in the DEIR should be avoidable. The commenter states that at a minimum, running water and functioning sewer should be ensured before housing can be built.

The commenter's opinion is noted and passed on to decision-makers for consideration. Pursuant to CEQA Guidelines Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes perceived fairness and equity.

EIR Public Comment 241

COMMENTER: Megan Cohen

DATE: February 13, 2023

Response 241.1

The commenter expresses the opinion that the site at 6898 Nolan Road (FOR-2) is not a suitable option. The commenter states that the Forestville community needs more affordable housing, and that she would likely qualify for affordable housing. The commenter expresses the opinion that the scope of the proposed development is not a suitable match for site FOR-2.

The commenter's opinion is noted and passed on to decision-makers for consideration.

Response 241.2

The commenter expresses concerns regarding safe evacuation, since the layout and condition of roads, specifically Mirabel Road, makes evacuation difficult. The commenter states that the neighborhood is vulnerable to flooding, and it would be unsafe to substantially increase the population.

Please refer to Master Response EMG regarding emergency evacuation.

Response 241.3

The commenter states that current residents are already experiencing planned and unplanned outages due to an overtaxed power grid, and states that there should be solutions to strengthen the infrastructure before accommodating hundreds more of people.

Please refer to Master Response EXST regarding existing conditions of infrastructure. Impacts related to electric power are described on page 4.18-15 of the Draft EIR. As noted therein, adequate infrastructure and supply exists, and impacts were determined to be less than significant.

Response 241.4

The commenter questions how transportation will be safe since there is limited sidewalks and minimal transit. The commenter expresses the opinion that adding more residents to the area would result in substantial impacts to congestion on Mirabel Road, Nolan Road, and Giusti Road. The commenter expresses the opinion that the large size of the proposed development would be dangerous for future residents as well as current residents. The commenter urges to planning commission to reconsider the site on Nolan Road and to partner with local residents to find a more suitable site.

Please refer to Master Response TRA regarding traffic congestion. Roadways in the area would be subject to increased use through construction and residential traffic, which could result in accelerated deterioration. The County collects countywide traffic development fees pursuant to Article 98 of Chapter 26 of the Sonoma County Code. The payment of these fees by each individual project would alleviate cumulative roadway deterioration impacts to the regional road network.

Potential impacts related to traffic safety are discussed under Impact TRA-2, on page 4.16-18 of the Draft EIR.

The commenter's opinion is noted and passed on to decision-makers for consideration.

EIR Public Comment 242

COMMENTER: Melissa Kemp

DATE: February 13, 2023

Response 242.1

The commenter expresses opposition to rezoning seven sites in Forestville since it would result in substantial issues rather than improve the town.

The commenter's opposition is noted and passed on to decision-makers for review. Please refer to Master Response HE.

Response 242.2

The commenter expresses the opinion that Forestville lacks adequate services to accommodate a large increase in population. The commenter states that Forestville has limited public transportation, job opportunities, and local services. The commenter suggests the adequacy of the existing public transit system should be studied. The commenter states that the impact of increased traffic on roads prone to flooding should also be studied. The commenter also states that the adequacy of public services and parks should be studied.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes job growth and impacts to local commercial businesses.

Please refer to Master Response EXST regarding existing conditions and services. Please refer to Master Response TRA regarding traffic congestion. Potential impacts to public services and parks were analyzed in Section 4.15, *Public Services and Recreation* of the Draft EIR.

Response 242.3

The commenter expresses the opinion that the proposed sites would result in increased traffic, VMT, and pollution; land disruption via parking that would need to be developed as well as that required to address drainage and flooding mitigation; further land disruption through the development of general services; and would not be consistent with the goal of connecting low-income residents with affordable housing that supports their employment and access to services.

Please refer to Master Response TRA regarding traffic congestion. Impact discussions referenced by the commenter include mitigation measures where appropriate, to reduce potential impacts as much as feasible.

The comment regarding land disruption due to parking, drainage, flood mitigation, and general services is speculative and does not require a response. Furthermore, parking is not considered an environmental impact and is not required to be analyzed under CEQA.

The commenter does not provide evidence that low-income housing would not provide affordable housing; this comment does not warrant a response. Please refer to Master Response SITE regarding the site selection criteria.

Response 242.4

The commenter requests the County to update Alternative 3 to remove the seven Forestville sites since existing services and infrastructure is inadequate to accommodate the proposed increase in residents. The commenter states the County should instead invest in improving existing services and economic activity, which would enable Forestville to eventually expand and welcome new residents.

Please refer to Master Response EXST regarding existing conditions and services, including road infrastructure. Potential impacts to public services and parks were analyzed in Section 4.15, *Public Services and Recreation* of the Draft EIR.

Please refer to Master Response TRA regarding traffic congestion-related impacts.

Drainage and flooding impacts were addressed in Section 4.10, *Hydrology and Water Quality*, of the Draft EIR. Please refer to Impact HWQ-3 and Impact HWQ-4.

Alternative 3, discussed in Section 6 of the Draft EIR, provides a project alternative that would remove some Rezoning Sites. The commenter's suggestion of removing all FOR sites from rezoning would not be substantially different from Alternative 3. The commenter's preference for this modification is noted and passed on to decision-makers for consideration.

EIR Public Comment 243

COMMENTER: Michael and Sherry Kane

DATE: February 13, 2023

Response 243.1

The commenters state they recognize the need for additional affordable housing, and reference an article from the Press Democrat that states the County has an aging population.

This comment is noted. This comment does not pertain to the adequacy of analysis within the Draft EIR.

Response 243.2

The commenters raise their concerns regarding road infrastructure and transportation, and state that the single road in and out of Forestville is already inadequate to handle the current population. The commenters state that there are limited sidewalks, crosswalks, and streetlights in the downtown area. The commenters express the opinion that the increase in non-electric vehicles would impact air quality, and a study should be prepared to see if the only gas station in town is adequate. The commenters also state that the County's bus system schedule should be improved for workers and the senior population.

Please refer to Master Response TRA regarding traffic impacts; Master Response EMG for emergency access and evacuation; and Master Response EXST regarding existing conditions and infrastructure. For information regarding impacts to air quality, please refer to Section 4.3, *Air Quality*, of the Draft EIR.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes availability of gas stations.

The commenter's suggestion regarding bus service is noted and will be passed on to decision-makers.

Response 243.3

The commenters state that the Forestville wastewater treatment plant is adequate for the current population but would be required to be re-engineered to accommodate the additional residents.

Please refer to Master Response UTIL regarding existing utility service systems.

Response 243.4

The commenters state that existing police and fire/EMT would not be adequate to serve an increased population. The commenters express the opinion that a bus system with better schedule would be beneficial for residents to commute to doctor's appointments.

The potential need for additional police and fire services are analyzed in Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed therein, development facilitated by the project on Rezoning Sites would not result in substantial adverse physical impacts associated with the construction of new or physically altered police and fire facilities. The commenter's suggestion regarding bus service is noted and will be passed on to decision-makers.

EIR Public Comment 244

COMMENTER: Michael Nicholls

DATE: February 13, 2023

Response 244.1

The commenter expresses objection towards rezoning sites GUE-1, GUE-2, GUE-3, and GUE-4 in Guerneville.

Please refer to Master Response HE regarding opposition to the Housing Element.

Response 244.2

The commenter expresses the opinion that sites GUE-1 through 4 are located far from transit and lack infrastructure to accommodate dense housing.

Section 4.16 of the Draft EIR acknowledges that none of the Rezoning Sites are within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor. The commenter does not specify what type of infrastructure they are referring to; however, Refer to Master Response UTIL regarding utility infrastructure to serve the project.

Response 244.3

The commenter expresses the opinion that although affordable workforce housing is needed along the Lower Russian River, but the increase of more than 600 residents would not support the level of workforce in the local community and would lead to increases in GHG since future residents would commute elsewhere for employment.

Potential impacts to GHG emissions are discussed in Section 4.8, *greenhouse Gas Emissions*. As discussed therein, development facilitated by the project on Rezoning Sites would not exceed GHG emission project-level or plan-level thresholds and would be consistent with the goals of the California Air Resources Board 2017 Scoping Plan, the Association of Bay Area Governments' Plan Bay Area 2040, the County's General Plan, and the County's Climate Change Action Resolution.

Response 244.4

The commenter expresses the opinion that sites for workforce housing should be located within the County's employment hubs such as Healdsburg, Cotati, Rohnert Park, Windsor, Petaluma, and Santa Rosa.

Please refer to Master Response SITE regarding the site selection process. The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within other cities in the county as they are separate jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Healdsburg and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 244.5

The commenter expresses the opinion that the County Government Center in Santa Rosa should be considered for dense workforce housing and asks if underutilized parking structures near/within downtown Santa Rosa was considered for multi-story housing.

Refer to Response 244.4.

Response 244.6

The commenter asks why the airport corridor (Brickway Boulevard, Copperhill Parkway, Skyline Boulevard) was not designated for workforce housing, since the area is in proximity to transportation corridors and includes the appropriate infrastructure to accommodate a growth in population.

Please refer to Master Response SITE regarding the site selection process.

EIR Public Comment 245

COMMENTER: Mike Gray and Susan Ryan

DATE: February 13, 2023

Response 245.1

The commenter states that the community surrounding Laughlin Road in Guerneville opposes the rezoning of GUE-2, GUE-3, and GUE-4.

Refer to Response 14.1.

Response 245.2

The commenter expresses concerns regarding utility availability and evacuation routes near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.2.

Response 245.3

The commenter expresses concerns regarding water and sewer services near rezoning sites GUE-2 and GUE-3.

Refer to Response 14.3.

Response 245.4

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are within high fire hazard zones, floodplains, and earthquake risk areas and are zoned as subject to high susceptibility to liquefaction. The commenter states that building in high fire zones and floodplains is contrary to the County General Plan.

Refer to Response 14.4.

Response 245.5

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are within high fire hazard zones, floodplains, and earthquake risk areas and are zoned as subject to high susceptibility to liquefaction. The commenter states that building in high fire zones and floodplains is contrary to the County General Plan.

Refer to Response 14.5.

Response 245.6

The commenter states that rezoning sites GUE-2, GUE-3, and GUE-4 are inconsistent with the County General Plan, Housing Element Policies, and Bay Area 2050.

The commenter states that the rezoning of sites GUE-2, GUE-3, and GUE-4 is inconsistent with the goals of the County General Plan, Bay Area 2050, and Housing Element policy.

Refer to Response 14.6.

Response 245.7

The commenter expresses concern for the community and discontent for the lack of notification and community involvement. The commenter reasserts that they are opposed to sites GUE-2, GUE-3, and GUE-4.

Refer to Response 14.7.

EIR Public Comment 246

COMMENTER: Mitchell Genser

DATE: February 13, 2023

Response 246.1

The commenter expresses the opinion that creating more affordable housing should be carried out in a progressive manner and should not be disruptive to current residents.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 246.2

The commenter expresses opposition towards the construction of 635 new units and the addition of 1,652 new residents in Forestville. The commenter states that site FOR-2 would result in a population increase of 736 people, which would result in substantial impacts on Covey Road and the entirety of Forestville.

Please refer to Master Response HE regarding opposition to the Housing Element and Master Response EXST regarding impacts to existing infrastructure.

Response 246.3

The commenter recommends selecting only one or two of the FOR sites with a maximum population increase of 250 people. The commenter states that the proposed project would reduce the livability and desirability of the town.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

EIR Public Comment 247

COMMENTER: Anonymous

DATE: February 13, 2023

Response 247.1

The commenter expresses the opinion that development of site FOR-4 would lead to significant impacts to wetland and riparian habitats since Van Keppel and the single-lane dirt road easement over property APN 083-073-009 infringe on riparian corridor setbacks. The commenter states that property APN 083-073-009 is bisected by a year-round creek that floods during heavy rains and wetland habitats. The commenter states that the current conditions of the roads would not be able to accommodate proper fire evacuation for the proposed population increase. The commenter also states that since Travis Road is the only entryway for the Forestville Elementary School, if access to site FOR-4 is via Travis Road, the impacts from the increase in traffic would pose as a safety concern to the school and children.

Please refer to Master Response EMG regarding fire evacuation and Master Response TRA regarding traffic impacts. Impacts relating to bicycle and pedestrian safety are discussed in Section 4.16, *Transportation*, of the EIR, under Impact TRA-1. As stated therein, no significant impacts would occur. As discussed in Section 4.4, *Biological Resources*, in the Draft EIR impacts to riparian habitats and wetlands would be significant; however, Mitigation Measures BIO-13 through BIO-16 would be required to minimize impacts to less than significant.

Response 247.2

The commenter states that site FOR-1 is currently listed by the State as contaminated with trichloroethylene, and proposed housing would pose as significant public health concern to future residents. The commenter recommends building public parking at site FOR-1 which could also be used as an emergency coordination center during fire or flood events.

Please refer to Response 235.3.

Response 247.3

The commenter expresses the opinion that sites FOR-1 through FOR-6 should not be allowed with no public hearing and local input given that the County did not allow an expedited process to create a downtown open space park on the main corridor of Highway 116 after eight years of public discussion. The commenter expresses her opposition to the project since the rezoning would result in significant impacts with no feasible mitigation.

This comment is noted and will be passed onto decision-makers. Regarding significant impacts, the commenter is correct that the project would result in significant and unavoidable impacts to the environment. To that end, to certify the EIR and approve the project, the County would adopt a Statement of Overriding Considerations pursuant to *CEQA Guidelines* Section 15093. This statement must explain the County's decision to approve the project that balances the project's economic, legal, social, technological or other benefits against its unavoidable environmental risks.

The commenter is incorrect that there was no public hearing for the project. Refer to Section 1.2, *Environmental Review Process*. As stated therein, “the Planning Commission received verbal comments on the Draft EIR during the public hearing on February 2, 2023.” Additionally, the Planning Commission and Board of Supervisors will both have public hearings on the Final EIR for recommendation and approval on the project.

Response 247.4

The commenter expresses the opinion that the rezoning in Forestville would result in aesthetic impacts and disrupt the rural character of the town since there are currently no multi-story apartment buildings.

Please refer to Section 4.1, *Aesthetics*, in the Draft EIR. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Response 247.5

The commenter expresses the opinion that the town would not be able to accommodate increased traffic without installing safe pedestrian corridors. The commenter recommends allowing subdivisions with ¼ acre lots with a maximum of two-story townhouse duplex units instead of apartment buildings which would preserve the rural aesthetics of Forestville.

Please refer to Master Response EXST regarding the existing conditions on the rezone sites and Master Response TRA regarding traffic. The commenter’s recommendation is noted and will be passed on to decision-makers.

EIR Public Comment 248

COMMENTER: Patricia Brunelle

DATE: February 13, 2023

Response 248.1

The commenter expresses concerns regarding sites FOR-1 through FOR-7 in Forestville, and states that adding 635 additional housing units would severely impact the current residents' quality of life.

The comment does not pertain to a particular environmental issue or the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 248.2

The commenter expresses the opinion that roads in Forestville are narrow with no sidewalks, and the addition of hundreds of people would result in congestion and safety hazards. The commenter asks if there are plans to build new roads to accommodate the increase, and why housing is not planned along transportation corridors such as Santa Rosa.

Please refer to Master Response TRA regarding traffic impacts and Master Response EMG regarding emergency response and evacuation. Refer to Master Response EXST regarding existing road conditions. The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within Santa Rosa or other cities within the county as they are separate jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 248.3

The commenter expresses the opinion that increasing the town's population by 44 percent is inconsistent with rational growth plans, and asks how water, sewage, and police servicing needs could be accommodated. The commenter expresses the opinion that housing should be located in larger cities in proximity to transportation and well served by water and sewer systems.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter.

Potential impacts to public services, including police services, are discussed in Section 4.15, *Public Services and Recreation*, of the Draft EIR. As discussed therein, development facilitated by the project on Rezoning Sites would not result in substantial adverse physical impacts associated with the construction of new or physically altered police facilities. Potential impacts to water and wastewater services are discussed in Section 4.18, *Utilities and Service Systems*, of the Draft EIR. As discussed therein, impacts related to water and wastewater services would be less than significant with mitigation.

The proposed project involves rezoning to facilitate implementation of the Sonoma County Housing Element; Sonoma County does not have authority to rezone parcels within Santa Rosa or other cities

within the county as they are separate jurisdictions. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, and Windsor, have their own ABAG-assigned RHNA and housing elements.

Response 248.4

The commenter states that commute from Forestville to the Smart Train is a 10 mile drive and asks if bus routes or bicycle infrastructure have been planned so residents could walk, bicycle, or bus to work.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 248.5

The commenter asks if the locals were included in discussions when deciding where to locate housing. The commenter also asks if the location of jobs of future residents will be studied in order to make housing convenient to the employment locations.

Please refer to Master Response SITE regarding the site selection process, and a summary of public participation for the Housing Element can be found in Section 1.4 of the Housing Element.

Response 248.6

The commenter requests responses to her questions before adding 635 units to Forestville.

Responses to the commenter's comments are provided in Responses 248.1 through 248.5.

EIR Public Comment 249

COMMENTER: Roberta Schepps

DATE: February 13, 2023

Response 249.1

The commenter expresses opposition to rezoning properties in Guerneville, specifically GUE-2, GUE-3, and GUE-4, located off Armstrong Woods Road, which is a scenic corridor. The commenter states that residents should be included in the identification of viable housing sites. The commenter states that the DEIR notes many specific adverse effects that would impact the health and safety of current and future residents.

Refer to Response 198.1.

Response 249.2

The commenter expresses the opinion that sites GUE-2 and GUE-3 are only accessible via one-lane roads that would require utility upgrades, upgrades which would result in road closures and severely impact emergency egress for residents. The commenter states that road work on Cutten Drive and Laughlin Road must be addressed before initiation of any construction activity, since heavy machinery would not be transported safely to these areas without causing severe access issues.

Refer to Response 198.2.

Response 249.3

The commenter states that the lack of sidewalks or bicycle lanes poses as a safety hazard, and increasing the population would result in accidents and injuries.

Refer to Response 198.3.

Response 249.4

The commenter states that sites GUE-2 and GUE-3 has inadequate potable water and sewer systems.

Refer to Response 198.4.

Response 249.5

The commenter states that sites GUE-2 through 4 are located within a flood zone, high wildfire danger zone, liquefaction zone, and earthquake prone zone. The commenter states that residents in Guerneville are consistently on evacuation status due to floods, fires, and no electricity. The commenter expresses the opinion that the closest hospitals are 30 minutes away and the medical and policing services are inadequate and would not be able to accommodate the increase in population.

Refer to Response 198.5.

Response 249.6

The commenter expresses the opinion that site GUE-3 would result in significant biological resource impacts since it would require the removal of redwoods, which is a known habitat for California Quail, California Grey Foxes, and Osprey. The commenter states that site GUE-3 is also located adjacent to agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

Refer to Response 198.6.

Response 249.7

The commenter states that site sensitivity should be high and visual dominance should be dominant for site GUE-3 since a significant number of redwoods and valley oak would be removed for development. The commenter states Figure 4.1-5 of the DEIR is misleading since additional photos should show the immense valley view beauty which determines the visual character of Guerneville.

Refer to Response 198.7.

Response 249.8

The commenter states that rezoning of sites GUE-2 through 4 are inconsistent with the goals and policies of the County General Plan, Bay Area 2050, and the Housing Element.

Refer to Response 198.8.

Response 249.9

The commenter expresses discontent for the lack of notification and inclusion in the early processes of the Housing Element Update and expresses her opposition to rezoning sites GUE-2 through 4.

Refer to Response 198.9.

EIR Public Comment 250

COMMENTER: Bob and Robin Shopbell

DATE: February 13, 2023

Response 250.1

The commenter comments on site FOR-4, and expresses dissatisfaction with inclusion of FOR-4.

Please refer to Master Response HE regarding opposition to the Housing Element.

Response 250.2

The commenter states that maps identifying and describing site FOR-4 are incorrect. The commenter expresses the opinion that Van Keppel is a single egress road, and adding more than 70 units would result in significant evacuation impacts.

Refer to Response 131.1 regarding the address of 6090 Van Keppel, which has been corrected in the EIR; the figures in the Draft EIR are correct. Please refer to Master Response EMG regarding emergency access and evacuation.

Response 250.3

The commenter states that current residents are using septic on the 6000 block of Van Keppel, and sanitary systems would be required to be updated to accommodate the increase in more than 70 units.

Please refer to Master Response UTIL regarding impacts to utility infrastructure and Appendix WSS. Existing sewer infrastructure is shown in Table 4-1, and FOR-4 is listed as having adjacent sewer pipe based on information from the general manager of Forestville Water District.

Response 250.4

The commenter expresses opposition to rezoning site FOR-4 since there are inadequate public sewer systems and the proposed units would be inconsistent with the character and style of the neighborhood.

Please refer to Master Response HE regarding opposition to the Housing Element and Master Response UTIL regarding impacts to utility infrastructure. Potential impacts to aesthetics are discussed in Section 4.1, *Aesthetics*, which concludes that development facilitated by the project on Rezoning Sites would have significant and unavoidable impacts even with the incorporation of Mitigation Measure AES-1 (refer to Impact AES-3). In terms of neighborhood character, social effects of a project shall not be treated as a significant effect on the environment pursuant to *CEQA Guidelines* Section 15131. As such, formal analysis of social impacts is not required, which includes neighborhood character or fiscal impacts.

EIR Public Comment 251

COMMENTER: Sabrina Zola

DATE: February 13, 2023

Response 252.1

The commenter expresses opposition to rezoning six parcels in Forestville since it would result in substantial impacts to traffic, evacuation, infrastructure such as sewer and water, pedestrian safety, and wildlife.

Please refer to Master Response HE regarding opposition the Housing Element, Master Response TRA regarding traffic impacts, and Master Response EXST regarding existing issues in Forestville. Refer to Master Response EMG regarding emergency evacuation Potential impacts to evacuation, sewer and water services, pedestrian safety, and wildlife are discussed in the following sections of the Draft EIR, respectively: Section 4.19, *Wildfire*; Section 4.18, *Utilities and Service Systems*; Section 4.16, *Transportation*; and Section 4.4, *Biological Resources*. As discussed therein, the proposed project would not substantially impair an adopted emergency response or evacuation plan, or substantially increase hazards due to design features or incompatible uses, or result in significant impacts to wildlife. However, refer to Master Response UTIL regarding infrastructure impacts of the project.

EIR Public Comment 252

COMMENTER: Scott Ruthrauff

DATE: February 13, 2023

Response 252.1

The commenter expresses the opinion that the parcels and infrastructure in Forestville are incapable of accommodating an additional 1,652 new residents.

Please refer to Master Response EXST regarding existing infrastructure and Master Response UTIL regarding impacts of the proposed project on water and wastewater infrastructure.

Response 252.2

The commenter expresses the opinion that increasing the Forestville population by 1,625 new residents is increasing the population by 50 percent, and there is already limited space with only one single road in and out of the town. The commenter states that even if the proposed projects resulted in improved services, the roadways would not be able to handle additional traffic, especially during evacuations.

The change in buildout potential for the five Forestville sites would be 1,172 people (refer to Table 2-4 of the EIR). The current population of Forestville is approximately 3,788 people, which would be a 30 percent increase rather than the 50 percent increase cited by the commenter. Please refer to Master Response EXST regarding existing infrastructure, Master Response TRA regarding traffic congestion, and Master Response EMG regarding emergency access and evacuation.

Response 252.3

The commenter expresses the opinion that the proposed number of new residents should be reduced to 600 with a total of 150 homes. The commenter recommends placing new housing in proximity to transit, services, and existing infrastructure such as Santa Rosa, Rohnert Park, Windsor, and Petaluma.

Please refer to Master Response SITE regarding the site selection process. This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers. The EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 253

COMMENTER: Soichiro Takahashi

DATE: February 12, 2023

Response 253.1

The commenter expresses opposition towards high density housing in downtown Forestville since it is inconsistent with the small and intimate character of the town. The commenter states that police stations, traffic lights, larger roads, markets, and a hospital would be required to support the proposed population growth.

Please refer to Master Response HE regarding opposition to the Housing Element and Master Response EXST regarding existing conditions. Impacts to public services, including police stations, are analyzed in Section 4.15, *Public Services and Recreation*, of the Draft EIR, which concludes that development facilitated by the project on Rezoning Sites would not result in substantial adverse physical impacts associated with the construction of new or physically altered police facilities. Additionally, pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes existing markets and hospitals.

Response 253.2

The commenter expresses the opinion that housing should be concentrated in areas with existing employment, transit, services, and infrastructure such as downtown Santa Rosa, and not Forestville.

The proposed project would involve rezoning sites to facilitate implementation of Sonoma County's Housing Element. Sonoma County does not have authority to rezone parcels within Santa Rosa or other cities within the county as they are separate jurisdictions. Additionally, the EIR for the Sonoma County Housing Element analyzes rezoning sites proposed in the unincorporated areas of Sonoma County to support meeting the County's RHNA. Incorporated areas such as Santa Rosa, Petaluma, Sebastopol and Windsor, have their own ABAG-assigned RHNA and housing elements.

EIR Public Comment 254

COMMENTER: Steve and Andrea Perry

DATE: February 13, 2023

Response 254.1

The commenter states that the rezoning of parcels APN 054-290-057 and APN 054-290-084 in Glen Ellen should be removed from the proposed Housing Element Update.

Please refer to Master Response HE regarding opposition to the Housing Element.

Response 254.2

The commenter states that the proposed rezoning would increase density by more than 300 percent, which would change the community's character and impact the limited downtown center.

Pursuant to *CEQA Guidelines* Section 15131, social or economic effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of social or economic impacts is not required, including the community's character and downtown businesses.

Response 254.3

The commenter states that the increase in vehicles would worsen Glen Ellen's parking issue. The character expresses the opinion that the DEIR does not adequately address impacts to increased density and resulting traffic issues.

Parking is not considered an environmental impact and is not required to be analyzed under CEQA. Refer to Response 70.6 regarding the Sonoma Developmental Center.

Response 254.4

The commenter refers to the General Plan and Glen Ellen Design and Development Guidelines and reiterates that the rezoning of parcels APN 054-290-057 and APN 054-290-084 in Glen Ellen should be removed from the proposed Housing Element Update.

Refer to Response 70.3 and Response 136.4 regarding the Glen Ellen Design and Development Guidelines and Sonoma County General Plan. Please refer to Master Response HE regarding opposition to the Housing Element.

EIR Public Comment 255

COMMENTER: Susan Mulcahy

DATE: February 13, 2023

Response 255.1

The commenter expresses opposition to rezoning sites GLE-1 and GLE-2 since it is inconsistent with County guidelines and is an inappropriate use of the sites. The commenter states that bus service is minimal and stores are inadequate to accommodate an increase in population. The commenter states that the project does not take into account other proposed project such as the SDC, Hanna Boys Center, and Elnoka.

Refer to Master Response HE regarding opposition to the project. Refer to Table 4.11-2 for an in-depth discussion regarding the project's consistency with the County General Plan. Refer to Master Response EXST regarding existing bus service and stores. Refer to Response 70.6 regarding cumulative development including in regard to the Sonoma Developmental Center, Hannah Boys Center, and Elnoka developments.

EIR Public Comment 256

COMMENTER: Susan Ziegler

DATE: February 13, 2023

Response 256.1

The commenter expresses confusion at what the project entails and asks what types of units would be built, whether they would be owner-occupied or rental, and what the terms of ownership are. The commenter also asks whether all properties would be developed.

The proposed project would not facilitate the construction of specific types of development. Rather, the proposed project would rezone the 59 identified sites to allow for a greater number of dwelling units than allowed under existing zoning. Please refer to Table 2-3 for the maximum number of dwelling units allowed per acre on each site, and Table 2-4 for the total number of dwelling units allowed on each site. It is unlikely that every site would be developed and that every site would be developed at its maximum buildout potential.

Response 256.2

The commenter states that the DEIR lists an approximate population increase of 616 residents from sites GUE-1 through 4, but doesn't list proposed population for sites GUE-5 and GUE-6. The commenter asks what the acreage of sites GUE-5 and GUE-6 are, and whether all six sites would be used.

Table 2-2 of the EIR shows all sites on the housing element inventory. The 59 sites on the inventory proposed for rezoning are shown in Table 2-4 of the EIR. GUE-5 and GUE-6 are not proposed for rezoning as they are already zoned for residential development.

Response 256.3

The commenter expresses concerns regarding car exhaust impacts resulting from the increase in vehicles and delivery trucks. The commenter expresses the opinion that Laughlin Road and Watson Valley Lane which lead to sites GUE-1 through 3 have no sidewalks and are narrow with areas allowing for only one-way traffic.

Refer to Master Response TRA regarding traffic congestion and Master Response EXST regarding existing roadway conditions.

Please refer to Section 4.3, *Air Quality*, of the Draft EIR. As discussed therein, project construction would temporarily increase air pollutant emissions and impacts would be potentially significant (page 4.3-16 of the Draft EIR). The project would include implementation of Mitigation Measures AQ-1, Basic Construction Mitigation Measures, and AQ-2, Additional Construction Mitigation Measures (page 4.3-19 of the Draft EIR). Additionally, development facilitated by the project on Rezoning Sites would not expose sensitive receptors to substantial pollutant concentrations from carbon monoxide hotspots or toxic air contaminants (page 4.3-21 of the Draft EIR).

Please refer to Master Response EMG regarding emergency access. Additionally, refer to Section 4.16, *Transportation*. As discussed therein, development facilitated by the proposed project on Rezoning Sites

would be required to provide, safe, continuous, and convenient pedestrian access (page 4.16-14 of the Draft EIR).

Response 256.4

The commenter asks whether community input would be included and how they can get more information and questions answered about the proposed project.

Public comments on the Draft EIR were received for a 55-day comment period until February 23, 2023, as described in Section 1, *Introduction*, above. Additional information regarding the Housing Element process is available on the County's Housing Element Update website:

<https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/housingelement>

EIR Public Comment 257

COMMENTER: Suzi Molofsky

DATE: February 13, 2023

Response 257.1

The commenter expresses opposition to rezoning sites GLE-1 and GLE-2.

Please refer to Master Response HE regarding opposition to the project. The commenter's opposition to rezoning sites in Glen Ellen is noted and will be passed on to decision-makers.

Response 257.2

The commenter expresses an opinion that the proposed rezoning would result in traffic congestion and would be inconsistent with the General Plan and Glen Ellen Development Guidelines. The commenter states that the rezoning would be out of scale with the character and infrastructure of Glen Ellen. The commenter states that new housing is already addressed by the increase in ADUs as well as the development of the Sonoma Developmental Center and the Hannah Boys Center. The commenter states that current residents have to travel outside of Glen Ellen to shop.

Please refer to Master Response TRA regarding traffic impacts. Additionally, refer to Table 4.11-3 in Section 4.11, *Land Use and Planning*, which outlines the project's consistency with the Sonoma County General Plan, and Section 4.1, *Aesthetics*, which concludes that development facilitated by the proposed project on Rezoning Sites would not significantly affect public views and community and aesthetic character with implementation of mitigation measures (page 4.1-59 of the Draft EIR). Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes retail services. Refer to Response 70.6 regarding the Sonoma Developmental Center and Hannah Boys project. Refer to Response 70.3 regarding the Glen Ellen Development Guidelines.

EIR Public Comment 258

COMMENTER: Tamara Sarkissian

DATE: February 13, 2023

Response 258.1

The commenter expresses the opinion that increasing the size of Forestville by 50 percent would result in substantial impacts to traffic, safety, and quality of life. The commenter states that Forestville has a lack of infrastructure to accommodate the growth, and has limited access to public transportation, limited sewer and water capacity, no police force, and no high school.

Please refer to Response 188.1.

Response 258.2

The commenter comments on the rezoning of site FOR-2, and asks how traffic safety would be facilitated for the additional 736 cars entering Mirabel Road, Highway 116, and River Road.

Please refer to Response 188.2.

Response 258.3

The commenter states that Mirabel Road only has a sidewalk on one side of the street heading towards downtown, and expresses her concerns regarding pedestrian safety.

Please refer to Response 188.3.

Response 258.4

The commenter states that public transportation is limited and infrequent in Forestville, and asks how pedestrian safety while walking to bus stops would be ensured given the lack of sidewalks.

Please refer to Response 188.4.

Response 258.5

The commenter asks how public transportation from Forestville to Santa Rosa and throughout the Russian River would be improved.

Please refer to Response 188.5.

Response 258.6

The commenter asks how the local elementary school would be improved to ensure that teachers could accommodate the influx in children.

Please refer to Response 188.6.

Response 258.7

The commenter expresses the opinion that the local sewer and water systems would require upgrades to handle the increase in residents, and asks what upgrades would be included to accommodate 283 new units.

Please refer to Response 188.7.

Response 258.8

The commenter expresses the opinion that Forestville does not have a police station, and asks how extra policing would be received for an additional 736 residents.

Please refer to Response 188.8.

Response 258.9

The commenter asks how appropriate access to medical and social services would be improved to accommodate increased numbers of residents.

Please refer to Response 188.9.

Response 258.10

The commenter expresses her discontent that housing would increase the Forestville population by 50 percent.

Please refer to Response 188.10.

EIR Public Comment 259

COMMENTER: Tamara Sarkissian

DATE: February 13, 2023

Response 259.1

The commenter expresses the opinion that increasing the size of Forestville by 50 percent would result in substantial impacts to traffic, safety, and quality of life. The commenter states that Forestville has a lack of infrastructure to accommodate the growth, and has limited access to public transportation, limited sewer and water capacity, no police force, and no high school. The commenter comments on the rezoning of site FOR-4, and states that Van Keppel is a narrow one-lane road that could barely accommodate the current flow of traffic. The commenter asks how the road would be made safe for an additional 185 vehicles. The commenter expresses the opinion that Highway 116 is a busy thoroughfare, and asks how a safe flow of traffic for an additional 185 vehicles would be facilitated. The commenter states that Van Keppel is a narrow road with no sidewalk, and asks how pedestrian safety would be ensured. The commenter states that public transportation is limited and infrequent in Forestville, and asks how pedestrian safety while walking to bus stops would be ensured given the lack of sidewalks. The commenter asks how public transportation from Forestville to Santa Rosa and throughout the Russian River would be improved. The commenter asks how the local elementary school would be improved to ensure that teachers could accommodate the influx in children. The commenter expresses the opinion that the local sewer and water systems would require upgrades to handle the increase in residents, and asks what upgrades would be included to accommodate 71 new units. The commenter expresses the opinion that Forestville does not have a police station, and asks how extra policing would be received for an additional 185 residents. The commenter asks how appropriate access to medical and social services would be improved to accommodate increased numbers of residents. The commenter expresses discontent that housing would increase the Forestville population by 50 percent.

This letter is identical to Comment 258. Refer to Responses 258.1 through 258.10

EIR Public Comment 260

COMMENTER: Tamara Sarkissian

DATE: February 13, 2023

Response 260.1

The commenter expresses the opinion that increasing the size of Forestville by 50 percent would result in substantial impacts to traffic, safety, and quality of life. The commenter states that Forestville has a lack of infrastructure to accommodate the growth, and has limited access to public transportation, limited sewer and water capacity, no police force, and no high school. The commenter comments on the rezoning of site FOR-4, and states that Van Keppel is a narrow one-lane road that could barely accommodate the current flow of traffic. The commenter asks how the road would be made safe for an additional 185 vehicles. The commenter expresses the opinion that Highway 116 is a busy thoroughfare, and asks how a safe flow of traffic for an additional 185 vehicles would be facilitated. The commenter states that Van Keppel is a narrow road with no sidewalk, and asks how pedestrian safety would be ensured. The commenter states that public transportation is limited and infrequent in Forestville, and asks how pedestrian safety while walking to bus stops would be ensured given the lack of sidewalks. The commenter asks how public transportation from Forestville to Santa Rosa and throughout the Russian River would be improved. The commenter asks how the local elementary school would be improved to ensure that teachers could accommodate the influx in children. The commenter expresses the opinion that the local sewer and water systems would require upgrades to handle the increase in residents, and asks what upgrades would be included to accommodate 71 new units. The commenter expresses the opinion that Forestville does not have a police station, and asks how extra policing would be received for an additional 185 residents. The commenter asks how appropriate access to medical and social services would be improved to accommodate increased numbers of residents. The commenter expresses discontent that housing would increase the Forestville population by 50 percent.

This letter is identical to Comment 258. Refer to Responses 258.1 through 258.10

EIR Public Comment 261

COMMENTER: Tamara Sarkissian

DATE: February 13, 2023

Response 261.1

The commenter expresses the opinion that increasing the size of Forestville by 50 percent would result in substantial impacts to traffic, safety, and quality of life. The commenter states that Forestville has a lack of infrastructure to accommodate the growth, and has limited access to public transportation, limited sewer and water capacity, no police force, and no high school. The commenter comments on the rezoning of site FOR-4, and states that Van Keppel is a narrow one-lane road that could barely accommodate the current flow of traffic. The commenter asks how the road would be made safe for an additional 185 vehicles. The commenter expresses the opinion that Highway 116 is a busy thoroughfare, and asks how a safe flow of traffic for an additional 185 vehicles would be facilitated. The commenter states that Van Keppel is a narrow road with no sidewalk, and asks how pedestrian safety would be ensured. The commenter states that public transportation is limited and infrequent in Forestville, and asks how pedestrian safety while walking to bus stops would be ensured given the lack of sidewalks. The commenter asks how public transportation from Forestville to Santa Rosa and throughout the Russian River would be improved. The commenter asks how the local elementary school would be improved to ensure that teachers could accommodate the influx in children. The commenter expresses the opinion that the local sewer and water systems would require upgrades to handle the increase in residents, and asks what upgrades would be included to accommodate 71 new units. The commenter expresses the opinion that Forestville does not have a police station, and asks how extra policing would be received for an additional 185 residents. The commenter asks how appropriate access to medical and social services would be improved to accommodate increased numbers of residents. The commenter expresses discontent that housing would increase the Forestville population by 50 percent.

This letter is identical to Comment 258. Refer to Responses 258.1 through 258.10.

EIR Public Comment 262

COMMENTER: Tim and Kathy Dellinger

DATE: February 13, 2023

Response 262.1

The commenters express their opposition to the rezoning of parcels in Forestville and comments on the DEIR's analysis and alternatives specifically regarding Forestville.

This comment does not pertain to analysis in the Draft EIR. Please refer to Master Response HE regarding opposition to the Housing Element.

Response 262.2

The commenters express their confusion on how the sites were chosen and ask which parties were responsible for selecting the sites and what methodology was used. The commenters also ask what input Forestville had in the process.

Please refer to Master Response SITE regarding the site selection process.

Response 262.3

The commenters ask if the County of Sonoma would make the final decision regarding the selection and the use of sites, and whether Forestville citizens and officials would be able to give their input.

This comment does not pertain to the adequacy of analysis within the Draft EIR. However, the commenter is correct that, as stated in the EIR, the Sonoma County Board of Supervisors has the authority to remove sites from the Housing Element.

Response 262.4

The commenters refer to Table 2-4 of the DEIR and state that sites FOR-2 and FOR-3 are omitted under Alternative 3. The commenters ask if the total allowable dwelling units would remain at the current designation of 7 and 3, respectively.

Alternative 3, Fewer Potential Sites, is discussed starting on page 6-12. As shown in Section 6.3.1, *Description*, Alternative 3 would omit sites FOR-1 and FOR-2. Under this alternative, sites FOR-1 and FOR-2 would not be rezoned and the total allowable dwelling units under current designations for the site would not change.

Response 262.5

The commenters express the opinion that Forestville is a small village with low density housing and residents choose to live there due to a slower pace and peacefulness. The commenters state that Forestville is mostly quiet with the exception of occasional daytime noise from a nearby stone quarry and transporting trucks.

This comment does not pertain to the adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers. Refer to Master Response EXST regarding existing conditions.

Response 262.6

The commenters express the opinion that the addition of 1,625 new residents would result in major changes to the current way of life in Forestville since nearly half of the new residents would be added to a 14-acre landlocked site (FOR-2). The commenters state that the multi-story structures would be inconsistent with the single-story homes on the perimeter of the FOR-2 site, and express the opinion that the DEIR incorrectly minimizes the impact of the aesthetic change.

Refer to Master Response EXST regarding the existing conditions of Forestville. The commenter does not specifically refer to which part of the aesthetics analysis minimizes potential impacts, and the EIR finds a significant and unavoidable aesthetic impact to FOR-2 under Impact AES-3 in Section 4.1, *Aesthetics*. Please note that the proposed project would not require identified parcels to be developed and that the project would not include construction.

Response 262.7

The commenters state that part of the road traffic on Nolan Road, Mirabel Road, and Giusti Road is foot traffic, and that there are no sidewalks on either side of these roads. The commenters state that the DEIR does not mention the absence of sidewalks, and express their concern regarding pedestrian safety, asking how children of the FOR-2 site would be able to safely cross Mirabel Road which includes heavy traffic. The commenters express their opinion that most people travel outside of Forestville for employment, and new residents should not be added to the area with few jobs to support them.

The commenter is incorrect that the Draft EIR does not mention the absence of sidewalks; refer to the pedestrian facilities setting section on page 4.16-8. As discussed elsewhere in Section 4.16, *Transportation*, development facilitated by the proposed project on Rezoning Sites would be required to provide, safe, continuous, and convenient pedestrian access (page 4.16-14 of the Draft EIR). Additionally, as discussed under Impact TRA-2 (page 4.16-17 of the Draft EIR), development facilitated by the proposed project on Rezoning Sites would not substantially increase hazards due to sharp curves, dangerous intersections, or other design features.

Response 262.8

The commenters state that the town center has a small retail and personal service businesses, and although there is congestion due to the lack of parking it is currently tolerable. The commenters state that the increase in residents would result in an increase in traffic through the town center, which the Fehr and Peers Transportation Study underestimated, since there is no traffic signaling or road configuration that slows the traffic entering the town center and traffic also includes large trucks from the nearby quarry and from grape vineyards during harvest season.

Refer to Master Response TRA regarding traffic congestion. Appendix TRA includes a congestion-based analysis for informational purposes only, and not for purposes of CEQA. Refer to Section 4.16, *Transportation*, for the VMT-based transportation analysis.

EIR Public Comment 263

COMMENTER: Tony Barber

DATE: February 13, 2023

Response 263.1

The commenter expresses support for the majority of housing sites, but opposes the rezoning of the Cutten property.

This comment is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process.

Response 263.2

The commenter states that the DEIR lacks specific analyses and recommendations and requests the removal of sites GUE-1 through 3 from the Housing Element Update.

This comment is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to specific Rezoning Sites.

Response 263.3

The commenter expresses the opinion that housing should be commercially viable, close to services, include appropriate infrastructure, in proximity to safe transportation, and does not include negative impacts to the environment or residents. The commenter states that the Cutten site is not likely to be developed.

This comment is noted and passed on to decision-makers for consideration. Please refer to Master Response SITE regarding the site selection process and Master Response HE regarding opposition to specific Rezoning Sites. Please refer to Response EXST regarding existing conditions and services. Potential environmental impacts are described and discussed through Section 4 of the Draft EIR, and mitigation measures are included to reduce potential impacts where feasible.

Response 263.4

The commenter states that the site is 1.4 miles from Guerneville and residents would be dependent on cars. The commenter states that the increase in traffic and lack of parking would result in negative impacts.

The Guerneville Rezoning Sites are all located within the designated Urban Service Area associated with Guerneville (please refer to Figure 2-4 on page 2-12 of the Draft EIR). Please refer to Master Response EXST regarding existing conditions, including that of road infrastructure. Please refer to Master Response TRA regarding traffic congestion. Refer to Master Response UTIL regarding water and sewer infrastructure. Parking is not considered an environmental impact and is not required to be analyzed under CEQA.

Response 263.5

The commenter expresses the opinion that other sites along Armstrong Woods and in downtown Guerneville are better options for housing sites.

Please refer to Master Response SITE regarding the site selection process, and criteria that selected sites needed to meet.

Response 263.6

The commenter states that the Cutten site would require road widening and sidewalk construction, which would lower the financial viability of investment at that site.

Specific road widening locations have not been identified, it would be speculative to analyze potential impacts at this time. However, if it is determined that road widening is needed to access Rezoning Sites for future development, road widening would require site-specific CEQA compliance that could include additional mitigation measures.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the financial viability of construction.

Response 263.7

The commenter asks why the buildout potential and zoning for the Cutten property was increased from 21 units as listed in the 2014 Housing Element (Site 11) to 33 units as listed in Table 2-4 of the DEIR. The commenter states that there are many other larger and vacant sites closer to services and infrastructure.

Please refer to Master Response SITE regarding the site selection process. References to previous proposal for development on the Rezoning Sites are not relevant to the proposed project or analysis provided in the EIR. The commenter's opposition to the proposed rezoning to R2 is noted and passed on to decision-makers for consideration.

Response 263.8

The commenter states that sites GUE-2 and GUE-3 are only accessible via one-lane roads and would require utility upgrades. The commenter states that upgrades and road closures would severely impact the emergency egress for residents. The commenter states that the redwood tree on Laughlin Road would be required to be removed to widen the road. The commenter states that road work on Cutten Drive and Laughlin Road must be addressed before construction activities.

Please refer to Response 263.6 regarding road improvements and Master Response EXST regarding existing conditions. Potential impacts related to road closures during construction are discussed in Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. As noted therein, the implementation of Mitigation Measure TRA-2, which requires a construction traffic management plan, would reduce potential impacts associated with traffic disruptions during construction to less than significant.

Potential impacts related to tree removal are discussed under Impact BIO-5, beginning on page 4.4-39 of the Draft EIR. As stated therein:

Trees to be removed have not yet been identified because individual projects have not been developed yet... Development facilitated by the project on Rezoning Sites would be required to comply with these goals policies and measures, including via the application for tree removal permits and compliance with associated requirement (e.g., tree replacement) where applicable.

Response 263.9

The commenter expresses concerns regarding pedestrian safety since there are no sidewalks or bicycle lanes in Guerneville.

Potential impacts related to pedestrian and bicycle facilities are discussed under Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. Potential impacts related to traffic safety are discussed under Impact TRA-2, on page 4.16-18 of the Draft EIR. Please refer to Master Response EXST regarding existing conditions, including existing pedestrian and bicycle infrastructure.

Response 263.10

The commenter states that the DEIR incorrectly lists distances from services and does not mention that Guerneville is not a walkable area or that the one-lane road leading up to Cutten Drive could not be expanded due to geography and is prone to slides. The commenter states that the DEIR is inconsistent with Goal 3 of the Housing Element Update.

The commenter does not provide specifics of which distances are incorrectly stated in the Draft EIR; therefore, it is unclear if revisions are needed. No further response is warranted.

Please refer to Master Response SITE regarding site selection criteria. As noted therein, being located in a “walkable area” is not a criterion. Please refer to Response 263.6 regarding road improvements.

Landslide potential is discussed in Section 4.7, *Geology and Soils* of the Draft EIR.

Consistency with Goal 3 is addressed on page 4.11-39 of the Draft EIR. As determined therein, the project would be consistent with this goal.

Response 263.11

The commenter states that the DEIR does not address public safety or insufficient roadways of the Cutten site and does not provide mitigation measures.

Please refer to Master Response SITE regarding the site selection process. Please refer to Master Response EXST regarding existing road infrastructure and Response 263.6 regarding road improvements.

Response 263.12

The commenter claims that the DEIR does not address public transit or pedestrian sidewalks, which is inconsistent with Goal 6 of the Housing Element Update. The commenter states that there are no sidewalks at the Cutten site, bus service is more than 0.4 miles away, and the area is not well lit. The commenter refers to the “Pedestrian Facilities” section of page 4.16-8 of the DEIR, and expresses the opinion that the DEIR does not mention system gaps for the Cutten site or the Laughlin site. The commenter asserts that it is geographically impossible to construct sidewalks on the Cutten site, and the site is inappropriate for increasing density.

Housing Element Goal 6: Encourage Equitable and Sustainable Housing is not relevant to the analysis provided in the EIR. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes equity.

Please refer to Master Response EXST regarding existing conditions and infrastructure. The Draft EIR is not required to mitigate existing conditions or deficiencies.

Existing transit access, bicycle conditions, and pedestrian facilities are described beginning on page 4.16-5 of the Draft EIR. Potential impacts to these facilities are described in Impact TRA-1, beginning on page 4.16-14 of the Draft EIR. As noted therein:

...in compliance with the County of Sonoma's General Plan, development facilitated by the project on Rezoning Sites would be required to provide safe, continuous, and convenient pedestrian access to local services and destinations. Pedestrians, therefore, would not be introduced to areas without safe, continuous sidewalks.

Response 263.13

The commenter refers to "Pedestrian Facilities" on page 4.16-15 of the DEIR, and claims that the DEIR does not mitigate any of the impacts listed. The commenter states that the significant and unavoidable determination for Impact TRA-1 shows that there is no plan to address sidewalks or roadways for the Cutten site and requests for the site to be removed from the housing inventory.

The commenter is incorrect. The Draft EIR provides a conclusion of a less than significant for impacts to pedestrian facilities, as stated in the quoted text included in this comment. The significant and unavoidable conclusion is related to VMT impacts, and not pedestrian facility impacts.

Response 263.14

The commenter refers to Table 5-2 of the DEIR appendix, and states that with an approximation of 134.77 gpd per resident and an estimated 42 residents on the Cutten site, sewer usage would increase from the current 5,660 gpd to over 20,000 gpd due to the 500 percent increase in population. The commenter states that the DEIR does not analyze water and sewer infrastructure at the Cutten site.

Please refer to Master Response UTIL regarding water and wastewater impacts.

Table 5-2 of Appendix WSS provides a summary of water demand increases in each Urban Service Area. The Guerneville sites would result in a total increase of 93.2 acre-feet per year in water demand. It is unclear where the commenter's figure of 134.77 GPD per resident is sourced from.

Wastewater generation on the Guerneville sites is provided in Table 5-3 of Appendix WSS. As shown therein, the increase in average sewer generation would result in 32,139 GPD of wastewater. It is again unclear where the commenters figures of 5,660 GPD and 20,000 GPD are sourced from.

The calculations provided in Appendix WSS informed the analysis provided in the Draft EIR, including Impact UTIL-1, beginning on page 4.18-12, which describes potential impacts to water and wastewater services. Mitigation is required as necessary, for sites that are not located adjacent to existing water and wastewater infrastructure.

Response 263.15

The commenter refers to Table 4.19-1 of the DEIR, which shows that the Cutten site has a slope of 50 to 75 percent. The commenter states that the DEIR does not analyze sloping on the Cutten site or provide mitigation.

CEQA does not require an analysis of slope as it relates to development costs. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes the cost of construction.

Slopes as they pertain to landslides are addressed in Section 4.7 of the Draft EIR. Slopes as they pertain to wildfire are addressed in Section 4.19 of the Draft EIR.

Response 263.16

The commenter refers to the Cultural Resources section of the DEIR and states that the DEIR does not list mitigation or analyze the likelihood that the property would be sold which would impact the viability of the site, given that the family at the Cutten property has lived there for over 100 years.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes existing property owner intentions.

Site GUE-3 is acknowledged as containing a potentially historic structure, as noted in Table 4.5-1 on page 4.5-5 of the Draft EIR. Please refer to Impact CUL-1 regarding potential impacts to historical resources, beginning on page 4.5-11 of the Draft EIR.

Response 263.17

The commenter states that sites GUE-2 through 4 are located in a flood plain zone, high wildfire danger zone, and seismic zone. The commenter expresses the opinion that building in flood and high fire zones is contradictory to the County General Plan for safety reasons.

Potential impacts related to flooding, wildfire, and seismic events are addressed in Sections 4.9, 4.19, and 4.7 of the Draft EIR, respectively. Please refer to Master Response EMG regarding emergency evacuation.

Response 263.18

The commenter states that the closest hospitals are at least 30 minutes away and ambulance and emergency services are inadequate. The commenter asserts that low-income residents would be elderly.

Please refer to Master Response EMG regarding emergency access. Please refer to Section 4.15, *Public Services and Recreation*, regarding potential impacts to emergency medical services.

The commenter's speculation on the demographics of future residents is not related to the EIR and does not warrant a response.

Response 263.19

The commenter expresses the opinion that the amount of law enforcement and emergency response would be required to be increased to accommodate the increase in residents.

Please refer to Section 4.15, *Public Services and Recreation*, regarding potential impacts to police services (Impact PS-2) and emergency medical services (Impact PS-1). As noted therein, impacts would be less than significant.

Response 263.20

The commenter expresses the opinion that site GUE-3 would result in significant biological resource impacts since it would require the removal of redwoods, and remove meadow habitat for California Quail, California Grey Foxes, and Osprey.

Refer to Response 198.7.

Response 263.21

The commenter states that site GUE-3 is also located adjacent to agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development.

The commenter is correct that any Rezoning Sites located adjacent to active agricultural operations would be required to implement Mitigation Measure AG-1.

Response 263.22

The commenter states that site sensitivity should be high and visual dominance should be dominant for site GUE-3 since a significant number of redwoods and valley oak would be removed for development.

Refer to Response 198.8.

Response 263.23

The commenter states Figure 4.1-5 of the DEIR is misleading since additional photos should show the immense valley view beauty which determines the visual character of Guerneville.

The commenter's opinion is noted; however, Figure 4.1-5 is intended to provide views of GUE-2 and GUE-3 that is experienced by travelers on Cutten Road, and not views experienced by residents or visitors on GUE-2 or GUE-3.

Response 263.24

The commenter expresses the opinion that Figure 4.1-5 of the DEIR undermines the actual assessment of dominance in the area, and that the DEIR is missing a more in-depth and local view of the area.

The images provided in the Draft EIR are not exhaustive of the analysis conducted in the Draft EIR. Additionally, Figure 4.1-5 does provide a perspective of a clearly visible redwood tree. Redwood trees are prevalent in the area, and not located exclusively on GUE-3. Therefore, as described in Response 263.22, the EIR correctly characterizes GUE-3 as being co-dominant.

Please refer to Impact BIO-5, beginning on page 4.4-39 of the Draft EIR, regarding potential impacts associated with tree removal. As noted therein, compliance with County-required policies related to

heritage trees and tree removal (which apply to all projects in the County, regardless of CEQA requirements) was determined to be adequate to reduce impacts to less than significant.

Response 263.25

The commenter expresses the opinion that there is not enough time to comment on the entire document given the size and technicalities. The commenter recommends planning officials to reconsider some of the sites.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Response 120.2 regarding the public comment period.

Response 263.26

The commenter states that rezoning of sites GUE-2 through 4 are inconsistent with the goals and policies of the County General Plan, Bay Area 2050, and the Housing Element.

Please refer to Impact LU-2, beginning on page 4.11-30 of the Draft EIR, for an analysis of consistency with the County General Plan, Plan Bay Area 2050, and County Housing Element.

Response 263.27

The commenter expresses the opinion that a deeper review of the DEIR and Housing Element Update would underscore the need to remove certain sites.

The commenter's opinion is noted and passed on to decision-makers for consideration. Please refer to Master Response HE regarding opposition to certain Rezoning Sites.

EIR Public Comment 264

COMMENTER: Vikki Miller

DATE: February 13, 2023

Response 264.1

The commenter expresses the opinion that Forestville has a need for workforce housing, and of the proposed sites, sites FOR-3 and FOR-6 are most suitable for the development of housing.

This comment does not pertain to the adequacy of analysis in the Draft EIR. This comment has been passed on to County decision-makers.

Response 264.2

The commenter states that sites FOR-1, FOR-5, and FOR-6 are located on hazardous materials sites, and would be suitable for housing if they could be safely mitigated.

Please refer to Section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR. As discussed therein, development facilitated by the project on Rezoning Sites would be subject to existing applicable regulations related to site remediation, compliance with which would minimize impacts from development on contaminated sites (page 4.9-11 of the Draft EIR). As concluded therein, impacts would be less than significant.

Response 264.3

The commenter expresses the opinion that Forestville's limited stores and restaurants would not be able to accommodate an increase in population. The commenter also expresses concern regarding potential greenhouse gas emissions and traffic congestion associated with the project, and that the increase in population facilitated by the project would impair emergency evacuation routes.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, including the capacity of existing stores and restaurants. Please refer to Master Response TRA and Master Response EMG regarding traffic congestion and emergency impacts.

Please refer to Section 4.8, *Greenhouse Gas Emissions*, of the Draft EIR for analysis of fuel consumption and greenhouse gas (GHG) emissions associated with the proposed project. As discussed therein, GHG emissions associated with the proposed project would not exceed the Bay Area Air Quality Management District project-level or plan-level GHG emission thresholds, and the project would be consistent with the goals of the California Air Resources Board 2017 Scoping Plan, the Association of Bay Area Governments' Plan Bay Area 2040, the County's General Plan, and the County's Climate Change Action Resolution. Impacts would be less than significant and no mitigation would be required. Please refer to Section 4.16, *Transportation*, for analysis of transportation impacts associated with the proposed project. As discussed therein, impacts related to VMT would be significant and unavoidable, and the project would involve implementation of Mitigation Measures TRA-1 and TRA-2 (page 4.16-15 of the Draft EIR). Refer to Master Response TRA regarding traffic congestion, and Master Response EMG regarding evacuation.

Response 264.4

The commenter expresses concerns regarding potential development of site FOR-1 and states that existing hazards should be remediated prior to its development.

Please refer to Response 264.2 and Response O-2.3 regarding the Electro Vector site.

Response 264.5

The commenter expresses her opposition to site FOR-2 due to potential impacts to aesthetics and emergency access.

Please refer to Section 4.1, *Aesthetics*, for analysis of potential impacts to aesthetics. As stated under Impact AES-3, “The project would facilitate development projects at some sites that could introduce incongruous styles and massing or could degrade visual character through the necessary removal of existing, mature trees. New development that is incompatible with the natural and built conditions as they exist could cause a significant impact to the visual quality by changing the visual nature of the site from open space to densely developed residential properties, or by introducing structures with unremarkable design into a neighborhood with a distinctive character informed, in part, by the architecture.” FOR-2 would be subject to Mitigation Measure AES-1, but impacts because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects (including FOR-2) on identified sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings. Thus, impacts would remain significant and unavoidable. Please refer to Master Response EMG regarding emergency access.

Response 264.6

The commenter states that sites FOR-3 and FOR-6 are the most promising of the proposed rezone sites due to their proximity to services and public transportation.

This comment does not pertain to the adequacy of analysis with the Draft EIR. This comment has been passed on to County decision-makers.

Response 264.7

The commenter states that the roadway that would provide access to site FOR-4 is narrow and development within the site would impair emergency access.

Please refer to Master Response EMG regarding emergency access.

Response 264.8

The commenter states that site FOR-5 has been previously considered for development as a skate park, and having a non-residential use within the site could provide a barrier to housing built near an existing sewage plant.

This comment does not pertain to adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 264.9

The commenter states that site FOR-6 would be a suitable site as it is proximate to shops and public transportation on Main Street.

This comment does not pertain to adequacy of analysis within the Draft EIR. This comment has been passed on to County decision-makers.

Response 264.10

The commenter states that site FOR-7 would be suitable for smaller development, as denser development could cause traffic congestion.

Please note that FOR-7 is not a Rezoning Site. It is analyzed for inclusion in the Housing Element Site Inventory based on its existing zoning. Please refer to Master Response TRA regarding traffic impacts. This comment has been passed on to County decision-makers.

EIR Public Comment 265

COMMENTER: Wayne Weeks

DATE: February 13, 2023

Response 265.1

The commenter identifies themselves as a resident of Guerneville and expresses their opposition to the proposed rezoning sites. The commenter states that the proposed rezoning would allow development that is too large for the area due to the one lane roadway that would provide access to the rezone site.

Please refer to Master Response HE regarding opposition to the Housing Element. Refer to Master Response EXST and Master Response EMG regarding existing conditions and vehicle access.

Response 265.2

The commenter states that the County should have notified property owners of the proposed rezoning.

The County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction*, on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation*. Refer to Master Response Site regarding notification of property owners.

EIR Public Comment 266

COMMENTER: Andy and Renee Tchirkin

DATE: February 14, 2023

Response 266.1

The commenter states that the approach to housing taken in the Housing Element and associated rezoning sets a dangerous precedent for a dictatorship style of government and conflicts with the Constitution. The commenter states that state preemption limits the ability of community to address local issues.

This comment does not pertain to the adequacy of analysis within the Draft EIR and has been passed on to County decision-makers. Please note that the project does not require identified parcels to be developed and that the project does not include buildout or construction of housing allowed by proposed rezoning.

Response 266.2

The commenter asks what right the State of California and the Sonoma County have to implement the proposed rezoning in rural communities with limited services and limited ability to accommodate additional vehicle traffic.

This comment does not pertain to the adequacy of analysis within the Draft EIR and has been passed on to County decision-makers. Please refer to Master Response EXST and Master Response EMG regarding existing conditions and vehicle access.

Response 266.3

The commenter asks why the County has ignored the requirements of CEQA and how future lawsuits can be avoided.

This comment does not pertain to the adequacy of analysis within the Draft EIR and has been passed on to County decision-makers. Refer to Section 1, *Introduction*, of the Draft EIR which outlines the preparation process for an EIR, requirements for the format and content of an EIR as established by the *CEQA Guidelines*, and the adequacy of the Draft EIR.

Response 266.4

The commenter states that a proposed increase in housing must be fair to local communities so that the existing environmental conditions are not disproportionately impacted.

This comment does not pertain to the adequacy of analysis within the Draft EIR and has been passed on to County decision-makers. Please note that the project does not require identified parcels to be developed and that the project does not include buildout or construction of housing allowed by proposed rezoning.

Response 266.5

The commenter asks why there are more proposed rezoning sites in Forestville than in other communities with proposed rezoning sites, and asks how proposed rezoning site allocations amongst Sonoma County communities was determined.

Please refer to Master Response SITE regarding the site selection process.

Response 266.6

The commenter asks why the unincorporated communities of Sebastopol, Windsor, Healdsburg, and Cloverdale do not contain proposed rezoning sites.

Please refer to Master Response SITE regarding the site selection process.

Response 266.7

The commenter states that amenities, including food and medical services, along major corridors must be considered to avoid traffic, accidents, pollution, and parking. The commenter asks why the proposed rezoning sites are not located closer to highway corridors.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes access to food and medical services. Please refer to Master Response TRA regarding traffic congestion, and Master Response EXST regarding existing conditions of roadways. Please refer to Section 3.3 of the Draft Housing Element, which describes the rezoning site selection process beginning on page 68.

Response 266.8

The commenter asks how does the County propose that future occupants of the proposed rezoning sites access services in main urban corridors.

Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of social impacts is not required, which includes how future site occupants will access services. Please refer to Section 4.16, *Transportation*, of the Draft EIR for analysis of transportation impacts.

Response 266.9

The commenter asks how potential impacts from increased fuel consumption and traffic are mitigated.

Please refer to Response 264.3. Refer also to Master Response TRA regarding traffic congestion.

EIR Public Comment 267

COMMENTER: Anita Das

DATE: February 14, 2023

Response 267.1

The commenter identifies themselves as a resident of Guerneville and states that the proposed rezoning sites in Guerneville would change the character of the neighborhood. The commenter states their opposition to the proposed rezoning.

Please refer to Master Response HE regarding opposition to the Housing Element.

Response 267.2

The commenter states that additional traffic associated with development allowed by the proposed rezoning would cause congestion in Guerneville, and that traffic would have negative impacts to businesses.

Impacts related to transportation are discussed in Section 4.16, *Transportation*, of the Draft EIR. Please refer to Master Response TRA for a discussion of CEQA-required analysis of traffic congestion. Additionally, pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes potential impacts to businesses.

Response 267.3

The commenter expresses concern over evacuation routes including the possibility of residents being trapped under trees if they were to fall and the possibility that traffic would force people to evacuate on foot.

Please refer to Master Response EMG regarding emergency services and evacuations.

Response 267.4

The commenter expresses concern over evacuation routes in the event of a flood especially along the Armstrong Woods area. The commenter states that in 2019 the Russian River flooded the Guerneville Area and that adding more people to this area would stretch emergency services.

Please refer to Master Response EMG regarding emergency services and evacuations. Refer also to Master Response EXST regarding existing flood risk.

Response 267.5

The commenter asks if there would be an increase in fire and police personnel proportional to the addition of 588 residents to the Guerneville area.

Please refer to Section 4.15, *Public Services and Recreation*, in the Draft EIR. As stated therein, while the project would generate additional demand for fire services, it would not substantially reduce existing response times or require the construction of new or altered fire stations and development facilitated by the project on Rezoning Sites would be required to comply with existing regulations regarding fire

safety. Additionally, the increased population would generate a need for 12 additional police officers throughout the county, with no more than three at any one station. The Draft EIR is required to analyze environmental impacts associated with the construction of new police and/or fire facilities, and an additional three officers in any given station throughout the county would not require additional facilities to be built. Therefore impacts to fire and police services would be less than significant.

Response 267.6

The commenter expresses concern over the sewer, water, and electricity infrastructure in the Guerneville Area. The commenter states that the sewer and water system would need to be evaluated, removed, and redone. The commenter states that the area is prone to electrical blackouts and asks if the power grid would be updated as needed.

Please refer to Master Response UTIL regarding water and wastewater infrastructure. Please refer to Section 4.18, Utilities and Service Systems, in the Draft EIR for a discussion of impacts related to electricity. As discussed therein, impacts to electric power would be less than significant.

Response 267.7

The commenter states and opinion that Cutten and Laughlin Roads are not suitable for large numbers of affordable housing and that adding 588 residents would be irresponsible from a health and safety perspective.

This comment is noted and will be passed on to decision-makers.

EIR Public Comment 268

COMMENTER: Caitlin Marigold

DATE: February 14, 2023

Response 268.1

The commenter identifies themselves as a resident of Guerneville and expresses their opposition to the rezoning. The commenter states the streets in Guerneville are too narrow and cannot accommodate additional traffic.

Please refer to Master Response HE regarding opposition to the Housing Element. Refer to Master Response EXST and Master Response EMG regarding existing conditions and vehicle access.

Response 268.2

The commenter states that property owners wish to maintain the low density zoning of their neighborhoods. The commenter states that the streets in Guerneville cannot accommodate additional traffic, and that the area is susceptible to flooding and fire.

Please refer to Master response HE regarding opposition to the Housing Element. Refer to Master Response EXST and Master Response EMG regarding existing conditions and vehicle access. Refer to Response 14.4 for a response regarding existing flooding and fire risk.

Response 268.3

The commenter states that because Guerneville is located in a valley, noise impacts from additional traffic people would impact residents' quality of life. The commenter reiterates their opposition to the proposed rezoning.

Potential noise impacts associated with the rezoning sites are discussed in Section 4.13 of the Draft EIR. As discussed therein starting on page 4.13-5, operational noise impacts associated with the project would be less than significant with implementation of mitigation measures. Please refer to Master response HE regarding opposition to the Housing Element.

EIR Public Comment 269

COMMENTER: Janice Stenger

DATE: February 14, 2023

Response 269.1

The commenter states their comments pertain to proposed rezoning sites along Laughlin Road in Guerneville, as the proposed rezoning would apply to their property (identified by the commenter as 16450 Laughlin [GUE-2]) on Laughlin Road and other properties on Laughlin Road and Cutten Drive.

Based on these details, it is assumed that the commenter is referring to Rezoning Sites GUE-2, GUE-3, and GUE-4. This comment does not pertain to the adequacy of environmental analysis in the Draft EIR.

Response 269.2

The commenter summarizes their opinions regarding taxes, California's management of the COVID-19 pandemic, water issues in California, development trends in California, and farm work and farm worker housing.

This comment does not pertain to the adequacy of environmental analysis in the Draft EIR. This comment is noted but no response is required.

Response 269.3

The commenter expresses concern regarding Guerneville's sewer system.

Please refer to Master Response UTIL for information regarding concerns about the existing sewer system.

Response 269.4

The commenter states that the 59 parcels proposed to be rezoned under the project were suggested by unknown people, and that the County should have facilitated conversations with property owners to share thoughts regarding the proposed project.

Details regarding the site inventory and selection process are provided in Section 2, *Project Description*, starting on page 2-6 of the Draft EIR, and in Master Response SITE.

In terms of public participation in preparation of the Draft EIR, the County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction*, on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation*.

Response 269.5

The commenter expresses concern regarding existing issues with County roads and concern that many houses in the County have been converted into short-term rental properties, exacerbating the housing crisis.

Please refer to Master Response EXST regarding the existing conditions of services and infrastructure in the County. The number of short-term rental properties is not related to the analysis in the Draft EIR.

Response 269.6

The commenter states that owners of proposed rezone properties were not provided information regarding the Draft EIR process and the Draft EIR is difficult to understand.

The County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction*, on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation*. The commenter does not specify a section of the EIR for which they require clarification.

Response 269.7

The commenter provides Objective LU-7.1 from the County's General Plan, which would restrict development in areas susceptible to hazards including but not limited fire and geologic hazards, and asks why rezoning sites near Laughlin Road in Guerneville are proposed when such hazards exist.

This comment is similar to Comment 14.4. Please refer to Response 14.4. Refer also to Table 4.11-3, which includes analysis of consistency with Objective LU-7.1. As stated therein, the project is consistent with this policy. Page 4.11-36 reads, "Refer to Section 4.7, *Geology and Soils*; Section 4.9, *Hazards and Hazardous Materials*; and Section 4.19, *Wildfire*, for a discussion of site-specific environmental factors that could create health and safety problems. Refer to Section 4.18, *Utilities and Service Systems*, for a discussion of sewer service to the Rezoning Sites. Refer to Section 4.10, *Hydrology and Water Quality*, regarding development in floodplains; as stated therein, Rezoning Sites GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, and PEN-9 are partially within a 100-year floodplain. Future development on these sites would be required to comply with Policy LU-7c, with site design placing permanent new structures outside of the floodway and raised above the 100-year flood elevation. Refer to Section 4.4, *Biological Resources*, regarding the presence of wetlands on the Rezoning Sites. Mitigation Measures BIO-15 and BIO-16 require jurisdictional delineations prior to development on Rezoning Sites and avoidance of wetland features or minimization of impacts to wetlands. Refer to Section 4.19, *Wildfire*, regarding the wildfire risk designation of each Rezoning Site. As stated therein, some of the sites are within Moderate Fire Hazard Severity Zones, and mitigation would be required to reduce impacts."

Response 269.8

The commenter states that the project area is located within State Responsibility Area for fire protection, and that state fire regulations do not allow a single-lane road to serve as an access road.

Please refer to Master Response FIRE and Master Response EMG.

Response 269.8

The commenter provides several policies from the County's General Plan pertaining to development in fire hazard zones.

The commenter does not provide a comment along with the policies.

EIR Public Comment 270

COMMENTER: Tre Gibbs

DATE: February 14, 2023

Response 270.1

The commenter expresses concern over the wildfire risk of the proposed rezoning on Laughlin Road (GUE-2 and GUE-4). The commenter states that Laughlin Road is a “narrow dead-end road” that would be a safety hazard in the event of a mandatory wildfire evacuation if the population living on this road increases according to the proposed project.

Please refer to Master Response FIRE regarding wildfire impacts and Master Response EMG regarding emergency evacuation. Please refer to Master Response EXST regarding existing conditions of roadways.

Response 270.2

The commenter expresses concern over flooding. The commenter states that the only road out of Guerneville is Armstrong Woods Road, a two lane road that often floods and that adding almost 600 people to the area would increase the risk of danger due to flooding.

Please refer to Master Response EMG regarding emergency evacuation. Please refer to Master Response EXST regarding existing conditions of roadways. A portion of GUE-4 is acknowledged in Section 4.10, *Hydrology and Water Quality*, of the EIR as being within the FEMA-mapped floodway and an additional portion is within the FEMA-mapped 100-year flood hazard area. However, as analyzed under Impact HWQ-4, “[f]or the sites partially within the 100-year floodplain, development would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. This includes the prohibition of fill in County-identified special flood hazard areas (refer to Section 7B-12 of the Sonoma County Code of Ordinances), and requiring review and approval of proposed drainage facilities by Permit Sonoma. Rezoning Sites that are within the Floodway Combining District (F1) or Floodplain Combining District (F2) would be required to comply with County requirements as stated in Articles 56 and 58, respectively, of the Sonoma County of Ordinances. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project.”

Response 270.3

The commenter states that the current sewer system in Guerneville cannot keep up with current residents. The commenter states that the sewage infrastructure north of Main Street would need to be evaluated, removed, and redone.

Please refer to Master Response UTIL regarding wastewater infrastructure availability. Please refer to Master Response EXST regarding existing conditions of wastewater infrastructure.

Response 270.4

The commenter states a concern that more residents would increase traffic coming in and going out of Guerneville and this would have a negative impact on businesses in town.

Please refer to Master Response TRA regarding traffic congestion, and Master Response EXST regarding existing conditions of roadways. Pursuant to *CEQA Guidelines* Section 15131, economic or social effects of a project shall not be treated as a significant effect on the environment. As such, formal analysis of economic or social impacts is not required, which includes analysis of accessibility of businesses and resorts.

Response 270.5

The commenter expresses that they are not against affordable housing, but that they do not believe Laughlin Road is an acceptable location for affordable housing from a health and safety perspective.

The commenter's opinion is noted and passed on to decision-makers for review. Please refer to Master Response HE regarding opposition to specific Rezoning Sites. Please refer to Master Response SITE regarding site selection criteria.

EIR Public Comment 271

COMMENTER: Rick Savel

DATE: February 22, 2023

Response 271.1

The commenter forwarded a letter regarding the Penngrove Sewer Zone Capacity Study from 2002, related to concerns about existing capacity issues.

This comment does not pertain to the contents or adequacy of the Draft EIR. No response is required. Please refer to Master Response EXST regarding existing infrastructure.

4 Summary of Public Hearing Comments

Public comments received during the February 2, 2023, Planning Commission meeting are summarized and responded to below.

Response 1

The commenters ask if sites surrounding the selected Rezoning Sites were given notice.

The County of Sonoma distributed a Notice of Preparation of the Draft EIR and held a public scoping meeting for input on preparation of the Draft EIR, as described in Section 1, *Introduction*, on page 1-4 of the Draft EIR. Public participation efforts undertaken for the Housing Element Update itself are detailed in the Draft Housing Element beginning on page 2 under Section 1.4, *Public Participation*. Refer to Master Response SITE for more information about property owner notification.

Response 2

The commenters ask if development at each of the proposed Rezoning Sites would include public outreach and accept public comment.

Please refer to Section 1.2 of the Draft EIR. As stated therein, the intent of the EIR is to enable future development by-right, without further discretionary approvals. If future development projects are proposed on the Rezoning Sites that require a discretionary action (e.g., a future project is not consistent with the zoning or land use designation and requires a zoning or General Plan amendment), then additional CEQA analysis may be required. However, the project would not modify the County's review process for future development projects on the Rezoning Sites. Existing processes, including public notification, opportunities for public involvement, and County discretionary actions would remain.

Response 3

The commenters ask if development of each of the proposed Rezoning Sites would be by-right.

Development proposed at each of the Rezoning Sites would be required to be consistent with the zoning code. If the proposed development is consistent, then the only review required for the development would be the design review, which would not be discretionary.

Response 4

The commenters ask if a density bonus would trigger discretionary review. The commenter asks if there are any conditions that would trigger additional environmental review of a Rezoning Site.

The state's density bonus law requires the County to grant, upon request, a density bonus and incentives or concessions to a residential development application that proposes five or more units and for which the developer agrees to construct at least the minimum required number of affordable, senior, student, or other qualifying units, or agrees to donate land for such housing.

Each development facilitated by the project on Rezoning Sites, regardless of whether it takes advantage of a density bonus, would be subject to administrative review to determine consistency with the project as analyzed in the EIR. If additional analysis and mitigation is required, it would be implemented as a

condition for the proposed development. Generally speaking, if proposed development is consistent with the EIR for the proposed project then additional environmental review would not be required. However, development on a Rezoning Site would be required to do additional studies if required in the EIR, such as a biological resources screening and assessment as required by BIO-1, an architectural history evaluation as required by CUL-1, and/or an archaeological resources study as required by CUL-3. The County would also review for adherence to County code and policies and implementation of any applicable mitigation measures adopted as standards of approval or other enforceable development standard.

Response 5

The commenters ask how a development proposal would be treated if the proposed development had a density lower than that of a Rezoning Site. The commenters ask if there is a minimum density requirement.

New development applications on a Rezoning Site would be required to meet the minimum density based on the requirements outlined in the zoning code, within the developable area for that site. Please refer to Response 112.6 regarding future development of the Rezoning Sites to the minimum density. . Final density at each project site will depend on the development proposed and site-specific factors.

Response 6

The commenters express concerns about the existing sewer and water systems.

This comment has been noted. Please refer to Master Response UTIL.

Response 7

The commenters express concern regarding wildfire and flood risk and associated emergency evacuation.

This comment has been noted. Please refer to Master Response FIRE and Master Response EMG.

Response 8

The commenters express concern regarding impacts to aesthetics and community character.

This comment has been noted. Please refer to Section 4.1, *Aesthetics*, of the Draft EIR for a detailed analysis of potential impacts to aesthetics. As stated therein, the proposed project may impact the character of visual resources. As discussed under Impact AES-3, most of the Forestville Rezoning Sites may be visually dominant in areas of high site sensitivity. Therefore, Mitigation Measure AES-1 would be required in order to screen sites with additional vegetation. Even after implementation of Mitigation Measure AES-1, because development facilitated by the project on Rezoning Sites cannot be made to comply with subjective design guidelines, projects on these sites may substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Response 9

The commenters express concern regarding existing infrastructure near each of the Rezoning Sites. The commenters express concern regarding the lack of existing services and infrastructure such as medical centers, gas stations, grocery stores, and other commercial services.

This comment has been noted. Please refer to Master Response EXST regarding the existing conditions or lack thereof of services and infrastructure.

Response 10

The commenters express concern regarding future population growth and how that growth may impact fire protection, police protection, and schools.

This comment has been noted. Please refer to Section 4.15, *Public Services and Recreation*, of the Draft EIR.

As stated therein, while the project would generate additional demand for fire services, it would not substantially reduce existing response times or require the construction of new or altered fire stations and development facilitated by the project on Rezoning Sites would be required to comply with existing regulations regarding fire safety. Additionally, the increased population would generate a need for 12 additional police officers throughout the county, with no more than three at any one station. The Draft EIR is required to analyze environmental impacts associated with the construction of new police and/or fire facilities, and an additional three officers in any given station throughout the county would not require additional facilities to be built. Therefore, impacts to fire and police services would be less than significant.

As stated under Impact PS-3 beginning on page 4.15-13, existing laws would require future project applicant(s) of any development facilitated by the project on Rezoning Sites to pay school impact fees at the time building permits are issued. These fees are used by Sonoma County School Districts to mitigate impacts associated with long-term operation and maintenance of school facilities. The applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount requested by the applicable district. The payment of school developer fees is considered adequate mitigation of schools impacts under CEQA. Therefore, impacts to schools are considered less than significant without mitigation.

Response 11

The commenters express concern regarding the placement of each Rezoning Site and opposition to the proposed Rezoning Sites.

This comment has been noted. For additional information regarding Rezoning Site selection or criteria, please refer to Master Response SITE. For concerns regarding opposition to the Housing Element or selected Rezoning Sites, please refer to Master Response HE.

Response 12

The commenters express concern regarding increased traffic, road safety, and pedestrian safety.

For concerns regarding traffic, please refer to Master Response TRA.

Please refer to Impact TRA-2 in Section 4.16, *Transportation*, of the Draft EIR. As discussed therein, General Plan Policies CT-2w, CT-3c, CT-3d, CT-3xx, CT-4e, and CT-4f are protective of pedestrian, bicycle, and traffic safety. Consistency with County policies would reduce impacts to a less than significant level.

5 Revisions to the Draft EIR

Chapter 5 presents specific changes to the text of the Draft EIR that are being made in response to comments received or to make corrections. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined and deleted text is indicated with ~~strikeout~~. Page numbers correspond to the page numbers of the Draft EIR.

Executive Summary

Page ES-1

The Housing Element Update would rezone 59 urban sites located in designated Urban Service Areas throughout unincorporated Sonoma County, listed in Table 2-1, for by-right, ~~medium-density~~ high-density housing¹. In addition, ~~205 additional inventory sites~~ do not require rezoning~~would not be rezoned~~ under implementation of the project.

footnote 1:

By-right ~~high-density~~~~medium-density~~ housing means that no discretionary land use approvals for the development of ~~medium-density~~ zoning-consistent housing would be required on the sites. ~~Design-Objective design~~ review approval is required for all multifamily or mixed-use housing development with more than 3 units.

Page ES-2:

Rezoning Sites analyzed for rezoning to R2 (Medium-Density Residential), with a base density of 10 to 11 units per acre and assuming application of the County’s Rental Housing Opportunity Area program, which automatically doubles a site’s density for projects that include at least 40 percent of units as affordable to lower income households, as well as rezoning to R3, with a base density of 20 units per acre, and were assumed to be rezoned to allow a density of 20 to 22 units per acre, respectively.

Beginning on page ES-5, Table ES-1:

Impact	Mitigation Measure (s)	Residual Impact
Agriculture and Forestry Resources		
Impact AG-3. The project would rezone some sites that are adjacent to agricultural uses, and may indirectly impact those uses.	AG-1 Interim Agricultural Buffers. Development facilitated by the project <u>on the Rezoning Sites</u> adjacent to active agricultural operations shall provide fencing and a minimum buffer of 200 feet to the agricultural operations, consistent with 26-88-040(f) of the Sonoma County Zoning Code. If this distance is not practical due to project design or features, a minimum 100-foot buffer is acceptable if it complies with all of the requirements for a reduced buffer and a vegetative screen is provided as specified in Section 26-88-040(f).	Less than significant
Air Quality		
Impact AQ-2. Project construction would temporarily increase air pollutant emissions, possibly	AQ-1 Basic Construction Mitigation Measures. All development facilitated by the project <u>on the Rezoning Sites</u> (regardless of whether the development is under the	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
<p>creating localized areas of unhealthy air pollution levels or air quality nuisances.</p>	<p>jurisdiction of the NSCAPCD or the BAAQMD) shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM₁₀ and PM_{2.5}) by implementing the BAAQMD’s Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions.</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, with priority given to the use of recycled water for this activity. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified visible emissions evaluator. 8. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations. <p>AQ-2 Additional Construction Mitigation Measures. In addition to implementation of Mitigation Measure AQ-1, for any project <u>on the Rezoning Sites</u> (regardless of whether the development is under the jurisdiction of the NSCAPCD or the BAAQMD) that meets the following conditions and as listed in Table 4.3-6, the County shall condition development facilitated by the project to implement BAAQMD CEQA Air Quality Guidelines’ Additional Construction Mitigation Measures:</p> <ol style="list-style-type: none"> 1. Exceed the BAAQMD construction screening threshold of a change in allowable dwelling units of 114 dwelling units for single-family residences or 240 dwelling units for multi-family residences 2. Would result in a change in allowable dwelling units of more than 38 units 	

Impact	Mitigation Measure (s)	Residual Impact
	<ol style="list-style-type: none"> 3. Would require demolition or simultaneous occurrence of more than two construction phases 4. Simultaneous construction of more than one land use type (e.g., a mixed-use project involving commercial and residential) 5. Extensive material transport of more than 10,000 cubic yards <p>In addition to implementation of Mitigation Measure AQ-1, for any Rezoning Sites that meet the criteria listed above, the following measures (or equivalent, expanded, or modified measures based on project- and site-specific conditions) shall be implemented throughout construction of the project:</p> <ol style="list-style-type: none"> 1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. 2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks shall have at maximum 50 percent air porosity. 4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. 5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. 6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel. 8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. 9. Minimizing the idling time of diesel powered construction equipment to two minutes. 10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NO_x reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices 	

Impact	Mitigation Measure (s)	Residual Impact
	<p>such as particulate filters, and/or other options as such become available.</p> <p>11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).</p> <p>12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NO_x and PM.</p> <p>13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.</p>	
Biological Resources		
<p>Impact BIO-1. Future development facilitated by the project could impact special status species and their habitat during construction and/or operation.</p>	<p>BIO-1 Biological Resources Screening and Assessment. For projects on the Rezoning Sites in the BSAs that would require ground disturbance through clearing/grading or vegetation trimming, the project applicant shall engage a qualified biologist (having the appropriate education and experience level) to perform a preliminary Biological Resources Screening and Assessment to determine whether the project has any potential to impact special status biological resources, inclusive of special status plants and animals, sensitive vegetation communities, jurisdictional waters (including creeks, drainages, streams, ponds, vernal pools, riparian areas and other wetlands), critical habitat, wildlife movement area, or biological resources protected under local or regional (City or County) ordinances or an existing Habitat Conservation Plan (HCP) or Natural Community Conservation Plan, including the Santa Rosa Plain Conservation Strategy. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 500 feet around the project footprint, and to determine the potential impacts to those resources. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, state, and/or federal agencies. If the project would have the potential to impact these resources, the following mitigation measures (Mitigation Measures BIO-2 through BIO-12) shall be incorporated, as applicable, to reduce impacts to a less than significant. Pending the results of the project-specific biological analysis, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, NMFS, CDFW, and/or other local, state, and federal agencies may be required. Note that specific surveys described in the mitigation measures below may be completed as part of the project-specific biological analysis where suitable habitat is present.</p>	<p>Less than significant</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>BIO-2 Special Status Plant Species Surveys. If the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for significant impacts to federally or state-listed plants or regional population level impacts to species with a CRPR of 1B or 2B from project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). <u>Surveys shall be conducted following CDFW’s 2018 Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities and, as applicable, the Santa Rosa Plain Conservation Strategy Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present, or any formal updates of these protocols.</u> The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. <u>More than one year of surveys may be required to establish that plants are absent, and the above Santa Rosa Plain Conservation Strategy Appendix D requires a minimum of two years of surveys, which shall be implemented unless otherwise approved in writing by CDFW.</u> All special status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. <u>The project shall obtain written approval of the survey reports from CDFW prior to the start of construction, unless otherwise approved in writing by CDFW.</u> If any special-status plants are observed, the Project shall: 1) avoid all direct and indirect impacts to the special-status plants, and 2) <u>prepare and implement an avoidance plan that is approved in writing by CDFW prior to Project start.</u> If CESA listed plants are observed and impacts cannot be avoided, the Project shall obtain a CESA ITP from CDFW. <u>For impacts to federal Endangered Species Act (ESA) listed plants, the Project shall obtain authorization from USFWS.</u></p>	

Impact	Mitigation Measure (s)	Residual Impact
	<p>BIO-3 Special Status Plant Species Avoidance, Minimization, and Mitigation. If federally and/or state-listed or CRPR 1B or 2 species are found during special status plant surveys (pursuant to Mitigation Measure BIO-2), and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be re-designed to avoid impacting those plant species. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm.</p> <p>For projects <u>on Rezoning Sites</u> in BSAs located within the Santa Rosa Plain Area, protocol rare plant surveys shall be conducted, and impacts to suitable rare plant habitat mitigated, in accordance with the 2007 USFWS Santa Rosa Plain Programmatic Biological Opinion, as amended in 2020.</p> <p>BIO-4 Restoration, and Monitoring, and Habitat Compensation</p> <p>Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as and if applicable) for each species as a component of habitat restoration, <u>unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 1:1 mitigation to impact ratio shall be provided, which may include either the purchase of credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the project proponent in perpetuity, unless otherwise approved in writing by CDFW.</u> A qualified biologist shall prepare and submit a restoration plan to the County <u>and CDFW</u> for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization may <u>will be obtained from required</u> by these agencies.) The restoration plan shall include, at a minimum, the following components [...]</p> <p>BIO-5 Endangered/Threatened Species Habitat Assessments and Protocol Surveys. Specific habitat assessments and survey protocols are established for several federally- and state-listed endangered or threatened species. If the results of the project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat assessments/surveys shall</p>	

Impact	Mitigation Measure (s)	Residual Impact
	<p>be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005) <u>with prior written approval from CDFW and USFWS. Due to numerous documented occurrences of CTS in the Santa Rosa Plain in conjunction with the documented dispersal distances for the species of up to 1.3 miles, it has been established that CTS are present within many grassland and vernal pool habitats within the Santa Rosa Plain rendering surveys unnecessary, and therefore any protocol CTS surveys shall be approved in writing by CDFW and USFWS prior to conducting the survey and habitat compensation for impacts to CTS habitat shall be provided by the Project pursuant to the Santa Rosa Plain Conservation Strategy even if survey results are negative, unless otherwise approved in writing by CDFW and USFWS. If impacts to grassland or vernal pool habitat will occur, the Project shall consult with CDFW to determine if a CESA ITP for CTS is warranted. If CESA listed animal species such as CTS cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to Project construction. For impacts to ESA listed wildlife species such as CTS, the Project shall obtain authorization from USFWS. While often consistent with the Santa Rosa Plain Conservation Strategy, the CESA ITP habitat compensation requirements may differ from it based on a site-specific analysis.</u> If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys.</p> <p>BIO-6 Endangered/Threatened Animal Species Avoidance and Minimization. The following measures shall be applied to aquatic and/or terrestrial animal species as determined by the project-specific Biological Resources Screening and Assessment required under Mitigation Measure BIO-1.</p> <ol style="list-style-type: none"> 1. Ground disturbance shall be limited to the minimum necessary to complete the project. A qualified biologist shall flag the project limits of disturbance. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. 2. All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31 to avoid impacts to sensitive aquatic species. Any work outside these dates would require project-specific approval from 	

Impact	Mitigation Measure (s)	Residual Impact
	<p>the County and may be subject to regulatory agency approval.</p> <ol style="list-style-type: none"> 3. All projects occurring within or adjacent to sensitive habitats that may support federally and/or state-listed endangered/threatened species shall have a CDFW- and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW, NMFS, and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are fully implemented. 4. No endangered/threatened species shall be captured and relocated without express permission from the CDFW, NMFS, and/or USFWS. 5. If at any time during project construction an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and USFWS, as appropriate, to determine whether it was safe for project activities to resume. 6. For all projects occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete. 7. All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body, including seasonal wetland features. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies. 8. No equipment shall be permitted to enter wetted portions of any affected drainage channel. 9. If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline, and to monitor during construction for comparison to the baseline. 10. If water is to be diverted around work sites, the applicant shall submit a diversion plan (depending upon the 	

Impact	Mitigation Measure (s)	Residual Impact
	<p>species that may be present) to the CDFW, RWQCB, USFWS, and/or NMFS for their review and approval prior to the start of any construction activities (including staging and mobilization). If pumps are used, all intakes shall be completely screened with wire mesh not larger than five millimeters to prevent animals from entering the pump system.</p> <p>11. At the end of each workday, excavations shall be secured with cover or a ramp provided to prevent wildlife entrapment.</p> <p>12. All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.</p> <p>13. The CDFW/USFWS-approved biologist shall remove invasive aquatic species such as bullfrogs and crayfish from suitable aquatic habitat whenever observed and shall dispatch them in a humane manner and dispose of properly.</p> <p>14. Considering the potential for projects to impact federally and state-listed species and their habitat, the applicant shall contact the CDFW and USFWS to identify mitigation banks within Sonoma County during project development. If the results of the project-specific biological analysis (Mitigation Measure BIO-1) determine that impacts to federally and state threatened or endangered species habitat are expected, the applicant shall explore species-appropriate mitigation bank(s) servicing the region for purchase of mitigation credits. If projects are located within the Santa Rosa Plain Area, mitigation for impacts to CTS shall be implemented in accordance with the Santa Rosa Plain Conservation Strategy (2005).</p> <p>15. For projects occurring in the Petaluma BSA (PET-1 through PET-4), prior to grading and construction in natural areas of containing suitable upland habitat, a qualified biologist shall conduct a preconstruction survey for CTS. The survey shall include a transect survey over the entire project disturbance footprint (including access and staging areas), and mapping of burrows that are potentially suitable for salamander occupancy. If any CTS are detected, no work shall be conducted until the individual leaves the site of their own accord, unless federal and state “take” authorization has been issued for CTS relocation. Typical preconstruction survey procedures, such as burrow scoping and burrow collapse, cannot be conducted without federal and state permits. If any life stage of CTS is found within the survey area, the applicant shall consult with the USFWS and CDFW to determine the appropriate course of action to comply with the FESA and CESA, if permits are not already in place at the time of construction.</p> <p>BIO-7 Non-Listed Special Status Animal Species Avoidance and Minimization. The project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) shall</p>	

Impact	Mitigation Measure (s)	Residual Impact
	<p>identify some or all the below measures that will be required and applicable to the individual project:</p> <ol style="list-style-type: none"> 1. For non-listed special status terrestrial amphibians and reptiles, a qualified biologist shall complete coverboard surveys within 14 days of the start of construction. The coverboards shall be at least four feet by four feet and constructed of untreated plywood placed flat on the ground as determined by the project-specific biological assessment (pursuant Mitigation Measure BIO-1). The qualified biologist shall check the coverboards once per week for each week after placement up until the start of vegetation removal. The biologist shall capture all non-listed special status and common animals found under the coverboards and shall place them in five-gallon buckets for transportation to relocation sites. The qualified biologist shall review all relocation sites and those sites shall consist of suitable habitat. Relocation sites shall be as close to the capture site as possible but far enough away to ensure the animal(s) is not harmed by project construction. Relocation shall occur on the same day as capture. The biologist shall submit CNDDB Field Survey Forms to the CFDW for all special status animal species observed. 2. Prior to construction, a qualified biologist shall conduct a survey of existing buildings to determine if bats are present. The survey shall be conducted during the non-breeding season (November through March). The biologist shall have access to all structures and interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.). 3. If bats are roosting in the building during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not re-enter the structure. Maternal bat colonies shall not be disturbed. 4. A qualified biologist shall conduct pre-construction clearance surveys within 14 days of the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200-foot buffer, and shall identify all special status animal species that may occur on-site. All non-listed special status species shall be relocated from the site either through direct capture or through passive exclusion. The biologist shall submit a report of the pre-construction survey to the County for their review and approval prior to the start of construction. 5. A qualified biologist shall be present during all initial ground-disturbing activities, including vegetation removal to recover special status animal species unearthed by construction activities. 6. Project activities shall be restricted to daylight hours. 	

Impact	Mitigation Measure (s)	Residual Impact
	<p>7. Upon completion of the project, a qualified biologist shall prepare a Final Compliance Report documenting all compliance activities implemented for the project, including the pre-construction survey results. The report shall be submitted to the County within 30 days of completion of the project.</p> <p>8. If special status bat species may be present and impacted by the project, a qualified biologist shall conduct, within 30 days of the start of construction, presence/absence surveys for special status bats in consultation with the CDFW where suitable roosting habitat is present. Surveys shall be conducted using acoustic detectors and by searching tree cavities, crevices, and other areas where bats may roost. If active roosts are located, exclusion devices such as netting shall be installed to discourage bats from occupying the site. If a qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately.</p> <p>BIO-8 Western Pond Turtle Avoidance and Minimization. For projects located <u>on Rezoning Sites</u> in the Penngrove BSA (PEN-1 through PEN-9), a qualified biologist shall conduct pre-construction clearance surveys for western pond turtle within 14 days prior to the start of construction (including staging and mobilization) in areas of suitable habitat. The biologist shall flag limits of disturbance for each construction phase. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance. If western pond turtles are observed, they shall be allowed to leave the site on their own.</p> <p>BIO-9 American Badger Avoidance and Minimization. For projects located <u>on Rezoning Sites</u> in the Petaluma BSA (PET-1 through PET-4), a qualified biologist shall conduct surveys of the grassland habitat on-site to identify any American badger burrows/dens. These surveys shall be conducted not more than 14 days prior to the start of construction. Impacts to active badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week in order to track the status of the den and to determine when a den area has been cleared for construction.</p>	

Impact	Mitigation Measure (s)	Residual Impact
	<p>BIO-10 Pre-construction Surveys for Nesting Birds for Construction Occurring within Nesting Season. For projects on <u>Rezoning Sites</u> that require <u>construction, grading, the removal of trees or vegetation, or other project-related improvements</u>, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds covered by the CGFC no more than <u>within 14 days prior to project activities vegetation removal and shall conduct additional surveys if there is a lapse of 14 days or more in construction activities.</u> The surveys shall include the entire disturbance area plus <u>at least a 200 500-foot buffer</u> around the <u>project</u> site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 <u>250</u> feet for non-raptor bird species and at least 150 <u>500</u> feet for raptor species, <u>unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established.</u> Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion.</p> <p>BIO-11 Worker Environmental Awareness Program. If potential impacts to special status species are identified in the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall</p>	

Impact	Mitigation Measure (s)	Residual Impact
	<p>attend Worker Environmental Awareness Program training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the BSAs for the project. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of projects. All employees shall sign a form documenting provided by the trainer indicating they have attended the Worker Environmental Awareness Program and understand the information presented to them. The form shall be submitted to the County to document compliance.</p> <p>BIO-12 Invasive Weed Prevention and Management Program. For those projects <u>on Rezoning Sites</u> where activity would occur within or adjacent to sensitive habitats, as determined by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to start of construction a qualified biologist shall develop an Invasive Weed Prevention and Management Plan to prevent invasion of native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan. Landscape species shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High Risk Lists.</p>	
<p>Impact BIO-3. Future development facilitated by the project could impact jurisdictional state or federally protected wetlands during construction and/or operation.</p>	<p>BIO-15 Jurisdictional Delineation. If potentially jurisdictional wetlands are identified by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), a qualified biologist shall complete a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for CDFW, USACE, and/or RWQCB, and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the County, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Jurisdictional areas shall be avoided to the maximum extent possible. If jurisdictional areas are expected to be impacted, then the</p>	<p>Less than significant</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>RWQCB would require a Waste Discharge Requirement permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Lake or Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to Section 404 of the CWA would be required. Furthermore, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the state shall be completed at a ratio as required in applicable permits. All temporary impacts to waters of the U.S. and waters of the state shall be fully restored to natural condition.</p> <p>BIO-16 General Avoidance and Minimization. Projects shall be designed to avoid potential jurisdictional features identified in jurisdictional delineation reports. Projects <u>on Rezoning Sites</u> that may impact jurisdictional features shall provide the County with a report detailing how all identified jurisdictional features will be avoided, including groundwater draw down.</p> <ol style="list-style-type: none"> 1. Any material/spoils generated from project activities shall be located away from jurisdictional areas or special status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate. 2. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. 3. Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified. 	
Cultural Resources		
<p>Impact CUL-1. The project has the potential to cause a significant impact on a historic resource if development facilitated by the project would cause a substantial adverse change in the significance of that resource.</p>	<p>CUL-1 Architectural History Evaluation. For any future project <u>on a Rezoning Site that is proposed</u> on or adjacent to a property that includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older at the time of or permit application, the project applicant shall hire a qualified architectural historian to prepare an historical resources evaluation. The qualified architectural historian or historian shall meet the Secretary of the Interior’s (SOI) Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an</p>	<p>Significant and unavoidable</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>intensive-level evaluation in accordance with the guidelines and best practices recommended by the State Office of Historic Preservation to identify any potential historical resources in the proposed project area. Under the guidelines, properties 45 years of age or older shall be evaluated within their historic context and documented in a technical report and on Department of Parks and Recreation Series 523 forms. The report will be submitted to the County for review prior to any permit issuance. If no historic resources are identified, no further analysis is warranted. If historic resources are identified by the Architectural History Evaluation, the project shall be required to implement Mitigation Measure CUL-2.</p> <p>CUL-2 Architectural History Mitigation. If historical resources are identified in an area proposed for redevelopment as the result of the process described in Mitigation Measure CUL-1, the project applicant shall reduce impacts. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g. preservation in place). In conjunction with any project that may affect the historical resource, the project applicant shall provide a report identifying and specifying the treatment of character-defining features and construction activities to the County for review and approval, prior to permit issuance, to avoid or substantially reduce the severity of the proposed activity on the historical qualities of the resource. Any and all features and construction activities shall become Conditions of Approval for the project and shall be implemented prior to issuance of construction (demolition and grading) permits.</p> <p>Mitigation measures may include but are not limited to compliance with the Secretary of the Interior’s Standards for Treatment of Historic Properties and documentation of the historical resource in the form of a Historic American Building Survey (HABS)-like report. The HABS report shall comply with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements.</p>	
<p>Impact CUL-2. Development facilitated by the project has the potential to cause a substantial adverse change in the significance of an archaeological resource, including those that qualify as historical resources.</p>	<p>CUL-3 Phase I Archaeological Resource Study. Prior to project approval, the project applicant shall investigate the potential to disturb archaeological resources. If the project will involve any ground disturbance, a Phase I cultural resources study shall be performed by a qualified professional meeting the SOI’s PQS for archaeology (National Park Service 1983). If a project would solely involve the refurbishment of an existing building and no ground disturbance would occur, this measure would not be required. A Phase I cultural resources study shall include a pedestrian survey of the project site and sufficient background research and field sampling to determine whether archaeological resources may be present. Archival research shall include a records search of the Northwest Information Center no more than two years old and a Sacred Lands File search with the NAHC. The Phase I technical report documenting the study shall include</p>	<p>Less than significant</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources, to the extent that the resource's physical constituents are preserved or their destruction is offset by the recovery of scientifically consequential information. The report shall be submitted to the County for review and approval, prior to the issuance of any grading or construction permits, to ensure that the identification effort is reasonable and meets professional standards in cultural resources management. Recommendations in the Phase I technical report shall be made Conditions of Approval and shall be implemented throughout all ground disturbance activities.</p> <p>CUL-4 Extended Phase I Testing. For any projects <u>on a Rezoning Site that is</u> proposed within 100 feet of a known archaeological site and/or in areas identified as sensitive by the Phase I study (Mitigation Measure CUL-3), the project applicant shall retain a qualified archaeologist to conduct an Extended Phase I (XPI) study to determine the presence/absence and extent of archaeological resources on the project site. XPI testing shall comprise a series of shovel test pits and/or hand augured units and/or mechanical trenching to establish the boundaries of archaeological site(s) on the project site. If the boundaries of the archaeological site are already well understood from previous archaeological work and is clearly interpretable as such by a qualified cultural resources professional, an XPI will not be required. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any XPI work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4.</p> <p>All archaeological excavation shall be conducted by a qualified archaeologist(s) under the direction of a principal investigator meeting the SOI's PQS for archaeology (National Park Service 1983). If an XPI report is prepared, it shall be submitted to Sonoma County for review and approval prior to the issuance of any grading or construction permits. Recommendations contained therein shall be implemented for all ground disturbance activities.</p> <p>CUL-5 Archaeological Site Avoidance. Any identified archaeological sites (determined after implementing Mitigation Measures CUL-3 and/or CUL-4) shall be avoided by project-related construction activities. A barrier (temporary fencing) and flagging shall be placed between the work location and any resources within 60 feet of a work location to minimize the potential for inadvertent impacts.</p> <p>CUL-6 Phase II Site Evaluation. If the results of any Phase I and/or XPI (Mitigation Measures CUL-3 and/or CUL-4) indicate the presence of archaeological resources that cannot be avoided by the project (Mitigation Measure CUL-5) and that have not been adequately evaluated for CRHR</p>	

Impact	Mitigation Measure (s)	Residual Impact
	<p>listing at the project site, the qualified archaeologist will conduct a Phase II investigation to determine if intact deposits remain and if they may be eligible for the CRHR or qualify as unique archaeological resources. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase II work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4.</p> <p>A Phase II evaluation shall include any necessary archival research to identify significant historical associations and mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit. The sample excavation will characterize the nature of the sites, define the artifact and feature contents, determine horizontal and vertical boundaries, and retrieve representative samples of artifacts and other remains.</p> <p>If the archeologist and, if applicable, a Native American monitor (see Mitigation Measure TCR-4) or other interested tribal representative determine it is appropriate, cultural materials collected from the site shall be processed and analyzed in a laboratory according to standard archaeological procedures. The age of the materials shall be determined using radiocarbon dating and/or other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards. The significance of the sites shall be evaluated according to the criteria of the CRHR. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)." The report shall be submitted to Sonoma County for review and approval prior to the issuance of any grading or construction permits. Recommendations in the Phase II report shall be implemented for all ground disturbance activities.</p> <p>CUL-7 Phase III Data Recovery. If the results of the Phase II site evaluation (Mitigation Measure CUL-6) yield resources that meet CRHR significance standards and if the resource cannot be avoided by project construction in accordance with Mitigation Measure CUL-5, the project applicant shall ensure that all recommendations for mitigation of archaeological impacts are incorporated into the final design and approved by the County prior to construction. Any necessary Phase III data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the SOI standards for archaeology according to a research design reviewed and approved by the County prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the California Office of Historic Preservation Planning Bulletin 5 (1991), Guidelines</p>	

Impact

for Archaeological Research Design, or the latest edition thereof. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s) and any Phase III work plans may be combined with a tribal cultural resources plan prepared under Mitigation Measure TCR-3. If applicable, a Native American monitor shall be present in accordance with Mitigation Measure TCR-4.

As applicable, the final Phase III Data Recovery reports shall be submitted to Sonoma County prior to issuance of any grading or construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.

CUL-8 Cultural Resources Monitoring. If recommended by Phase I, XPI, Phase II, or Phase III studies (Mitigation Measures CUL-3, CUL-4, CUL-6, and/or CUL-7), the project applicant shall retain a qualified archaeologist to monitor project-related, ground-disturbing activities. If archaeological resources are encountered during ground-disturbing activities, Mitigation Measures CUL-5 through CUL-7 shall be implemented, as appropriate. The archaeological monitor shall coordinate with any Native American monitor as required by Mitigation Measure TCR-4.

CUL-9 Unanticipated Discovery of Archaeological Resources. If archaeological resources are encountered during ground-disturbing activities, work within 60 feet shall be halted and the project applicant shall retain an archaeologist meeting the SOI's PQS for archaeology (National Park Service 1983) immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. If the resource is of Native American origin, implementation of Mitigation Measures TCR-1 through TCR-4 may be required. Any reports required to document and/or evaluate unanticipated discoveries shall be submitted to the County for review and approval. Recommendations contained therein shall be implemented throughout the remainder of ground disturbance activities.

Geology and Soils

Impact GEO-6. Development facilitated by the project may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature during ground disturbing activities.

GEO-1 Paleontological Review of Project Plans. For projects with proposed ground-disturbing activity on Rezoning Sites, the project applicant shall retain a Qualified Professional Paleontologist to review proposed ground disturbance associated with development to:

Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	<ol style="list-style-type: none"> 1. Assess if the project will require paleontological monitoring; 2. If monitoring is required, to develop a project-specific Paleontological Resource Mitigation and Monitoring Program (PRMMP) as outlined in Mitigation Measure GEO-2; 3. Draft the Paleontological Worker Environmental Awareness Program as outlined in Mitigation Measure GEO-3; and 4. Define within a project specific PRMMP under what specific ground disturbing activity paleontological monitoring will be required and the procedures for collection and curation of recovered fossils, as described in Mitigation Measures GEO-4, GEO-5, and GEO-6. <p>The Qualified Paleontologist shall base the assessment of monitoring requirements on the location and depth of ground disturbing activity in the context of the paleontological potential and potential impacts outlined in this section. A qualified professional paleontologist is defined by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010). The County shall review and approve the assessment before grading permits are issued.</p> <p>GEO-2 Paleontological Resources Mitigation and Monitoring Program. For those projects <u>on Rezoning Sites</u> deemed to require a PRMMP under Mitigation Measure GEO-1 above, the Qualified Paleontologist shall prepare a PRMMP for submission to the County prior to the issuance of grading permits. The PRMMP shall include a pre-construction paleontological site assessment and develop procedures and protocol for paleontological monitoring and recordation. Monitoring shall be conducted by a qualified paleontological monitor who meets the minimum qualifications per standards set forth by the SVP. The PRMMP procedures and protocols for paleontological monitoring and recordation shall include:</p> <ol style="list-style-type: none"> 1. Location and type of ground disturbance requiring paleontological monitoring. 2. Timing and duration of paleontological monitoring. 3. Procedures for work stoppage and fossil collection. 4. The type and extent of data that should be collected with recovered fossils. 5. Identify an appropriate curatorial institution. 6. Identify the minimum qualifications for qualified paleontologists and paleontological monitors. 7. Identify the conditions under which modifications to the monitoring schedule can be implemented. 8. Details to be included in the final monitoring report. 	

Impact	Mitigation Measure (s)	Residual Impact
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shall be submitted to the County for review and approval as to adequacy.

GEO-3 Paleontological Worker Environmental Awareness Program (WEAP). Prior to any ground disturbance on ~~within~~ Rezoning Sites underlain by geologic units with high paleontological resource potential, the applicant shall incorporate information on paleontological resources into the Project’s Worker Environmental Awareness Training (WEAP) materials, or a stand-alone Paleontological Resources WEAP shall be submitted to the County for review and approval. The Qualified Paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff if fossils are discovered by construction staff. The Paleontological WEAP training shall be fulfilled simultaneously with the overall WEAP training, or at the first preconstruction meeting at which a Qualified Paleontologist attends prior to ground disturbance. Printed literature (handouts) shall accompany the initial training. Following the initial WEAP training, all new workers and contractors must be trained prior to conducting ground disturbance work. A sign-in sheet for workers who have completed the training shall be submitted to the County upon completion of WEAP administration.

GEO-4 Paleontological Monitoring. Paleontological monitoring shall only be required for those ground-disturbing activities identified under Mitigation Measure GEO-1, where construction activities (i.e., grading, trenching, foundation work) are proposed in previously undisturbed (i.e., intact) sediments with high paleontological sensitivities. Monitoring shall be conducted by a qualified professional paleontologist (as defined above) or by a qualified paleontological monitor (as defined below) under the supervision of the qualified professional paleontologist. Monitoring may be discontinued on the recommendation of the qualified professional paleontologist if they determine that sediments are likely too young, or conditions are such that fossil preservation would have been unlikely, or that fossils present have little potential scientific value. The monitoring depth required for each of the Rezoning Sites is provided in Table 4.7-3, in addition to the associated geologic unit.

Table 4.7-3 Rezoning Sites Subject to Mitigation

Potential Rezone Site(s)	Sensitive Geologic Unit(s)	Recommended Monitoring
GEY-1 through GEY-3, GUE-2 through GUE-4, LAR-1 through LAR-8, SAN-1, SAN-3, SAN-5, SAN-10	Quaternary young alluvium (Q, Qal)	None

Impact	Mitigation Measure (s)	Residual Impact
	GEY-4 Quaternary young alluvium (Q, Qal) Early Cretaceous to Late Jurassic Great Valley Complex (KJgvc)	None
	GUE-1 Quaternary old alluvial and marine terrace deposits (Qt)	All excavations within native (intact) sediments
	FOR-1 through FOR-6, GRA-1, GRA-3 through GRA-5, PET-1 through PET-3 Wilson Grove Formation (Twg, Pwg)	All excavations within native (intact) sediments
	GRA-2 Quaternary young alluvium (Qal)	None
	SAN-2, SAN-4, SAN-6 through SAN-9, AGU-1 through AGU-3, SON-1 through SON-4 Quaternary old alluvium (Qo)	All excavations within native (intact) sediments
	GLE-1, GLE-2 Huichica and Glen Ellen Formations (QT)	All excavations within native (intact) sediments
	PEN-1 through PEN-9 Petaluma Formation (Pp)	All excavations within native (intact) sediments
	PET-4 Wilson Grove Formation (Twg, Pwg) Pliocene to Miocene Sonoma Volcanics (Psv, Tsb) mapped within the southeast corner	All excavations within native (intact) sediments None

The following outlines minimum monitor qualifications and procedures for fossil discovery and treatment:

1. **Monitoring.** Paleontological monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The Qualified Paleontologist will determine the duration and timing of the monitoring based on the location and extent of proposed ground disturbance. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, they may recommend that monitoring be reduced to periodic spot-

Impact	Mitigation Measure (s)	Residual Impact
	<p>checking or cease entirely. Refer to Table 4.7-2 and Table 4.7-3 for a paleontological resource potential summary and recommendations for each of the 59 Rezoning Sites.</p> <p>2. Fossil Discoveries. In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Paleontologist shall evaluate the find before restarting construction activity in the area. If the Qualified Paleontologist determines that the fossil(s) is (are) scientifically significant; including identifiable specimens of vertebrate fossils, uncommon invertebrate, plant, and trace fossils; the Qualified Paleontologist (or paleontological monitor) shall recover them following standard field procedures for collecting paleontological as outlined in the PRMMP prepared for the project.</p> <p>3. Salvage of Fossils. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the Qualified Paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. If fossils are discovered, the Qualified Paleontologist (or Paleontological Monitor) shall recover them as specified in the project's PRMMP.</p> <p>GEO-5 Preparation and Curation of Recovered Fossils. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist.</p> <p>GEO-6 Final Paleontological Mitigation Report. Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. The report shall be submitted to the County prior to occupancy permits. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.</p>	
Greenhouse Gas Emissions		
<p>Impact GHG-1. Development facilitated by the Housing Element</p>	<p>GHG-1: Comply with BAAQMD Project-Level Land Use Thresholds. Individual residential projects facilitated by the Housing Element Update project <u>on Rezoning Sites</u> shall comply with the following BAAQMD thresholds for land use</p>	<p>Significant and Unavoidable</p>

Impact	Mitigation Measure (s)	Residual Impact
<p>Update would not meet State GHG goals for 2030 or 2045.</p>	<p>projects as defined in the BAAQMD CEQA <i>Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans</i>, published April 2022, or its later adopted successor. Projects on the Rezoning Sites shall include, at a minimum, the following design elements:</p> <ol style="list-style-type: none"> 1. Buildings <ol style="list-style-type: none"> a. The project shall not include natural gas appliances or natural gas plumbing. 2. Transportation <ol style="list-style-type: none"> a. The project shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. <p>As noted in the BAAQMD CEQA <i>Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans</i>, a project designed and built to incorporate these design elements would contribute its fair share to achieve California’s long-term climate goals, and an agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change.</p> <p>If the County adopts a GHG reduction strategy that meets the criteria under CEQA Guidelines Section 15183.5(b), projects may comply with that GHG reduction strategy in lieu of implementing the BAAQMD project-level land use thresholds stated above.</p>	

Noise		
<p>Impact NOI-1. Construction activities associated with development facilitated by the project could result in noise level increases that would exceed applicable construction noise standards at nearby noise sensitive receivers. Operational noise impacts from HVAC units and generators would potentially exceed County standards if located near noise-sensitive land uses. These would be significant impacts and mitigation measures would be required.</p>	<p>NOI-1 General Construction Activities Noise Reduction Measures. If construction activities occur during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), the following measures shall be implemented:</p> <ol style="list-style-type: none"> 1. Nighttime construction noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. 2. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. 3. The analysis of nighttime construction activities shall be completed in accordance with the County’s Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of construction equipment to be used and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site. 4. Provided the nighttime construction noise analysis determines that nighttime noise levels will not exceed 45 dBA L50, 50 dBA L25, 55 dBA L08, or 60 dBA L02 between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures. 	<p>Less than significant</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>5. Provided the nighttime construction noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing activities at a further distance from the noise-sensitive land use.</p> <p>NOI-2 Pile Driver Noise and Vibration Reduction Measures. If pile driving activities occur within 2.8 miles of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), or, during daytime or nighttime hours, within 160 feet of a vibration-sensitive receiver (residences, research and advanced technology equipment), the following measures shall be implemented:</p> <ol style="list-style-type: none"> 1. Daytime (7 a.m. to 10 p.m.) <ol style="list-style-type: none"> a. Pile Driving Vibration <ol style="list-style-type: none"> i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver; ii. Daytime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers 2. Nighttime (10 p.m. to 7 a.m.): <ol style="list-style-type: none"> a. Pile Driving Noise <ol style="list-style-type: none"> i. Nighttime pile driving noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. iii. The analysis of nighttime pile driving activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the type of pile driver to be used and potential noise levels at noise-sensitive receivers located within 15,000 feet of the Rezoning Site. iv. Provided the analysis concludes that noise levels will not exceed 45 dBA L₅₀, 50 dBA L₂₅, 55 dBA L₀₈, or 60 dBA L₀₂ between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures. v. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels. b. Pile Driving Vibration 	

Impact	Mitigation Measure (s)	Residual Impact
	<ul style="list-style-type: none"> i. Use of a pile driver shall not occur within 160 feet of a vibration-sensitive receiver. ii. Nighttime pile driving vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers. iii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis. iv. The analysis of nighttime pile driving vibration shall be completed in accordance with industry standards. The analysis shall consider the type of pile driver to be used and potential vibration levels at vibration-sensitive receivers located within 160 feet of the Rezoning Site. v. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, construction may proceed without additional measures. vi. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, pre-drilling pile holes, utilizing a vibratory pile driver, or performing pile driving at a further distance from the noise-sensitive land use to reduce vibration levels. 	
	<p>NOI-3 Breaker Noise Reduction Measures. If construction activities use a breaker noise during nighttime hours as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation, within 0.5 mile of a noise-sensitive receiver (residences, schools, day care facilities, hospitals, nursing homes, long term medical or mental care facilities, places of worship, libraries and museums, transient lodging, and office building interiors), one of the following measures shall be implemented:</p> <ul style="list-style-type: none"> 1. Nighttime breaker noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m. 2. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis. 3. The analysis of nighttime breaker activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider type of breaker used and other factors of the environment and the potential noise levels at noise-sensitive receivers located within 0.5 mile of the Rezoning Site. 	

Impact	Mitigation Measure (s)	Residual Impact
	<p>4. Provided the nighttime breaker noise analysis determines that nighttime noise levels will not exceed 45 dBA L₅₀, 50 dBA L₂₅, 55 dBA L₀₈, or 60 dBA L₀₂ between the hours of 10 p.m. to 7 a.m., construction may proceed without additional measures.</p> <p>5. Provided the nighttime breaker noise analysis determines that nighttime noise levels would exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers or performing breaking at a further distance from the noise-sensitive land use.</p> <p>NOI-4 Blasting Noise and Vibration Reduction Measures. If construction activities using blasting occurs during construction of <u>on</u> a Rezoning Site, the following measure shall be implemented:</p> <p>1. Daytime (7 a.m. to 10 p.m.)</p> <p>a. Blasting Vibration</p> <p>i. Daytime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers</p> <p>2. Nighttime (as defined in the General Plan Noise Element (currently 10 p.m. to 7 a.m.), or applicable successor regulation:</p> <p>a. Blasting Noise</p> <p>ii. Nighttime blasting noise shall not exceed the noise level standards shown in Table 4.13 4 when conducted between the hours of 10 p.m. to 7 a.m.</p> <p>iii. The project applicant shall retain a qualified consultant to prepare a project-specific construction noise impact analysis.</p> <p>iv. The analysis of nighttime blasting activities shall be completed in accordance with the County's Guidelines for the Preparation of Noise Analysis. The analysis shall consider the blasting plan and potential noise levels at noise-sensitive receivers located within 0.25 mile of the Rezoning Site.</p> <p>v. Provided the analysis concludes that noise levels will not exceed 45 dBA L₅₀, 50 dBA L₂₅, 55 dBA L₀₈, or 60 dBA L₀₂ between the hours of 10 p.m. to 7 a.m. construction may proceed without additional measures.</p> <p>vi. Provided the analysis concludes that pile driving noise levels exceed the nighttime standards shown in Table 4.13 4, additional measures shall be implemented to reduce noise levels below the standard. These measures may include, but not be limited to, use of temporary noise barriers to reduce noise levels.</p> <p>b. Blasting Vibration</p>	

Impact	Mitigation Measure (s)	Residual Impact
	<ul style="list-style-type: none"> i. Nighttime blasting vibration shall not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV at vibration sensitive receivers within 0.25 mile feet of the Rezoning Site. ii. The project applicant shall retain a qualified consultant to prepare a project-specific construction vibration impact analysis. iii. The analysis of nighttime blasting vibration shall be completed in accordance with industry standards. The analysis shall consider the blasting plan and potential vibration levels at vibration-sensitive receivers located within 0.25 mile of the Rezoning Site. iv. Provided the analysis concludes vibration levels do not exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, blasting may proceed without additional measures. v. Provided the analysis concludes that pile driving vibration levels exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact to structures of 0.4 in/sec PPV, additional measures shall be implemented to reduce vibration levels below the standard. These measures may include, but not be limited to, blasting mats shall be implemented to reduce vibration levels below the threshold. 	
	<p>NOI-5 HVAC Noise Reduction Measures. For any individual project <u>on a Rezoning Site</u> that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13 4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis. Noise control measures shall include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.</p>	
	<p>NOI-6 Generator Noise Reduction Measures. If an individual project <u>on a Rezoning Site</u> would place permanent backup generators within 300 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of generators shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses, listed in Table 4.13 4. The analysis shall be completed in accordance with the County's current Guidelines for the Preparation of Noise Analysis.</p>	

Impact	Mitigation Measure (s)	Residual Impact
	<p>Project specific noise reduction measures shall be implemented into the design plan during construction by the project applicant. Noise control measures that could be implemented include, but are not limited to, the selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.</p>	
Tribal Cultural Resources		
<p>Impact TCR-1. Development facilitated by the project has the potential to impact tribal cultural resources.</p>	<p>TCR-1 Tribal Cultural Resources Consultation. If during the implementation of Mitigation Measure CUL-1, archival research results in the identification of an association between a historical built-environment resource and a local (traditionally and culturally affiliated) California Native American tribe, the qualified architectural historian or historian shall confer with the local California Native American tribe(s) on the implementation of Mitigation Measure CUL-2. Throughout the implementation of Mitigation Measures CUL-3 through CUL-9, the qualified archaeologist retained to implement the measures shall confer with local California Native American tribe(s) on the identification and treatment of tribal cultural resources and/or resources of Native American origin not yet determined to be tribal cultural resources through AB 52 consultation. If, during the implementation of Mitigation Measures CUL-3 through CUL-9, a resource of Native American origin is identified, the County shall be notified immediately in order to open consultation with the appropriate local California Native American tribe(s) to discuss whether the resource meets the definition of a tribal cultural resource.</p> <p>TCR-2 Avoidance of Tribal Cultural Resources. Development facilitated by the project <u>on Rezoning Sites</u> shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall be fenced off to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the County and applicant in consultation with local (traditionally and culturally affiliated) California Native American tribe(s).</p> <p>TCR-3 Tribal Cultural Resources Plan. A tribal cultural resources Plan shall be required for Rezoning Sites identified as potentially sensitive for tribal cultural resources during consultation with local (traditionally and culturally affiliated) California Native American tribe(s) during the implementation of TCR-1 and/or by the qualified archaeologist during the implementation of CUL-3 through CUL-9. Prior to any development facilitated by the project that would include ground disturbance, the project applicant or its consultant shall prepare a tribal cultural resources treatment plan to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction. The plan shall include any necessary monitoring requirements, suspension of all earth-disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall</p>	<p>Less than significant</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>outline the appropriate treatment of the resource in coordination with the local Native Americans and, if applicable, a qualified archaeologist. Examples of appropriate treatment for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, and heritage recovery. As appropriate, the tribal cultural resources treatment plan may be combined with any Extended Phase I, Phase II, and/or Phase III work plans or archaeological monitoring plans prepared for work carried out during the implementation of Mitigation Measures CUL-4, CUL-6, CUL-7, or CUL-8. The plan shall be reviewed and approved by the County and the appropriate local California Native American tribe(s) prior to construction to confirm compliance with this measure.</p> <p>TCR-4 Native American Monitoring. For Rezoning Sites identified as potentially sensitive for tribal cultural resources through consultation with local California Native American tribe(s) during the implementation of TCR-1, and/or identified as sensitive for cultural resources of Native American origin by the qualified archaeologist during the implementation of CUL-3 through CUL-9, the project applicant shall retain a traditionally and culturally affiliated Native American monitor to observe all ground disturbance, including archaeological excavation, associated with development facilitated by the project. Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. In the event of a discovery of tribal cultural resources, the steps identified in the tribal cultural resources plan prepared under Mitigation Measure TCR-3 shall be implemented.</p> <p>TCR-5 Sensitive Location of Human Remains. For any development facilitated by the project on Rezoning Sites where human remains are expected to be present based on the results of tribal consultation during the implementation of TCR-1 and/or as identified by the qualified archaeologist, the County shall consult with local California Native American tribe(s) on the decision to employ a canine forensics team. If appropriate, the County shall require the use of a canine forensics team to attempt to identify human remains in a noninvasive way (e.g., non-excavation) for the purpose of avoidance, if avoidance is feasible (see Mitigation Measure TCR-2). Any requirements for the use of a canine forensics team shall be documented in the tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. Pending the results of any canine investigations, the tribal cultural resources treatment plan may require revision or an addendum to reflect additional recommendations or requirements if human remains are present.</p>	
Utilities		
<p>Impact UTIL-1. Impacts related to stormwater drainage, electric</p>	<p>UTIL-1 Water and Wastewater Provider Capacity. Future development proposed on the following sites shall be</p>	<p>Significant and Unavoidable</p>

Impact	Mitigation Measure (s)	Residual Impact
<p>power, natural gas, and telecommunication infrastructure would be less than significant. Impacts related to water and wastewater facilities would be significant due to Rezoning Sites that are not located adjacent to existing wastewater collection infrastructure; impacts would be less than significant with implementation of mitigation measures. However, water supply impacts would be significant and unavoidable, even with implementation of mitigation measures.</p>	<p>required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy:</p> <ol style="list-style-type: none"> 1. Rezoning Sites that need to demonstrate capacity from the applicable water service provider: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4. 2. Rezoning Sites that need to demonstrate capacity from the applicable wastewater service provider GEY-1, GUE-2, GUE-3, LAR-1 through LAR-8, FOR-1, FOR-2, FOR-6, GRA-4, SAN-6, SAN-7, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4. 3. <u>Rezoning Site GRA-4 shall be annexed into the Graton Community Services District prior to development of the site.</u> <p>The required documentation shall be provided to the County during the plan review and permit approval process for projects on the above-listed Rezoning Sites.</p>	
Wildfire		
<p>Impact WFR-2. The project includes Rezoning Sites that are in or near Moderate, High, and Very High FHSZs. Development facilitated by the project would expose project occupants and structures to wildfire risks for sites located in or near (within 2 miles of) SRAs or Very High FHSZs.</p>	<p>WFR-1 Construction Wildfire Risk Reduction. The County of Sonoma shall require the following measures during project construction on <u>Rezoning Sites</u>:</p> <ol style="list-style-type: none"> 1. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings. 2. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher. 3. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance. <p>At the County’s discretion, additional wildfire risk reduction requirements may be required during construction. The County shall review and approve the project-specific methods to be employed prior to building permit approval.</p> <p>WFR-2 Landscape Plan Wildfire Risk Reduction. Project landscape plans <u>for projects on Rezoning Sites</u> shall include fire-resistant vegetation native to Sonoma County and/or the local microclimate of the site and prohibit the use of fire-prone species, especially non-native, invasive species.</p> <p>WFR-3 New Structure Locations. Prior to finalizing site plans, proposed structure locations shall, to the extent feasible given site constraints, meet the following criteria:</p>	<p>Significant and Unavoidable</p>

Impact	Mitigation Measure (s)	Residual Impact
	<ol style="list-style-type: none"> 1. Located outside of known landslide-susceptible areas; and 2. Located at least 50 feet from sloped hillsides. <p>If the location meets the above criteria, no additional measures are necessary. If the location is within a known landslide area or within 50 feet of a sloped hillside, structural engineering features shall be incorporated into the design of the structure to reduce the risk of damage to the structure from post-fire slope instability resulting in landslides or flooding. These features shall be recommended by a qualified engineer and approved by the County prior to the building permit approval.</p>	

Section 2, Project Description

Page 2-4:

“In 2020, Permit Sonoma initiated the EIR process for the Rezoning Sites for Housing Project.”

Page 2-5:

Program 15d would revise the by-right allowance for cottage housing development from three units to four units per parcel before a use permit is required.

The Housing Element contains various other programs, including Program 4c, which states the County has identified the existing County administrative center campus as able to accommodate future housing. Implementation of this program would be subject to future CEQA review. In addition, Program 4b states the County will rezone the 30.32 acres of land, located at Guerneville Road and Lance Drive, within an unincorporated island in the City of Santa Rosa to match the rezoning and the North Station Area Specific Plan adopted by the City following certification of an EIR for the North Station Area Specific Plan. Implementation of this program will also be done in compliance with CEQA.

Page 2-5:

“As shown in Table 2-1, Sonoma County’s RHNA allocation for the 2023-2031 planning period is 3,824 units, which is distributed among four income categories (ABAG 2022~~4~~). For the last (5th) RHNA cycle, the County’s final unit allocation was 515 units.

Page 2-6:

Table 2-1 RHNA Allocation and Percentage of Income Distribution for Sonoma County

Income Level	Percent of Area Median Income	Units	Percent
Very Low	0-50%	1,024	27%
Low	51-80%	584	15%
Moderate	81-120%	627	16%
Above Moderate	>120%	1,589	42%
Total	--	3,824	100%

Source: ABAG 2022~~4~~

... Sonoma County has identified 79 total sites proposed for the 6th cycle Housing Element site inventory that would satisfy the RHNA allocation... All 59 Rezoning Sites are within General Plan-designated Urban Service Areas,¹ and, if near incorporated areas, within voter-approved Urban Growth Boundaries.²

Page 2-7, Table 2-2:

Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
GEY-1	21837 Geyserville Avenue	140-180-035	Geyserville	2-32-2	Yes
GEY-2	No address 21404 Geyserville Avenue	140-150-008 22 , 140-150-023, 140-150-024, 140-150-025, 140-150-026, 140-150-027	Geyserville	2-32-2	Yes
GEY-3	21413 Geyserville Avenue	140-150-004	Geyserville	2-32-2	Yes
GEY-4	21421 Geyserville Avenue	140-150-001	Geyserville	2-32-2	Yes
GEY-5	80 Highway 128	140-100-004	Geyserville	2-32-2	No
GEY-6	21322 Geyserville Avenue	140-150-012	Geyserville	2-32-2	No
GEY-7	Geyser Ridge	140-160-011	Geyserville	2-32-2	No
GUE-1	14156 Sunset Avenue	070-070-040	Guerneville	2-42-3	Yes
GUE-2	16450 Laughlin Road	069-270-002	Guerneville	2-42-3	Yes
GUE-3	16500 Cutten Court	069-280-043	Guerneville	2-42-3	Yes
GUE-4	16050 Laughlin Road	069-230-007	Guerneville	2-42-3	Yes
GUE-5	16451 River Road	071-180-014	Guerneville	2-42-3	No
GUE-6	17081 CA-116	071-200-003	Guerneville	2-42-3	No
LAR-1	5146 Old Redwood Highway	039-320-051	Larkfield	2-52-4	Yes
LAR-2	201 Wikiup Drive	039-040-040	Larkfield	2-52-4	Yes
LAR-3	1 Airport Boulevard	039-025-060	Larkfield	2-52-4	Yes
LAR-4	245 Airport Boulevard	039-025-026	Larkfield	2-52-4	Yes
LAR-5	175 Airport Boulevard	039-025-028	Larkfield	2-52-4	Yes
LAR-6	145 Wikiup Drive	039-040-035	Larkfield	2-52-4	Yes
LAR-7	5495 Old Redwood Highway	039-380-018	Larkfield	2-52-4	Yes
LAR-8	5224 Old Redwood Highway	039-390-022	Larkfield	2-52-4	Yes
LAR-9	5200 Fulton Road	039-025-053	Larkfield	2-52-4	No
LAR-10	5368 Fulton Road	039-380-027	Larkfield	2-52-4	No
FOR-1	6555 Covey Road	083-073-017	Forestville	2-62-5	Yes
FOR-2	6898 Nolan Road	083-120-062	Forestville	2-62-5	Yes
FOR-3	6220 Highway 116 N 6194 Forestville Street	084-020-004	Forestville	2-62-5	Yes
FOR-4	6090 Van Keppel Road ¹	083-073-010	Forestville	2-62-5	Yes
FOR-5	6475 Packing House Road	084-020-003	Forestville	2-62-5	Yes
FOR-6	6250 Forestville Street	084-020-011	Forestville	2-62-5	Yes
FOR-7	Mirabel Road and Highway 116	083-090-085	Forestville	2-62-5	No

Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
GRA-1	9001 Donald Street	130-165-001	Graton	2-72-6	Yes
GRA-2	3400 Ross Road	130-090-009	Graton	2-72-6	Yes
GRA-3	3155 Frei Road	130-180-079	Graton	2-72-6	Yes
GRA-4	3280 Hicks Road	130-146-003	Graton	2-72-6	Yes
GRA-5	8525 Graton Road	130-176-013	Graton	2-72-6	Yes
SAN-1	3525 Brooks Avenue	134-132-057	South Santa Rosa	2-82-7	Yes
SAN-2	298 W Robles Avenue	134-111-068	South Santa Rosa	2-82-7	Yes
SAN-3	3569 Brooks Avenue	134-132-056	South Santa Rosa	2-82-7	Yes
SAN-4	3345 Santa Rosa Avenue	043-153-021	South Santa Rosa	2-82-7	Yes
SAN-5	3509 Brooks Avenue	134-132-034	South Santa Rosa	2-82-7	Yes
SAN-6	3824 Dutton Avenue	134-072-040	South Santa Rosa	2-82-7	Yes
SAN-7	3280 Dutton Avenue	134-072-038	South Santa Rosa	2-82-7	Yes
SAN-8	3427 Moorland Avenue	134-111-020	South Santa Rosa	2-82-7	Yes
SAN-9	150 Todd Road	134-171-059	South Santa Rosa	2-82-7	Yes
SAN-10	4020 Santa Rosa Avenue	134-192-016	South Santa Rosa	2-82-7	Yes
SAN-11	3372 Santa Rosa Avenue	044-101-023	Santa Rosa	2-82-7	No
SAN-12	358 E Robles Avenue	134-132-022	Santa Rosa	2-82-7	No
SAN-13	3847 Santa Rosa Avenue <u>3855 Santa Rosa Avenue</u>	134-181-046	Santa Rosa	2-82-7	No
SAN-14	3847 Santa Rosa Avenue <u>3845 Santa Rosa Avenue</u>	134-181-047	Santa Rosa	2-82-7	No
SAN-15	3454 Santa Rosa Avenue	134-132-017	Santa Rosa	2-82-7	No
SAN-16	3445 Brooks Avenue <u>3452 Brooks Avenue</u>	134-132-067	Santa Rosa	2-82-7	No
SAN-17	388 E Robles Avenue	134-132-025	Santa Rosa	2-82-7	No
<u>SAN-18</u>	<u>No Address</u>	<u>036-111-009</u>	<u>Santa Rosa</u>	<u>2-8</u>	<u>No</u>
<u>SAN-19</u>	<u>No Address</u>	<u>036-111-010</u>	<u>Santa Rosa</u>	<u>2-8</u>	<u>No</u>
<u>SAN-20</u>	<u>No Address</u>	<u>036-111-016</u>	<u>Santa Rosa</u>	<u>2-8</u>	<u>No</u>
GLE-1	950 & 987 Carquinez Avenue 136651 & 13675 Arnold Drive	054-290-057	Glen Ellen	2-92-8	Yes
GLE-2	No Address	054-290-084	Glen Ellen	2-92-8	Yes
<u>GLE-3</u>	<u>15000 Arnold Dr</u>	<u>054-090-001</u>	<u>Glen Ellen</u>	<u>2-9</u>	
<u>GLE-4</u>	<u>14785 Arnold Dr</u>	<u>054-150-005</u>	<u>Glen Ellen</u>	<u>2-9</u>	
AGU-1	188 Academy Lane	056-531-005	Agua Caliente	2-102-9	Yes
AGU-2	211 Old Maple Avenue	056-531-006	Agua Caliente	2-102-9	Yes
AGU-3	18621 Railroad Avenue	052-272-011	Agua Caliente	2-102-9	Yes
AGU-4	17881 Riverside Drive	133-150-038	Agua Caliente	2-102-9	No
PEN-1	10078 Main Street	047-174-009	Penngrove	2-112-10	Yes

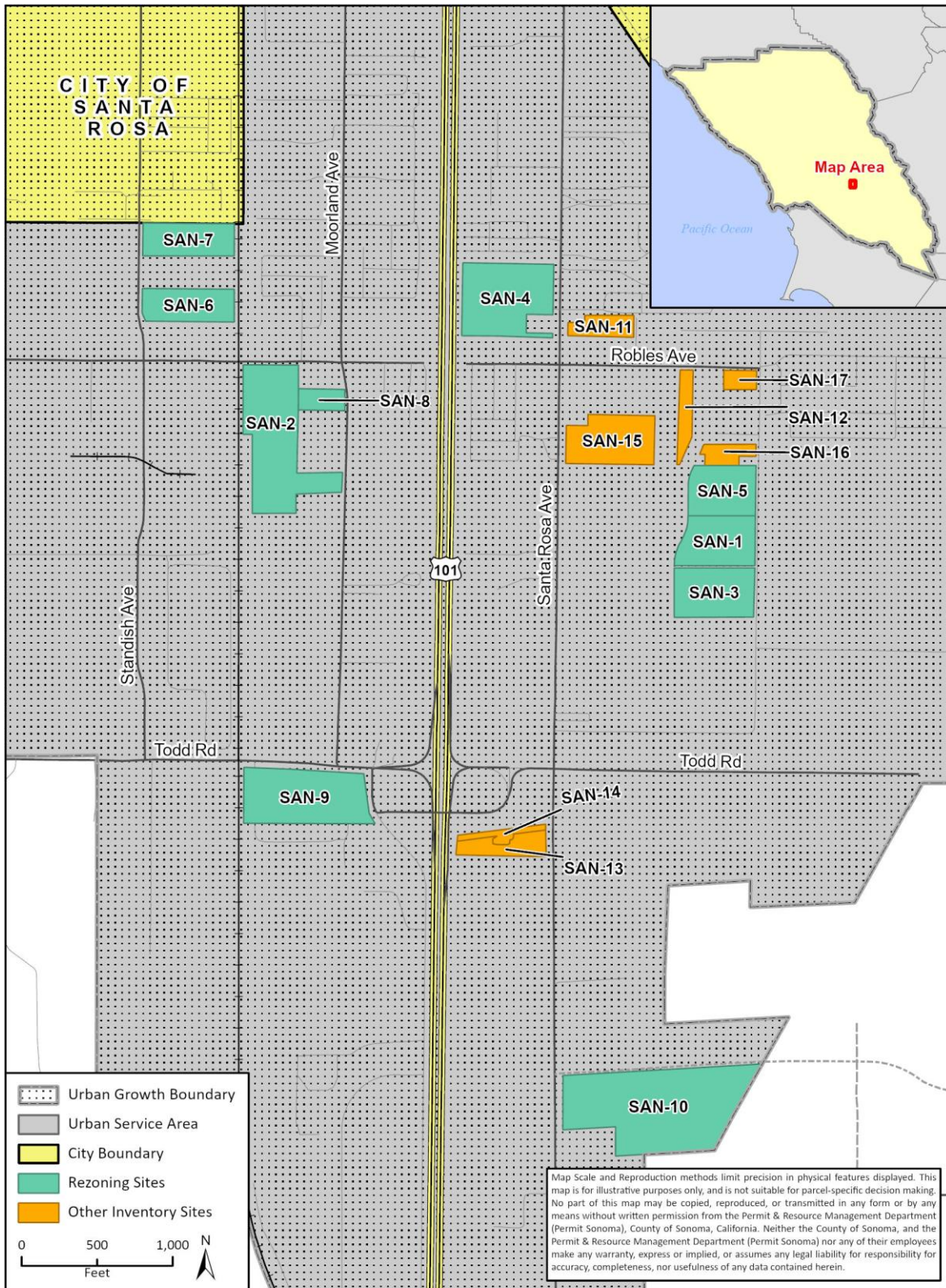
Site ID	Site Address	Assessor's Parcel Number	Nearest Community	Corresponding Figure No.	Rezone Site?
PEN-2	635 Goodwin Avenue No Address	047-152-020	Penngrove	2-112-10	Yes
PEN-3	10070, 10078, 11790 Main Street	047-174-008	Penngrove	2-112-10	Yes
PEN-4	635 Goodwin Avenue No Address	047-152-019	Penngrove	2-112-10	Yes
PEN-5	No address 361 Woodward Avenue	047-173-028, 047-173-029 011	Penngrove	2-112-10	Yes
PEN-6	355 Adobe Road	047-091-013	Penngrove	2-112-10	Yes
PEN-7	220 Hatchery Road	047-153-004	Penngrove	2-112-10	Yes
PEN-8	202 206 & 11790 Main Street	047-166-023	Penngrove	2-112-10	Yes
PEN-9	11830 Main Street	047-166-025	Penngrove	2-112-10	Yes
PEN-10	10004 Main Street	047-173-016	Penngrove	2-112-10	No
PEN-11	5500 Old Redwood Highway	047-213-009	Penngrove	2-112-10	No
PEN-12	Old Redwood Highway	047-213-010	Penngrove	2-112-10	No
PET-1	1085 Bodega Avenue	019-090-003	Petaluma	2-122-11	Yes
PET-2	1105 Bodega Avenue	019-090-053	Petaluma	2-122-11	Yes
PET-3	1155 Bodega Avenue	019-090-004	Petaluma	2-122-11	Yes
PET-4	1002 Bodega Avenue	019-090-058	Petaluma	2-122-11	Yes
SON-1	20549 Broadway	128-311-015	Sonoma	2-132-12	Yes
SON-2	20561 & 20531 Broadway	128-311-016	Sonoma	2-132-12	Yes
SON-3	20535 & 20539 Broadway	128-311-014	Sonoma	2-132-12	Yes
SON-4	20563 Broadway	128-311-017	Sonoma	2-132-12	Yes
ELD-1	15577 Brookview Dr	054-381-010	Eldridge	2-142-13	No

¹ An address of 6325 Van Keppel Road is also associated with this property, as an address correction was filed in January 2023.

Page 2-9:

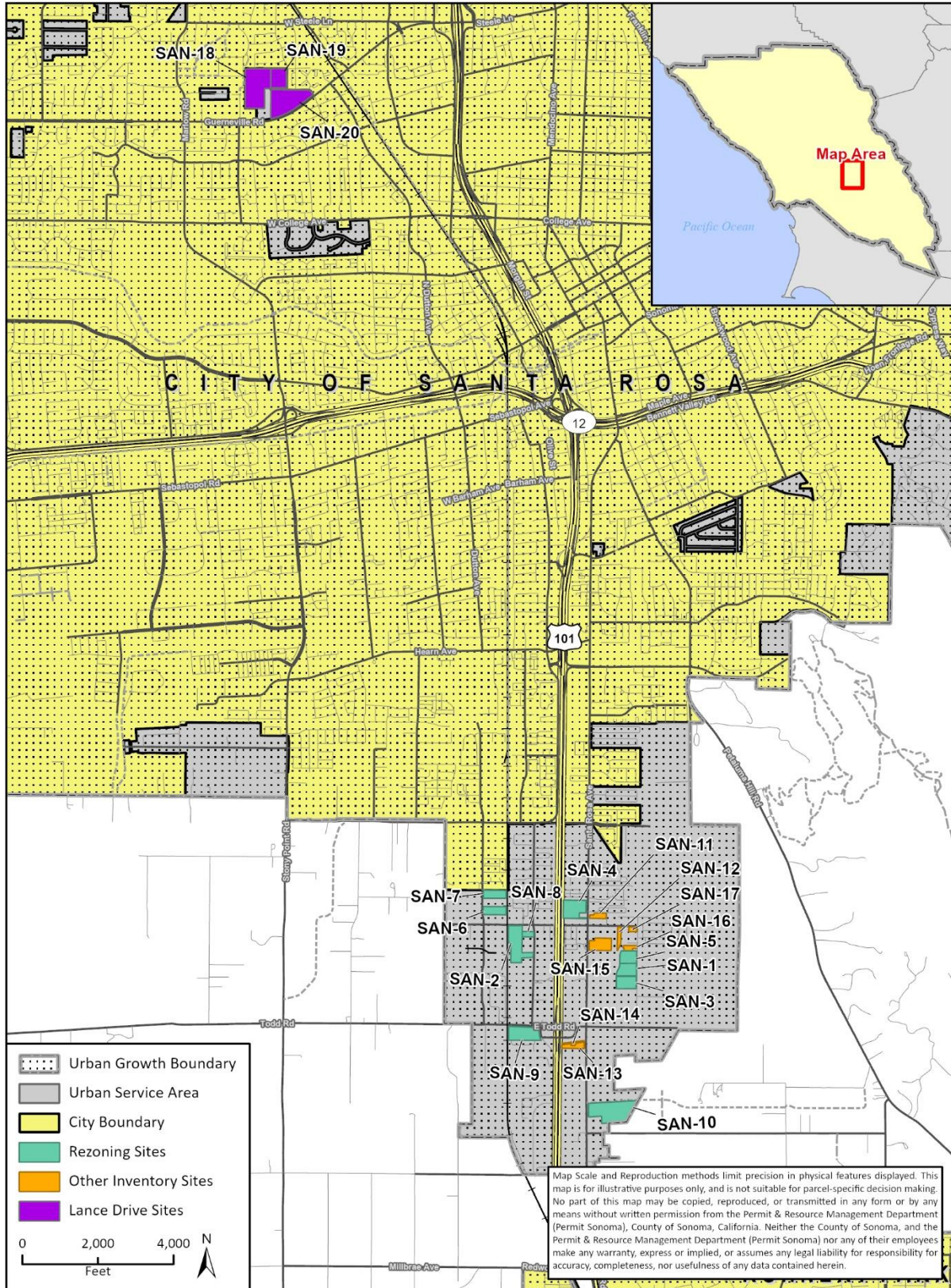
The Sonoma County Housing Element Update would rezone up to 59 urban sites in General Plan-designated Urban Service Areas throughout unincorporated Sonoma County (as identified in Table 2-2) for by-right, ~~medium~~ high-density housing. By-right, ~~medium~~ high-density housing means that no discretionary land use approvals and no CEQA review would be required for the development of ~~medium~~ high-density (up to 24 units per acre) housing on the sites. Design review approval for consistency with objective design standards is required for all multi-family or mixed-use housing development of more than three units.

Page 2-16, Figure 2-8:



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma), 2022. Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

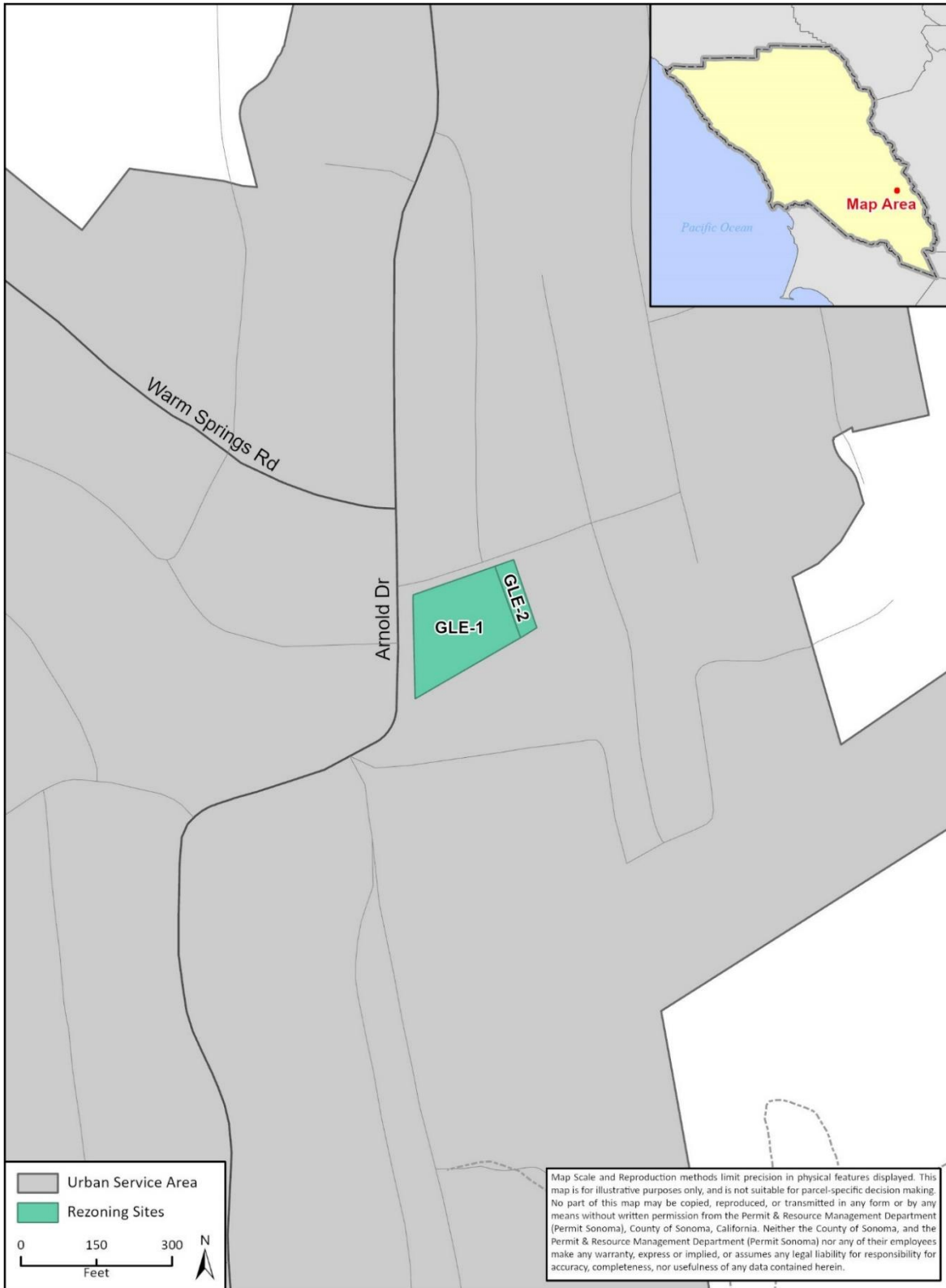
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Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma), 2022. Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri.

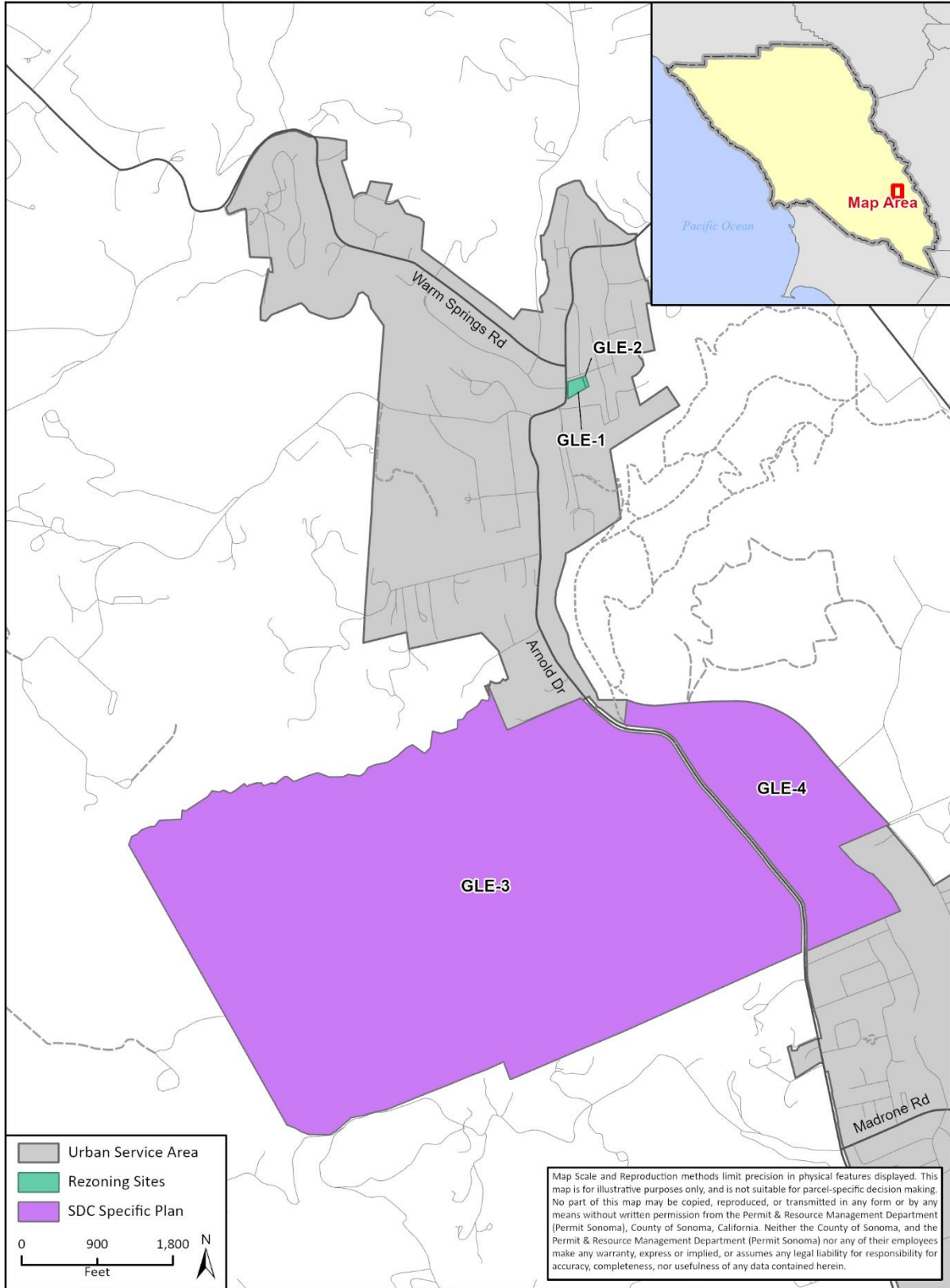
(figure added)

Page 2-17, Figure 2-9:



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma), 2022.
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(figure added)

Page 2-23:

For purposes of the environmental analysis, sites were analyzed for rezoning to R2, with a base density of 10 or 11 units per acre and assuming application of the Rental Housing Opportunity Program, as well as rezoning to R3 with a density of 20 units per acre; both were assumed to be rezoned to allow a density of 20 or 22 units per acre, respectively, which represents the maximum buildout potential utilizing the County’s Rental Housing Opportunity Area program, which automatically doubles the site density for projects proposing to include at least 40 percent of units as affordable. Sites analyzed for rezoning to add the WH Combining District were assumed to allow a density of 20-24 units per acre, the maximum allowed in this district.

Page 2-23, Table 2-3:

Site(s)	Proposed Modification to General Plan Land Use Designation and Density ¹ (units/acre)	Proposed New Base Zoning Districts and/or Addition of WH Combining District	Maximum Number of dwelling units allowed per acre ²
GEY-1	UR 20 10	R3-R2	20
GEY-2	UR 10	R2	20
GEY-3	UR 20 10	R3-R2	20
GEY-4	UR 20 10	R3-R2	20
GUE-1	UR 20 10	R3-R2	20
GUE-2	UR 20 10	R3-R2	20
GUE-3	UR 20 10	R3-R2	20
GUE-4	UR 20 10	R3-R2	20
LAR-1	UR 20 11	R3-R2	20-22
LAR-2	UR 20 11	R3-R2	20-22
LAR-3	UR 20 11	R3-R2	20-22
LAR-4	UR 20 11	R3-R2	20-22
LAR-5	UR 20 11	R3-R2	20-22
LAR-6	UR 20 11	R3-R2	20-22
LAR-7	UR 20	R3-R2	20-22
LAR-8	No change	Add WH	24
FOR-1	UR 20 No change	R3 Add WH	20 24
FOR-2	UR 20 10	R3-R2	20
FOR-3	UR 20 10	R3-R2	20
FOR-4	UR 20 10	R3-R2	20
FOR-5	UR 20 10	R3-R2	20
FOR-6	UR 20 10	R3-R2	20
GRA-1	UR 20 10	R3-R2	20
GRA-2	No change	Add WH	24
GRA-3	UR 20 10	R3-R2	20
GRA-4	UR 20 10	R3-R2	20
GRA-5	UR 20 10	R3-R2	20
SAN-1	UR 20 10	R3-R2	20
SAN-2	LI	M1, Add WH	24

Site(s)	Proposed Modification to General Plan Land Use Designation and Density ¹ (units/acre)	Proposed New Base Zoning Districts and/or Addition of WH Combining District	Maximum Number of dwelling units allowed per acre ²
SAN-3	UR 2010	R3-R2	20
SAN-4	LC	LC, Add WH	24
SAN-5	UR 2010	R3-R2	20
SAN-6	No change	Add WH	24
SAN-7	No change	Add WH	24
SAN-8	UR 2010	R3-R2	20
SAN-9	No change	Add WH	24
SAN-10	No change	Add WH	24
GLE-1	No change	Add WH	24
GLE-2	No change	Add WH	24
AGU-1	UR 2010	R3-R2	20
AGU-2	UR 2010	R3-R2	20
AGU-3	UR 2010	R3-R2	20
PEN-1	LC	Add WH	24
PEN-2	UR 2010	R3-R2	20
PEN-3	LC	Add WH	24
PEN-4	UR 2010	R3-R2	20
PEN-5	No change	Add WH	24
PEN-6	UR 2010	R3-R2	20
PEN-7	UR 2010	R3-R2	20
PEN-8	No change	C2, Add WH	24
PEN-9	No change	C2, Add WH	24
PET-1	UR 10	R2	20
PET-2	UR 10	R2	20
PET-3	No change	Add WH	24
PET-4	UR 10	R2	20
SON-1	UR 2010	R3-R2	20
SON-2	UR 2010	R3-R2	20
SON-3	UR 2010	R3-R2	20
SON-4	UR 2010	R3-R2	20

¹ Commercial land use designations do not have associated residential density.

² ~~The Rental Housing Opportunity Area Program doubles site density for projects with 40 percent affordable units.~~

General Plan Land Use Designations: UR = Urban Residential, LC = Limited Commercial

Zoning Districts: ~~R23 = High Medium~~ Density Residential District, WH = Workforce Housing Combining District

Page 2-25:

Table 2-5 identifies the dwelling unit and population buildout potential of the ~~2520~~ additional inventory sites that ~~would not be rezoned~~ do not require rezoning under implementation of the project. If all 59 sites are chosen to move forward in the Housing Element Update as studied under this EIR, project

implementation could increase the housing availability in the County to accommodate up to 3,312 additional dwelling units and approximately 8,246 additional people.⁸ The remaining 569 dwelling units required in the County under the 6th cycle RHNA would be accommodated by currently planned and approved units in development, in addition to the number of accessory dwelling units expected to be built in the County through 2031. For the purposes of this EIR, accessory dwelling units are exempt under CEQA and are consistent with the General Plan and zoning as provided in state law, including density.

Table 5-1 Housing Unit and Population Buildout Potential for Rezoning Sites

Rezoning Site	Allowable Dwelling Units Under Current Designation	Total-Allowed Dwelling Units Under Proposed Designation	Change in Total-Allowed Dwelling Units (Buildout Potential)	Total Population Under Current Designation ¹	Total Population Under Proposed Designation ¹	Change in Buildout Population Potential
---------------	--	---	---	---	--	---

Page 2-28, Table 2-5:

Other Inventory Site	Total-Allowed Dwelling Units	Total Population Potential (Based on Maximum Capacity)
GEY-5	12	10
GEY-6	12	17
GEY-7	9	10
GUE-5	10	20
GUE-6	10	11
LAR-9	22	66
LAR-10	10	10
FOR-7	10	8
SAN-11	26	32
SAN-12	40	44
SAN-13	10	15
SAN-14	10	7
SAN-15	26	106
SAN-16	40	38
SAN-17	40	30
<u>SAN-18¹</u>	<u>18-30²</u>	<u>324</u>
<u>SAN-19¹</u>	<u>18</u>	<u>87</u>
<u>SAN-20¹</u>	<u>30</u>	<u>345</u>
<u>GLE-3</u>	<u>30</u>	<u>200³</u>
<u>GLE-4</u>	<u>30</u>	<u>200³</u>
AGU-4	10	13
PEN-10	12	16
PEN-11	10	10

⁸ Calculation based on 2.6 persons per household in unincorporated Sonoma County (California Department of Finance 2022). See Table 4.14-2 in Section 4.14, *Population and Housing*, for more detail.

Other Inventory Site	Total-Allowable Dwelling Units	Total Population Potential
PEN-12	10	38
ELD-1	8	10
Total	337	511

Notes:

¹ Sites included in the North Santa Rosa Station Area Specific Plan, which was adopted in September 2012 and covered in a separate EIR. These sites would require rezoning by the County to match the current City zoning, but this would not change the number of dwelling units allowed.

² Site is split-zoned with 6 acres at a density of 30 du/ac and 8 acres at 18 du/ac.

³ Based on 200-unit buildout projected in Housing Element. Project covered in separate EIR certified December 2022.

Section 4, Environmental Impact Analysis

Page 4-1:

...As detailed in Section 2.6, *Project Characteristics*, these sites would be located within census-designated urbanized areas and urban service areas that are zoned R1 and located outside of both the high and very high fire hazard severity zones. The updated Housing Element also includes a program for rezoning under Senate Bill (SB) 10. Senate Bill 10 provides a streamlined process for local governments to increase residential density up to 10 dwelling units per parcel on eligible parcels, provided the parcel is qualifies under SB 10 as a transit-rich or urban infill site. The Housing Element proposes to allow sites within census-designated urbanized areas or urban clusters and urban service areas that are zoned R1 (Low-Density Residential) and located outside of both the High and Very High Wildfire Hazard Severity Zones to allow additional units based on parcel size. Under the policy detailed in the Housing Element and allowed by SB 10, parcels that meet these criteria would be allowed to build a maximum of X du if they are between 10,000 square feet and 20,000 square feet in size, and a maximum of X du if they are above 20,000 square feet in size. There are over 2,000 sites in unincorporated Sonoma County between 10,000 and 20,000 square feet in size that fit these criteria and 1,000 sites in unincorporated Sonoma County above 20,000 square feet in size that fit these criteria....

Section 4.1, Aesthetics

Page 4.1-12:

Figure 4.1-5a GUE-2 Looking North from Laughlin Road



Figure 4.1-5b GUE-2 and GUE-3 Looking Westward from Cutten Avenue



Source: Google Earth 2020

Page 4.1-19:

Figure 4.1-15 FOR-5 from Packing House Road Looking Southeast



(figure deleted)



(figure added)

Figure 4.1-16 FOR-6 from Forestville Street Looking Southwest



(figure deleted)



(figure added)

Page 4.1-18:

...Views of the ridgelines and open spaces are not visible from the streets looking across the lot due to existing residential development, relatively flat topography, and mature vegetation on all sides (Figure 4.1-14)....

Page 4.1-18:

On Mirabel Road, the Forestville Youth Park a school is directly across the street from FOR-2... FOR-4 is situated east of FOR-1 in an area accessible only by ~~unpaved roads~~ a private driveway off Van Keppel Road.

Page 4.1-18:

...They are situated close to the roadway and are landscape in a varied but unified manner. ~~On Mirabel Road, a school is directly across the street from FOR-2.~~ The residential development on Mirabel Road features a less unified design than that on Giusti Road...

Page 4.1-34:

Figure 4.1-2SAN-10 Viewed from the Southern Boundary, Looking East North

Page 4.1-46:

Goal OSRC-6: Preserve the unique rural and natural character of Sonoma County for residents, businesses, visitors, and future generations.

~~**Objective OSRC-6.2:** Establish Rural Character as a primary criterion for review of discretionary projects, but not including administrative design review for single family homes on existing lots outside of Urban Service Areas.~~

~~**Policy OSRC-6a:** Develop design guidelines for discretionary projects in rural areas, but not including administrative design review for single family homes on existing lots, that protect and reflect the rural character of Sonoma County. Use the following general design principles until these Design Guidelines are adopted, while assuring that Design Guidelines for agricultural support uses on agricultural lands are consistent with Policy AR-9h of the Agricultural Resources Element.~~

- ~~(1) New structures blend into the surrounding landscape, rather than stand out.~~
- ~~(2) Landscaping is included and is designed to blend in with the character of the area.~~
- ~~(3) Paved areas are minimized and allow for informal parking areas.~~
- ~~(4) Adequate space is provided for natural site amenities.~~
- ~~(5) Exterior lighting and signage are minimized.~~

Page 4.1-51 through 4.1-53, Table 4.1-6:

Table 4.1-6 Site Impacts and Recommended Mitigation Summary

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GEY-1	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
GEY-2	Moderate	Co-Dominant	Less than significant	AES-2
GEY-3	Moderate	Co-Dominant	Less than significant	AES-2
GEY-4	Moderate	Co-Dominant	Less than significant	AES-2
GUE-1	Moderate	Co-Dominant	Less than significant	AES-2
GUE-2	Moderate	Co-Dominant	Less than significant	AES-2
GUE-3	Moderate	Co-Dominant	Less than significant	AES-2
GUE-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
LAR-1	Low	Co-Dominant	Less than significant	AES-1 , AES-2, AES-3 , AES-4
LAR-2	Low	Co-Dominant	Less than significant	AES-2
LAR-3	Low	Co-Dominant	Less than significant	AES-2
LAR-4	Low	Co-Dominant	Less than significant	AES-2
LAR-5	Low	Co-Dominant	Less than significant	AES-2
LAR-6	Low	Co-Dominant	Less than significant	AES-2
LAR-7	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
LAR-8	Low	Co-Dominant	Less than significant	AES-2
FOR-1	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-2	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-3	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-5	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
FOR-6	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
GRA-1	Low	Co-Dominant	Less than significant	AES-2
GRA-2	Low	Co-Dominant	Less than significant	AES-2
GRA-3	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
GRA-4	Moderate	Co-Dominant	Less than significant	AES-2 AES-5

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
GRA-5	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4, AES-5
SAN-1	Low	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
SAN-2	Low	Co-Dominant	Less than significant	AES-25
SAN-3	Low	Dominant	Less than significant	AES-25
SAN-4	Low	Co-Dominant	Less than significant	AES-25
SAN-5	Low	Dominant	Less than significant	AES-25
SAN-6	Low	Co-Dominant	Less than significant	AES-25
SAN-7	Low	Co-Dominant	Less than significant	AES-25
SAN-8	Low	Co-Dominant	Less than significant	AES-25
SAN-9	Low	Co-Dominant	Less than significant	AES-25
SAN-10	Low	Co-Dominant	Less than significant	AES-25
GLE-1	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
GLE-2	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
AGU-1	Moderate	Co-Dominant	Less than significant	AES-1 , AES-2, AES-5
AGU-2	Moderate	Co-Dominant	Less than significant	AES-1 , AES-2, AES-5
AGU-3	Moderate	Co-Dominant	Less than significant	AES-25
PEN-1	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-2	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-3	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-4	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-5	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-6	Moderate	Co-Dominant	Less than significant	AES-25
PEN-7	Moderate	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-8	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PEN-9	High	Co-Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PET-1	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PET-2	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5

Rezoning Site	Site Sensitivity	Project Potential Dominance	Potential Impact*	Required Mitigation Measure Number(s)
PET-3	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
PET-4	High	Dominant	Significant	AES-1, AES-2, AES-3 , AES-4 , AES-5
SON-1	Moderate	Co-Dominant	Less than significant	AES- 2 5
SON-2	Moderate	Co-Dominant	Less than significant	AES- 2 5
SON-3	Moderate	Co-Dominant	Less than significant	AES- 2 5
SON-4	Moderate	Co-Dominant	Less than significant	AES- 2 5

*The potential impact statement listed in this table coincides with the impact evaluation decision matrix in the County's Visual Assessment Guidelines (2019) and does not apply to every CEQA issue for every site. Potentially significant impacts are indicated for specific sites and mitigation measures reiterated by CEQA issue area.

Section 4.4, Agriculture and Forestry Resources

Page 4.2-17:

Mitigation Measure AG-1 Interim Agricultural Buffers

Development facilitated by the project on the Rezoning Sites adjacent to active agricultural operations shall provide fencing and a minimum buffer of 200 feet to the agricultural operations, consistent with 26-88-040(f) of the Sonoma County Zoning Code. If this distance is not practical due to project design or features, a minimum 100-foot buffer is acceptable if it complies with all of the requirements for a reduced buffer and a vegetative screen is provided as specified in Section 26-88-040(f).

Section 4.3, Air Quality

Page 4.3-9:

Policy OSRC-16h: Require that development within the BAAQMD that generates high numbers of vehicle trips, such as shopping centers and business parks, incorporate air quality mitigation measures in their design.

Policy OSRC-16i: Ensure that any proposed new sources of toxic air contaminants or odors provide adequate buffers to protect sensitive receptors and comply with applicable health standards. Promote land use compatibility for new development by using buffering techniques such as landscaping, setbacks, and screening in areas where such land uses abut one another.

~~Policy OSRC-16j: Require consideration of odor impacts when evaluating discretionary land uses and development projects near wastewater treatment plant or similar uses.~~

~~Policy OSRC-16k: Require that discretionary projects involving sensitive receptors (facilities or land uses that include members of the population sensitive to the effects of air pollutants such as children, the elderly, and people with illnesses) proposed near the Highway 101 corridor include an analysis of mobile source toxic air contaminant health risks. Project review should, if necessary, identify design mitigation measures to reduce health risks to acceptable levels.~~

Policy OSRC-16l: Work with the applicable Air Quality districts to adopt a diesel particulate ordinance. The ordinance should prioritize on site over off site mitigation of diesel particulate emissions to protect neighboring sensitive receptors from these emissions.

Policy OSRC-16m: Provide education and outreach to the public regarding the Air Quality Districts' "Spare the Air" Programs.

Page 4.3-19:

AQ-1 Basic Construction Mitigation Measures

All development facilitated by the project on the Rezoning Sites (regardless of whether the development is under the jurisdiction of the SFBAAB or the BAAQMD) shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM₁₀ and PM_{2.5}) by implementing the BAAQMD's Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions.

AQ-2 Additional Construction Mitigation Measures

In addition to implementation of Mitigation Measure AQ-1, for any project on the Rezoning Sites (regardless of whether the development is under the jurisdiction of the SFBAAB or the BAAQMD) that meets the following conditions and as listed in **Error! Reference source not found.**, the County shall condition development facilitated by the project to implement BAAQMD CEQA Air Quality Guidelines' Additional Construction Mitigation Measures:

Section 4.4, Biological Resources

Page 4.4-25-26:

~~Policy OSRC-7k: Require the identification, preservation and protection of native trees and woodlands in the design of discretionary projects, and, to the maximum extent practicable, minimize the removal of native trees and fragmentation of woodlands, require any trees removed to be replaced, preferably on the site, and provide permanent protection of other existing woodlands where replacement planting does not provide adequate mitigation.~~

~~Policy OSRC-7e: Encourage the use of native plant species in landscaping. For discretionary projects, require the use of native or compatible non-native species for landscaping where consistent with fire safety. Prohibit the use of invasive exotic species.~~

~~Policy OSRC-8i: As part of the environmental review process, refer discretionary permit applications near streams to CDFG and other agencies responsible for natural resource protection.~~

Page 4.4-30:

BIO-2 Special Status Plant Species Surveys

If the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1) determines that there is potential for ~~significant~~ impacts to federally or state-listed plants or ~~regional population level impacts to~~ species with a CRPR of 1B or 2B from project development, a qualified biologist shall complete surveys for special status plants prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). Surveys shall be conducted following CDFW's 2018 Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities and, as applicable, the Santa Rosa Plain Conservation Strategy Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present, or any formal updates of these protocols. The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific biological analysis. All plant surveys shall be conducted by a qualified biologist during the blooming season prior to initial ground disturbance. More than one year of surveys may be required to establish that plants are absent, and the above Santa Rosa Plain Conservation Strategy Appendix D requires a minimum of two years of surveys, which shall be implemented unless otherwise approved in writing by CDFW. All special status plant species identified on site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the County, and the CDFW and/or USFWS, as appropriate, for review and/or approval. The project shall

obtain written approval of the survey reports from CDFW prior to the start of construction, unless otherwise approved in writing by CDFW. If any special-status plants are observed, the Project shall: 1) avoid all direct and indirect impacts to the special-status plants, and 2) prepare and implement an avoidance plan that is approved in writing by CDFW prior to Project start. If CESA listed plants are observed and impacts cannot be avoided, the Project shall obtain a CESA ITP from CDFW. For impacts to federal Endangered Species Act (ESA) listed plants, the Project shall obtain authorization from USFWS.

Page 4.4-30:

BIO-3 Special Status Plant Species Avoidance, Minimization, and Mitigation

If federally and/or state-listed or CRPR 1B or 2 species are found during special status plant surveys (pursuant to Mitigation Measure BIO-2), and would be directly impacted, or there would be a population-level impact to non-listed sensitive species, then the project shall be re-designed to avoid impacting those plant species. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm.

For projects on Rezoning Sites in BSAs located within the Santa Rosa Plain Area, protocol rare plant surveys shall be conducted, and impacts to suitable rare plant habitat mitigated, in accordance with the 2007 USFWS Santa Rosa Plain Programmatic Biological Opinion, as amended in 2020.

BIO-4 Restoration, ~~and~~ Monitoring, and Habitat Compensation

Development and/or restoration activities shall be conducted in accordance with a site-specific Habitat Restoration Plan. If federally or state-listed plants or non-listed special status CRPR 1B and 2 plant populations cannot be avoided, and will be impacted by development, all impacts shall be mitigated by the applicant at a ratio not lower than 1:1 and to be determined by the County (in coordination with CDFW and USFWS as ~~and~~ if applicable) for each species as a component of habitat restoration, unless otherwise approved in writing by CDFW. For impacts to state-listed plants, habitat compensation at a minimum 1:1 mitigation to impact ratio shall be provided, which may include either the purchase of credits at a CDFW-approved mitigation or conservation bank or purchasing appropriate habitat and conserving it in perpetuity through a conservation easement and management plan, which shall be prepared, funded, and implemented by the project proponent in perpetuity, unless otherwise approved in writing by CDFW. A qualified biologist shall prepare and submit a restoration plan to the County and CDFW for review and approval. (Note: if a federally and/or state-listed plant species will be impacted, the restoration plan shall be submitted to the USFWS and/or CDFW for review, and federal and/or state take authorization ~~may will~~ be obtained from ~~required by~~ these agencies.) The restoration plan shall include, at a minimum, the following components [...]

Page 4.4-31:

BIO-5 Endangered/Threatened Species Habitat Assessments and Protocol Surveys, CDFW and USFWS Authorization and Habitat Compensation

Specific habitat assessments and survey protocols are established for several federally- and state-listed endangered or threatened species. If the results of the project-specific biological analysis determine that suitable habitat may be present for any such species, protocol habitat

assessments/surveys shall be completed in accordance with CDFW, NMFS, and/or USFWS protocols prior to issuance of any construction permits. If projects are located within the Santa Rosa Plain Area, surveys shall be conducted for CTS in accordance with the Santa Rosa Plain Conservation Strategy (2005) with prior written approval from CDFW and USFWS. Due to numerous documented occurrences of CTS in the Santa Rosa Plain in conjunction with the documented dispersal distances for the species of up to 1.3 miles, it has been established that CTS are present within many grassland and vernal pool habitats within the Santa Rosa Plain rendering surveys unnecessary, and therefore any protocol CTS surveys shall be approved in writing by CDFW and USFWS prior to conducting the survey and habitat compensation for impacts to CTS habitat shall be provided by the Project pursuant to the Santa Rosa Plain Conservation Strategy even if survey results are negative, unless otherwise approved in writing by CDFW and USFWS. If impacts to grassland or vernal pool habitat will occur, the Project shall consult with CDFW to determine if a CESA ITP for CTS is warranted. If CESA listed animal species such as CTS cannot be avoided, the Project shall obtain a CESA ITP from CDFW prior to Project construction. For impacts to ESA listed wildlife species such as CTS, the Project shall obtain authorization from USFWS. While often consistent with the Santa Rosa Plain Conservation Strategy, the CESA ITP habitat compensation requirements may differ from it based on a site-specific analysis. If through consultation with the CDFW, NMFS, and/or USFWS it is determined that protocol habitat assessments/surveys are not required, the applicant shall complete and document this consultation and submit it to the County prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicant shall be responsible for ensuring they understand the protocol requirements and shall hire a qualified biologist to conduct protocol surveys.

Page 4.4-34 through 36:

BIO-9 American Badger Avoidance And Minimization

For projects located on Rezoning Sites in the Petaluma BSA (PET-1 through PET-4), a qualified biologist shall conduct surveys of the grassland habitat on-site to identify any American badger burrows/dens. These surveys shall be conducted not more than 14 days prior to the start of construction. Impacts to active badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week in order to track the status of the den and to determine when a den area has been cleared for construction.

BIO-10 Pre-Construction Surveys for Nesting Birds for Construction Occurring within Nesting Season

For projects that require construction, grading, the removal of trees or vegetation, or other project-related improvements, construction activities shall occur outside of the nesting season (September 16 to January 31), and no mitigation activity is required. If construction activities must occur during the nesting season (February 1 to September 15), a qualified biologist shall conduct surveys for nesting birds ~~covered by the CGFC no more than~~ within 14 days prior to project activities ~~vegetation removal and shall conduct additional surveys if there is a lapse of 14 days or more in construction activities.~~ The surveys shall include the entire disturbance area plus at least a 200 500-foot buffer

around the project site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of ~~50~~ 250 feet for non-raptor bird species and at least ~~150~~ 500 feet for raptor species, unless determined otherwise by the qualified biologist. Buffer distances for bird nests shall be site-specific and an appropriate distance, as determined by a qualified biologist. The buffer distances shall be specified to protect the bird's normal behavior thereby preventing nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. The biologist shall submit a report of these preconstruction nesting bird surveys to the County to document compliance within 30 days of its completion.

...

BIO-12 Invasive Weed Prevention and Management Program

For those projects on Rezoning Sites where activity would occur within or adjacent to sensitive habitats, as determined by the project-specific Biological Resources Screening and Assessment (Mitigation Measure BIO-1), prior to start of construction a qualified biologist shall develop an Invasive Weed Prevention and Management Plan to prevent invasion of native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan. Landscape species shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High Risk Lists.

Page 4.4-37:

BIO-14 Permitting and Restoration for Impacts to Sensitive Natural Communities, Waters, and Wetlands

Impacts to sensitive natural communities (including riparian areas and waters of the state or waters of the U.S. under the jurisdiction of the CDFW, USFWS, ~~or~~ RWQCB, or USACE) shall require that the Project: 1) submit an LSA Notification to CDFW (for impacts to streams or lakes and associated riparian habitat) and comply with the Final LSA Agreement, and 2) obtain authorization from

RWQCB and the USACE (for impacts to Waters of the U.S. or State including wetlands pursuant to the Clean Water Act). Impacts shall be mitigated as required by agency permits and at a minimum 1:1 mitigation impact ratio through the funding of the acquisition and in-perpetuity management of similar habitat, in-kind credits purchased from a conservation or mitigation bank, or on-site or off-site habitat restoration based on area and linear distance for permanent impacts, unless otherwise approved in writing by the agencies. Temporary impacts shall be restored on-site. The applicant shall provide funding and management of off-site mitigation lands through purchase of credits from an existing, approved mitigation bank or land purchased by the County and placed into a conservation easement or other covenant restricting development (e.g., deed restriction). Internal mitigation lands (internal to the Rezoning Sites), or in lieu funding sufficient to acquire lands, shall provide habitat at a minimum 1:1 ratio for impacted lands, comparable to habitat to be impacted by individual project activity. The applicant shall submit documentation of mitigation funds to the County. Please be advised that CDFW may not accept in-lieu fees as an appropriate method to mitigate impacts to streams or lakes and associated riparian habitat.

1. **Restoration and Monitoring.** If sensitive natural communities cannot be avoided and will be impacted by future projects, a compensatory mitigation program shall be implemented by the applicant in accordance with Mitigation Measure BIO-4 and the measures set forth by the regulatory agencies during the permitting process. All temporary impacts to sensitive natural communities shall be fully restored to natural condition.
2. **Sudden Oak Death.** The applicant shall inspect all nursery plants used in restoration for sudden oak death. Vegetation debris shall be disposed of properly and vehicles and equipment shall be free of soil and vegetation debris before entering natural habitats. Pruning tools shall be sanitized.

Habitat restoration shall occur in the same calendar year as the impact onsite or as close to the site as possible within the same stream or watershed and may consist of restoration or enhancement of riparian habitat. If mitigation is not possible within the same stream or watershed, mitigation ratios may increase at the discretion of CDFW.

To mitigate for the removal of trees, replacement trees shall be planted at the below minimum replacement to removal ratios:

- 1:1 for removal of non-native trees;
- 1:1 for removal of native trees other than oak (Quercus sp.) up to 3 inches diameter at breast height (DBH);
- 3:1 for removal of native trees other than oak 4 to 6 inches DBH;
- 6:1 for removal of native trees other than oak greater than 6 inches DBH;
- 4:1 for removal of oak trees up to 6 inches DBH;
- 5:1 for removal of oak trees greater than 6 inches to 15 inches DBH; and
- 10:1 for removal of oak trees greater than 15 inches in diameter

Replacement tree plantings shall consist of five-gallon or greater saplings and locally-collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three acorns planted at an approximately two-inch depth to minimize predation risk. Large acorns shall be selected for

plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they are planted.

The project proponent shall monitor and maintain, as necessary, all plants for five years to ensure successful revegetation. Planted trees and other vegetation shall each have a minimum of 85 percent survival at the end of five years. If revegetation survival and/or cover requirements do not meet established goals as determined by CDFW, the project proponent is responsible for replacement planting, additional watering, weeding, invasive exotic eradication, or any other practice, to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for five years after planting.

Section 4.5, Cultural Resources

Page 4.5-12:

CUL-1 Architectural History Evaluation

For any future project on a Rezoning Site that is proposed on or adjacent to a property that includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older at the time of or permit application, the project applicant shall hire a qualified architectural historian to prepare an historical resources evaluation. [...]

Page 4.5-13:

CUL-4 Extended Phase I Testing

For any projects on a Rezoning Site that is proposed within 100 feet of a known archaeological site and/or in areas identified as sensitive by the Phase I study (Mitigation Measure CUL-3), the project applicant shall retain a qualified archaeologist to conduct an Extended Phase I (XPI) study to determine the presence/absence and extent of archaeological resources on the project site. [...]

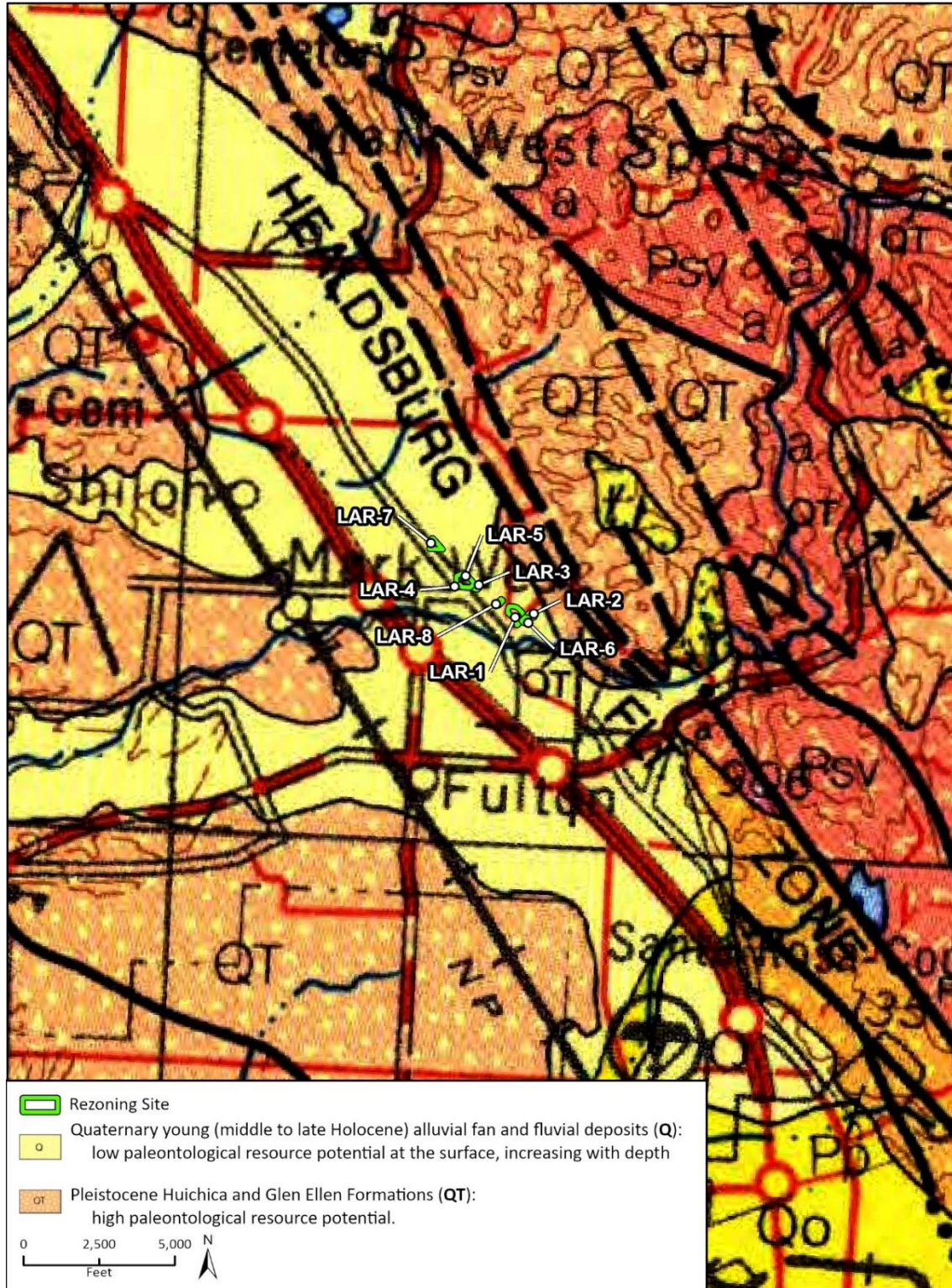
Section 4.6, Energy

Table 4.6-4, page 4.6-13, revised rows only:

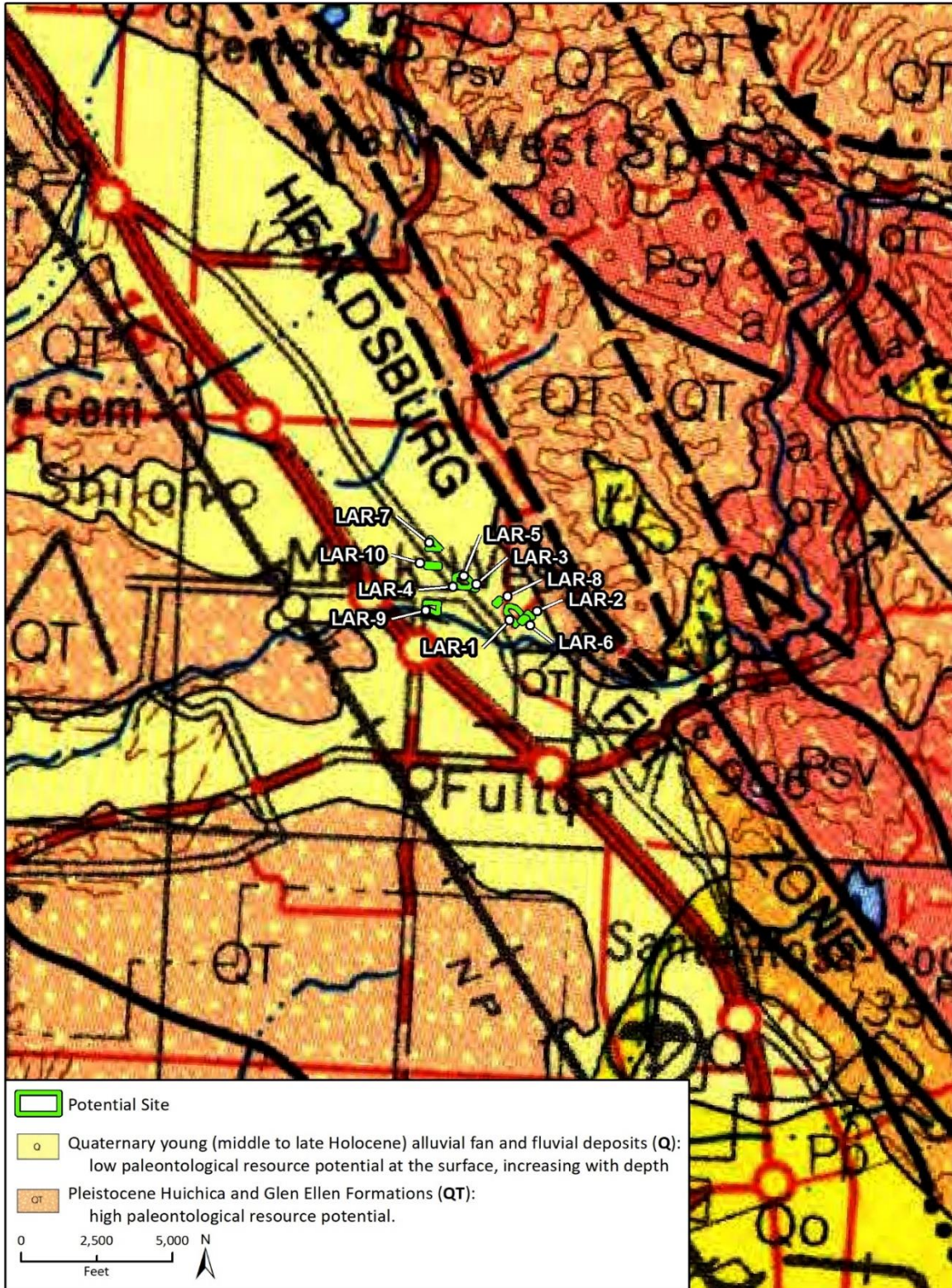
Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
<p>AB 1007: State Alternative Fuels Plans. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California’s goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.</p> <p>Bioenergy Action Plan, EO S-06-06. The EO establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050.</p>	<p>Consistent. The project would result in a rezoning of sites for medium-density <u>high-density</u> housing in the Unincorporated County and would not interfere with or obstruct the production of biofuels in California. Vehicles used by future residents would be fueled by gasoline and diesel fuels blended with ethanol and biodiesel fuels as required by CARB regulations. Therefore, the project would not conflict with or obstruct implementation of the Bioenergy Action Plan or the State Alternative Fuels Plan.</p>

Section 4.7, Geology and Soils

Figure 4.7-5 is revised as follows on page 4.7-11:



(figure removed)



Imagery provided by Esri, 2023; D.L. Wagner and E.J. Bortugno, 1982.

Fig X Geology_Larkfield

(figure added)

Page 4.7-29:

GEO-1 Paleontological Review of Project Plans

For projects with proposed ground-disturbing activity on Rezoning Sites, the project applicant shall retain a Qualified Professional Paleontologist to review proposed ground disturbance associated with development to[...]

GEO-2 Paleontological Resources Mitigation and Monitoring Program

For those projects on Rezoning Sites deemed to require a PRMMP under Mitigation Measure GEO-1 above, the Qualified Paleontologist shall prepare a PRMMP for submission to the County prior to the issuance of grading permits. [...]

Page 4.7-30:

GEO-3 Paleontological Worker Environmental Awareness Program (WEAP)

Prior to any ground disturbance on ~~within~~ Rezoning Sites underlain by geologic units with high paleontological resource potential, the applicant shall incorporate information on paleontological resources into the Project’s Worker Environmental Awareness Training (WEAP) materials, or a stand-alone Paleontological Resources WEAP shall be submitted to the County for review and approval. [...]

Section 4.8, Greenhouse Gas Emissions

Page 4.8-19:

GHG-1 Comply With BAAQMD Project-Level Land Use Thresholds

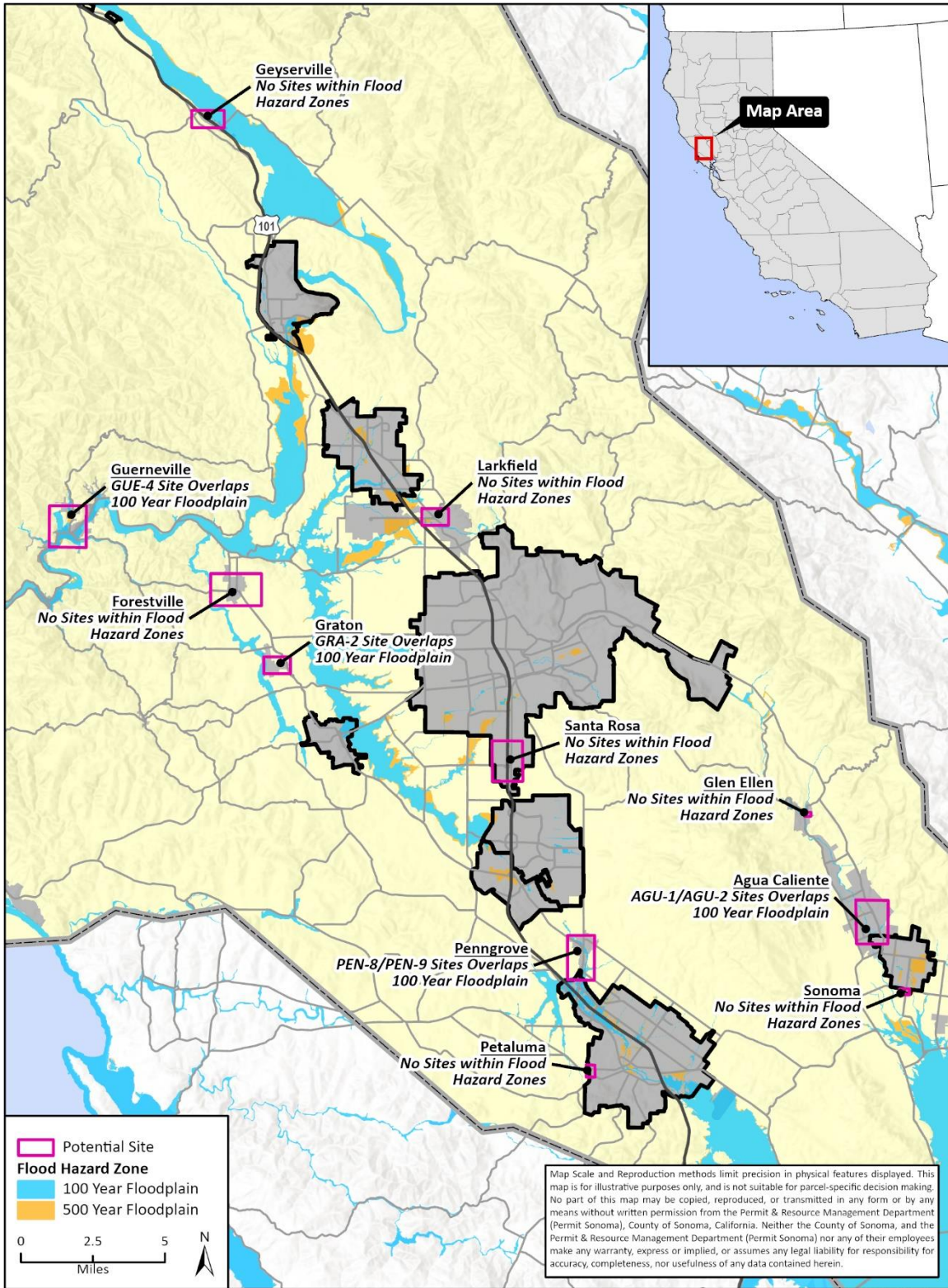
Individual residential projects facilitated by the Housing Element Update project on Rezoning Sites shall comply with the following BAAQMD thresholds for land use projects as defined in the BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, published April 2022, or its later adopted successor. Projects on the Rezoning Sites shall include, at a minimum, the following design elements:[...]

Section 4.10, Hydrology and Water Quality

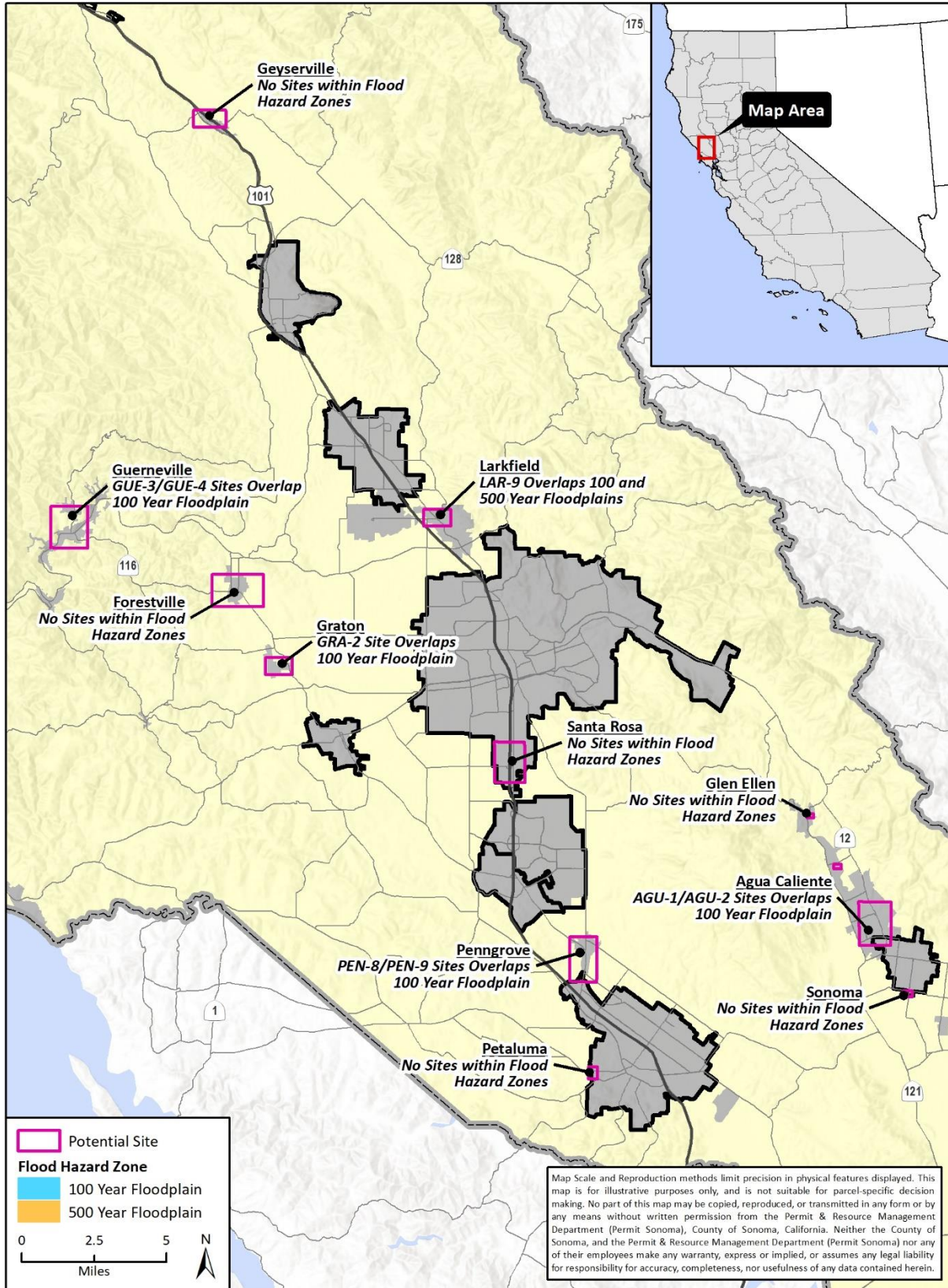
Page 4.10-9:

As shown therein, the following sites are partially within the 100-year floodplain: GUE-3, GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, ~~and~~ PEN-9, and LAR-9.

Page 4.10-10, Figure 4.10-4:



(figure removed)



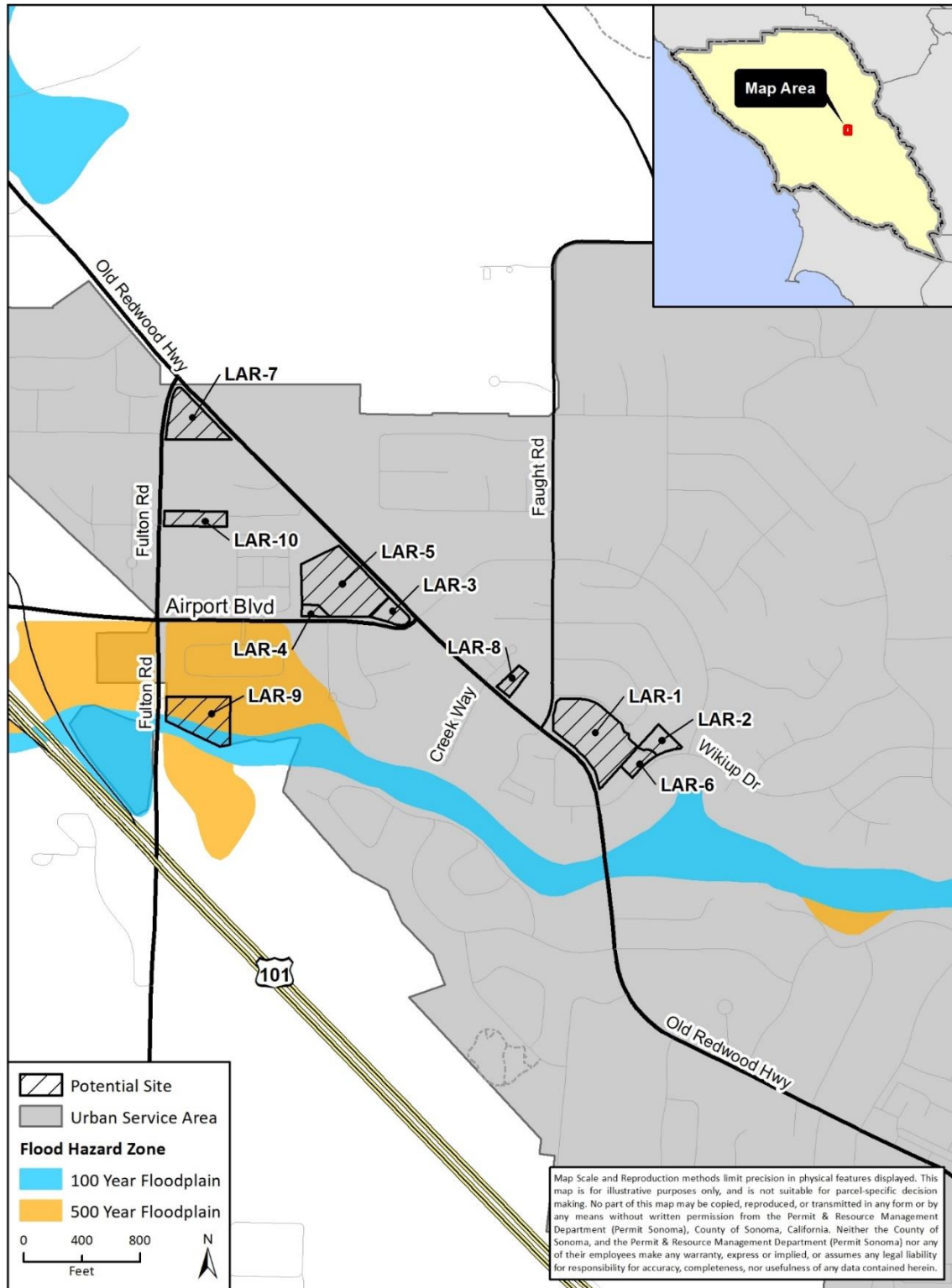
Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri; FEMA.

Fig 4.10-1 Flood Zones

(figure added)

The following figure is added immediately preceding page 4.10-15:

Figure 4.10-9 FEMA Floodplain Map – Larkfield



Source: Modified from data obtained with permission from the County of Sonoma, Permit & Resource Management Department (Permit Sonoma).
Data and/or analysis depicted may be altered from the original Permit Sonoma dataset source therefore not representative of Permit Sonoma data; Esri; FEMA.

Page 4.10-21:

Section 26-56, F2 Floodplain Combining District (applies to GUE-3, GUE-4, GRA-2, AGU-1, AGU-2, and PEN-8, and PEN-9), ...

Page 4.10-28:

As stated in Section 4.10.1, *Environmental Setting*, the following Rezoning Sites are partially within a 100-year flood hazard area: GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, and PEN-9, and LAR-9.

Development facilitated by the project would not impede or redirect flood flows on the remaining Rezoning Sites. For the sites partially within the 100-year floodplain, development would be required to comply with General Plan policies that aim to achieve General Plan Goal PS-2. General Plan Goal PS-2. ~~This includes achieving zero net fill within these sites following development, avoiding fill in areas that retain flood waters, and requiring review and approval of proposed drainage facilities by Permit Sonoma.~~ Rezoning Sites that are within the Floodway Combining District (F1) or Floodplain Combining District (F2) would be required to comply with County Zoning Code requirements as stated in Articles 56 and 58, respectively, in Chapter 26 of the Sonoma County Code. This includes the prohibition of fill in County-identified special flood hazard areas (refer to Section 7B-12 of the Sonoma County Code), and requiring review and approval of proposed drainage facilities by Permit Sonoma. Under Sonoma County Code Sec. 7B-12, encroachment within adopted floodways, including fill, new construction, substantial improvements, and other development, is not permitted unless it has been demonstrated through hydrologic and hydraulic analysis performed in accordance with standard engineering practice and certified by a registered professional engineer or architect licensed in the state of California that the proposed encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge. These requirements ensure that any development on the Rezoning Sites would result in no net change in the 100-year floodplain. Therefore, increased flooding on adjacent parcels to the Rezoning Sites would not occur because of the project.

Section 4.11, Land Use and Planning

Page 4.11-20:

Objective LU-19.1: Avoid extension of Petaluma's Urban Service Boundary and limit urban residential development to the Urban Service Area when annexed by the City.

Policy LU-19a: Use zoning to avoid new urban uses within the Petaluma Urban Service Area prior to annexation by Petaluma.

~~Policy LU-19b: Refer to the City of Petaluma for review and comment any application for discretionary projects within one mile of the Urban Service Boundary.~~

Page 4.11-22:

Objective CT-1.8: Improve demand for transit by development of a growth management strategy encouraging projects in urbanized areas that decrease distance between jobs and housing, increase the stock of affordable housing, and increase density.

Policy CT-1b: Focus commute and through traffic onto Highway 101. Designate major arterial routes to serve primarily as connectors between urban areas.

Policy CT-1c: Work with the Cities to provide locations for jobs, housing, shopping, and coordination of location of transit along the Highway 101 corridor to reduce the volume of traffic on east/west corridors.

Policy CT-1d: Work with the Cities to provide jobs, housing, shopping, and coordination of local transit along the SMART passenger rail corridor to reduce the need for automobile travel to and from work and shopping centers.

Policy CT-1e: Support development, implementation, and operation of a passenger rail system and contiguous north south pedestrian and bicycle path along the SMART passenger rail corridor including the funding necessary to support a multi-modal feeder system.

Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability.

~~Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.~~

~~Policy CT-2v: Require discretionary development projects, where nexus is identified, to provide crossing enhancements at bus stops, recognizing that many transit riders have to cross the street on one of the two-way commutes.~~

Policy CT-2w: Increase the convenience and comfort of transit riders by providing more amenities at bus stops, including adequately-sized all-weather surfaces for waiting, shelters, trash cans, bike racks, and pedestrian-sized lighting. Required that these improvements be provided as part of nearby public or private development projects.

Page 4.11-31

The proposed project would help meet the County's RHNA allocation, as well as the County's desire to provide higher-density housing throughout the unincorporated areas. The project provides the opportunity for future development of ~~medium~~ high-density housing, which is supportive of the County's goal and policies. As outlined above in Table 4.11-3, the project would be substantially consistent with the County General Plan as a whole.

Page 4.11-35 through 4.11-38, Table 4.11-3 (revised rows only):

General Plan Policy	Discussion
<p>Objective LU-20.1: Seek to jointly coordinate and monitor development within the City of Sonoma and the unincorporated Urban Service Area. Discourage urban development within Sonoma's Urban Service Boundary until annexation by the city (excluding parcels within the Sonoma Valley Redevelopment Area).</p> <p><u>Policy LU-20a:</u> Avoid urban residential and commercial development within Sonoma's Urban Growth Boundary until annexed by the City.</p> <p><u>Policy LU-20b:</u> In general, encourage annexation by the city prior to urban development on parcels that are within the Sonoma Valley Sanitation District and within the city's primary Sphere of Influence. Require annexation for urban residential development in this area. Parcels within the Sonoma Valley Redevelopment Area are exempt from these policies.</p> <p><u>Policy LU-20c:</u> Establish procedures for joint City/County review of major projects within the City and the County. Continue to utilize the Sonoma Valley Citizen's Advisory Commission as an advisory body to the two jurisdictions for this purpose.</p> <p>Goal LU-6: Diversify new residential development types and densities. Include a range of urban densities and housing types in some unincorporated communities, and lower density in rural communities. In rural areas, housing types and densities should meet the needs of agricultural and resource users and provide limited residential development on large parcels.</p> <p>Objective LU-6.1: Provide opportunities for a range of urban housing types and densities in unincorporated communities, while retaining the character of these communities.</p> <p>Objective LU-6.2: Limit residential density to a maximum of one dwelling per acre in unincorporated communities with public water but without sewer systems.</p> <p>Objective LU-6.6: Encourage the development of adequate housing for farm workers and farm family members.</p> <p>Site specific environmental factors shall be considered in making decisions on development permits. Site specific factors which create health or safety problems or result in unmitigated significant environmental impacts may at times reduce densities that are allowed by the Land Use Map and zoning.</p> <p><u>Policy LU-6i:</u> Provide expanded opportunities for a mix of residential and commercial or industrial use in Urban Service Areas.</p>	<p>Partially Consistent. SON-1 through SON-4 are located in the City of Sonoma's Urban Service Area and are within the Sonoma Valley Sanitation District and the city's primary sphere of influence. While urban development on these sites is discouraged prior to annexation into the city boundaries, the project does not propose development on these sites at this time but rezoning to allow for medium^{high}-density residential development. This would not conflict with these objectives and policies. Per these policies, future proposed development on SON-1 through SON-4 would be required to annex into the city prior to development. However, the project would facilitate urban residential development prior to annexation.</p> <p>Consistent. The project would encourage higher-density housing in Urban Service Areas that currently contain or are located near single-family housing. This would introduce new residential development types and densities, per Goal LU-6, and would utilize the AH Combining District to increase affordable housing in Urban Service Areas, per Objective LU-6.6 and Policy LU-6h.</p> <p>As stated in Section 4.18, <i>Utilities and Service Systems</i>, the Rezoning Sites are within areas where public water and public sewer connections are available in the general vicinity although not always located directly adjacent to each Rezoning Site.</p> <p>Refer to Section 4.7, <i>Geology and Soils</i>; Section 4.9, <i>Hazards and Hazardous Materials</i>; and Section 4.19, <i>Wildfire</i>, for a discussion of site-specific environmental factors that could create health and safety problems.</p> <p>As described under Impact LU-1, adjacent land to the Rezoning Sites are currently used or zoned for residential purposes. Additionally, as shown on Figure 4.11-1 through Figure 4.11-11, while the project would increase the density of residential areas within Urban Service Areas, there are opportunities for commercial development on nearby parcels in these areas, allowing for a mix of residential and commercial uses per Policy LU-6i.</p>

General Plan Policy	Discussion
<p>Objective LU-20.1: Seek to jointly coordinate and monitor development within the City of Sonoma and the unincorporated Urban Service Area. Discourage urban development within Sonoma's Urban Service Boundary until annexation by the city (excluding parcels within the Sonoma Valley Redevelopment Area).</p> <p><u>Policy LU-20a:</u> Avoid urban residential and commercial development within Sonoma's Urban Growth Boundary until annexed by the City.</p> <p><u>Policy LU-20b:</u> In general, encourage annexation by the city prior to urban development on parcels that are within the Sonoma Valley Sanitation District and within the city's primary Sphere of Influence. Require annexation for urban residential development in this area. Parcels within the Sonoma Valley Redevelopment Area are exempt from these policies.</p> <p><u>Policy LU-20c:</u> Establish procedures for joint City/County review of major projects within the City and the County. Continue to utilize the Sonoma Valley Citizen's Advisory Commission as an advisory body to the two jurisdictions for this purpose.</p>	<p>Partially Consistent. SON-1 through SON-4 are located in the City of Sonoma's Urban Service Area and are within the Sonoma Valley Sanitation District and the city's primary sphere of influence. While urban development on these sites is discouraged prior to annexation into the city boundaries, the project does not propose development on these sites at this time but rezoning to allow for <u>medium-high</u>-density residential development. This would not conflict with these objectives and policies. Per these policies, future proposed development on SON-1 through SON-4 would be required to annex into the city prior to development. However, the project would facilitate urban residential development prior to annexation.</p>
<p><u>Policy LU-20gg:</u> Land use for the Glen Ellen area, including residential densities, shall correspond with the General Plan Land Use Element for Sonoma Valley. New development in Glen Ellen shall be evaluated in the context of the following:</p> <ol style="list-style-type: none"> (1) the relationship between growth and traffic congestion, (2) the boundaries and extent of Urban Service Areas, (3) the amount and location of recreation and visitor-serving commercial uses, (4) the need to upgrade existing structures and public infrastructure, and (5) the compatibility of rural development with protection of agriculture, scenic landscapes, and resources. <p><u>Policy LU-20hh:</u> All new development in the Glen Ellen area (as designated in the Glen Ellen Development and Design Guidelines) shall comply with the Glen Ellen Development and Design Guidelines, which are part of the County Development Code.</p>	<p>Partially Consistent. This Program EIR analyzes potential transportation impacts of GLE-1 and GLE-2 in Section 4.16, <i>Transportation</i>. Traffic congestion is not analyzed because it may not be considered a significant impact under CEQA. Those sites are both within the Urban Service Area for Glen Ellen and would not require expansion of or influence the boundaries of the existing Urban Service Area.</p> <p>Error! Reference source not found. shows the existing zoning of GLE-1, GLE-2, and surrounding areas. As shown therein, the recreation and visitor-serving commercial areas would not be modified by the rezoning of these sites.</p> <p>Section 4.15, <i>Public Services and Recreation</i>, and Section 4.18, <i>Utilities and Service Systems</i>, analyze whether the project would require upgrades to public facilities and infrastructure. As stated therein, no upgrades to existing facilities are anticipated for GLE-1 and GLE-2.</p> <p>Section 4.2, <i>Agriculture and Forestry Resources</i>, and Section 4.1, <i>Aesthetics</i>, analyze the potential impacts on agricultural lands and scenic resources. Sites GLE-1 and GLE-2 do not contain prime farmland, unique farmland, farmland of statewide importance, forest land, or timberland, and are not zoned or adjacent to agricultural lands.</p> <p>The project does not propose development on these sites at this time but rezoning to allow for <u>medium-high</u>-density residential development, and future projects would <u>continue to be allowed by right and would not</u> be subject to review under the Glen Ellen Development and Design Guidelines as discussed in Section 4.1, <i>Aesthetics</i>. <u>In addition, as only</u> objective design standards would apply.</p>

General Plan Policy	Discussion
<p>Objective LU-20.1: Seek to jointly coordinate and monitor development within the City of Sonoma and the unincorporated Urban Service Area. Discourage urban development within Sonoma's Urban Service Boundary until annexation by the city (excluding parcels within the Sonoma Valley Redevelopment Area).</p> <p><u>Policy LU-20a:</u> Avoid urban residential and commercial development within Sonoma's Urban Growth Boundary until annexed by the City.</p> <p><u>Policy LU-20b:</u> In general, encourage annexation by the city prior to urban development on parcels that are within the Sonoma Valley Sanitation District and within the city's primary Sphere of Influence. Require annexation for urban residential development in this area. Parcels within the Sonoma Valley Redevelopment Area are exempt from these policies.</p> <p><u>Policy LU-20c:</u> Establish procedures for joint City/County review of major projects within the City and the County. Continue to utilize the Sonoma Valley Citizen's Advisory Commission as an advisory body to the two jurisdictions for this purpose.</p>	<p>Partially Consistent. SON-1 through SON-4 are located in the City of Sonoma's Urban Service Area and are within the Sonoma Valley Sanitation District and the city's primary sphere of influence. While urban development on these sites is discouraged prior to annexation into the city boundaries, the project does not propose development on these sites at this time but rezoning to allow for <u>medium-high</u>-density residential development. This would not conflict with these objectives and policies. Per these policies, future proposed development on SON-1 through SON-4 would be required to annex into the city prior to development. However, the project would facilitate urban residential development prior to annexation.</p>
<p>Goal 3: Promote Production of Affordable Housing Units</p> <p>Objective HE-3.1: Eliminate unneeded regulatory constraints to the production of affordable housing.</p> <p>Objective HE-3.2: Review and revise housing programs to address changing needs, including needs that may not be met by traditional housing units. Consider the use of new community housing models and innovative types of structures and building materials to meet a wide variety of housing needs while protecting the public health and safety.</p> <p>Objective HE-3.3: Increase opportunities for the production of affordable housing.</p> <p><u>Policy HE-3j:</u> Continue to encourage affordable "infill" projects on underutilized sites within Urban Service Areas by allowing flexibility in development standards pursuant to state density bonus law (Government Code 65915).</p>	<p>Consistent. The project would increase opportunities for the development of affordable housing throughout the Unincorporated County by rezoning sites with higher density residential zones. Identified sites are generally undeveloped or underutilized and would be zoned for <u>medium-high</u>-density housing following approval of the project.</p> <p>Per Policy HE-3i, to the extent feasible, the Rezoning Sites proposed for the AH combining zoning district are located within Urban Service Areas, with adequate water and sewer supplies (Section 4.18, <i>Utilities and Service Systems</i>, with implementation of Mitigation Measure UTIL-1), near transit (Section 4.16, <i>Transportation</i>), near neighborhood-serving commercial uses (most Rezoning Sites are near commercial areas, with the exception of GUE-2, GUE-3, GUE-4, and AGU-3), near schools (Section 4.15, <i>Public Services and Recreation</i>), and at safe distances from major roadways (Section 4.3, <i>Air Quality</i>).</p>

COUNTY ZONING ORDINANCE

The project would alter the zoning of the Rezoning Sites, for the future development of medium-high-density housing in the Unincorporated County. Future projects on these sites would be required to comply with the County's Zoning Ordinance specifications for the proposed zoning of the sites, which would be confirmed during the County development review process. The project would be consistent with the Zoning Ordinance. While the Draft EIR focuses on the impacts of the Rezoning Sites, adoption of

the Housing Element will trigger a variety of amendments to the zoning code, as discussed in the Housing Element.

CITY OF SONOMA GENERAL PLAN

The project includes four sites located in the City of Sonoma's sphere of influence and UGB. While urban development on these sites is discouraged prior to annexation into the City, the project does not propose development on these sites at this time but rezoning to allow for ~~medium~~high-density residential development. Per these policies, future proposed development on SON-1 through SON-4 would be encouraged to obtain annexation into the City prior to development.

Section 4.13, Noise

Page 4.13-8:

~~Policy NE-1d: Consider requiring an acoustical analysis prior to approval of any discretionary project involving a potentially significant new noise source or a noise sensitive land use in a noise impacted area. The analysis shall:~~

- ~~(1) Be the responsibility of the applicant,~~
- ~~(2) Be prepared by a qualified acoustical consultant,~~
- ~~(3) Include noise measurements adequate to describe local conditions,~~
- ~~(4) Include estimated noise levels in terms of Ldn and/or the standards of Table 4.13-4 for existing and projected future (20 years hence) conditions, based on accepted engineering data and practices, with a comparison made to the adopted policies of the Noise Element. Where low frequency noise (ex: blasting) would be generated, include assessment of noise levels and vibration using the most appropriate measuring technique to adequately characterize the impact,~~
- ~~(5) Recommend measures to achieve compliance with this Element. Where the noise source consists of intermittent single events, address the effects of maximum noise levels on sleep disturbance,~~
- ~~(6) Include estimates of noise exposure after these measures have been implemented, and~~
- ~~(7) Be reviewed by the Permit and Resource Management Department and found to be in compliance with PRMD guidelines for the preparation of acoustical analyses.~~

~~Policy NE-1e: Continue to follow building permit procedures to ensure that requirements based upon the acoustical analysis are implemented.~~

Page 4.13-19:

NOI-4 BLASTING NOISE AND VIBRATION REDUCTION MEASURES

If construction activities using blasting occurs during construction ~~of~~ on a Rezoning Site, the following measure shall be implemented: [...]

NOI-5 HVAC NOISE REDUCTION MEASURES

For an individual project on a Rezoning Site that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses [...]

NOI-6 GENERATOR NOISE REDUCTION MEASURES

For an individual project on a Rezoning Site that would place one or more HVAC unit(s) within 30 feet of an existing noise-sensitive receiver, the County shall, concurrently with design review and prior to the approval of building permits, require a project-specific design plan demonstrating that the noise level from operation of the HVAC unit(s) shall not contribute to a cumulative exceedance of the County noise standards at receiving noise-sensitive land uses [...]

Section 4.14, Population and Housing

Page 4.14-6:

The project proposes to update the County's existing Housing Element Update, which would result in rezoning of sites for ~~medium density~~ high density housing throughout urban service areas in the Unincorporated County

Page 4.14-9:

PH-1 Relocation Plan

In order to protect against increasing susceptibility to displacement, the County shall require replacement housing units, based on but not limited in applicability to the requirements in Government Code Section 65915(c)(3), when any new development occurs on a site in the Sites Inventory if that site meets any of the following conditions:

- Currently has residential uses or within the past five years has had residential uses that have been vacated or demolished; or
- Was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower- or very-low income; or
- Is occupied by lower- or very low-income households.

~~For Rezoning Sites that contain existing rental housing that would displace individuals during development, the project applicant shall prepare a relocation plan similar to the requirements of Government Code Section 7260-7277. The relocation plan may include, but not be limited to:~~

- ~~1. Proper notification of occupants or persons to be displaced.~~
- ~~2. Provision of "comparable replacement dwelling" which means decent, safe, and sanitary; and adequate in size to accommodate the occupants.~~
- ~~3. Provision of a dwelling unit that is within the financial means of the displaced person.~~
- ~~4. Provision of a dwelling unit that is not subject to unreasonable adverse environmental conditions.~~

~~This measure shall apply to future development projects on Rezoning Sites that may displace individuals and is not limited to development undertaken by a public entity or development that is publicly funded. The County shall approve the relocation plan prior to project approval.~~

Section 4.15, Public Services and Recreation

Page 4.15-8:

~~Policy PF-2n: Require prior to discretionary project approval written certification that fire and related services customarily provided to comparable uses are available or will be available prior to occupancy for projects within the service area of the applicable fire agency.~~

Policy PF-2x: Utilize development fees to require that new development pay for its share of needed infrastructure as identified in existing and future Capital Improvement Plans prepared by the County.

Page 4.15-16:

To address this shortage, the County requires payment of park fees for development requiring discretionary approvals in the amount of \$3,678 per residential unit prior to the issuance of a building permit (per Sonoma County Code Section 20-65); or appraisal of the property in the same manner as a subdivision which would require the payment of in-lieu park fees pursuant to Sonoma County Code Section 25-58. Future in-lieu fees to fund park facilities (per Sonoma County Code Section 20-65) offsetting any impacts related to increased demand at existing recreation facilities, and project applicant(s) of the Rezoning Sites would be required to pay this park fee during the permit approval process in order to offset any impacts related to increased demand at existing recreation facilities.

Section 4.16, Transportation

Page 4.16-5:

Mirabel Road, located north of Forestville, is a north to south collector with one lane in each direction. The road begins at the intersection with Highway 116 and ends at the intersection with River Road.

Page 4.16-10:

Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability.

~~Policy CT-2f: Require discretionary development projects to provide bicycle and pedestrian improvements and gap closures necessary for safe and convenient bicycle and pedestrian travel between the project and the public transit system.~~

~~Policy CT-2v: Require discretionary development projects, where nexus is identified, to provide crossing enhancements at bus stops, recognizing that many transit riders have to cross the street on one of the two-way commutes.~~

Policy CT-2w: Increase the convenience and comfort of transit riders by providing more amenities at bus stops, including adequately-sized all-weather surfaces for waiting, shelters, trash cans, bike

racks, and pedestrian-sized lighting. Required that these improvements be provided as part of nearby public or private development projects.

Page 4.16-18:

In addition, General Plan Policies ~~CT-2v~~ and CT-2w and CT-3xx provide for urban and community design that prioritizes pedestrian safety; General Plan Policies CT-4e and CT-4f provide roadway design requirements and allow safety improvements to be included as conditions of approval; and General Plan Policies CT-3c and CT-3d include provisions for traffic safety as part of the implementation of traffic calming measures or local community design guidelines.

Section 4.17, Tribal Cultural Resources

Page 4-17-4:

TCR-2 Avoidance of Tribal Cultural Resources

Development facilitated by the project on Rezoning Sites shall be designed to avoid known tribal cultural resources. Any tribal cultural resource within 60 feet of planned construction activities shall be fenced off to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the County and applicant in consultation with local (traditionally and culturally affiliated) California Native American tribe(s).

TCR-5 Sensitive Location of Human Remains

For any development facilitated by the project on Rezoning Sites where human remains are expected to be present based on the results of tribal consultation during the implementation of TCR-1 and/or as identified by the qualified archaeologist, the County shall consult with local California Native American tribe(s) on the decision to employ a canine forensics team. [...]

Section 4.18, Utilities and Service Systems

Page 4.18-1, Table 4.18-1 (revised rows only):

Site Group	Water Provider	Water Supply Source
Larkfield	California American Water – Larkfield	<u>California American Water, local wells</u> Unknown ¹

¹ Information was not provided by the agency
Source: Appendix WSS; Appendix WSA

Page 4.18-7:

Policy PF-1c: Give the highest priority for water and sewer improvement planning to those service providers whose capacity for accommodating future growth is most limited. These include the Occidental County Sanitation District, the Geyserville Water Works and Geyserville Sanitation Zone, the Sweetwater Springs Water District, Monte Rio, the Town of Windsor (water supply to the Airport Industrial Area), the California American Water Company (Larkfield-Wikiup), the Airport-Larkfield-Wikiup County Sanitation Zone, the Valley of the Moon Water District, and the Sonoma Valley Sanitation District, or any entities which may succeed these service providers.

~~Policy PF-1d: Require as part of discretionary project applications within a water or sewer service area written certification that either existing services are available or needed improvements will be made prior to occupancy.~~

Policy PF-1e: Avoid General Plan amendments that would increase demand for water supplies or wastewater treatment services in those urban areas where existing services cannot accommodate projected growth as indicated in Table LU-1 or any adopted master plan.

Page 4.18-14:

...Additionally, the wastewater capacity for sites GUE-1 through GUE-4, GRA-1 through GRA-5, and PET-1 through PET-4 is either unknown or limited. It should also be noted that Site GRA-4 would need to be annexed into the Graton Community Services District in order to receive wastewater collection treatment services.

Page 4.18-16:

UTIL-1 Water and Wastewater Provider Capacity

Future development proposed on the following sites shall be required to demonstrate that the applicable water and/or sewer service provider has sufficient capacity and that existing water and/or sewer services are available to serve future development projects, or that the necessary improvements to serve a Rezoning Site will be made prior to occupancy:

1. Rezoning Sites that need to demonstrate capacity from the applicable water service provider: GUE-1, GUE-2, FOR-4, GRA-1 through GRA-5, SAN-1, SAN-3, SAN-5, SAN-8, and SON-1 through SON-4.
2. Rezoning Sites that need to demonstrate capacity from the applicable wastewater service provider: GEY-1, GUE-2, GUE-3, LAR-1 through LAR-8, FOR-1, FOR-2, FOR-6, GRA-4, SAN-6, SAN-7, SAN-10, PEN-2, PEN-4, PEN-9, PET-1, and SON-1 through SON-4.
3. Rezoning Site GRA-4 shall be annexed into the Graton Community Services District prior to development of the site.

The required documentation shall be provided to the County during the plan review and permit approval process for projects on the above-listed Rezoning Sites.

Section 4.19, Wildfire

Page 4.19-26:

...However, as evidenced by recent wildfires in the County, urban areas, particularly those on the outer edges of urban development, are also susceptible to wildfires, despite ~~the~~ having less abundant typical wildfire fuels.

Page 4.19-26:

Access to Rezoning Sites FOR-2, FOR-4, GRA-2, AGU-1, and AGU-2 currently does not meet County road standards of 20 feet in width or greater, and access to Rezoning Sites GUE-1 through GUE-3 also appear not to mee this requirement. Prior to approval of development on those Rezoning Sites, on- and off-site improvements to County and/or private roadways would ~~could~~ be required.

Page 4.19-27:

WFR-1 Construction Wildfire Risk Reduction

The County of Sonoma shall require the following measures during project construction on Rezoning Sites:

5. Construction activities with potential to ignite wildfires shall be prohibited during red-flag warnings issued by the National Weather Service for the site. Example activities include welding and grinding outside of enclosed buildings.
6. Fire extinguishers shall be available onsite during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher.
7. Construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained pursuant to manufacturer recommendations to ensure adequate performance.

At the County's discretion, additional wildfire risk reduction requirements may be required during construction. The County shall review and approve the project-specific methods to be employed prior to building permit approval.

WFR-2 Landscape Plan Wildfire Risk Reduction

Project landscape plans for projects on Rezoning Sites shall include fire-resistant vegetation native to Sonoma County and/or the local microclimate of the site and prohibit the use of fire-prone species, especially non-native, invasive species.

Section 6, Alternatives

Page 6-18:

5. The County considered an alternative where development "by right" is not an integral project component. By-right means that no discretionary land use approvals would be required for the development of ~~medium-density~~ high-density housing on the Rezoning Sites. This alternative was eliminated because it would not reduce or avoid an environmental impact, as the same level of future buildout would be anticipated as under the proposed project.